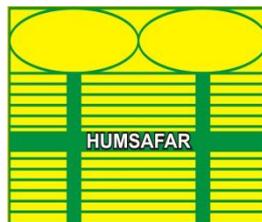


**HUMSAFAR**  
**Support Centre for Women**

**Anti-Corruption Policy of HUMSAFAR**

**21 May 2016**



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## **Anti-Corruption Policy of HUMSAFAR**

This policy applies to the Trustees, all staff of HUMSAFAR and those of Partner organizations who are in a working relationship with HUMSAFAR. The policy covers the responsibility to report wrongful acts committed by staff of HUMSAFAR, partners and members of the Trustees on the Board.

The purpose of this anti-corruption policy for the organization is to support ethical practices of work which are characterized by high personal and organizational integrity, both internally and in relation to partners and donors. The regulations of HUMSAFAR make clear demands to prevent and fight corruption within and externally, and the commitment to fulfill this responsibility by promoting, transparency and democratic practices within HUMSAFAR as well as our partner organizations, both at the State and National Level.

### **A. The policy covers:**

1. Any serious misconduct by Trustees, staff or partners, which includes wrongdoing, corruption, bribery or theft.
2. Financial and procedural malpractice, including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority or even covert subversive behavior
3. Falsification of organizational or personal or other records for personal gain or gain for others on the part of staff, partners and members of the Governing Body.
4. Miscarriage of justice with colleagues, clients or partners.
5. Attempts to cover up any of the above

### **B. Safeguard to Protect Assets from Fraud, Waste, Abuse and Negligence**

Care will be taken to prevent cases of fraud, wastage, abuse and negligence of upkeep of assets. All staff members have moral responsibility to report to the Management Committee/ HUMSAFAR Trust any cases of fraud, wastage and misuse, committed internally by staff members or externally by our partners, vendors and contractors.

What do we mean by the following:

**Fraud**--- An act of intentional, deliberate or reckless deceit to mislead or deceive, done internally or misrepresent information to Trustees, colleagues and external partners.

1. Fraudulent credentials
2. Falsifying financial or other records.
3. Claims for fraudulent expense reimbursement.
4. Forgery or alternation of official documents

**Waste**---- A reckless or negligent act that causes funds or other assets of the organization to be spent/used in a manner that is not authorized or represents significant inefficiency and needless expense.

1. Purchase of unnecessary supplies or equipment
2. Purchase of goods at inflated prices.

**Abuse**--- The intentional, wrongful, or improper use or destruction of resources, assets and materials.

1. Misuse of finances, equipment, supplies and/or other materials
2. Failure to report damage to equipment or property

**Negligence** - Failure to exercise a degree of care and discretion in the management and use of resources and assets

### **C. Grievance Redressal Mechanism**

#### **Grievance redressal authority and procedure**—

- a) Any member of the Trust, staff or partners believing they have evidence of serious misconduct on the part of anyone associated with the organisation, should in the first instance bring the matter (either verbal or written) to the attention of the Coordinator of HUMSAFAR who should report it immediately to the Managing Committee. The Managing Committee shall assess and evaluate whether an investigation committee should be appointed. The internal Investigation Committee shall comprise of the Programme Coordinator, one staff member and one member of the Management Committee.
- b) The Trust shall be authorized to appoint an external Special Investigation Committee should there be a case or a reason for such a Committee to be appointed for a specific purpose. The task of the Special Investigation Committee will in the first instance be to ensure that persons involved in the complaint are not involved in dealing with the complaint and that those dealing with the complaint are not disqualified. The Investigation Committee will examine the complaint and draw up a report of its findings within four weeks clearly stating decisions taken and need for further action. Furthermore, it will be the task of the Committee to take a decision whether the case should be dealt with further and also to inform the person who has made the complaint about the result of the decisions taken. All concerns raised will be investigated carefully and thoroughly. Any person accused of alleged misconduct will have the right to present their account of events in all fairness at the earliest opportunity.
- c) If the complaint is about a HUMSAFAR Trustee/s, it should be reported in writing to other members and in such cases the Investigation Committee shall comprise of other members and external experts.
- d) Upon investigation, the managing committee shall take appropriate corrective action warranted

by the outcome of the investigation. If it still cannot be resolved, it will be placed before the Board of Trustees. There may be occasions when external bodies such as donors and regulators will be notified of the outcome of an investigation.

On an annual basis, issues raised will be tracked and reported to the Board

#### **D. Procedure for Reporting**

##### **Staff**

Staff may raise concerns with their Reporting Head or Programme Coordinator, in the first instance verbally, but subsequently supported in writing, and where possible, with supporting evidence. If this is not possible in the event of it concerning the Programme Manager, the issue will be raised with the Managing Committee, before being referred to the Trustees.

The practice shall be to bring issues of wastage, fraud and abuse during review meetings to sort them out through democratic processes rather than encourage covert behind the back reporting to encourage transparency and accountability in the system.

##### **Partners**

Before engaging with them the partners shall be made aware of HUMSAFAR's anti-corruption policy.. If any instance of malpractice is detected in their dealing and operations with HUMSAFAR or others, it should initially be raised with their Programme Officer. This can be done initially verbally, but subsequently supported in writing, and where possible, with supporting evidence. Similarly, if the Partner feels that their Programme Officer is a part of such malpractice, they can raise the issue with a more senior person in the Programme team such as the Coordinator.

##### **Volunteers**

A similar procedure, as detailed above will be applicable in the case of volunteers/ interns who work with HUMSAFAR from time to time. They may raise the issue either with their Supervisor or the Programme Coordinator as the case may be.

##### **False Allegations**

Any allegations not made in 'good faith' or found to be false or malicious, will be treated as a disciplinary offence and will be investigated in accordance with extant procedures.

##### **Prevention of Reporting**

If some person tries to prevent an individual from making a confidential report or victimises that person for raising their concerns, HUMSAFAR will take this to be a serious disciplinary misdemeanour and this instance will be investigated in accordance with extant policies.

### **Anonymous Reporting**

Anonymous reporting of any type will not be encouraged in HUMSAFAR, but this is likely to occur from time to time. In all such cases, while not taking formal cognizance of such reporting, the managing committee may choose to ascertain all the verifiable facts mentioned in such reporting. If facts verified are found to sustain the allegation, formal proceedings may be initiated by an appointed person or an Investigation Committee.

### **E. Confidentiality**

Staff/Partners/Volunteers/ who partner with HUMSAFAR join us on a premise of trust primarily. When they raise concerns of malpractice or misconduct they will be accorded protection from victimisation, or any other hostile behaviour. But any person coming forward with such a concern/allegation will follow due procedure and give ample reason to show that these concerns have been raised in good faith. The identity of the person who raises concerns will be kept confidential as far as possible. However, this protection will be accorded to those individuals who make such disclosures with honest and clean intention, and without malicious intent or spite.

### **F. Notification**

All personnel, are required to be informed and communicated the existence and contents of this policy by the Programme Coordinator and the Team Leaders of different programmes respectively.

