

Child Protection Policy



Of Sabuj Sangha

**Vill & P.O.: Nandakumarpur
Dist: South 24 Parganas
West Bengal**

An Overview

Sabuj Sangha, as a non-governmental organisation, started its journey for the overall upliftment of the underprivileged population of the Sundarban delta regions of South 24 Parganas in the year 1975 in People's Participatory mode. In the subsequent years Sabuj Sangha expanded in all dimensions and extended its developmental activities with the poorest of the poor at considerable cross-sections of South 24 Parganas and Southern half of Kolkata Metropolis. The focus areas being:

- Child Education.
- Child Protection.
- Health Care Services.
- Women's Empowerment and Entitlement.
- Environment.
- Human Rights.
- Advocacy.

With child being the niche issue of all our interventions.

In the course of work, at one point Sabuj Sangha felt, in order to safe guard and protect the interests and safety of children, we are working in, declared Child Protection Policy for Sabuj Sangha is a must.

The Child Protection Policy of Sabuj Sangha includes guidelines to be abided by all associated with the organisation setup for mandatory protection of Child Rights.

SABUJ SANGHA believes that a child needs to be protected according to his/her felt need in a holistic way.

We define a child to be a person below 18 years of age.

1. Protection of every child from any sort of social injustice and discrimination.
2. Registration of birth as a mandate to give the child constitutional right to be protected.
3. Basic needs like food, clothing and shelter are addressed for every child ensuring mental and physical well being.
4. Every child should have access to necessary immunization, nutrition, and basic health services.
5. Child friendly atmosphere for every child at home, at school, at any other social milieu.

6. Every child should have access to education as per need.
7. Every child should be at school atleast upto 14 years of age.
8. Restraining Child Labour, Child Trafficking, Physical, Mental and Sexual Abuse.
9. Equipping children with vocational skill development on need.
10. Protection of children from any sort of natural or manmade calamities.
11. Family and community sensitization on child's right to protection irrespective of gender.
12. Networking/Advocacy.

A.Application of the Child Protection Policy:

- The Child Protection Policy of Sabuj Sangha applies to all the children, staff of Sabuj Sangha (from management to all levels of functionaries), donors, suppliers, contractors, parents of children, and community stakeholders who may have contacts with children directly or indirectly.

Explanation:

- *'children'- all children of the schools, coaching centres, preparatory centres, platform children, child domestic workers, out-of-school children, residential and non-residential camp children and all those under the age of 18 years within Sabuj Sangha's area of operation.*
- *'management'- all management level functionaries.*
- *'staff'- all permanent and contractual staff, project personnel, community volunteers, coaching teachers, health workers, community mobilizers, Sishu Sathis and those who are directly or indirectly involved with the developmental activities of Sabuj Sangha.*
- *'donors'- all who support for developmental activities of Sabuj Sangha directly or indirectly.*
- *'suppliers'- who supply materials directly or indirectly to Sabuj Sangha.*
- *'contractors'- who are deployed in any constructional and allied activities by Sabuj Sangha.*
- *'parents'- parents of all children of the schools, coaching centres, preparatory centres, platform children, child domestic workers, out-of-school children, residential and non-residential camp children and all under the age of 18 years with the areas of operation of Sabuj Sangha.*

- *'community stake holders' - all community members who are involved directly or indirectly with Sabuj Sangha in extension of developmental activities in the operational areas of Sabuj Sangha at rural, semi-urban and urban areas.*

B.Mandatory Behavioural Attitude for whom Child Protection Policies apply:

The policy ensures that all personnel understand and comply the following behavioural pattern in dealing with children:

I. Mandatory Behavioural Policy for Staff:

- No child should be neglected.
- A child's dignity has to be acknowledged.
- Not to use derogatory language in presence of children.
- No child be discriminated irrespective of gender, caste, creed etc.
- Share empathetic feeling towards children.
- No child be abused physically, mentally or sexually.
- No child be deployed for domestic help or any other labour.
- No child to be subjected to physical punishment.
- Children should be encouraged for expression of their feelings.
- No child be humiliated by any means.

II. Mandatory Behavioural Policy for Visitors/Donors/Suppliers/Contractors:

- All visitors/donors to secure prior permission of concerned authority for visit.
- Not to use derogatory language in presence of children.
- Keep in mind the local sentiments, proper dress code should be maintained.
- Not to make donations or gifts directly to children.
- Not to involve children in unscrupulous activities.
- Have a child friendly attitude.

C. The Dos for all who are in the race for protecting Child Rights:

- Awareness generation among all community cross-sections on Child Rights.
- Say no to verbal abuse, ridicule, insult and isolation of child.

- To be vigilant and ready to protest against all sorts of physical abuses arising out of stigmas and ill practices in the society.
- Endeavour should be there from every quarter to provide a good environment for every child to grow.
- Not to ignore if children are seen in substance abuse and to help those children quit substance abuse.
- Ensuring security and safety of a child from any sorts of exploitation and hazards.
- Say no to CHILD LABOUR.

D. Reporting Format on incidences of Violation of Child Rights:

- In cases of incidents amounting to violation of Child Rights, the reporting staff, of what so ever category, should inform his/her concerned Line Managers either through written report or Telephonic mode in cases of emergency interaction.

Report should clearly indicate the following informations:

- ☞ Nature of Child Rights Violation.
 - ☞ Name of the Victim.
 - ☞ Age.
 - ☞ Sex.
 - ☞ Address.
 - ☞ Suspected offender (if any).
 - ☞ Immediate steps taken.
 - ☞ Type of assistance requested from Line Manager.
- For major or strategic interventions the Line Manager must have the prior acquiescence of the Chief Functionary through the Administrative Officer.



সবুজ সংঘের শিশু সুরক্ষা নিয়মাবলী

সবুজ সংঘ একটি অসরকারী সংগঠন হিসাবে তার যাত্রা শুরু করে ১৯৭৫ সালে, জনগনের অংশগ্রহণ প্রক্রিয়ার মধ্য দিয়ে সুন্দরবনের দক্ষিণ ২৪ পরগনা অঞ্চলের পিছিয়ে পড়া দরিদ্রতম মানুষের সামগ্রিক উন্নয়নের লক্ষ্যে।

ঐ একই সময় থেকেই সবুজ সংঘ তার কাজের পরিধি বিস্তার করে সুন্দরবনের দক্ষিণ ২৪ পরগনা থেকে কলকাতা মহানগরীর দরিদ্রতম মানুষের উন্নয়নের বিভিন্ন প্রকার প্রকল্পের মধ্য দিয়ে কাজ করে, বিশেষ করে যারা সুন্দরবন থেকে কাজের বা জীবন জীবিকার জন্য শহরে চলে আসে তাদের জন্য।

এই গুলি হল :-

শিশু শিক্ষা

শিশু সুরক্ষা

স্বাস্থ্য পরিষেবা

মহিলাদের ক্ষমতায়ন ও অধিকার

পরিবেশ

মানব অধিকার

শিশুদের সঙ্গে ও শিশুদের জন্যই সবুজ সংঘ'র সমস্ত কাজের মূখ্য উদ্দেশ্য।

কাজ করার সময় সবুজ সংঘ একটা বিষয় গুরুত্বের সঙ্গে লক্ষ্য করে যে শিশু অধিকার ও শিশু সুরক্ষা যেন অগ্রাধিকার পায়। আমরা কাজ করি নিজস্ব ঘোষিত শিশু সুরক্ষা নিয়মের মাধ্যমে।

সবুজ সংঘের শিশু সুরক্ষা নিয়মের নীতি নির্দেশাবলী সংগঠনের সমস্ত কর্মীবৃন্দ ও সদস্য মেনে কাজ করতে বাধ্য থাকেন।

সবুজ সংঘ বিশ্বাস করে যে একটি শিশুর প্রয়োজন অনুযায়ী সামগ্রিক ভাবে সুরক্ষা।

আমরা বিশ্বাস করি যে একটি শিশু হবে মানুষ হিসাবে অনূর্ধ্ব আঠারো বছর।

১. শিশুর শৈশব থেকে যে কোনও ধরনের সামাজিক অধিকার ও বৈষম্য থেকে সুরক্ষা।

২. জন্মনিবন্ধীকরণ শিশুকে দেয় সাংবিধানিক অধিকারের সুরক্ষা।

৩. মৌলিক প্রয়োজন যেমন খাদ্য, বস্ত্র, বাসস্থান, শিক্ষা ও স্বাস্থ্য প্রতিটি শিশুকে দেয় শারীরিক ও মানসিক সুরক্ষা ।

৪. প্রতিটি শিশুর টীকা, পুষ্টি ও মৌলিক স্বাস্থ্য পরিষেবা পাওয়া উচিত ।

৫. প্রতিটি শিশুর প্রয়োজন শিশু বন্ধু সুলভ পরিবেশ শিশুটির বাড়িতে বিদ্যালয়ে/শিক্ষাকেন্দ্রে ও সামাজিক জমায়েতে ।

৬. প্রতিটি শিশুর প্রয়োজন অনুযায়ী শিক্ষার প্রয়োজন ।

৭. প্রতিটি শিশুর ১৪ বছর বয়স পর্যন্ত স্কুলে যাওয়া উচিত ।

৮. শিশুশ্রমিক, শিশুপাচার, শারীরিক, মানসিক ও যৌন অত্যাচার থেকে শিশুদের রক্ষা করা উচিত ।

৯. শিশুদের বৃত্তিমূলক দক্ষতায় উন্নীত করা প্রয়োজন ।

১০. শিশুদের যে কোনও পরিবেশগত বা মনুষ্যগত দূষণ থেকে সুরক্ষা দেওয়া উচিত ।

১১. শিশু অধিকার সংক্রান্ত পরিবার ও সমাজে সচেতনতার মধ্য দিয়ে মহিলা/ পুরুষ নিবিশেষে সুরক্ষা দেয় ।

১২. সকলের সঙ্গে ও পক্ষাবলম্বন ।

ক. শিশু সুরক্ষা নিয়মের ব্যবহার

সবুজ সংঘের শিশু সুরক্ষা নিয়ম সমস্ত শিশু, সবুজ সংঘের কর্মী (কর্মকর্তা ও সমস্ত স্তরের কর্মী), দাতা সংগঠন, সরবরাহকারী বিক্রেতা, নির্মাতা, অভিভাবক, সামাজিক দায়িত্বশীল যারা শিশুদের সঙ্গে প্রত্যক্ষ অথবা পরোক্ষ ভাবে যোগাযোগ করে তাদের জন্য প্রযোজ্য ।

ব্যাখ্যা :-

শিশু

সমস্ত শিশু যেমন বিদ্যালয়, কোচিং কেন্দ্র, প্রিপারেটরি কেন্দ্র, প্লাটফর্ম শিশু, ঘরোয়া শিশু কর্মী, বিদ্যালয়ে না যাওয়া শিশু, আবাসী ও অনাবাসী শিশু শিবির এবং যাদের বয়স অনূর্ধ্ব আঠারো বছর সবুজ সংঘ তাদের নিয়ে কাজ করে ।

ব্যবস্থাপক - সমস্ত ব্যবস্থাপনা পর্যায়ের কর্মী
কর্মী

সমস্ত স্থায়ী ও চুক্তিভিত্তিক স্বেচ্ছাসেবী, কোচিং শিক্ষক, স্বাস্থ্য কর্মী, সমাজকর্মী, শিশু সাথী এবং যারা প্রত্যক্ষ অথবা পরোক্ষ ভাবে যুক্ত সবুজ সংঘের উন্নয়ন মূলক কাজের সঙ্গে ।

দাতাগন - সবাই যারা সবুজ সংঘের উন্নয়নমূলক কাজ গুলিকে প্রত্যক্ষ বা পরোক্ষভাবে সাহায্য করেন ।

সরবরাহকারীগণ - যারা প্রত্যক্ষ বা পরোক্ষভাবে সবুজ সংঘে জিনিসপত্র সরবরাহ করেন ।

কন্ট্রাক্টর - যারা যুক্ত সবুজ সংঘের যে কোনও ধরনের নির্মাণমূলক কাজের সঙ্গে ।

অভিভাবক - সমস্ত শিশু যেমন - অনূর্ধ্ব অঠারো বছর তাদের অভিভাবক যারা সবুজ সংঘের কর্ম এলাকায় বাস করেন ।

সামাজিক দায়িত্বশীল ব্যক্তি - সমস্ত সামাজিক ব্যক্তিত্ব যারা প্রত্যক্ষ বা পরোক্ষভাবে সবুজ সংঘের সঙ্গে উন্নয়নমূলক কাজের সম্প্রসারণের জন্য গ্রামে ও শহরতলী এলাকায় যুক্ত ।

আবাসিক আচরণগত মনোভাব/অঙ্গভঙ্গী যার জন্য শিশু সুরক্ষা নিয়ম প্রযোজ্য ।

এই নিয়ম নিশ্চিতকরণ যা যে সমস্ত ব্যক্তিত্বের বোঝা ও মেনে চলা উচিত । নিম্নলিখিত আচরণগত নকশা :-

১. বাধ্যতামূলক আচরণগত নিয়ম কর্মীদের জন্য

কোন শিশুকে আবহেলা করা চলবে না ।

প্রতিটি শিশুকে মর্যাদা দেওয়া উচিত ।

শিশুর সামনে কুরুচিকর ভাষা ব্যবহার করা চলবে না ।

কোনও শিশুকে বর্ণ, জাতি, ধর্ম, লিঙ্গ নির্বিশেষে বৈষম্যমূলক আচরণ করা যাবে না ।

কোনও শিশুকে গৃহকর্ম অথবা শিশুশ্রমিকের কাজে নিযুক্ত করা যাবে না ।

কোনও শিশুকে শারীরিকভাবে শাস্তি দেওয়া যাবে না।

শিশুদেরকে উৎসাহ দেওয়া উচিত তাদের আবেগকে কোনও ভাবেই অপমান করা যাবে না ।

২. বাধ্যতা মূলক আচরনগত নিয়ম/দাতা/সরবরাহকারী/পরিদর্শক/

কন্ট্রাক্টরদের জন্য

সমস্ত পরিদর্শক ও দাতাগণের জন্য আগাম অনুমতি সুনিশ্চিত করা কতৃপক্ষের (পরিদর্শনের জন্য)

শিশুর সামনে কুরুচিকর

স্থানীয় আবেগ আনুষায়ী বিচারকের উপযুক্ত পোষাক বজায় রাখা উচিত ।

কোনও প্রকার দান বা উপহার সরাসরি শিশুকে দেওয়া যাবে না ।

শিশুকে কোনও প্রকার ঝুঁকিপূর্ণ কাজের সাথে যুক্ত করা যাবে না ।

শিশুর সঙ্গে বন্ধুসুলভ আচরণ হওয়া উচিত ।

৩. কী করা উচিত যারা শিশু অধিকার সুরক্ষিত করার প্রতিযোগিতায় আছে :- শিশু অধিকার সংক্রান্ত বিষয়ে সমগ্র সমাজকে সাথে করা ।

শিশুকে মৌখিক অত্যাচার, পরিহাস, অপমান এবং একাকীকরন না করা ।

সতর্ক হওয়া এবং প্রতিবাদের জন্য তৈরী হওয়া যে কোনও ধরনের শারীরিক অত্যাচার যা জন্ম নেয় অবহেলা এবং সমাজের কুঅভ্যাসের দ্বারা ।

সেখানে পদক্ষেপ নেওয়া উচিত যেখানে প্রতিটি জায়গায় ভাল পরিবেশ নিশ্চিত করা শিশুর বৃদ্ধির জন্য ।

অগ্রাহ্য করা যাবেনা যদি দেখা যায় শিশুটি মাদকাসক্ত অথবা অন্য শিশুদের মাদকাসক্তিতে আকৃষ্ট করছে ।

শিশু সুরক্ষা ও নিরাপত্তা নিশ্চিত করন করা যে কোনও ধরনের শোষণ এবং সমস্যা থেকে ।

বল - শিশুশ্রম নয়।

৪. শিশু অধিকার লঙ্ঘনের ঘটনার প্রতিবেদন কাঠামো :-

যে কোন ধরনের শিশু অধিকার লঙ্ঘনের পরিমান ও ঘটনা যদি কোনও কর্মী প্রতিবেদন দেয় তার উর্দ্ধতন কতৃপক্ষকে লিখিত অথবা টেলিফোনের মাধ্যমে জানাবে যদি ঘটনাটি জরুরী হয় ।

প্রতিবেদনে সুপষ্টভাবে নিম্নলিখিত বিষয়গুলি উল্লেখ করতে হবে :-

কী ধরনের শিশু অধিকার লঙ্ঘিত হয়েছে

নিগৃহীত শিশুর নাম :

বয়স :

লিঙ্গ :

ঠিকানা :

সন্দেহজনক অত্যাচারী (যদি কেউ হয়)

তৎক্ষণাৎ কী উদ্যোগ নেওয়া হয়েছে

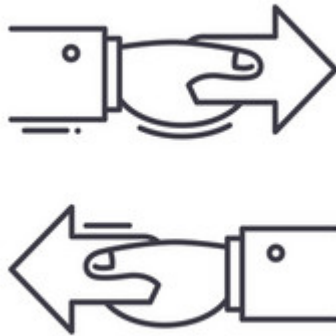
কী ধরনের সহযোগীতা পাওয়া গেছে উদ্ধৃতন কতৃপক্ষ থেকে

মুখ্য আধিকারীকের কাছ থেকে প্রশাসনিক অফিসার এর মাধ্যমে আগাম সম্মতি নেওয়া থাকে বড়
সড় বা কৌশলগত পদক্ষেপের জন্য



CONFLICT OF INTEREST POLICY

Sabuj Sangha's Code of Ethics & Business Conduct at Work



SABUJ SANGHA

30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107



I. PREFACE

The Organisation has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Organisation and its employees.

The Board of Sabuj Sangha has approved the Conflict of Interest Policy of Sabuj Sangha. It has adopted a conflict of interest policy to ensure the legal and ethical integrity and to make clear that no organization/individual benefits inappropriately because of a relationship with either staff, partners or Board Members of Sabuj Sangha.

Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Organisation. The role of employees in pointing out such violations of the Code cannot be undermined.

II. POLICY

This policy applies to all staff of Sabuj Sangha and those of Partner organizations, as well as Vendors and Vendor organizations who are in a relationship with Sabuj Sangha. The policy covers responsibility to report all wrongful acts committed by staff of Sabuj Sangha, partners and members of the governing body only to the Ombudspersons, who are officially appointed to receive complaints, initiate the investigation. The Ombudspersons will also keep track of all reported cases and report the same to Board. The Organisation is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Organisation encourages its employees who have concerns about suspected conflict of interest in its business to come forward and express concern without fear of punishment or unfair treatment. This policy aims to provide an avenue for employees to raise concerns on any violations of conflict of interest in the organization business transactions.

III. PROHIBITED BUSINESS TRANSACTIONS

Sabuj Sangha, where financial involvement exists, shall be driven by the following key prohibitions of business transactions while initiating partnership, appointing consultants and entering into other services agreements:

- Organization will not engage in partnership with any organization or individual where the concerned officials of Sabuj Sangha is a board member of that organization, or respective Sabuj Sangha official is related to any of the board members/management team members of that organization or that individual. This may not apply in case of Sabuj Sangha or Sabuj Sangha's staff members, which is part of a larger network/association like Association of NGOs, CSOs, and INGOs etc.
- Due care needs to be exercised in the appointment of consultants so that it does not cause conflict of interest.



- Organization will not appoint any consultant or service provider who is affiliated (member of board/staff member) with an organization where a Sabuj Sangha official is also a board member of any such organization. This may not apply in case of Sabuj Sangha or Sabuj Sangha's staff members, who are a part of larger networks/associations like Association of NGOs, CSOs, and INGOs etc.
- This policy and principles will apply to all consultancies and services, small, long term and large.
- Organization will also not appoint any consultant and other services provider who is a close relative either of a Sabuj Sangha staffer or of Sabuj Sangha's Board Members and partners.

IV. APPLICABILITY

This Policy covers all directors, managers, employees, third party vendors, consultants, and partners operating out of any location of the Organisation.

V. PROCEDURE FOR RELATED PARTY TRANSACTIONS

- In case the organization has to involve financially with any related party under any exceptional circumstance then the Secretary and Director of the organization will give a formal approval.
- Formal approval will involve submission of a note to the Secretary and Director of the organization describing the nature of involvement and relationship, explanation on exceptional circumstances, task, financial involvement and period of transactions.

VI. DISCLOSURE OF RELATED PARTY TRANSACTION

In case of such party transactions, year-end statutory accounts of the organization will have to disclose related party transactions as per the generally accepted accounting and auditing standards.

VII. DISCLOSURE OF EXISTING RELATED PARTY TRANSACTIONS

It is the duty of all directors, managers and employees to notify the organization if they observe, or learn of, any Unethical and Improper Practices. Failure to promptly raise a known or suspected violation is considered as an unethical behaviour. It is obligatory for all of Sabuj Sangha staff to report wrongful acts or suspected wrongful acts in accordance with this policy. Staffs of Partner organizations are also required to report such acts committed by Sabuj Sangha staff or their own staff in the execution of their Partnership agreements.

All Sabuj Sangha staff will have to disclose their all-existing related party transactions at the time of joining the organisation or as soon as it is known. This disclosure should include-nature of involvement and relationship, circumstances, task, financial



involvement and period of transaction. This disclosure note must be submitted to Secretary and Director.

VIII. PROCEDURE FOR REPORTING OR RAISING CONCERNS

Any member of the staff or partners believing they have suspicion or evidence of serious misconduct on the part of anyone associated with the organization, should in the first instance bring the matter to the attention of the appointed person for the purpose. The point person will be responsible for ensuring that the case is dealt with in accordance with the policy. The Secretary and Director of the organization will be the final authority to decide and take action.

IX. DEFINITION OF RELATIVES

For the above purpose of this policy relative means:

- (i). Spouse/parents of the individual;
- (ii). Brother or sister of the individual or their children;
- (iii). Brother or sister of the spouse of the individual or their children;
- (iv). Brother or sister of either of the parents of the individual or their children;
- (v). Any lineal ascendant or descendant of the individual;
- (vi). Any lineal ascendant or descendant of the spouse of the individual;
- (vii). Spouse of the person referred to in clauses (ii) to (vi).

X. NOTIFICATION

1. All Managers, are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.
2. The onus of making the Partners aware of their responsibilities vests with Director or the person assigned for the purpose by Sabuj Sangha Management who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of Sabuj Sangha staff in the execution of a Partnership agreement.

FINANCIAL RULES & REGULATIONS

(As on 1st April 2013)



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**: FINANCIAL RULES & REGULATIONS:
OF SABUJ SANGHA**

(Nandakumarpur, South 24 Parganas, Pin – 743 349, West Bengal)

1. Financial Propriety

All expenditure of SABUJ SANGHA (hereinafter called and referred to as “Organization”) shall be guided by high standard of financial propriety. Emphasis shall be given on the following principles.

- a) Every person of the Organization is expected to exercise the same vigilance and care in respect of expenditure incurred as a person of ordinary prudence would exercise in respect of expenditure of his own.
- b) The expenditure should not be prima facie more than the realistic and should be within the approved budget under the specific head of account. For expenses exceeding budgets, it is preferable to revise budget or get such expenses ratified with prior intimation to the concerned authority.
- c) No personal benefit or profit should be expected to be derived from any expenditure while exercising power of approval or payment.
- d) The following indicators should be considered while taking decision for any purchase or procurement of any material for the Organization:
 - i) Purchase / Service is essentially required in the interest of the organisation.
 - ii) Proper market evaluation is made before procurement of Articles or Services.
 - iii) Invitation of quotation will depend on the volume of procurement to be made.
 - iv) The offer price is accepted after taking into consideration all relevant factors and maintaining the high standard of financial propriety.

- v) The quality and value added service would be considered during acceptance of quotation.
- vi) Purchase of fixed assets from reputed vendors well known for their brands will not require quotation.

2. Procedural Requirements

The organization shall draw a budget every year for carrying out development activities with a view to achieve the set out objectives for which it was established. The budget shall be prepared by setting the goal, objectives and broad activities of each and every segment of the organization. The yearly budget will include individual projects which may have definite sources of funding or would have to be financed by the organization itself. Budgets will be prepared separately under both the sections – Foreign Contribution and Non Foreign or Domestic. After the yearly budget has been drawn, monthly Cash Flow statements would be drawn on an overall basis for the sections covering the individual projects. This will enable to apprehend the requirement of funds over the months and appropriate financial planning for the same. The budget shall be supported with Work Plan where duties and responsibilities of each of the staff to be involved would be clearly articulated. While drawing the work plan, care should be taken to carry out activities that would provide holistic developmental support to the beneficiaries. The Work Plan would serve as a support document while the Budget & Monthly Projected Cash Flow Statement will be an integral part of the integrated system of Financial Management. It shall be approved in the meeting of the Core Group which would be duly minuted. A Minute Book shall be maintained for the purpose.

Furthermore the following activities are also to be taken:

- a) The yearly Work Plan shall be converted into monthly Cash Flow Plan.
- b) In order to implement the projected activities in planned manner, required posts of appropriate designation and number should be created. Each post shall be assigned with adequate responsibility commensurate with authority so that the desired objectives of the project could be achieved. These will be governed by the provisions of the HR Manual.

- c) The structure and form of Own Means (Organization's contribution) as per requirement of projects shall be worked out.

3. Cash Management

A. Cash management is an important tool and technique of financial management. The following aspects of internal control procedure shall be kept in mind relating to handling of cash:

- a) The function of approving the payments, writing cheques, handling the cash and making entries in the books of account should be clearly demarcated and effected by different persons to the extent possible, to ensure adequate and effective internal control.
- b) Transactions should be recorded daily.
- c) Cash in hand as per books of accounts shall be reconciled daily with the book balance/Physical cash balance.
- d) At periodical intervals cash to be verified by a person in a position higher than the cashier (Finance Head of the Unit or the Unit Head). This can be surprise verification for more effectiveness.

B. The following procedures shall be observed while managing the cash:

- a) The organization shall notify that whenever cash is deposited to the Accountant, that is so done under a valid original "Cash Receipt"
- b) Cash shall be dealt with and managed as per Cash Flow Plan duly approved by the Director or an official duly authorized by him in writing.
- c) No cash will be disbursed for any expenditure which was not budgeted and not included in the Cash Flow Plan.
- d) Any expenditure proposed to be incurred without having a provision in the budget, will require prior approval of the Director or an official duly authorized by him in writing.
- e) Cash will always be kept in a safe or locked almirah under the dual charges of Accountant and Cashier. To ensure this system double lock safe is to be used in the cash section.

- f) Retention of Cash balance shall not be more than 7 days average requirements.
- g) All cash collections shall be acknowledged promptly by issuing serially numbered printed “Cash Receipt” duly signed by the Cashier. Original “Cash Receipt” shall be issued to the payee and the carbon copy (counterfoil) shall be kept in the “Cash Receipt” Book as evidence for accounting, monitoring and auditing. All collections over Rs.5000 (Rupees five thousand only) shall be acknowledged by affixing Revenue Stamp. If it is not so done on account of unavailability of revenue stamp, revenue stamps to be affixed on that whenever it is available later.
- h) The Cashier shall disburse cash from general fund or sub fund/project account to which the payment relates only against the bill / cash memo for an amount up to Rs. 5,000 (Rupees Five thousand) only duly approved by the Project Coordinator / Director. Payment more than Rs. 5,000/- shall have to be made by A/C payee cheque. However, use of account payee cheques is preferred for payments to outside agencies or parties. In case of salary payments, no cash payments can be made for amounts exceeding Rs.3,000/-. Use of account payee cheques may be diluted under exceptional circumstances after obtaining approval from the Director. In case of operation in remote or other areas where banking facility is not much developed, cash payments may have to be resorted to.
- i) The Cashier shall maintain a Daily Collection & Disbursement Record which will start with the opening balance at the beginning of the day, added with the collections of the day, subtracted by the approved payment made during the day and finally closed with the balance at the end of the closing hour every day. The Cashier will also record the denomination of notes and coins in the DCDR and sign the same daily.
- j) Any donation, collection, recovery by the Unit office shall be deposited to the local bank account of the unit. No expenditure is allowed to be incurred from the same.
- k) Daily Cash balance must be reconciled with the balance as per Projects A/cs every day.

- 1) Cash deposit & cash withdrawal will be under full responsibility of the Cashier. If the Cashier is not available, the local head of office will depute a suitable staff as replacement.

DAILY COLLECTIONS & DISBURSEMENT RECORD (DCDR)

Date:.....

**Name of Unit –
Name of Project**

| <u>Collections</u> | | | <u>Disbursements</u> | | |
|--------------------|-------|-------|--------------------------|-------|-------|
| | CR no | Rs | | CV no | Rs. |
| Opening Balance | | | | | |
| | | | | | |
| | | | | . | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | Closing Balance | | |
| | | | | | |
| | | | Denominations: | | |
| | | | Rs.1000x | | |
| | | | Rs.500x | | |
| | | | Rs.100x | | |
| | | | Rs50x | | |
| | | | Rs.20x | | |
| | | | Rs10x | | |
| | | |x | | |
| | | | Coins | | |
| | | | | | |
| | | | | | |
| | | | Maintained by (Cashier) | | |
| | | | Verified by | | |
| | | | (Accountant) | | |

- m) The Accountant shall verify the DCDR daily with the collections and disbursement records supported by Cash Receipt book and approved payment bills / cash memos. The Closing cash balance shown in the DCDR should tally with that of physical cash balance maintained by the cashier and that of cash book balance maintained by the accountant.
- n) The cashier shall deposit the daily collections to the respective funds designated bank account on for the fund the next working day.
- o) Cash Disbursement Register should be separate for each project.

4. Management of Bank Accounts

The daily cash collections will be segregated by the accountant in accordance with the heads of accounts. The cashier will fill up the Cash Deposit slip of respective funds account and deposit the collections immediately on the next day to the respective bank accounts.

The Requirement of fund based on Requisition Slips shall be grouped up fund wise and allocation of expenditure and withdrawal of fund shall be arranged from the respective fund account.

The following aspects shall be kept in mind while conducting the banking operations:

- a) General Fund account as well as all the sub funds/Project Accounts to be opened in a Scheduled Bank and be operated by any two of the President, Secretary, Treasurer or any other official to be maintained by the Governing Body.
- b) A Cheque Register shall be maintained by the Accountant. Whenever any amount is required to be drawn or any cheque is required to be issued, the Accountant shall write a short note regarding the expenditure in the cheque Register, enclose the bill together with the Cheque and submit the same to the signatories who will verify the bill, read the note and while signing the cheque will also sign the cheque Register.
- c) Payment of electric bill, telephone bill and to outsiders / suppliers shall be preferably made by A/c Payee Cheque. If it is not possible to

- make such payment on account of an emergent situation, only then can payment be made by cash.
- d) Payment by account payee cheques should be made for amounts more than Rs. 5,000/-.
 - e) Cash withdrawal from respective fund account is permitted only after receiving Requisition slip, the estimated expenditure of which should tally with the projected expenditure shown in the Cash flow Plan.
 - f) The Accountant will reconcile the bank balance of each fund account as per cash book with that of respective fund bank account once in every 3 months.
 - g) Surplus fund in bulk immediately not required for operational/-running expenditure should be kept in higher interest bearing eligible investments as approved by the Governing Body.
 - h) All Cheque book should be kept under the custody of the Accountant.
 - i) Bank balances to be reconciled monthly and appropriate corrective action to be taken.
 - j) Fund Transfer Form to be used for Transfer of Cash or Cheque for Inter Office Transaction. (Annexure).
 - k) Fund requisition should reach Central Office in the prescribed format. (Annexure).

5. Advances

- a) Documentation- Every advance granted to any staff member will be on the basis of a valid requisition (filled up requisition format with appropriate approval and other required details). Money receipt to be taken from the person taking the advance. A requisition based on which cash is released to be attached with the voucher and a copy to be presented to accounts at the time of settlement.
- b) Administration: Every staff is eligible to receive one advance for any one specific programme/ project on the basis of action plan and approved budget. The approved advance for one purpose is not allowed to be utilized for any other purposes. The advance money will not be adjusted with the advance of any other person. In case of any deviation in the process a prior approval has to be taken from the level of Regional Manager and above.
- c) A list of outstanding advance with the staff is to be prepared at the end of every month and displayed in the accounts section of the respective

units. A copy of the same will be forwarded to Regional Manager/Unit Head.

- d) Accounting- To record settlement of advances, advance amount taken is to be credited and bill debited as per normal practice and the difference between the two amounts is to be adjusted by deposit of cash.

6. Project Closing

- A. At the end of a project, it is generally found that there is a small deficit or surplus from the project closed. Appropriate GB resolution is to be obtained to transfer the balance fund to the General fund with adequate documentation.
- B. In case of fixed assets of such projects, those will be governed by the relevant terms of grant. If so allowed, those will be transferred from the relevant project to the general section or continued to be held with the project if grant condition do not permit such takeover.

7. Grant Delay

Often delay is experienced in receiving FC funds from donors. In such cases transfer of fund from NFC to FC will have to be made in case there are inadequate funds available in FC. Once FC funds are received this transfer will be adjusted. However, if such a deficit continues at the end of a financial year, advance from NFC in FC fund will be reversed along with the expenses and such expenses are to be recorded in the NFC section.

8. Salary

There will be a master salary register/sheet which will be analytically prepared with details of funding (FC/NFC) and project details uniformly for all division/units. Initial disbursement for all projects are to be made and payments and accounting done likewise. All adjustments are to be made in

the master sheet. The authority however can adopt some other procedure in the event of special/specific reimbursement.

9. Closing Balance and Transfer to Units

At the end of the financial year, accounts of all the Units will be transferred to Central Office where consolidation and preparation of the global account will be made. After adjustment of balances, Central Office will transfer balances of various projects to the respective units, based on which unit will pass opening entries in the projects under their domain.

10. NGO Contribution

The NGO contribution may be necessitated from different agencies under various projects. Suitable debit of the account heads where the NGO contribution is to be made and relevant reference information from where the payment has been made to be maintained. Community contribution and collected donation, and similar other activity in other donor funded projects can be matched with a appropriate disclosure in journal.

However, where, specific outgo is necessary, normal treatment in accounts will be effected.

11. Financial Discipline

A. Request for fund for Programme Running Expenses:

- i. One week's consumption requirement of frequent consumable materials shall be kept in store.
- ii. The eligible person¹ shall make requisition to the store keeper for the materials needed for office use at least 10 days before its requirement.
- iii. The store keeper will consolidate the material-wise requisition and verify the stock. If the stock is not sufficient to meet the requirements the storekeeper shall place an order to the appropriate person at least 7 days before the requirement of the materials.

- iv. The office Assistant, entrusted with the job, will prepare a weekly (6 days) requisition slip based on the requisition made by the Store Keeper for Programme Running Expenses. The materials stated in the Requisition slip should be in conformity with the cost incorporated in the approved monthly cash flow plan.
- v. The Weekly requirement of fund shall be released as Advance in two equal installments to meet the requirement of 3 days each. After incurring the expenditure for the first 3 days, the Office Assistant will submit accounts on the 4th day stating the detailed break up of utilization of the amount as stated in the requisition slip and get his advance adjusted. Fresh advance for the next 3 days will be released only after adjustment of the earlier advance. The cycle of paying advance as adjustment of the same and will continue as usual.
- vi. The office Assistant shall bring the material purchased together with the bill / Cash memo to the store keeper who will check the quality and quantity physically with that of the sample (or earlier stock) if there is any and bill / Cash memo and also verify with the list of materials he had requisitioned. After the verification, he will enter the details of the goods in the Material Purchase Register and then will put a stamp “Materials received in good condition and entered in page no. _____ of MPR” on the face of the bill / cash memo and put his signature thereon. The materials shall be in his custody in the store room.
- vii. The respective unit heads shall issue an order authorizing the person/s specifying his / her designations who is / are eligible to receive materials from the store keeper for the purpose of running the organization.
- viii. The Accountant shall make payment only after satisfying that the bill / cash memo bears the stock entry stamp as per Para 6 above and signature of the Office Assistant and the purchase was made in due approval.
- ix. The authorized persons /s can obtain the material required for running project / office work from the store keeper after observing the following procedure:

- a. Prepare a materials requisition slip and get it approved by the Project Coordinator / Director.
 - b. Submit the approved Materials Requisition slip to the store keeper
 - c. Store keeper shall issue the approved materials after obtaining signature of the receiver in the Materials Issue Register.
 - d. Store Keeper shall file the approved Materials Requisition slips in chronological order.
- B. In case of certain important heads of expenditure, the procedure to be followed are as follows:
- i. Salary will be paid to the staff appointed by the organization.
 - ii. Contract / agreement will be executed or Letter of appointment will be issued by the Secretary / Director to the concerned staff stating his / her pay, job description, duties and responsibilities leave rules etc, a copy of which should be forwarded to the respective finance section.
 - iii. Personnel Service File for each of the staff shall be maintained.
 - iv. Every staff shall sign the Staff Attendance Register at the time of coming into and going out from the office.
 - v. Salary to the staff will be paid through Salary Register or Salary sheet.
 - vi. There will be a master salary register and that is to be analytically prepared with details of funding (FC/ NFC) and project details uniformly for all division/ units. Initially disbursement for all FC projects to be made under FC general and transfers effected between the concerned project and FC general. Similar practice will be followed in the NFC section through NFC general. All adjustments to be made in the master sheet.
 - vii. The Salary Register or sheet will be ready by 25th of every month. Each column of the salary register or sheet will be totaled horizontally

as well as vertically so that net salary amount tallies in both ways. The Accountant will write the net salary amount in words also and to put his signature on the salary register / sheet. The register should be placed before the Secretary for approval through the head of local finance section. Once the amount is approved, the Accountant will write a Cheque for the approved amount of the Salary which will be drawn from respective designated bank account on the day of disbursement.

However, it will be preferable if the salary of as many officials as possible can be transferred to the bank account of respective persons.

- viii. Salary exceeding Rs. 5,000/- shall be paid by a/c payee Cheque / Bank Transfer.
- ix. Statutory deductions such as Income Tax, Profession Tax, and other deductions like excess leave (Which should be governed by service rule) etc, shall be made as per rules from the salary of the respective staff before its disbursement.

Deduction towards the staff welfare scheme if introduced any time, where employees' contribution is compulsory, should also be made before payment.

- x. Each staff shall receive the salary from the Accountant after signing the Salary Register.
- xi. The organization should apply for TAN & PAN for Income Tax purpose and Profession Tax registration for the organization.
- xii. Statutory deduction collected from the employees should be deposited to the bank within a week of its deduction.
- xiii. Periodical Profession Tax Return, annual TDS return of the employees and PF return shall be submitted to the appropriate authorities in time.
- xiv. Salary certificate in Form 16 shall be issued, by 30th April every year, to the employees from whom income tax has been deducted at source during the previous financial year ending on 31st March.

C) Electricity Expenses:

- i. The meter reading noted in the bill is to be verified and it is to be ascertained that the bill amount is consistent with the last payment. In case there is an abnormally high amount charged which merits special/immediate attention, adequate follow up measures should be initiated with the Power supply concern.
- ii. Payment of electricity bill shall be made by A/c payee Cheque before the due date to avail rebate.

D) Telephone, Fax, email expenses:

- i. The bill amounts are to be verified and checked that it is consistent with the last payment. In case of an abnormally high amount charged which needs special/immediate attention, appropriate follow up measures should be initiated with the telephone authorities.
- ii. Fax and email shall be made for official purpose only. The email password should be kept confidentially and will not be used unless authorized by the appropriate Authority.

E) Property Tax to Government / Panchayat / Municipal Authority

The organization shall pay the notices / demand of the Property Tax to be paid to Government / Panchayat / Municipal authority as the core may be is received / collated in time. All action shall be taken to pay the dues on time so that rebate can be availed. Records of such payment should be kept safely period wise for future reference.

F) Printing:

- i. Printing of Vouchers, Cash Memo, bills, cash receipts, forms, registers, etc shall be made on receipt of Requisition by the Accountant from the Stationary in Charge. When the level of stock comes down, arrangement shall be made to procure or print the concerned materials by taking appropriate action in conformity with the purchase rules of the organization.

- ii. Quotation shall be invited asking rates of printing and delivery with giving specification, quantity, quality of the materials, delivery time, last date of submission of quotation, etc. (where possible with sample to be printed).
- iii. A contractor / supplier can be selected only after receipt of at least 3 quotations. Offer quoting lowest price / cost should be accepted and work / supply order to be placed.

However, in exceptional cases, a rate higher than the lowest one can be accepted where it is absolutely necessary. In such case the reasons are to be stated in writing on the comparative statement under signature of the official who invited the quotation. Such recommendation should go to the Director for final approval. If the proposal is approved by the Director, procurement at a higher rate can be made.

- iv. Payment through A/c Payee Cheque will be made after verifying that the printed materials have been checked, verified and received in good condition by the stationery in charge / storekeeper.

G) Stationery Bill:

- i. Stationery items shall be purchased only on the basis of Requisition for Stationery that is to be prepared by the stationery In charge when the stock of stationery items comes down to the level of one week's consumption.
- ii. The Authorized Official shall verify the requisition of stationery with that of the stationery stock register and satisfy himself that the requisition is correctly drawn after taking into account the balance of stock and quantity proposed for purchase.
- iii. Stationery should be purchased in a phased manner as per requirement. Bulk purchase should preferably be avoided. Stationery stock register should be maintained item-wise.
- iv. Every purchase of stationery shall be first recorded in the Stationery Receipts Register immediately on arrival of the stock.

- v. All issue of stationery items should be distributed through Stationery Issue Register.
- vi. Stationery Stock Register shall be maintained on the basis of purchase and issue of stationeries.
- vii. All payments of stationery bills / reimbursement bills of stationery purchased should be made after proper verification that the article/ materials were actually received by the stationery In charge, who has put his signature under the certificate as per Para 11 (A) (vi) of this rules on the face of the bill / cash memo and ensuring that it was entered in the stationery Receipts Register.
- viii. All actions for purchase of stationeries should be in conformity with the purchase rules of the organization.

However, purchase of stationeries upto Rs. 200/- can be made without observing formalities of collecting quotations.

H) Travelling Bill:

All Traveling bills shall contain the following details:

- Duty Schedule
 - Place from where travel begins and place where it ends.
 - Mode of travel
 - Duration of travel
 - Details of expenditure supported with documents wherever applicable.
 - Approval of the higher authority sanctioning the tour.
- In case of travel undertaken for project work the terms and conditions of the relevant projects would have to be honored.

I) Repair & Maintenance:

- i) Repair of assets (Building, furniture, fixture, computers office equipment etc) shall be done after receiving report from the respective staff under whose custody the asset is kept and after getting it technically verified separately.

- ii) It is worth while to enter into an AMC after verifying the rate from different agencies.
- iii) Payment above Rs. 1000/- only under this head should be made by A/c Payee Cheque.
- iv) All maintenance and repair works above Rs. 1000/- are to be done after observing formalities of collecting quotation, etc. as mentioned in other places of this rule.

J) Vehicle running & Maintenance Charges:

- i) Due economy measures should be maintained in respect of repair and maintenance of vehicles of the organization. Vehicles shall strictly be used for official purpose only.
- ii) In case of major repair works or purchase of any vehicle parts formalities as per Para 11 (F) (ii & iii) along with the provisions of purchase rules of the organization should be followed.

Old parts replaced must be returned to office for suitable disposal by the authority.

- iii) Proper maintenance of vehicle should be ensured. Payment of taxes, insurance premium, and renewal of driver's license must be done by the due dates to avoid fine and penalties or legal action.
- iv) Milometer of the vehicle shall be kept in running condition. One Logbook for each vehicle should be maintained, which will besides other things contain the date and cost of maintenance also and a monthly assessment of consumption of fuel, repair & maintenance and use shall be done to monitor the economy of maintaining the vehicle.
- v) Whenever any fuel or lubricating oil is filled in, the Driver will enter the kilometer reading and quantity of fuel in the Logbook and also write the kilometer reading on the face of the bill/ cash memo which is to be submitted to the cash section for payment.

- vi) When the driver takes the car out of garage, he will check the meter reading and record the kilometer in the vehicle's logbook. He will fill up the logbook for every journey undertaken with name of the user, place of journey, purpose of journey, kilometer covered and get the signature of the user before his descend from the vehicle.
- vii) The Driver will record the kilometer reading of the vehicle in log book after parking the vehicle in garage. And on the next day when the vehicle is taken out of garage he will verify the kilometer reading of the previous day with the log book.
- viii) Charges ascertained by the authority will have to be paid by the person using the vehicle if ever the office vehicle is used for personal purpose (with the prior permission of the authority).

K) Car Hire Charges:

- i. Only authorized representative of the organization is eligible to hire a car if the official vehicle is out of order or engaged in other official duty and there is necessity of another or more vehicles in the interest of the official work.
- ii. The charging pattern of rate of vehicle engaged regularly for programme purpose should be verified with at periodical intervals.
- iii. Duty slip of the vehicle with necessary details duly signed by the user together with the bill shall be presented for payment.
- iv. Payment should be made preferably by A/c Payee Cheque and Money Receipts should be obtained against the payment.
- v. One or more agency can be fixed yearly for the purpose of taking vehicle on hire after formal comparison of rates to find out the lowest.

L) Rendering bills for program / other expenses:

- i. All bills / cash memos (for reimbursement / adjustment) should be in original and must be trustworthy.
- ii. Kuccha bills should be avoided as far as possible. In case of difficulty in getting printed bills / cash memo in rural areas, the following information should be in the document:
 - Name and address of the person who is receiving the money.
 - Amount paid to be written in figure and words also.
 - Purpose of payment (with number, quantity, weight, etc in details).
 - Signature of the payee must be in the voucher
 - Certificate from the person making payment as ‘that the payment was actually made and no Pakka cash memo could be obtained’.
 - Such bill should be countersigned by the authorized official.
- iii. In case of bill / cash memos are for expenditure of any meeting / seminar/ workshop /training etc the following additional information should be furnished.
- iv. A brief description of the meeting / workshop / seminar / training etc stating its venue, subject, duration, number of participants, name of resource persons .
- v. The list of participants with their signatures should be attached.
- vi. In case the amount paid for any food expenses detailed break up should be given e.g. number of heads, cost per meal, number of meals per day, number of days.
- vii. A detailed record of the business done in such programme should be maintained.
- viii. In case where any bulk quantity of item is to be procured the estimated cost of which is more than Rs. 5000/-, formal quotation, with due publicity, should be invited stating therein the last date of submission of the same and also quantity , specimen and details of each materials, need to be procured. On receipt of quotation, action to be taken as per Para 11 (F) and guidelines given in this regard at other places of the rules and the Purchase Policy of the organization. While

it is reasonable to accept the lowest offer, discretion may be exercised in consideration of the quality and other factors relating to such supply. In such cases reasons for accepting the higher offer should be noted in brief.

- ix. All payments to third parties shall be made preferably by A/c payee Cheque.
- x. Payments of bill shall be supported by Money Receipts.
- xi. Signature of the actual recipient shall be obtained when the amount is paid to him. Otherwise letter of authority to be obtained if paid to any representative.

M) Acquisition of Assets & Properties:

- i. Assets should be acquired after observing the procedure of inviting quotations and follow-up action as per rules. Due publicity should be given in this regard for fair participation by the supplier / contractor. In case of acquiring or constructing immovable property, prior approval of the Governing Body is to be obtained.
- ii. Each moveable asset is to be marked by allotting a distinctive identification Number and to be grouped up in appropriate sub heads.
- iii. Fixed Asset Register Should be maintained, sub head wise stating the name of the asset, identification number, location, date of purchase, name of the supplier, bill number, cost price, depreciation, disposal value, scrap value (if it has been rendered obsolete) and WDV.
- iv. If movable asset is acquired through donation, Gift, a deed to that effect should be prepared in non-judicial stamp paper stating the market value of the donated property where the donor and the donee shall sign. Necessary resolution regarding the donated asset should be passed in the Governing Body meeting. Appropriate accounting entry shall be made through the books of accounts of the organization accordingly.
- v. If immovable property is acquired through donation, gift, an appropriate deed should be prepared declaring the value of the property and the deed should be registered in the name of the

organization after paying the requisite amount of stamp duty. Necessary resolution regarding the donated property should be passed in the Governing Body meeting. Appropriate entry shall be made through the books of accounts of the organization accordingly. A Fixed assets register and a land register should be maintained.

- vi. Depreciation to be calculated at rates provided by the Income Tax and the W-D-V method of depreciation will be applicable.
- vii. Fixed Assets should be physically verified by the organization once in a year. Material discrepancies noticed, if any should be reconciled and dealt with properly in the books of accounts after finding out the cause of such discrepancy.
- viii. In case of disposal of fixed assets, prior approval of the Governing Body to be obtained and necessary adjustments made in the books of accounts and register. In case of disposal or transfer of fixed assets, additional conditions if any was imposed by the donor for project related assets to be followed.

12. Verification of Books of Accounts and Documents

In order to ensure that the financial activities are carried out in conformity with the approved cash flow plan, a routine checking of the financial transaction shall be conducted by the Treasurer or any one authorized by him (internally or externally) through verification of the books of accounts and documents. During the course of verification if any discrepancy / mistake are noticed, the treasurer or the person authorized will give a written note to the accountant stating the nature of the mistake/discrepancy. The accountant, in consultation with the coordinator, will rectify the mistake, which will be counter verified by the treasurer or his representative in his next inspection to the organization. However if no rectification is done without sufficient reason, the Treasurer shall report the matter in writing to the Governing Body.

13. Programme and Financial Monitoring

Periodical monitoring of program as well as finance & Accounts shall be done through the process of comparing actual performance against the

desired result. Remedial actions shall be taken if major deviation (more than 20%) is detected. The monitoring process shall indicate as to whether the programs are being carried out as per plan to achieve the objectives. It will also specify as to whether the programs are being implemented as per work plan and whether the expenditure are being carried out as per budgeted projections as well as cash flow plan and in conformity with the financial rules and regulations.

The treasurer or any authorized person shall monitor not only the physical activities of the organization but also its financial transactions at regular intervals. He shall provide adequate feedback about the status of the activities as well as of finance of the organizations to the Governing Body. The organization shall take corrective measure if found necessary to gear up the activities as per findings and directions of the Governing Body.

14. Statutory Audit

- A. The Accounting year of the organizations shall be a period of twelve months from 01st April to 31st March. The Accountant shall prepare the financial statements of the organization for every financial year by the end of May of the following the Financial Year. The Financial statements will have to be audited by a practicing firm of Chartered Accountants and the audit report of the previous financial year shall be obtained by July every year.

The organization shall submit the audited statement of accounts together with the auditor's report in the AGM in which it will be discussed and passed.

- B. The appointment of auditors of the organization and fixation of their remuneration shall be made every year in the AGM.

15. Maintenance of Books of Accounts

- A. Accounting is an important aspect of Financial Management system. It would facilitate to ascertain a true and fair financial status of the activities of the organization. The books of accounts shall be maintained under the double entry system of accounting.

B. A chart of agreed upon accounting heads will be drawn in conformity with the activities of the organization. The accounting heads will be designed in accordance with the main heads and sub heads reflected in the budget as well as in the cash flow plan. To facilitate financial monitoring system to evaluate actual achievement with that of the projected targets and necessary remedial measures to be suggested to ensure that the program and finance move in the right direction.

C. Accounting Procedure:

A simple but transparent system of book keeping and accounting system shall be implemented at every level of the organization and these should be done keeping in view the various provisions of different applicable statutes. The following are the guiding principles for maintenance of accounts.

- i. All collections shall be acknowledged (through printed numbered receipt book as far as practicable) forthwith and to be entered in the books of accounts immediately.
- ii. No person shall incur any expenditure or enter into any transaction which creates liability unless such expenditure or transaction, as the case may be is already incorporated in the budget and prior approval taken.
- iii. Payment should be made on production of proper bills / cash memos. In rural areas kuccha bill may be obtained for which adequate caution to be followed as stated earlier. Such bill should be properly certified.

D. The following *books* of accounts shall be maintained:

- I. Cash book (double column with cash & bank)
- II. General Ledger
- III. Personal Ledger (for monitoring the movement of individual advance)
- IV. Journal Register

E. Following important books and registers should also be maintained:

- I. Salary Register
- II. Fixed Assets register
- III. Land Register (stating purpose date of acquisition, purchase price / donated price, Location, measured area, deed number, details of holding number, seller's / donor's name & address)

IV. Staff Attendance register

V. Vehicle Log Book

VI. Subsidiary books for the organization:

- i) Purchase Register
- ii) Issue Register
- iii) Stock Register
- iv) Money Receipts Register
- v) Vehicle Movement Register
- vi) Staff Movement Register

VII. Filing System of Bills: Bills should be kept properly and date-wise separately in files under head “Pending bills”, “Approved but not paid” & “Paid”.

VIII. Backup of files should be kept on regular basis.

F. A separate set of accounts and records shall be maintained exclusively for foreign contribution received and utilized and the books of accounts like Cash Book and Ledger will also be separately maintained for this section. A separate designated bank account approved by the Ministry of Home, FCRA section, shall be maintained to receive such contribution.

G. The following financial statements and schedules shall be prepared at the end of every financial year.

- i) Receipts and Payments Accounts
- ii) Income and Expenditure Accounts
- iii) Balance Sheet
- iv) FC3 with financial statements (only for foreign contribution)
- v) Schedule of Advances
- vi) Schedule of Fixed Assets
- vii) Schedule of expenditure/payments of individual project
- viii) Schedule of receipts/income from various sources/heads
- ix) Bank Reconciliation Statement

16. General Financial Rules

- a) Back up of TALLY and other accounting software to be kept and updated regularly.

- b) All statutory deductions at subsidiary units to be transferred to Central Office in time for deposit of the consolidated amount.
- c) Opening Cash balance status to be informed to Central office by the first half of each day.
- d) Money Receipt books for FC & IC to be used separately.
- e) Salary from Project A/c will be transferred to General A/c for Centralized Salary Disbursement at each unit.
- f) Caution to be exercised for avoiding double payment of any dues.
- g) Payment at field level should be made by a person who is not directly involved in that work as far as practicable.
- h) Contract work should follow the Steps like detailed estimates- Quotation (Tender) –Vender Evaluation – Comparative analysis – Placing of Work Order – Certificate of Satisfactory Completion of Work – approval of bills – payment by A/c payee cheque.
- i) Local purchase should be limited to Rs. 5,000/-. For amounts exceeding Rs. 5,000/- but within Rs. 50,000/-, comparison of quotations to be made. Tendering system to be followed in cases of procurement cost exceeding Rs. 50,000/-.
- j) All bills should be recorded in Bill Register.
- k) Purchase Committee wills control the entire purchase procedure.
- l) FC Bank account and Cash balance in FC section at the units to be maintained in such a way so that at any point of time it is convenient to understand the Project wise FC balance.
- m) Audit fees and such other common expenses under different Projects should be transferred to General A/c at appropriate time. Actual payments from General Account to be made after the transaction is completed.
- n) Any refund of advance will be supported by the issue of money receipts.
- o) Staff Welfare fund & Festival Fund should be kept in separate bank a/c for easy control.

17. Staff Welfare Fund

Contribution towards Staff welfare fund or any other welfare scheme introduced by the organization will be deducted from Salary every month and separate accounts should be maintained for each of such schemes.

The Utilization of Staff Welfare Fund will be made on the following causes:

Staff Incentive, Medical grant, Staff Recreation, Accidental compensation, Group Insurance, Stipend to staff for study, Scholarship to meritorious children of staff, Capacity building, Construction of Staff quarter.

18. Adherence to the Rule

A. This rule shall be followed taking in view the purchase policy of the organization as and where it is relevant.

B. Any matter not found / not clear and seek further clarification shall be referred to the Director, whose decision will be final.

C. In selected cases the Director may if he so desire or in his view there is need to refer the matter noted in B to the Governing Body, he may do so and the decision / clarification issued by the Governing Body will be final and binding.

D. Everyone in the management and working as an employee of Sabuj Sangha shall apply common sense and intelligence as he is required to apply, in all work under this rule and its interpretation.

Sabuj Sangha Nandakumarpur

THE PURCHASE POLICY

The Prologue

After a considerable progress in the motivation and awareness generation of people in a Peoples Participatory Process (PPP) for a few years, the people were asked to identify their own problems and find out the local resources and other inputs required from outside for hastening the pace of development for leading a quality life. At this stage, the necessity arose for creating some infrastructure particularly in the field of shelter, drinking water, sanitation, education and health care services and for supplying the required inputs to the community for their income generation and better living.

At the beginning of these activities, the question of purchasing huge materials for creating the required infrastructure for supplying some income generating inputs to the individual beneficiaries. In view of the above, **Sabuj Sangha** had to adopt a Purchase Policy for the cause of transparency and economy in purchases. Since **Sabuj Sangha** observes utmost economy in purchases for the holistic development of the area, it is also the adopted policy of **Sabuj Sangha** to boost local trades and local business so as to ensure total economic development of the area.

1. The Purchase Committee

In view of the above to conduct any procurement under any specific project, a Purchase Committee consisting of at least 5 (five) members is to be formed with the approval of the Governing Body for a specific period of one year. In the committee there has to be adequate representation of finance, administration and the program/projects for which procurement has to be made. Further, while dealing with procurement of technical nature like say purchase of medical equipments, the Committee will be adequately strengthened with members having expertise in the technicalities of such items. This will be so done for procurement of this particular item only.

After the end of one year, a new committee has to be formed though existing members are eligible for re-election.

It is generally expected that decisions of the Purchase Committee are taken unanimously. However, circumstances may arise when decision of the majority may be necessary. In any case, all decisions of procurement taken by the Purchase Committee are to be recorded in Minutes of the Purchase Committee.

Market Survey

Initially, the Committee will scrutinize the proposals for purchase from the various projects/programs forwarded to it and identify the various materials to be purchased and the quantity required including item wise specification. The Committee will also consider various agencies who are capable of providing various services of general nature (like maintenance, car upkeep, repairs, logistics support etc). Thereafter, a market survey is to be conducted in the locality to find out whether such materials or agencies are available locally or not and the prevalent prices. Such basic information about the required quantity and value of materials/cost of providing services for implementing the project proposal will enable Sabuj Sangha to take the appropriate decision.

Selection of Vendors

While conducting the market survey, **Sabuj Sangha** will also prepare a list of local reputed vendors indicating their names and addresses and the materials they deal with or the type of service they are capable of providing. Simultaneously, their past volume of turnover is also recorded so as to understand the volume of order they would be able to handle within a stipulated period. Since the policy of **Sabuj Sangha** is to encourage local traders to ensure holistic development of the area, sometimes orders for huge quantities of materials may be sub-divided at the office end and placed with more than one vendor having regard to their turnover capability. However, in case of such order splits only one price per item will be considered and allowed to all such vendors.

The list of vendors, thus prepared, is reviewed at yearly intervals to include the names of new vendors if they fulfill the basic minimum standard prescribed by **Sabuj Sangha**. During such review, the name of any enlisted

vendor may be black-listed provided he is found guilty on any one of the following grounds.

- 1) Not able to supply the goods within the stipulated period indicated in the purchase order .
- 2) Supplying inferior quality goods as compared to samples submitted with the quotation.
- 3) In case of service providers , if their services have been irregular or not up to expectations.
- 4) If the vendor indulges in any kind of subversive activities detrimental to the interest of **Sabuj Sangha** or the community.
- 5) If he is found to be guilty of any charge involving moral turpitude.

Purchase Procedure

Once the materials of regular use to be purchased are decided and the list of local vendors are ready, quotations are invited from the local listed vendors as well as outside reputed vendors for the supply of goods and services. Materials or services of regular use will generally mean those that are required by the organization year to year for implementing its various projects and general activities. This will also include capital items like television, computer, printer, furniture ,notepad ,AC machine ,generator etc. (However, purchase of land or construction or purchase of building will remain outside the purview of the Purchase Committee as decisions in such cases will lie with the Governing Body). Quotations for procurement of materials or services are invited through tenders for submission of quotes in case of purchase of materials or provision of services of value exceeding Rs. 50,000. Notices for tenders are to be prominently put up in the office board and sent to reputed vendors. In case of procurement of goods or availing of services below Rs. 50,000 but exceeding Rs. 5,000, no tenders will be invited but purchase will be made on the basis of evaluating quotations of at least three listed suppliers or agencies. In case of procurement exceeding Rs. 5, 00,000, notice inviting tender will be put up in the local newspaper having wide circulation in the region or area. In case of purchase till Rs. 5,000, procurement may be made from existing supplier without seeking comparative quotes. The vendors are required to submit the quotations along

with samples and/or specifications of goods/services, as the case may be, indicating their price, the validity period of their quotes as also the other terms and conditions such as delivery mechanism, after - sales service, warranty period, free demonstration and other benefits, etc.

These sealed quotations will be accepted by the Administrative Division and submitted to the Purchase Committee for opening of all such quotations. Generally all the members of the Purchase Committee are expected to be present for taking decision . However, a minimum of 3 (three) members will form a legitimate quorum. The members of the Committee will prepare a comparative statement detailing the costs and benefits, as quoted by each vender. While preparing this comparative statement the Administration Section would provide necessary inputs after consultation with the concerned Project Section.

The Purchase Committee will give due consideration to the costs and benefits of each item as quoted by the vendors and indicate their acceptance with reasons thereof. Generally the one offering the least cost will be accepted out of the technically eligible suppliers. In case the minimum bidder is not selected by the Purchase Committee, the selection of the ultimate supplier should be justified and documented in the minutes and signed by the members present .Once the Purchase Committee puts its seal on the quotations, the Administration Section will issue necessary purchase orders to the vendor(s) with copy to Projects Section, Store keeper and the Accounts Section for further necessary action.

Spot Purchases

Having regard to the peculiar geographical situation of the area served by **Sabuj Sangha**, **certain** bulk materials are sold by mobile vendors in boatload such as bricks and sand. The mobile boat owners carry these materials in boat loads and anchor at various ferry ghats in search of buyers. It often becomes easier to purchase these materials from them. However, the normal procedure like obtaining quotations and preparing comparative statements etc. is not possible to be followed in such cases.

It has, therefore, been decided that in such cases two persons – one from the Projects Section and the other from the Administration Section will be deputed and will be authorized to negotiate with these mobile vendors for

purchase. While doing so it should be ensured that the quality matches with the requirements and the price quoted does not vary more than 5% with the price obtained through the latest market survey/ purchases made.

Once the designated persons are satisfied with the material and its price, an office note will be prepared. After approval by the Director, purchases will be made.

Small Purchases

Sometimes for the purpose of implementation of projects, certain small value items of irregular use are required to be purchased (irregular items are nails, screws, galvanized wire, straw etc). These are unbranded small items for which no quotations are available locally. Moreover, these are generally traded by small vendors who do not know the procedure for submission of quotations etc.

In these circumstances, it has been decided that whenever such items are required, **Sabuj Sangha** will designate two persons – one from the Projects Section and the other from the Administration Section who shall visit the local market, visit 2/3 shops dealing in such goods, compare quality and quotes ,if available, and then make spot purchases by making cash down payment.

However, on any occasion such purchases shall not exceed the maximum limit of Rs. 5000.00 on each such occasion.

Emergency Purchases

Emergency purchases may be required to be resorted to under two special circumstances, such as –

1. Disaster management ;
2. Completion of a job as per scheduled date.

The operational area of **Sabuj Sangha** is a disaster-prone area particularly during heavy monsoon months. People suffer a lot due to occasional hailstorms, heavy downpour and consequential flush floods. During such emergencies certain relief materials are required to be purchased when there will be no time to wait to call for quotations etc. During such emergencies,

Sabuj Sangha will depute two persons to purchase the required relief materials by paying cash.

Secondly, whenever any construction work is targeted to be finished by any specified date, there may be marginal shortage of any material which may hamper the completion date. In such cases also, **Sabuj Sangha** will depute two persons to make the purchases from the local market on cash payment basis.

These two persons to be deputed for emergency purchases should generally be those whose names are included as Purchase Committee members.

Purchase Committee Meetings

Normally, the Purchase Committee will meet as and when required for selection of vendor . Seven days notice will be served for convening the meeting. The quorum for valid meetings is 3(three).The meetings will normally discuss the following agenda.

1. Confirmation of the proceedings of the last meeting ;
2. Ratification of spot purchases and emergency purchases made after the last meeting ;
3. Listing and black-listing of vendors, if any, on the basis of reports of performance submitted ;
4. Decide on the quotes obtained and selection of vendor.
5. Preparation of comparative statements for selection of the ultimate vendor with reasons thereof.
6. Recording proceedings in minutes.
7. Deciding on future purchases.

8. Put forward proposal for amendment of Purchase Policy as and when required to the Governing Body ;
9. Any other relevant matter.

Receipt of goods and Quality Control

Whenever any goods are supplied against Purchase Orders, the Purchase Officer or any person designated or made responsible for such function should first check the quality and quantity of goods supplied. If satisfied, he will make the following remarks on the back of the challan.

“Quality and quantity checked.
May be accepted”

Date

Signature

The challan with this remarks will then be placed before the Central Store Keeper who will allow the entry of the goods in the godown after once again checking the quality and quantity of goods supplied. As and when the goods are loaded in the godown the Central Store Keeper will make an entry in his stock book and make the following endorsement on the back of the challan.

“Quality and quantity checked
Entered in the Stock Register.”

Entry No.

Dated

Date

Signature :

Whenever any single material is supplied by more than one vendor, the same should be stacked separately with proper identification.

In many cases, the construction work (such as latrine) is done for the beneficiaries. As such, the beneficiaries themselves are required to check the quality of materials they receive and reject the ones which are inferior in quality. In case there is heavy rejection (generally more than 5%) of any material supplied by a particular vendor, the storekeeper should immediately report the matter to the Administration Section, Projects Section and the Accounts Section so that the payment of the bill may be withheld. Negotiation may be made with the vendor for replacement of the rejected stock or reduction in the value of the bill and finally the particular vendor may be blacklisted also.

Payment Policy

Every bill, properly drawn and supported by receipted challans, should be recommended by the concerned Project Officer and sent to the Accounts Section along with all necessary documents. The Accounts Section will make a prima-facie scrutiny of the bill and make an entry in the Bills Register. All incomplete bills should be returned to the maker of the bill along with a note regarding the deficiencies observed so that the necessary rectification becomes easier.

Once the bills are entered in the Bills Register, the concerned Accountant should scrutinize the bill properly, compare it with the available budget and prepare the internal payment voucher and place it before the Approving Authority for approval.

On approval, all bills shall be paid by A/C Payee cheques, with the following exceptions.

- 1) Payments for spot purchases where the mobile vendors do not accept cheques for obvious reasons ;
- 2) For small purchases, where un assorted articles are purchased from petty shops ;
- 3) Emergency purchases when normal procedure cannot be followed due to the exigencies of the situation ;
- 4) Payment to small local vendors who do not have their own bank account.

Before releasing any cheque for payment, the procedure laid down for checking the quality and quantity of goods received should be thoroughly made to the satisfaction of the Accounts Division.

Vendor education

All listed vendors, from whom **Sabuj Sangha** will be purchasing goods, should be of a minimum standard, such as –

- 1) They should submit the bills in properly printed and serially numbered format.

- 2) Should maintain proper records in their books about the bills submitted to the buyers.
- 3) Should have a bank account in the firm's name so as to accept A/C Payee cheques against payment of the bills.

In case any local vendor is not having any of such attributes, the workers of **Sabuj Sangha** would try to educate him about the formal requirements. Pending finalization of the above requirements, a maximum of three payments may be made to him. Even after proper intellectual inputs and three payments are made in case the vendor does not come up to the standards prescribed, the vendor may be black listed.

All vendors should be selected on the basis of credentials submitted by them.

Contract for supply of similar items

Sometimes contracts are made with the vendors for supply of common articles over a period of time such as food for the children, regular stationery articles like writing pads, pens, pencils, computer consumables etc. The market prices of these articles are subject to frequent seasonal changes. It has, therefore, been decided that contract for supply of such articles should be made only for six months at a time. At the end of every half-year (September and March) fresh quotations will be invited from the listed vendors and on the basis of market survey and comparative statements, fresh contracts will be awarded for the ensuing half-year.

In case all the materials are purchased from a single vendor over a period then the basis for that should be recorded clearly in writing.

Saving Clause

This Purchase Policy has been prepared on the basis of the existing situations. The Governing Body reserves the right to change, amend, repeal or otherwise deal with the Purchase Policy in future to accommodate the special circumstances as and when necessary.

A Policy Paper for engagement of outside consultants by Sabuj Sangha

Sabuj Sangha is engaged in holistic development of the rural and semi-urban areas with multi-dimensional activities. For the purpose of taking up certain activities, the available manpower with Sabuj Sangha and their expertise is not always matching the situation. To tide over such a situation, Sabuj Sangha often requires the services of outside consultants for performing certain specific jobs.

However, for the purpose of engagement of outside consultants, it is not possible for Sabuj Sangha to call for global leaders, or all-India tenders or even all West Bengal tenders, as the consultants will have to stay and work in a remote village devoid of many modern facilities of life. Moreover, such consultants should not only be competent and sound in their technical knowledge but should also be acquainted with extension work in rural areas and conversant with NGO culture.

In view of the above, it has since been decided by the Governing Body of Sabuj Sangha that whenever any need for any consultant will arise, the Core Management Team will, at the initial stage, discuss in their meeting the following points.

1. The need for the consultant;
2. The particular job in hand;
3. The need for technical expertise;
4. The possible time needed for the job;

5. The possible amount of fees that can be spared;
and also short-list the names of certain firms/persons who can be engaged for the purpose.

On the basis of the above short-listing, Sabuj Sangha Core Team will negotiate with the already short-listed firms/persons and finalise the terms of reference (TOR).

On the basis of the above negotiations, firm contracts will be signed with the selected firm/person. While renewing such contracts, if found necessary, their past performance would also be taken into consideration.

Sabuj Sangha

Policy for Utilisation of Community Contribution

In the past Sabuj Sangha had been supported by various donor agencies to create certain physical assets for the benefit of local poor people. Examples of these are

1. Installation of drinking water tubewells for community use;
2. Establishment of sanitary latrines for individual household use.

The most important donor agencies have been

1. Water-Aid, London
2. GOAL, Ireland
3. Water for People, USA

A. Community Tubewells :

In the case of community assets, the proposed beneficiaries are required to make some initial down payment as community contribution to ensure their wholehearted participation and also to pay regular monthly subscription to the Village WATSAN Committees for their future maintenance as these community assets are subject to normal wear and tear.

B. Household Assets :

In the case of individual assets, such as household sanitary latrines, the beneficiaries, as per the conditions of the donor agency, will be required to make some down payment either in cash or kind (mostly in kind in the shape of his own unskilled labour).

Due to constant awareness generation and motivation of local people and also because of all pervasive rural development work initiated by Sabuj Sangha, the village people in general have become quite pro-active and instead of being mere sideline onlookers, they are now eager to contribute their might for the holistic development of the area in which they live. As for example, unless the entire area is covered with sanitary latrines, the beneficiaries who are already covered will not be spared from the rampage of fly borne diseases.

Accordingly, in consultation with the local Village Committee Members, it was decided that the individual beneficiaries should contribute for local development in easy instalments. Earlier, the beneficiaries had agreed to contribute at the rate of Rs. 20.00 per month. This rate has been revised to Rs. 50.00 per month per household with effect from April 01, 2007. For the purpose of such household collection, Sabuj Sangha had appointed field level volunteers who are paid 15% of the amount so collected as commission for such collection. Thus, 85% of the collection money will be received by Sabuj Sangha which is a local fund being voluntary contribution by local people.

Out of the net fund thus collected 15% will be credited to Corpus Fund of Sabuj Sangha for long-term development of the organisation. Similarly, all one time contribution will be utilized for the long-term development of the organization.

Another 15% of the net collection will be generally utilised for management of the fund such as salary of the administrator, accounts keeping, printing & stationery, audit fee, etc. In case, there is any saving in this regard this will be added with the remaining amount.

The remaining part of the fund i.e. 55% of gross collection, plus savings in the provision for administrative expenses plus interest earned from the fund invested outside for the time being will be generally utilised for the following purposes.

The Policy for utilization of the above mentioned fund will be as follows:

1. Maintain the net collection amount in a separate bank account apart from General Bank Account of Sabuj Sangha and a major part of it in fixed deposits.
2. With the amount thus collected, establish another set of community assets, mainly household sanitary latrines, with conditions of down payment as hitherto, so that new houses and broader areas can be covered *sans* donor dependency. Since 85% of the money is being collected every time, this process will continue at least for another 15 years. In certain specific cases of identified destitute families assets may be created without any contribution made by the beneficiaries.
3. Secondly, a part of the money may be utilised to create a permanent **Endowment Fund** in the Sabuj Jeevan Deep Division to pay a monthly pension amount for identified destitute beneficiaries. Such a Fund may be created in conjunction with other available funds for which a separate policy guidelines have been framed.
4. Under extreme circumstance, a part of the Fund may also be utilised for disaster management, as may be decided by the Governing Body of Sabuj Sangha.

Sabuj Sangha reserves the right to change the above Policy guidelines as and when the situation so demands.

This document has been finalized in the meeting of the Governing Body held on 27-12-2007.

END



HIV/AIDS Policy

Sabuj Sangha

Vill. & P.O: Nandakumarpur
P.S.: Raidighi
Pin – 743349
Dist.: South 24 Parganas
West Bengal



1.0 Overview

Sabuj Sangha's HIV/AIDS has been developed to respect and protect the rights and integrity of all people in relation to HIV/AIDS. HIV/AIDS is a major epidemic, both nationally and internationally. It poses as massive threat to development and social progress. Aside from the suffering it imposes on individuals and families, it also affects the most productive segment of society, the labour force.

With this in mind, Sabuj Sangha feels that it is essential to have a suitable HIV/AIDS policy in place. The policy aims to reduce the risks and vulnerability of staff, promote a health workplace environment free from discrimination, and to ensure conceptual clarity on HIV/AIDS among all staff.

The policy incorporates the International Labour Organisation's Guiding Principles and outlines its own strategies for policy implementation.

2.0 Background

2.1 Sabuj Sangha

Sabuj Sangha is a non-profit, non-government development organisation working in West Bengal, India. It was established in 1975 in the Sundarban region of West Bengal. From its humble beginnings, Sabuj Sangha has grown into a vibrant organisation working with a range of people across multiple sectors. It currently works in the following focus areas:

- Health and Nutrition
- Water, Sanitation and Hygiene
- Education and Protection
- Livelihood and Women's Empowerment
- Environment and Disaster Response

Sabuj Sangha seeks to improve the lives of people less fortunate through participation and empowerment. We believe that partnership is the key to breaking the cycle of poverty and ensuring that all people are given a fair and equal chance.

Aside from direct programme implementation, Sabuj Sangha is involved in research, documentation, advocacy and networking. It also works with Government to enact change and ensure people have access to their most basic human rights.

2.2 HIV/AIDS

The HIV/AIDS epidemic constitutes one of the most formidable challenges to development and social progress. The epidemic exacerbates poverty and inequality, and increases the burden on the most vulnerable people in society i.e. the elderly, the women, children and the poor.

Countries and organizations that do not respond in time have to bear huge costs on public and private sector enterprises through declining productivity, loss of skilled and experienced labour and increased expenditures on employee treatment and associated costs as the demand for public services increases. National economies, as seen in the severely affected regions like the sub-Saharan Africa, have experienced the impact on virtually every sector.



SABUJ SANGHA

HIV/AIDS in India

According to NACO an estimated 2.31 million people in India were living with HIV/AIDS in the year 2007 (88.7% adults in 15-49 years, 7.5% aged 50 and above and 3.5% children below 15 years). The prevalence rate of HIV/AIDS in the country is 0.34%. Women account for 39% of HIV burden in the country. 8 states have HIV prevalence greater than the national average. India has been successful in containing the overall prevalence of the epidemic. However, there is no room for complacency as the epidemic spreads from high risk groups to general populations, from men to women and from urban to rural areas¹.

2.3 Sabuj Sangha and HIV/AIDS

Sabuj Sangha employs over 230 staff spreading over multiple districts, namely South 24 Parganas(s), Jalpaiguri and Kolkata. Sabuj Sangha works with a varied range of people, including extremely vulnerable migrant groups, giving rise to the need to develop a policy, addressing the major issue that is HIV/AIDS. Given its wide spread of geographical focus and the range of people that are involved, Sabuj Sangha feels that it is essential to minimise the risks of HIV/AIDS and reduce the stigma and discrimination attached to HIV/AIDS through prevention.

3.0 Objectives of the Policy

The key objectives of the policy are:

- To reduce the risks and vulnerability of all the staffs of Sabuj Sangha to HIV/AIDS.
- To promote and ensure a healthy work environment, free from discrimination on the basis of HIV/AIDS within the organisation.
- To ensure conceptual clarity on HIV/AIDS through constant orientation and information dissemination.

4.0 Guiding Principles

The policy adopts the guiding principles, as set out by the International Labour Organisation Code of Practice on HIV/AIDS and the World of Work. The guiding principles are:

1. HIV/AIDS, a Workplace Issue

HIV/AIDS is a workplace issue, and should be treated like any other serious illness/condition in the workplace. This is necessary not only because it affects the workforce, but also because the workplace, being part of the local community, has a role to play in the wider struggle to limit the spread and effects of the epidemic.

2. Non-Discrimination

In the spirit of decent work and respect for the human rights and dignity of persons infected or affected by HIV/AIDS, there should be no discrimination against workers on the basis of real

¹ Ministry of Labour and Employment, India – “National Policy on HIV/AIDS and the world of Work”, 2007



or perceived HIV status. Discrimination and stigmatization of people living with HIV/AIDS inhibits efforts aimed at promoting HIV/AIDS prevention.

3. Gender Equality

The gender dimensions of HIV/AIDS should be recognized. Women are more likely to become infected and are more often adversely affected by the HIV/AIDS epidemic than men due to biological, socio-cultural and economic reasons. The greater the gender discrimination in societies and the lower the position of women, the more negatively they are affected by HIV. Therefore, more equal gender relations and the empowerment of women are vital to successfully prevent the spread of HIV infection and enable women to cope with HIV/AIDS.

4. Healthy Work Environment

The work environment should be healthy and safe, so far as is practicable, for all concerned parties, in order to prevent transmission of HIV, in accordance with the provisions of the Occupational Safety and Health Convention, 1981 (No. 155). A healthy work environment facilitates optimal physical and mental health in relation to work and adaptation of work to the capabilities of workers in light of their state of physical and mental health.

5. Social Dialogue

The successful implementation of an HIV/AIDS policy and programme requires cooperation and trust between employers, workers and their representatives and government, where appropriate, with the active involvement of workers infected and affected by HIV/AIDS.

6. Screening for Purposes of Exclusion From Employment or Work Processes

HIV/AIDS screening should not be required of job applicants or persons in employment.

7. Confidentiality

There is no justification for asking job applicants or workers to disclose HIV-related personal information. Nor should co-workers be obliged to reveal such personal information about fellow workers. Access to personal data relating to a worker's HIV status should be bound by the rules of confidentiality consistent with the ILO's code of practice on the protection of workers' personal data, 1997.

8. Continuation of Employment Relationship

HIV infection is not a cause for termination of employment. As with many other conditions, persons with HIV-related illnesses should be able to work for as long as medically fit in available, appropriate work.

9. Prevention

HIV infection is preventable. Prevention of all means of transmission can be achieved through a variety of strategies which are appropriately targeted to national conditions and which are culturally sensitive. Prevention can be furthered through changes in behaviour, knowledge, treatment and the creation of a non-discriminatory environment.

The social partners are in a unique position to promote prevention efforts particularly in relation to changing attitudes and behaviours through the provision of information and education, and in addressing socio-economic factors.



10. Care and Support

Solidarity, care and support should guide the response to HIV/AIDS in the world of work. All workers, including workers with HIV, are entitled to affordable health services. There should be no discrimination against them and their dependants in access to and receipt of benefits from statutory social security programmes and occupational schemes.

5.0 Commitment

Through this policy, Sabuj Sangha is committed to adhering to principles outlined above. Sabuj Sangha's HIV/AIDS policy includes:

5.1 Non-Discrimination

Sabuj Sangha will promote a non-discriminatory workplace environment at all times. There will be no discrimination towards workers on the basis of HIV/AIDS. Employees with real or perceived HIV/AIDS status are entitled to the same conditions, benefits and terms of employment.

5.2 Gender Equality

Rules, regulations and support will be equal for both males and females.

5.3 Healthy Work Environment and Social Dialogue

Sabuj Sangha will promote a positive, healthy work environment at all times. The organisation will encourage social dialogue, promote active involvement and provide necessary platforms to facilitate social dialogue.

5.4 Recruitment and Employment Process

Sabuj Sangha believes that skills, knowledge and expertise are the only criteria that should be considered throughout the employment process including the recruitment, renewal and promotion of staff.

5.5 Confidentiality

Sabuj Sangha will ensure confidentiality at all levels. Staff are not required to disclose HIV-related personal information. Any information relating to a person's HIV/AIDS status should remain confidential.



SABUJ SANGHA

5.6 Prevention and Care and Support

HIV/AIDS issues will be included within the in-house trainings, meetings, etc. HIV/AIDS Policy will be disseminated to all staff and shared with new staff during their induction. Employees living with HIV/AIDS will be linked up with the existing Government health care facilities for care and support.

6.0 Strategies for Policy Implementation

6.1 Core-Team

A core-team will be established and act as point persons within the organisation for all things related to HIV/AIDS. The team will be responsible for policy implementation at all levels, promoting the principles set out in the policy and ensuring that all staff are aware of their individual responsibilities.

6.2 Information

Sabuj Sangha will collect and disseminate appropriate information relating to HIV/AIDS, including information leaflets, media articles, and state, national and international reports, to all staff.

6.3 Awareness Workshops

The organisation is committed to promoting social dialogue. With this in mind, awareness workshops on HIV/AIDS will be conducted by the organisation. The Core-Team will be involved in the design, development and delivery of all workshops.

6.4 Policy Review

The HIV/AIDS policy will be reviewed annually. The Core-Team will be responsible for conducting the policy review. Any amendments will be reviewed by the Governing Body and adopted if appropriate.

Human Resource Policy of Sabuj Sangha



As on 1st April, 2013

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PART-I

General Employees of the organization

1. General

- a. The Rules hereunder are adopted by Sabuj Sangha for its smooth functioning and progress and shall be taken as Human Resource Policy of the organisation.
- b. The provisions of these rules shall apply to all the functions of the Sangha and on Governing Body members, employees, functionaries, agencies and all other who are connected with the organization or will be connected in future with Sangha.
- c. The power of interpreting these rules is reserved to the Governing Body of the Sangha.
- d. The Governing Body can create as many posts at any level as found necessary and make provision of maintenance of the same posts for a specific period or permanently for smooth running of the organization.
- e. The Governing Body/Director may relax the requirement of any provision under this policy to such extent and put forth such conditions as may be considered necessary for dealing with the particular case in the interest of the Sangha.
- f. All concerned shall follow and abide by these rules in good faith in course of discharging their duties and obligations.

2. Equal Opportunity for All

The Organization will never make any discrimination among the religion, region, caste, creed, colour, race, or any division or group alike, in the matter of recruitment of staff, selection of beneficiaries, selection of area of operation, or type of development work.

3. Gender Ratio

- a. The organization will not make any gender discrimination in recruiting employees or selection of beneficiaries (unless the project / scheme are earmarked for a particular gender). Only qualification, experience, merit and capability will be the criteria for selection in such cases.
- b. Utmost effort will be taken to arrive and maintain a good gender ratio in the above matter.
- c. The local authority will have to be vigilant and be alert in the matter of maintaining good atmosphere at the workplace, so that female workers do not face any inconvenience.

If any information or incident of violation of the above comes to the notice of the local authority, that should be brought to the notice of the Director instantly for taking necessary action.

4. Provision for Physically Challenged Persons

Sincere and active effort is to be taken for accommodating physically challenged persons in the matter of recruitment of staff and selection of beneficiaries.

In these cases, special advantage / facility may be allowed to such persons so that the job entrusted to and the workplace become friendly to them.

5. Employment free from Child Labour

No person below the age of 14 years will be engaged by the organization for any job / service in any form or way in consideration of money, or any remuneration / subsidy or in any other way.

The organization will be absolutely child labour free.

6. Age of Appointment

No person below the age of 18 years will be appointed by the organization for any work. Proper verification of age must be done before appointing any person by verification of birth / school / school leaving certificate. In absence of the above documents, local enquiry in the family of the candidate and local Panchayat, where the candidate resides should be done to determine the age. In all possible cases, a certificate from the concerned authority is to be procured, or a report to be taken from the enquiring official.

7. Recruitment of Staff

The following procedure to be followed by the organisation for recruitment of professional/ Staff at all levels:

Identification of vacancies

- a) Identification of post wise professional / staff required and its number.
- b) Exact qualification and experience required for the post.
- c) Formal approval from the governing body (in case of core staff of the organization).
- d) The requisition to be sent to the Director through proper channel, in the format provided for the purpose in **Annexure A**.
- e) A post-wise requirement of preferable qualifications is given in **Annexure B**. This may be suitably revised if necessary.

8. Advertisement for Recruitment

To get right candidates, organisation will arrange for publication of advertisement in news paper/s and / or through electronic media mentioning the following selection criteria. This can also be done through publication in local office notice board or any other suitable sources in case of field level / junior staff, with prior permission of the Director.

- a) Name of posts with number of vacancy.
- b) Minimum qualification and experience required.
- c) Age limit, if any
- d) Gender requirement, if any
- e) Provision for Physically Challenged persons, if any
- f) Place of posting.
- g) Honorarium/ Remuneration and any other facilities available.
- h) Last date for submission of application.
- i) Place, Date and Time of interview/ other test, if possible.
- j) Any other point necessary for the purpose.

9. Interview/ Test for Recruitment

a. All appointments should be made through formal procedure of interview or/and written test. To select right person/s the Organisation will form an interview board with a group of qualified and experienced persons. Interview Board's decision for selection of any candidate, should always be the final.

b. In case of recruitment for which and interview process is held

i) No one will be qualified to be member of a interview board if any candidate is closely related to him.

ii) In each case of recruitment, a provisional selection of members of interview board will be made. The members will be shown the list of candidates to be called for interview. They will then be requested to kindly give a declaration in the format below if they are found qualified under clause (a). On completion of this formality the interview board will be constituted finally.

Format

This is to declare that I am not closely related to any of the candidates to be called for interview, as shown to me, scheduled to be held for the post of _____ for _____ (Unit) on _____

Signature of the member of Interview Board

10. Appointment/ Agreement

A. According to the recommendation of the Interview board, the Organisation may issue a letter to the candidate informing of his provisional selection and also asking to know about his willingness to join the post. The authority may also execute agreement or issue appointment letter, as the case may be, directly on verbal confirmation by the candidate.

B. An agreement will be executed between the Sangha and the willing candidate mentioning the following points which will take effect from the date of joining in the post.

- a) Designation for the employee.
- b) Place of posting with Headquarter
- c) Period of agreement.
- d) Working hours.
- e) Code of conduct and discipline.
- f) Honorarium/ Remuneration entitled.

- g) Leave entitlement.
- h) Travelling allowance entitlement.
- i) Reporting superior.
- j) Conditions for termination of agreement.
- k) Any facility allowed specially to the employee
- l) Other terms and conditions, if any.

C. An agreement may however be revised or altered anytime during the period of agreement if situation so demands, in the interest of the organization.

D. Specimens of agreement in **Annexure C** and of appointment in **Annexure D** are given herewith which may be revised suitably if necessary.

E. A specimen showing the duties and responsibilities of staff at different levels is given in **Annexure E**, which may be revised as per requirement of the project / programme to be implemented by the organization.

11. Period of Contract/Agreement/Appointment:

a. All the staff/junior staffs are to be engaged on contract basis normally for a period of one year (or a longer period if the authority finds suitable) of which the first six months (normally) will be probation period. The appointing authority will have the right to terminate the employee within or at the end of the probation period if the services/conduct of the employee is found unsatisfactory. The agreement may be extended further if the services rendered by the employee are found satisfactory and mutually agreed upon. However, no probation period will be necessary for fresh agreements of existing employees.

b. Record of such period of agreement should be kept in **Annexure F** for ready reference.

c. However if found necessary, as a special case, the period of agreement / appointment of all or a specific category of employees or of a particular employee maybe extended by issuing an office order in this regard with specific mention of the period for which it is done.

12. Honorarium/Remuneration:

- a) Honorarium/Remuneration will be paid on monthly basis.
- b) This remuneration may be calculated in monthly / yearly package system which will include the Basic Salary, HRA, Medical Allowance, Transport Allowance, Festival Allowance etc.
- c) Honorarium/Remuneration will be paid to the staff members suitably on a fixed date of the month to be notified previously.
- d) Deduction towards statutory taxes will be made from the monthly remuneration of the employees.
- e) The employees will have to compulsorily subscribe at the rate as will be prescribed for the purpose, to the Provident Fund, Health Scheme, or any other staff welfare scheme or fund as maybe introduced by the organization.

13. Execution of Agreement/Appointment

- A. Contract/Agreement document should be prepared in Duplicate and should be signed by the Director and the person to be engaged. One copy of the agreement is to be handed over to the said person on receipt and the other is to be kept in the Central Office / Regional Office.
- B. In case of engagement of persons in Junior level appointment letters will be issued under signature of the Director and same procedure as above will be followed
- C. Next, two photocopies of the receipted copy of the document are to be prepared and one copy is to be kept in the concerned Administrative office of the unit and another to be sent to the Finance Department.

14. Joining of Staff

A. When a newly engaged person will report for duty, the concerned office will first examine the agreement document / appointment letter and if found proper, will take a joining report in duplicate from the person concerned and allow him to join. One copy of the joining report, with the endorsement as “May be Accepted” is to be sent to the Central Office for submission before the Director and record and another to be kept in the Administrative Office of the unit. A specimen joining report format is given in **Annexure G**.

The Administrative Office will also inform the Finance Department regarding the date of joining either by sending a copy of the Joining Report or through letter.

B. The employees will submit a declaration in the following format along with the joining report.

FORMAT

This is to declare that to the best of my knowledge and belief I do not have any relative working in the organization as employee or connected as contractor / vendor / supplier or existing in the office as a member of the Governing Body of Sabuj Sangha.

Or

As employee or connected as contractor / vendor / supplier or existing in the office as a member of the Governing Body of Sabuj Sangha I declare that the following person/s working in this organization is/are related to me.

| Sl. No. | Name | Designation | Unit | Relation |
|---------|------|-------------|------|----------|
| | | | | |

It is further declared that the above relation will not affect or influence my conduct as an employee or the work of the organization or the mutual official relation between us in any way.

Signature of the employee

Date:

Designation _____

Name of the Project / Programme _____

15. Declaration by GB Members in the event of new appointment of staff

When a new Governing Body Member will be elected, for the first time, the In-charge of the Registered Office at Nandakumarpur will ensure collection of the following declarations.

The Governing Body Member will submit a declaration in the following format after being elected as a member and before the first meeting of the G. B.

FORMAT

This is to declare that to the best of my knowledge and belief I do not have any relative working in Sabuj Sangha or is engaged as a contractor/vendor/supplier by Sabuj Sangha.

Signature of GB Member

Date :

Name :

Or

A

I declare that the following person/s working in this organization is/are related to me.

| Name of the employee | Designation | Unit | Relation |
|----------------------|-------------|------|----------|
| | | | |
| | | | |
| | | | |

B

I declare that the following person/s engaged as contractor/vendor/supplier is/are related to me.

| Name of the vendor/supplier | Designation | Unit | Relation |
|-----------------------------|-------------|------|----------|
| | | | |
| | | | |
| | | | |

It is further declared that the above relation will not affect or influence the work of the organization or the mutual official relation between us in any way

Signature of the G. B. Member

Date :

Name :

16. Employee's Profile

Immediately after joining of a person the concerned Administrative Office will request him to fill up and submit a "Employee's Profile" form, (**Annexure H**) which is to be kept in the employee's personal file.

17. Induction training for the new employee:

i) There should be a provision for Induction training (where ever necessary) at the beginning of the service in Sabuj Sangha. It is a process by which a New Employee settles down in the new surroundings. It is a Welcoming Process.

ii) Objectives:

- a) I.T. should include to orientation about the organisation's policy, practices and purpose.
- b) It should enable them to understand to whom they should report, if they have certain difficulties, to whom to report on the progress and problem of implementation of the projects and such other matters felt necessary.

iii. STEPS of Training:

- General orientation by Administrative machinery.
- Specific orientation on Job by the Job Supervisor.
- Follow up orientation by Line Manager/ Job Supervisor.

iv. Components of training:

- a) Structure of the organisation including various units performing and their inter-relationship.
- b) Organisational culture.
- c) Significance of the Job.
- d) Duties to perform.
- e) Future scope.
- f) Job satisfaction.
- g) Policies, Rules & Regulations of the Sangha.
- h) Payment date & procedure for being paid.
- i) Expectations of the organisation.
- j) Field work and visit.

Adequate subjects may however be included in the training course as it will be found necessary for the concerned post.

v. The following actions are to be taken before starting a training:

- a) A training schedule to be drawn & circulated well ahead of the training date.
- b) Trainers to be selected and informed accordingly.
- c) Selection of venue, procurement of required stationeries & other necessary arrangements to be made beforehand.

18. Identification Letter/Card

The staff of the organisation will be often on field visit – it may be an open street, railway platform, slums etc. Our staffs are dealing with varieties of target groups where they may need to introduce themselves to many agencies like Government sector, Police, Railways, Hospitals and Judiciary, etc.

For this purpose a Photo Identity Card should be issued to each of the staff to facilitate their functioning.

A specimen format for this purpose is provided in **Annexure I** which may be edited suitably if necessary.

19. Appraisal of Performance of Staff

Yearly Appraisal

The organisation always aims at developing its human resource. For this purpose the organisation will make an appraisal once in each calendar year for the period from January to November in respect of each of the employees and the authority will also give an adequate feed back to the employee. The feedback may be verbal or/and written.

The Line Manager will draw up the Appraisal Report of each of the employee under his/her supervision.

Proper marking to be made, out of the total marks noted in the form, on performance report to ensure correct assessment.

The records of appraisal should be kept confidential and will be taken into account in concerned future course of action.

Percentage of yearly increment in pay, incentive, promotion may be determined, on the basis of rating of yearly performance report. The management may fix a rate for this purpose.

The procedure to be followed for this purpose will be as follows.

- a. In respect of all employees the respective Line Managers will prepare for each employee an Appraisal Report in the Form given in **Annexure J**, and submit the same to his next higher level by 5th December, each year, who will in turn put his remarks on the report and forward it to the next higher level immediately so as to reach the Regional Manager by 12th December. All concerned will ensure that the reports reach RM by the stipulated date.
- b. The RM will, after putting his comments send all the reports submitted to him according to the above procedure to the Central Office by 15th December
- c. The Central Office will put marks on the appraisal reports as per pre-determined procedure and put up to the Director for perusal and observation.
- d. An Organogram of the organisation to be followed for this purpose is given in **Annexure K**.

20. Self Appraisal

The organization may also introduce the system of Self Appraisal upto a particular level of senior employees. The procedure mentioned below may be followed for this purpose.

- a. The employee will prepare a Self Appraisal Report for the period from January to November in the Format as per **Annexure L**, and submit the same to the Line Manager by 5th December, each year.
- b. The Line Manager will prepare a Appraisal Report for each of the above employee in the form given in **Annexure J** and submit the same together with the a above, of the respective person, to the immediate higher level by 10th December, each year.
- c. The Project / Programme head will forward the above Appraisal Reports with their comments to the Regional Manager by 12th December, each year
- d. The Regional Manager will forward the above with his comments, if any, to the Central Office by 15th December, each year.
- e. The Central Office will compile the reports as mentioned above in the form given in **Annexure M**, and place the same to the Director for his perusal and observation.

21. Running Appraisal

A Running Appraisal may however be made anytime in the year for an assessment of performance as and when required. Some points which may be used as a checklist is given in **Annexure N**.

22. Exit Strategy

The organisation, should also ensure that the staff who was associated with the organisation leave with proper dignity and honour.

The following points should be kept in view in such cases:-

1. The organisation will ensure that the employee submits a resignation letter stating the reason of leaving.
2. The employee resigning should sit with the Head of the organisation to express employee's experience during stay and also at the time of leaving.
3. The feedback received through the above Exit Interview, should be taken into account for future guidance and planning.
4. The dues of the employee should be cleared as soon as possible. Any amount/ material due from the employee should also be recovered before leaving.
5. A certificate of experience if desired should be issued to the employee.
6. A letter of acceptance of the resignation to be issued to the employee.
7. Above all, after resignation also, the organisation should maintain a cordial relation with the ex-employee and remember his/her contribution in the work of the organisation.

23. Employees Welfare Scheme

- A. The organization as a welfare initiative may take measure, introduce schemes for the benefit of the employees. Such schemes may be Employees' Provident Fund, Public Provident Fund, Contributory Provident Fund, Health Insurance, Payroll Savings, or any other system of similar nature.
The employees (consultants, contractual agencies, daily / casual labours, or similar workers will not come under such scheme) will have to participate and contribute towards the schemes in the manner that will be prescribed for the purpose by the authority or statutory provisions in this regard.
- B. The organization may also introduce and create a fund with contribution from the employees in prescribed rate and the organization will also contribute proportionately to create the fund for welfare activities and giving assistance in financial emergency of the employees.

24. Study Leave

- a. An employee may apply for study leave, as will be required for the particular course of study and the authority may sanction such leave if that is found proper and beneficial for the organization.
- b. However, the employee will have to give a written understanding that he/she will join the organization after enjoying the leave and continue at least for a period to be determined by the authority.
- c. The present contract of the employee may be extended for a further period equal to the study leave if the authority so desires.
- d. The period of study leave will be without any sort of pay allowance or any other facility.

25. Scholarship for Employees and their family

- a. The organization can sanction a scholarship to an employee if applied for, for any training or study to enhance his/her qualification, experience or expertise.
Provided that such training / study will be used by the employee in discharging duties in a better way and will be beneficial for the organization.
- b. However, the employee will have to give a written understanding that he/she will continue in the organization after the study and stay at least for a period to be determined by the authority.
- c. The organization may sanction one time or regular scholarship to the selected children of the employees, who are of outstanding merit, keeping in view the economic condition of the family where monetary support is essential.

26. Superannuation

- a. The age of superannuation of the employees of the organization will be on attaining 60 years.
- b. However, the authority if considers necessary and the person is found otherwise fit and willing, may retain that person upto the age of 65 years by giving extension of contract or appointment or making a new one for one year at a time.

- c. For both a and b above, the age of employee will be calculated on the basis of the certificates submitted by him at the time of joining the organization and kept in the office.
- d. The date of such superannuation will however be on the last day of the English calendar month in which the employees date of birth falls. For example, if the date of birth is 21.03.1963, then he/she will retire on 31.03.2023.

27. Death of Employee in service

Sometime, the organization may have to face unfortunate death or permanent incapacitation of an employee during the service period leaving the family in economic distress.

In such cases, the organization after assessing the financial condition of the family, may as a special case, employ one of the members of the employee's family who will support the family. Job to be offered in this case will be according to the qualification, experience, etc. of the person and requirement of the organization.

28. Attendance, Holidays and Weekly Off days

- a. Attendance – Every unit office of the organization, will in a circular notify the office hours and break time in an office day, to be followed by the employees attached to the respective units. The circular may be issued centrally or by the unit head, which will be in force until revised otherwise.
- b. Every unit office of the organization, will in a circular notify the weekly off day/s and/or time to be followed by the employees attached to the respective units. The circular may be issued centrally or by the unit head, which will be in force until revised otherwise.
- c. All the offices of the organisation will remain closed on a number of days in a year which will be notified by Central Office the organisation as holidays.
- d. The Central office by the third week of December each year will notify a list of Holidays which will fall in the next calendar year, with the prior approval of the Director. The list shall be published at the Central as well as the regional and branch offices for information of the employees and public.
- e. On the Foundation Day of Sabuj Sangha, i.e. 12th December, each year, the offices of the organization will remain closed for public business. The employees will however join the programme of observation of the day.

29. LEAVE

- a) The employees of Sabuj Sangha will be entitled to leave under the following heads, detailed clauses of which are given thereunder.
 - A. Casual leave
 - B. Earned leave

- C. Medical leave
- D. Maternity leave
- E. Special leave

- b) Leave admissible to an employee will be calculated for one Calendar year only and no balance will be carried over to the next year.
- c) In all cases of leave, prior application from the employee is necessary. Holidays / off days within the leave period of any type will be counted as leave.
- d) Applications for all types of leave should be made through proper channel.
- e) Leave cannot be claimed as of right. Any leave at any time can be refused by the authority if that is necessary in the interest of the organisation.
- f) In case of an emergency if the authority considers it necessary, any employee on leave can be called back and asked to join duties.
- g) The authority can at any time change the leave rules if found necessary in the interest of the organisation
- h) A table showing the leave sanctioning authority is provided in **Annexure-O**, which should be followed in all cases.
- i) A model application form for Casual/Medical/Earned leave is given in **Annexure P**.

A) CASUAL LEAVE

- a. Casual leave granted to an employee in any one calendar year shall not exceed 10 (ten) days. The leave entitlement will however be proportionate to the actual service period of the employee in that particular year.
- b. Casual leave shall not be granted for more than 4 (four) consecutive days. However Sundays, Saturdays (where it is off day) and holidays can precede or follow and shall not be counted as a part of the casual leave.
- c. Casual leave on both ends of holidays or off days, at a time shall not be granted and in such cases of absence, the entire period shall be treated as leave period.
- d. Application for casual leave should be made prior to proceeding on leave. However if that is not possible, information about the absence should be given immediately and application to be given on the joining day after leave.
- e. A register to be maintained for keeping Casual leave account as per **Annexure Q**.

B) EARNED LEAVE –

The management of Sabuj Sangha may introduce system of Earned leave if found suitable. In that case, the same will be governed by the following procedure:

- a. Earned leave granted in any Calendar year shall not exceed 10 (ten) days. The leave entitlement will however be proportionate to the actual service period of the employee in that particular year.

- b. Application for Earned leave shall be made at least 7 (seven) working days before the commencement of leave, except in very special circumstances.
- c. Holidays can be prefixed or affixed to Earned leave and shall not be counted as a part of leave.
- d. A register to be maintained for keeping Earned leave account as per **Annexure R**.
- e. The authority can introduce a system of payment of Cash equivalent to salary for the Earned leave in credit of an employee at the close of a Calendar year. The employee shall have to apply for the encashment and may be paid after proper verification of office records and leave account.

C) MEDICAL LEAVE

- a. Medical leave may be granted upto 10 (ten) days in a Calendar year. The leave entitlement will however be proportionate to the actual service period of the employee in that particular year. Medical Certificate of fitness shall be produced on the date of joining, if Medical leave is taken for more than 3 (three) days, failing which the same will be adjusted to other leave in credit.
- b. Holidays can be prefixed or affixed to the Medical leave and the same will not be counted as leave.
- c. The office should be informed forthwith regarding the Medical leave if that is not taken by applying before commencement of leave.
- d. A register to be maintained for keeping Medical leave account as per **Annexure S**.

D) MATERNITY LEAVE

- a. A female employee may be granted Maternity leave for a period of 120 (one hundred twenty) days. Full pay/remuneration shall be paid during this period of leave.
- b. The Maternity leave shall not be debited against any other leave account.
- c. Maternity leave can be combined with any other leave.
- d. Maternity leave shall be granted only on production of Medical Certificate from a registered Medical practitioner. A certificate of fitness from a registered Medical practitioner shall also be produced on the date of joining to the duties after expiry of such leave.
- e. No Maternity leave shall be granted for more than twice during the entire service period of an employee.
- f. An employee with yearly pay/remuneration upto Rs. 60,000 can apply for financial assistance from the Staff Welfare Fund if she needs more leave as per Medical advise and having no full pay leave in her credit.
- g. Proper records of this leave should be kept in the personal file of the employee.

E) SPECIAL LEAVE

- a. Special leave may be granted to an employee in an extraordinary circumstance when no other leave is admissible or though some other leave is in credit, the employee applies in writing for grant of Special leave.
- b. Special leave may be granted upto 90 (ninety) days on any occasion.
- c. The employee shall apply for Special leave at least 15 working days before the commencement of leave.
- d. No pay/remuneration shall be paid during the period of Special leave.

- e. The period of Special leave shall not be counted in the contract/agreement period. The contract/agreement period may be extended upto the period of Special leave if the authority so decides.
- f. Proper records of this leave should be kept in the personal file of the employee.

30.Appointment of Director, Additional Director and Deputy Director of the Organisation

- a) The Governing Body in consideration of the volume of work of the organization may appoint one full time Director who will be the chief functionary of the organization and accountable to the Governing Body. The Director will be responsible for overall functioning of the organization, mobilization of fund, implementation of projects, meeting requirement of the Donors, observing statutory formalities and all other actions & arrangements necessary for smooth running as a NGO.
- b) The Governing Body may decide to appoint one Additional Director and one or more Deputy Director/s if in their consideration the volume of work & circumstances so demands.
- c) The Director may by an office order authorize / empower / vest such of these duties, power, and authority, to the Additional Director or Deputy Director as he / she will find necessary and proper for functioning of the organization. Copy of such office order shall be communicated to the President of the Governing Body and all subordinate offices of the organization.
- d) The President of the organization will sign the aforesaid appointment orders of Director and Additional Director on behalf of the Governing Body. The appointment letter of the Deputy Director/s will be signed by the Director.
- e) Persons holding the posts mentioned above can be paid remuneration on monthly basis which will be fixed every year considering the fund input position for the work of the organisation and other related circumstances.

31. Formation of Committee(s)

- a. Sometime it may be necessary to Form one or more Committee/s for smooth functioning of the organisation or implementation of a particular project.
- b. The GB or the Director of the organisation will assess the necessity of forming such Committee(s) and are empowered to constitute the same with such number of members, to be nominated by him, as he will find proper for the purpose and vested with such powers as may be found necessary for accomplishment of the job.
- c. Such committee/s will monitor, evaluate and issue instructions to the working/implementing personnel in such manner as they will find proper & necessary. In each case one of the members of the Committee will act as convenor of the same.
The Committee will also keep the Director adequately posted of the progress of the work, its findings and measures suggested.

32. Core Committee

a. It is preferable to form a CORE COMMITTEE (the name is suggestive) or such other committees at each of the units of Sabuj Sangha and at Central level for smooth functioning & progress of the organisation.

b. The Director of the organisation is empowered to constitute such Core or Other Committee/s with such number of members, to be nominated by him, and vested with such powers as may be found proper for accomplishment of the purpose.

c. The committee will formulate the procedure and policy to be followed in day to day functioning of the unit, monitor and ensure smooth and timely implementation of the projects, solve problem, if any arises, draw up project proposals and also take up any other work that is felt necessary in the interest of the organisation. The Committee will also do such other work as and when will be entrusted to it.

33. Conflict Resolution

During discharge of day to day duties, the employees may have conflict with their colleagues and/or Supervisors or any other official, though it is not desirable. In such cases the employee concerned may approach and inform his supervisor/ immediate superior of his supervisor, as the case may be, verbally or in writing for resolution of the conflict.

The person so approached may however ask for a written statement on the conflict if finds it necessary.

The person to whom the conflict is reported will see that the conflicts are dissolved mutually and in case unable to do so, may seek instruction/intervention of immediate superior.

34. Grievance Redressal

Employees in course of their service may have some grievance for some reason. In such a case the employee concerned may inform regarding such grievance to his/her immediate superior in writing.

The superior on receipt of such information will find out the reason of the grievance and make all efforts to wipe-out the same. In case she/he is unable to redress the grievance will report it to the immediate superior, who will take adequate action for removing the cause of grievance.

35. Appeal

In cases where in the course of conflict resolution or grievance redressal as mentioned in para 33 & 34 above, any person/s not satisfied with the decision of the person to whom the conflict/grievance was referred to, the former may apply for a revision of the decision to the immediate superior of the person who took such decision. The person before whom such revision petition is filed will take all efforts and adequate action to solve the problem.

Normally, all the conflicts and grievances should be resolved within the level of the Programme Manager and utmost effort should be made by the Programme Managers in this regard. Only in very exceptional cases, the unresolved conflicts/grievance may be referred to the Director for decision.

In all such cases as mentioned above the decision of the Director will be final.

36. Appeal to the Governing Body

In exceptional and highly important cases an appeal may be preferred before the Governing Body of the organisation by any person who feels aggrieved by the decision of the Director. The Governing Body may accept or reject any such appeal without showing any reason whatsoever.

The Governing Body for the purpose of hearing such appeal may form an “Appeal Hearing committee” with the President as its Chairman and two other members.

On acceptance of the appeal the decision of the Governing Body/Appeal Hearing Committee will be final and binding on all concerned.

37. Transfer:

- A. In the interest of the work of the organisation an employee may be transferred (with or without change of Head Quarter) from (i) one Project / Programme to another, (ii) one place to another within the area of same unit or (iii) from one unit to another covering the entire area of operation of the organization. The change will not affect the pay or facilities (if the same is available in new place of posting also) enjoyed by the employee.
- B. However an employee may also seek such transfer in his own interest for which they will have to apply in writing. The authority may allow or reject such request without showing any reason.
- C. An employee will be allowed joining time on transfer. The joining time will however be determined on the distance between the present and new place of posting as noted hereunder
 - a. For (i), time taken for movement to new place of posting
 - b. For (ii), time as (i) plus one day
 - c. For (iii), within the district, same as (b). Out of the district (a) plus 3 days.
- D. An employee on transfer will be entitled to get transfer travelling allowance as per scale mentioned in the T.A. rules.

38. Resignation:

- a) An employee may desire to quit the organisation at the end or any time during the agreement/appointment period. As per agreement/appointment letter an employee is required to give one month (30 days) notice before the stipulated date of termination.
- b) The resignation letter of all employees in the rank of Programme Associate and above should be addressed to the Director and submitted to the respective Line Manager. The Line Manager will immediately put his comments on the Resignation letters and forward the same to the respective APM/PM, who in turn will forthwith send the same to the Regional Manager / Unit Head, who in turn will forward the same to the Director for acceptance.
- c) In case of the employees below the rank of Programme Associate the resignation letter should be addressed of the Programme Manager and submitted to the Line Manager. The Line Manager will put his comments on the resignation letter and immediately forward the same to the APM/PM, who will take appropriate action.
- d) Before forwarding the resignation letter as per (b) above to the Director it should be checked and confirmed whether the employee has any advance, loan or any other dues recoverable from him. The RM or Unit Head must ensure that a note to this effect is given on the body of the same by the programme end and finance section.
- e) In cases noted in (c) above the same procedure as (d) above should be followed by the APM/PM.
- f) All actions in this regard should be taken as quickly as possible so that immediate steps can be taken for filling up the resultant vacancy.
- g) The organisation may realise one month's pay from the employee in case the clause of one month's notice is not obeyed.

39. Promotion/Incentive

- a. The organisation if any time considers necessary and proper may promote an employee to a higher post with or without higher pay and facilities.
- b. The organisation may also sanction one time financial incentive or increase in monthly pay in favour of an employee as a recognition of extraordinary services rendered by him and/or notable achievement.

40. Adherence to Rules

The management, consultant, agencies, employees and others associated with the organization must obey, follow and act according to the rules, regulations, circulars, orders, etc. of the organization and apply common intelligence and show proper interest as should be expected of them in course of discharging official duties and obligations.

41. Disciplinary Action and Penal measure

- a) The organisation may take Disciplinary and/ or Penal measure, if the situation so demands, against an employee if he/she is found guilty for any action / inaction which stand in the way of the activities and smooth running of the organization or wilful breach of trust or/and discipline.
- b) Such action/inaction may be as not following terms & conditions laid down in the contract/agreement document or appointment letter as the case may be or wilful violation of rules/ regulations/ policies/ orders/ circulars, cessation of work, not obeying instructions of the superiors, not performing as required, wilful negligence of duties, any behaviour or gesture not conducive to the image of the organisation.
- c) In such cases the employee concerned is to be asked to explain his/her conduct and show cause in writing why proper action will not be taken against him/her. The employee may also be heard in person if considered necessary by the authority.
- d) When after considering the written and/or verbal explanation an employee is found guilty of such fault, the employee will be subject to punishment which may extend up to non-payment of pay, termination or non-renewal of agreement/ Contract / Appointment and / or action as per law of the land.
- e) The Director is authorized to take all actions in all cases as let down in these clause. The Director may however authorize any other official to take such action in regard to the employee subordinate to the authorized official.

42. If at any time any problem/ situation whatsoever arises which is not explained or mode of action to be taken is not laid down here in this policy, the Governing Body is empowered to guide, give clarification and decide on the issue. The decision of the Governing Body will be final and binding, unless it is against any law of the land, on all concerned.

Annexure A
Para 7 (d)

Sabuj Sangha
Requisition for Staff/ Junior Staff

| Sl. No. | Name of the Project | Duration of the Project | Name of the Post | No. of vacancy | Name of the Project for which required | Place of Posting (HQ) | Qualification required | Experience required | Whether to be recruited centrally or locally | Source of fund | Any other point necessary to be considered for recruitment |
|---------|---------------------|-------------------------|------------------|----------------|--|-----------------------|------------------------|---------------------|--|----------------|--|
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |

Approved
Necessary steps may be taken for recruitment.

Director

Signature of the Project In-Charge

Designation

Name of the Project

Sabuj Sangha

Appointment of Staff

Preferable Qualification/ experience for some posts (Suggestive)

a) Project Coordinator:

- A Master degree in Social Science/ English.
- Minimum 2 years of experience in development sector.
- Capable of handling different projects independently.
- Must be a computer literate.
- Good documentation skill is a must.
- Attitude and age should be appropriate.

b) Assistant Project Coordinator:

- Master degree in Social Science/ English or Graduate with minimum 3 years experience in development sector.
- Must be a computer literate.
- Good documentation skill is preferable.
- Candidates having no experience will have to undergo a Trainee period of at least six months.
- Candidate having some experience will have to undergo a trainee period of at least three months.

c) Programme Associate:

- Graduate.
- Computer operating knowledge is preferable.
- Right attitude towards the work is very much required as they will be front-line soldiers.
- Concept/ Exposure of social service will be appreciated.
- If experienced candidate is available, then direct appointment can be made.
- Otherwise, they will have to undergo a Trainee period of three months.

d) Volunteer:

- Young energetic person residing within the locality.
- Minimum Qualification necessary is School final or equivalent.

**Sabuj Sangha
Appointment of Staff**

**CONTRACT OF EMPLOYMENT
(TERMS AND CONDITIONS)**

PARTIES OF THE CONTRACT

Employer : SABUJ SANGHA

Village & P.O. – Nandakumarpur
Dist. 24 Parganas (South)
West Bengal

Employee :

Name:

Address:

1. A Contract is hereby executed between Sabuj Sangha (Hereinafter called the “Employer”) and Sri _____, son/daughter of _____ (Hereinafter called “Employee”) in consequence of that Sabuj Sangha was in need of a suitable employee and the latter offered himself/herself for the post in agreement with the terms and conditions laid down below.

2. DESIGNATION

The designation of the employee for the job will be _____ in the rank of _____

3. PLACE OF POSTING

The place of posting of the employee will be at the office of Sabuj Sangha at _____ (Head Quarter) and the area of work will be the Project area in which the employee will be placed on duty. However the employee may be transferred from the present place of posting to another place within or outside the present unit/region with a changed headquarter and working area if found necessary by the authority in the interest of the organization.

4a. PERIOD OF EMPLOYMENT

The appointment is a full time assignment. The present contract is from _____ to _____. However the present contract may be revised suitably before its expiry and may also be extended further if the services of the employee found satisfactory and mutually agreed upon.

There will be a probation period of ____ months from the date of joining. The authority reserves the right to terminate the contract within or at the expiry of the probation period if they find it necessary in the interest of the organization. The employment will however continue as usual if nothing on the contrary is informed to the employee. *

4b. The employee will not be authorized to accept or perform any assignment from any outside agency (other than Sabuj Sangha) in the form of consultancy, part time job, occasional/ periodical work paid or honorary or otherwise during the period of the present contract.

5. WORKING HOURS

The working days & hours of the employee will be the same as of the Head Quarter office. However the employee may have to attend duties on holidays or beyond working hours if situation so demands.

6. CODE OF CONDUCT AND DISCIPLINE

6a. The employee will have to abide by the code of conduct and discipline imposed by the Organisation from time to time.

The employee will not either during the continuance of this employment or thereafter except in the proper course of employee's duties as _____, divulge to any person whomsoever and will use employee's best endeavour to prevent the unauthorized publication or disclosure of any confidential information concerning the working of the organization or any of its dealings, transactions or affairs which may come to the employees knowledge during or in the course of employment and will not during such employment be concerned or interested, directly or indirectly, except as the official of the organization in the business of the employer .

Contd...2

*NB – This para is for an employee appointed in a post for the first time.

- 6b. If at any time during the present employment, the employee is found guilty of any misconduct or breach of terms of this agreement or loses confidence of the employer, the authority may terminate the employment forthwith without any notice or payment in lieu of notice.
- 6c. The employee should never take away any hard or soft copy of office document/s/records/registers in any form from the office without the prior permission of the Director
- 6d. Copy of all communication made with any authority/agency by the employee in the official capacity of the organisation should be kept in the respective office file and a soft copy in the computer as well.
- 6e. The employee will be required to furnish declarations at the time of joining the organization disclosing whether any relative of the employee is in the GB of the organization or working as an employee or as a vendor/ contractor engaged by the organization in the proforma prescribed for the purpose.

7. ADHERENCE TO RULES AND REGULATIONS

The employee must obey, follow and act according to the rules, regulations, circulars, orders, etc. of the organization and apply common intelligence and show proper interest as normally expected from an employee of his level in course of discharging official duties and obligations.

8. REMUNERATION

- a. The employee will receive a Consolidated Remuneration of Rs. _____ (Rupees : _____) only per month. However deductions will be made from the monthly gross salary towards statutory taxes as per scheduled rates. The attendance and performance of the employee will also be taken into account before sanction of the payment.
- b. The employee will have to compulsorily subscribe/deposit at the rate as will be prescribed for the purpose, to the Provident Fund, Health Scheme, or any other staff welfare scheme or fund as maybe introduced by the organization.

9. LEAVE

The employee will be entitled to all kinds of leave will be as per leave rules of the organization.

10. TRAVELLING ALLOWANCE

Smooth implementation of the project activities will require extensive traveling. The expenses incurred for such travelling will be reimbursed as per TA rules of the organization, on submission of bills in the office.

11. LINE MANAGER

The Line Manager of the employee will be the _____ under whose direct supervision the employee will work and also report on the progress of work from time to time.

12. NOTICE FOR TERMINATION OF CONTRACT

The employee is required to give one-month notice in advance in case the employee wants to quit the organisation. The employee will also have to seek written permission from the Secretary/Director in advance, for applying for any other job during the stay in the present employment. The organisation also reserves the right to terminate the contract at any time with proper notice of one month in advance. Prorata deduction or payment will be made if the notice period from either side be less than one month.

Secretary / Director

Date: _____

Read, Accepted and Signed

(_____)

Date: _____

Annexure D
Para 10 D

Sabuj Sangha
Appointment of Staff

Date: ____/____/____

Name:

Address:

You are hereby appointed to the post of _____ under the following terms and conditions:

1. This appointment is being made purely on temporary basis in line with the duration of the specific requirement of the Project/Programme (for which the employee is appointed) which being time bound may not be extended beyond the date of termination as specified in this letter.
2. The appointment will take effect from the date of joining in the post and will automatically terminate on _____. The engagement may, however, be extended if required, for the same or any other Project/Programme provided the services rendered are found satisfactory and mutually agreed upon.
There will be a probation period of ____ months from the date of joining. The authority reserves the right to terminate the contract within or at the expiry of the probation period if they find it necessary in the interest of the organization. The employment will however continue as usual if nothing on the contrary is informed to the employee.*
3. The place of posting will be at the _____ office (headquarter) of Sabuj Sangha and you will be required to go to the field as demanded by the Project/Programme work.
4. The working days & hours will be as per the norms of the unit office where you are posted. However, you may have to attend duties on holidays and/or beyond normal working hours, if situation so demands.
5. You are expected to abide by the code of conduct & discipline followed by the organization. The appointment may be terminated any time without any notice whatsoever if the employee is found to be guilty of any misconduct or breach of trust & confidence of the organization.
6. (a) The consolidated remuneration of the employee will be Rs. _____ (Rupees: _____) only per month. However, necessary statutory deductions will be made, if applicable.
(b) The employee will have to compulsorily subscribe/deposit at the rate as will be prescribed for the purpose, to the Provident Fund, Health Scheme, or any other staff welfare scheme or fund as maybe introduced by the organization.
7. The entitlement of leave will be as per leave rules of the organization.
8. Line Manager of the employee will be the _____.
9. The employee is required to give one month's notice in writing to the employer before leaving the organization. Similarly, the organization will serve a one month's notice in writing to you in case this appointment is terminated before the date of expiry as mentioned in point no. (2) above. Prorata deduction or payment will be made if the notice period from either side be less than one month.
10. The Candidate should join the post immediately. The offer will be treated as cancelled if the candidate does not report for duty at the H.Q. office within 15 (fifteen) days from the date of issue of this letter.

Accepted

Signature:

Director
Sabuj Sangha

*NB – This para is for an employee appointed in a post for the first time.

**Sabuj Sangha
Appointment of Staff**

Duties and Responsibilities of Certain Workers of the Organization

Sabuj Sangha is implementing several development programmes / projects under organization's planning and leadership.

While there are a number of posts already in existence, some others are also created at different levels as per requirement of the programme / project.

In the table below the general and common duties and responsibilities attached to the particular post are enumerated for information of all concerned.

The table is not comprehensive and to be taken as a guideline. Further change, addition or alteration may be made as and when it will be required.

All employees of this organization should follow and comply with the contents of the guidelines enumerated below.

Programme Manager

1. Overall responsibility for programme implementation – in time ensuring proper quality
2. To draw up action plan for the whole year.
3. Mobilize and guide project coordinators in planning and monitoring and programme activities.
4. Create good understanding for management of programme and sharing of duties and responsibilities with Asst. Programme Manager.
5. Provide guidance, suggestion to other team members from time to time
6. Monitor the programme and discussion with the team members
7. Field visit and inspection. To solve field level problems in implementation of programme
8. To make periodical meeting / discussion / review with the entire team on the physical / financial target and time schedule related to the programme
9. Strong Coordination with finance and ensure proper flow of fund
10. To follow up MIS and analyse the same
11. To do and ensure that proper documentation work and database work is done
12. Preparation of report for the donor and management
13. Coordinating with the donor agency in programme related matters as and when required
14. Periodical meetings with the donor, director and other management team members to review the progress and problems of programme implementation
15. Attend donor / government level meetings for stakeholder support

16. To draw up new project proposal
17. To take part in preparation of Annual Report of the organization
18. To find out new concept and advocacy with government, NGO, funding agency at state and district level
19. Administrative matters related to programme and annual / mid-term staff quality assessment
20. Reporting of vacancy and initiative for recruitment
21. Any other duty as and when entrusted

Assistant Programme Manager

1. To assist Programme Manager in all respect
2. To attend all work shown under Programme Manager's head as per her/his instruction and guidance
3. To perform all the duties and responsibilities of the Programme Manager in her/his absence
4. Any other work as and when entrusted

Project Coordinator / Project Officer / Coordinator

1. Overall responsibility for implementation of the programme at her/his sector in time with desirable quality
2. Provide guidance, suggestions to the facilitators and community mobilize for better service delivery
3. Monitor, visit, inspection of the work of field level implementation of project work as many times as possible and discuss the facts with the Asst. Project Coordinator and give feedback to Programme Manager / Asst. Programme Manager, as applicable
4. Periodical meetings / review with the team members on the progress of work and ways to solve emerging problems
5. Follow up of MIS and collection of periodical reports
6. Responsibility for preparing monthly report for the donor and for the management in consultation with Programme Manager / Asst. Programme Manager
7. Coordinating with other linking sectors of the programme from time to time for holistic integration of the programme
8. Provide regular feedback to upper level through timely submission of reports and discussions
9. Attend Block level meetings for stakeholder support and sensitization
10. Any other work as and when entrusted

Assistant Project Coordinator

1. To assist Project Coordinator in all respect
2. To attend all work shown under Project Coordinator's head as per her/his instruction and guidance

3. To perform all the duties and responsibilities of the Programme Coordinator in her/his absence
4. Any other work as and when entrusted

Community Mobilizer

1. Responsible for making public contact and mobilizing community of the allotted area for meetings at village level as well as Panchayat / Block level for developmental programme
2. Periodical reporting to the Coordinators of different sectors about the problems faced and follow up for remedial measures.
3. Preparation of a monthly report as per MIS and other proforma, if any
4. Strong coordination with Cluster and Federation SHG members to understand their perception and involvement in the process of development
5. Linkage with the Panchayat members to motivate and mobilize government resources through appropriate planning
6. Any other work as and when entrusted

Field Worker / Volunteer

1. Establish good relation with community people, beneficiaries, Panchayat and other organizations functioning in the area
2. Make the people aware and interested in organization's development programme and organization's mission, good practices, etc.
3. Motivate people for participation in project work
4. Regular visit of project work site and meet with beneficiaries
5. Implementation of project work as per instructions and guidance of supervisors
6. Reporting on project work
7. Conflict resolution among the community / beneficiary. To inform the supervisor about the same and seek her/his intervention if cannot be resolved locally
8. Any other work as and when entrusted

Annexure F

Para 11 (b)

Sabuj Sangha Renewal of Contract

Record of Renewal of Agreement/Appointment

Name of the Employee:

Post:

| From (date) | To (date) | Remuneration per year (Rs.) | Signature of the Unit Head |
|--------------------|------------------|------------------------------------|---------------------------------------|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Annexure G

Para 14 (a)

Format of Joining Report of Employees

To
The Director
Sabuj Sangha

Through.....

Sir,
In pursuance of your appointment letter no. _____ /Agreement
dated _____ I beg to report for duty as
_____ at _____, today, the
_____ in the forenoon/afternoon.

This may kindly be accepted as my joining report and oblige.

Yours faithfully,

(Signature of the employee)

Designation :

May be accepted, forwarded to the Director

Accepted

Director

(Signature of local office head)

Designation

SABUJ SANGHA**Employee's Profile**

1. Name :
2. Designation :
3. Father's / Mother's / Husband's name :
4. Present Postal address: Vill-.....P.O.-
Dist.-.....Pin-.....
Telephone No.:.....Mobile No.:.....
5. Permanent address: Vill- P.O.-
Dist.- Pin-.....
6. Telephone No.: Mobile No:
7. Date of Birth :
8. Marital Status : Married / Unmarried
9. Academic Qualification :
(Enclose copy of Certificate of last exam)
10. Other Qualification :
(Enclose copy of Certificate)
11. Working experience before joining Sabuj Sangha: a) Period: from to
b) Post (worked as):
12. Date of joining Sabuj Sangha:
a) Date:
b) Post at the time of joining:
13. Present post held:
a) From date:
b) Post (working as):
c) Name of Project/ Programme:
d) Place of posting:
14. Present Agreement a) Period: from to
b) Remuneration per year: Rs.....
15. Name of Training/Exposure interested to take which will help to discharge assigned duties:
16. Name, relation and address of nominee:

Signature of DM / UM

Signature of the Employee

Annexure I

Para 18

Format of Identification Letter / Card

Sabuj Sangha

City Office:

30/9, Rajdanga Main Road (East)

Kolkata-700107

Phone: +9133 2441 4357

Stamp
size
Photo

Regd. Office: Vill & P.O.- Nandakumarpur

Dist.- South 24 Parganas

Pin.-743349, West Bengal

This is to certify that Ms./Mr.(particulars noted below),
whose signature is given below is associated with Sabuj Sangha, a non-profit NGO as a
..... (Designation). We are primarily engaged in developmental
activities in the community. For this purpose, the above staff will have to undergo field visits
regularly in our operational area in the district of South 24 Parganas and K.M.C. area /
.....

Son of / wife of

Home address

Mobile No.

Telephone No.

Signature of the Staff

Signature of the Director

Seal of Organization

Sabuj Sangha
Staff Appraisal Report
(Confidential)

Period of Appraisal : _____ to _____

Name of the reporting
Officer :

Designation :

Name of the employee
reported upon :

Present designation :

Date of joining :

Present Salary (per year) :

| Sl. No. | Attributes | Total Marks | Marks allotted |
|---------|---|-------------|----------------|
| 01 | Timely attendance | 10 | |
| 02 | Leave Position | 10 | |
| 03 | Knowledge about present assignment | 10 | |
| 04 | Timely completion of assigned work | 10 | |
| 05 | Accuracy in work done | 10 | |
| 06 | Adaptability to new ideas | 10 | |
| 07 | Conformity with office rules and regulations | 10 | |
| 08 | Obedience to seniors | 10 | |
| 09 | Behaviour with peers and juniors | 10 | |
| 10 | Suitability of performance for the Organisation | 10 | |
| | Total | 100 | |

Indicate any special work done by the employee for the organisation during the appraisal period.

What is his

Weakness -

Strength -

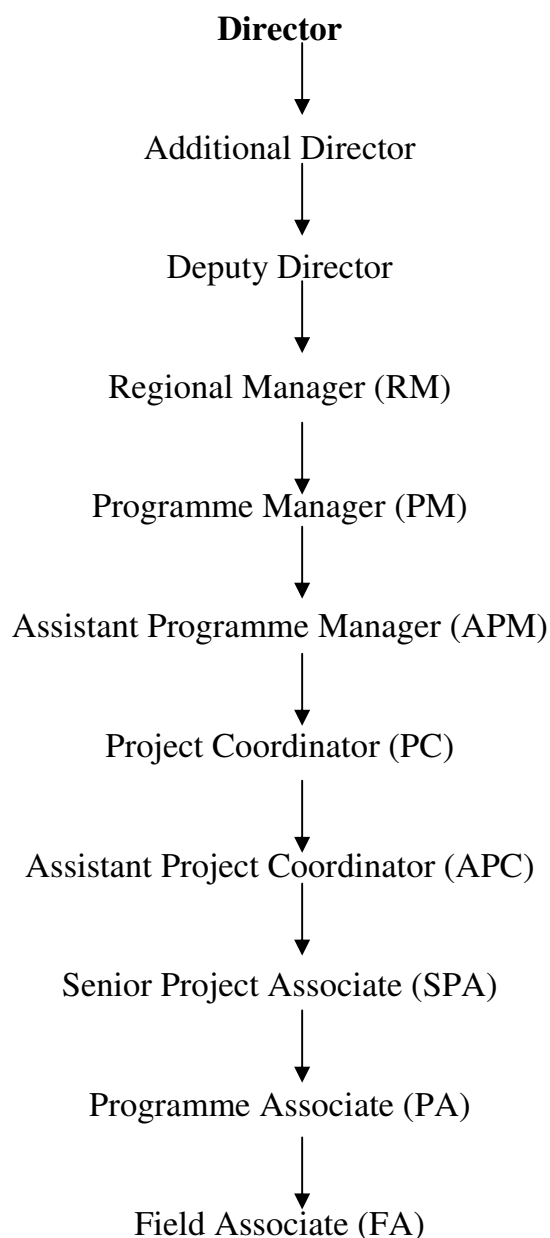
What is his specific requirement in the organisation

Date :

Signature
Designation

Sabuj Sangha

ORGANOGRAM



Sabuj Sangha
Self Appraisal Report
(Confidential)

Period of Appraisal : _____ to _____

Name of the employee :

Date of joining :

Present designation :

Present Salary per year :

Name of his Line Manager :

| Sl. No. | Attributes | Total Marks | Marks allotted |
|---------|---|-------------|----------------|
| 01 | Timely attendance | 10 | |
| 02 | Leave Position | 10 | |
| 03 | Knowledge about present assignment | 10 | |
| 04 | Timely completion of assigned work | 10 | |
| 05 | Accuracy in work done | 10 | |
| 06 | Adaptability to new ideas | 10 | |
| 07 | Conformity with office rules and regulations | 10 | |
| 08 | Obedience to seniors | 10 | |
| 09 | Behaviour with peers and juniors | 10 | |
| 10 | Suitability of performance for the organisation | 10 | |
| | Total | 100 | |

Indicate if there be any special work done by you for the organisation during the appraisal period.

What is my

Weakness

Strength

Date :

Signature
Designation

Sabuj Sangha
Review Committee Report
(Confidential)

Period of Appraisal : _____ to _____

Name of the employee :

Name of line Manager :

Date of joining :

Present Salary per year :

Marks scored : By Self : By Line Manager :

Any special work done :

Any achievement : Positive : Negative :

Employees own : Strength : Weakness :

Recommendations

a. Promoted in the post of

b. Transferred to

c. Sanctioned Increment of Rs.

Member

Member

Member

Director

Sabuj Sangha

Points to be assessed for Running Appraisal (Suggestive)

Date of Appraisal:

Name of the Employee:

Designation:

| Sl. No. | Points | Yes | No |
|---------|--|-----|----|
| 01 | Is the employee a hard worker? | | |
| 02 | Does the employee bother for consuming leaves? | | |
| 03 | Does the employee have good relation with majority? | | |
| 04 | Job knowledge is above average? | | |
| 05 | Job knowledge is below average? | | |
| 06 | Job knowledge is average? | | |
| 07 | Does the employee respect the Organisation's principles and norms? | | |
| 08 | Whether confident in taking decisions. | | |
| 09 | Leads the TEAM inspite of all odds. | | |
| 10 | Sincere in all sorts of assignments. | | |
| 11 | Lacks in planning assignments. | | |
| 12 | Maintains punctuality in coming to work place. | | |
| 13 | Responsive to organisational systems. | | |
| 14 | Does not require constant supervision | | |
| 15 | Handle subordinates' shortcomings with lessons. | | |
| 16 | Community handling capacity and conduct with others is good. | | |

Remarks

Appraisal done by –

Signature

Designation

Annexure O

Para 29 (h)

Leave Sanctioning Authority

| Leave | Category of Employee | Sanctioning Authority |
|-----------------|--------------------------------------|------------------------------|
| Casual Leave | a) Below Unit Manager | Unit Manager |
| | b) Unit Manager | Regional Manager |
| | c) Regional Manager & Central Office | Director |
| Earned Leave | a) Below Unit Manager | Regional Manager |
| | b) Unit Manager & above | Director |
| Medical Leave | Same as Casual leave | Same as Casual leave |
| Maternity Leave | All | Director |
| Special Leave | All | Director |

N.B.:

- a) Change in the sanctioning authority can be made if found necessary by a suitable office circular
- b) Respective leave register to be maintained at the level of leave sanctioning authority.

Annexure P

Para 29 (i)

SABUJ SANGHA
Casual / Medical / Earned Leave Application Form

From

Sri

Designation

Office

To

.....

.....

Sir,

I shall not be able to attend / I could not attend my duties on / from to
..... for the reason mentioned below.

Reason:

.....

Kindly grant me CL / ML / EL for the above period of absence and oblige.

With regards,

Yours faithfully

(Signature)

Designation

N.B.: Medical Certificate to be enclosed for ML of more than 3 days.

(For use in the leave sanctioning office)**Leave Account***

| Type | Entitled | Availed | Granted in the Application | Balance |
|---------|----------|---------|----------------------------|---------|
| Casual | | | | |
| Medical | | | | |
| Earned | | | | |

..... Leave fordays
may be / may not be granted.

Granted / Not granted

Signature of the recommending official

* Necessary entry to be made in the concerned leave register.

Signature of granting authority

Annexure Q

Para 29 A (e)

**Sabuj Sangha
CASUAL LEAVE REGISTER**

Name:

Designation:

| Sl. No. | Period of leave applied for | Purpose | No. of days sanctioned | No. of days in credit after this leave | Remarks | Initial of the sanctioning authority |
|----------------|------------------------------------|----------------|-------------------------------|---|----------------|---|
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |

N.B. Leave account to be closed after every calendar year.

Annexure R

Para 29 B (d)

Sabuj Sangha
EARNED LEAVE REGISTER

Name:

Designation:

| Sl. No. | Period of leave applied for | Purpose | No. of days sanctioned | No. of days in credit after this leave | Remarks | Initial of the sanctioning authority |
|---------|-----------------------------|---------|------------------------|--|---------|--------------------------------------|
| 1. | | | | | | |
| 2. | | | | | | |
| 3. | | | | | | |

N.B.: Leave account to be closed after every calendar year.

Annexure S

Para 29 C (e)

MEDICAL LEAVE REGISTER

Name:

Designation:

| Sl. No. | Period of leave applied for | Purpose | Whether medical Certificate produced | No. of days sanctioned | No. of days in credit after this leave | Remarks | Initial of the sanctioning authority |
|---------|-----------------------------|---------|--------------------------------------|------------------------|--|---------|--------------------------------------|
| 1. | | | | | | | |
| 2. | | | | | | | |
| 3. | | | | | | | |

N.B.: Leave account to be closed after every calendar year.

HR Policy – Part II

Travelling Allowance Rules

1. Entitlement

An employee will need to perform journey to discharge his duties properly. In all that cases the employee will be entitled to reimburse the expenses as per scale mentioned hereunder which will commonly be called as Travelling Allowance, i.e. T.A.

2. TOUR & Travelling Allowance.

- a. All tours should be undertaken with prior permission (can be over phone) of the Supervisor (immediate higher authority).
- b. The Supervisor will determine whether night halt is necessary for the job entrusted and if so the period of halt.
- c. All tours should be recorded in the common Movement Register to be maintained in the office before journey.
- d. Only actual expenses as per admissibility of the employee concerned will be reimbursable for the journeys within the radius of 3 kms of the Headquarter office.
- e. Transport of any kind may not be made available for an employee by the office for any journey.
- f. Transport can be provided to an employee on official tours if available to the local office.
- g. Local HQ office can spare a higher grade vehicle to a staff if found extremely necessary, as a special case.
- h. An employee may make advance requisition for vehicle mentioning date, period of time, place and purpose of journey.
- i. TA bills should contain date, time, place and purpose of journey beside the expenses made for the same. All relevant and supporting documents / receipts should be submitted in original with the authentication of the employee, along with the bill. The bills should be submitted through the respective supervisor of the employee.
- j. TA bills are to be recommended by the supervisor of the employee.
- k. The Supervisor will recommend a bill of traveling allowance only when the journey was undertaken with prior permission.

3. Transfer TA –

- a. An employee will get Transfer TA as & when the employee will be transferred from one place to another causing change of H.Q. The employee will get the actual expenses of transport cost only of the employee's grade for joining to

the new place of posting, where the transfer does not involve change of residence.

- b. Where change of residence is made in effect of the transfer the employee will also be entitled to get a consolidated Transfer Grant amounting to Rs. 500/- or 10% of the employee's consolidated pay, whichever is more.
- c. In cases where change of residence of the employee will be necessary for such transfer, he will also be entitled to get actual expenses of shifting domestic goods.
- d. In cases where the employee on being transferred moves to the new place of posting with his family, there will be an entitlement of getting actual transport cost of the employee's grade for the entire family and actual expense for shifting domestic goods.

4. Advance TA –

- a. In cases of tours involving a considerable large amount and transfer with change of residence, advance TA can be sanctioned. The employee will have to apply for it well in advance stating the place, date, purpose and probable expenditure (in details) of the journey.
- b. Adjustment of all such advances should be submitted to the respective office within seven days from the date of return from the tour or reaching new place of posting in case of Transfer TA.
Bills for such adjustment along with supporting documents in original duly authenticated by the employee concerned, in details, with due recommendation of the supervisor of the employee, should be submitted as per procedure of the office.

5. Payment of T.A. Bill

- a. A T.A. Bill submitted by an employee should be checked properly at the bill passing office and paid as soon as possible.
- b. An employee should submit adjustment of the Advance T.A. taken by the employee immediately after return from tour or arriving new place of posting as the case may be.
The advance disbursing office should remind him adequately if the advance is not adjusted within the stipulated period.
- c. The pay disbursing office of the employee will be authorized to deduct the advance amount from the pay of the employee if the advance not adjusted inspite of the reminder.

6. Grades of Management and Employees for T.A. admissibility:

The management and employees of the organization at different level will get T.A. etc. at different scales. To determine the admissibility at different levels they are divided into 4 grades as follows. The admissibility of any person not covered by the table below will be determined by the region / unit head:

FOUR GRADES

- Grade A: Governing Body Members, Director, Additional Director, Consultants & Guests
- Grade B: Deputy Director, Regional Manager, Doctor, Programme Manager, Additional Programme Manager, Finance Controller, Assistant Finance Controller, Sr. Finance Coordinator
- Grade C: Assistant Programme Manager, Project Coordinator, Assistant Project Coordinator, Supervisor, Accountant, Cashier, Clerk, Technicians, Nurse, Community Mobilizer
- Grade D: Facilitator, Driver, Peon, Cleaner, Cook, Helper, Van Puller

7. TA admissibility

The TA admissibility of different grades as shown in Para (6) above will be as follows:

| Grades | For Food | | Allowance on Tour | | Admissible of Transport |
|--------|----------|------------|--------------------------|--------------------|--|
| | One Meal | One Tiffin | For more than 6 hrs only | For one night halt | Actual expense for Up & Down journey |
| A | Rs. 100 | Rs. 30 | Rs. 50 | Rs. 100 | Air/Rail AC 2T/AC Bus / Launch / Taxi / Rickshaw / Reserved Auto / Reserved Van / Office Vehicle |
| B | Rs. 75 | Rs. 25 | Rs. 40 | Rs. 75 | Rail AC 3T/ Taxi if needed / AC Bus / Bus / Minibus / Reserved Auto / Reserved Van / Launch / Boat / Rickshaw / Office Vehicle |
| C | Rs. 50 | Rs. 20 | Rs. 30 | Rs. 50 | Rail AC 3T (if the entire train is AC) / sleeper / Bus / Minibus / shared Auto / shared van / Motorbike / Boat / Cycle |
| D | Rs. 50 | Rs. 20 | Rs. 20 | Rs. 35 | Rail AC 3T (if the entire train is AC) / sleeper / Bus / Minibus / shared Auto / shared van / Motorbike / Boat / Cycle |

8. Hotel charges:

- a. The employees should earnestly try to halt at unit offices of the organization, with advance information to that effect. The unit heads will look that such accommodation is made available to the employee on tour.
- b. Hotel charges for night halt will be allowed on production of original cash memo / bill of the hotel. However, there will be a restriction on the upper limit of cost of hotel accommodation as below:

| Grade | Other than Metro Cities | Metro Cities |
|--------------|--------------------------------|---------------------|
| Grade – A | Rs. 1000 | Rs. 1500 |
| Grade – B | Rs. 800 | Rs. 1000 |
| Grade – C | Rs. 700 | Rs. 800 |
| Grade – D | Rs. 600 | Rs. 800 |

- c. In very special cases, the Director is empowered to relax the upper limit of the charges mentioned in the table in Para 7 & 8.
9. The admissibility rates and grades mentioned in this rules maybe revised by the Director on behalf of the management from time to time, if found necessary. The Director may however take the views and approval of the Governing Body.

Sabuj Sangha

HR Policy – PART III

Policy on Placement of Staff on deputation for implementation of projects of short duration

In accordance with the decision made by the Governing Body of Sabuj Sangha in its meeting no. 44 dated 19.06.2011, a policy on placement of staff on deputation for implementation of projects of short duration is adopted by the organization.

1. It is being observed from some time past that the organization is getting offer for implementing projects of which some are of short duration. The implementation naturally requires experienced staff and all other infrastructure as needed in other projects. It is more important as no time can be allowed for training of new staff or for their learning through experience.
2. It is also felt that sometime projects are sanctioned late leaving no time to appoint staff after observing prescribed formalities. At the same time in case of projects with very short duration, suitable candidates do not agree to make them available for a short period.
3. The organization also feels that the responsibility of successful implementation of projects is on the organization as a whole with whatever resources it already has and can mobilize.
4. The organization is also of the opinion to take up and implement such projects in the interest of the overall development of the area or/and our target group people.
5. After due consideration of all aspects, keeping in view the interest of proper functioning of the organization, as well as smooth and timely implementation of projects of short duration, it is decided that henceforward following measures will be taken, which will mitigate the problem.
 - a. Assessment to be made regarding the implementing time, number and type of staff required for the project
 - b. Selection of person/s who can be spared temporarily for the above period and purpose, without hampering the work of present assignment
 - c. Person/s mentioned in Para 2 will be placed on deputation to the new project with a new designation and place of posting
 - d. The placement on deputation will not in any way negatively affect the pay, allowance and other benefits, if there is any, as the person was enjoying in the existing post.
 - e. The person so deputed will be placed back to the original posting (or for a better position) immediately on completion of the project where the person was deputed to.
 - f. The arrangement should be implemented by issuing necessary office orders and the concerned administrative and cash sections should be informed accordingly.

- g. Selection of person/s to be made who will cover up the function of the staff so withdrawn and necessary orders with proper instruction to the person should be issued accordingly.
- h. The fund allotted for the purpose of payment of remuneration to such staff should be transferred to the general fund of the organization and disbursed to them from there, which will ensure that their pay is not minimized in any way and are paid in time without depending on the availability of fund from the respective project.
- i. The staff so deputed from the existing projects or specially recruited for the short term project will be governed by all the policies, rules, regulations, orders, circulars in force issued by the organization.
- j. The policy will be treated as a part of the HR policy of the organization and all concerned should take note and act accordingly.

END

Sabuj Sangha

HR Policy – Part IV

Policy for engagement of outside consultants by Sabuj Sangha

1. Sabuj Sangha is engaged in holistic development of the rural and semi-urban areas with multi-dimensional activities. For the purpose of taking up certain activities, the available manpower with Sabuj Sangha and their expertise do not always match the requirement. To tide over such situations, Sabuj Sangha often requires the services of outside consultants / professionals for accomplishment of certain specific jobs.
2. It is not possible for Sabuj Sangha to call for global tenders, or all-India tenders or even all West Bengal tenders for the purpose of engagement of outside consultants as the consultants will have to stay and work in a remote village devoid of many modern facilities of life. Moreover, such consultants should not only have to be competent and sound in their technical knowledge but should also be acquainted with extension work in rural areas and conversant with NGO culture and their activity procedure.
3. In view of the above, it is decided by the Governing Body of Sabuj Sangha that whenever any need for any consultant will arise, the Core Management Team (or any other team/committee in some other name doing the job) will, at the initial stage, discuss and decide in their meeting on the following points.
 - a) Whether the job can be done with existing personnel of the organization or service of a consultant is absolutely necessary;
 - b) The particular job in hand to be entrusted to the consultant;
 - c) The need for technical expertise;
 - d) The possible time needed for the job;
 - e) The possible amount of fees that can be spared, the budget provision in the project or possible source of fund
 - f) Shortlisting names of certain firms / persons who can be engaged for the purpose

4. On the basis of the above short-list, Sabuj Sangha Core Team (or any other team or committee in some other name doing the job) will negotiate with the short-listed firms/persons and finalise the terms of reference (TOR) and recommend the names of proposed consultants in order of priority.
5. The authority will consider the above recommendation along with other relevant points as will be found necessary and appoint a consultant.
6. An agreement to the above effect to be executed or appointment letter to be issued and kept in the office along with a note of acceptance by the appointee. All aspects of the work, time, remuneration and mode of payment, etc. should be incorporated in the above document.
7. In the event of extension or renewal of agreement / appointment of consultants, the past performance, quality of work and fulfilment of requirement of the organization should be taken into account.
8. The authority if so feels necessary and decide to extend / renew the agreement / appointment can do so on the terms and conditions mutually agreed upon.
9. The organization or the consultant, either of the party can terminate the agreement / appointment with prior notice of one month.
10. Dispute if any arises, anytime can be settled mutually over discussion failing which the decision of the Governing Body of Sabuj Sangha will be final and binding on all.

_____END_____



POLICY ON DATA PROTECTION AND PRIVACY

(PROTECTION, TRANSPARENCY, AND ACCOUNTABILITY)

Sabuj Sangha's Code of Ethics & Business Conduct at Work



SABUJ SANGHA

30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107



I. PREFACE

The Organisation has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Organisation and its employees.

The right to privacy is a fundamental right and it is necessary to protect personal as well as organizational data as an essential facet of informational privacy. The data as a critical means of communication between persons and thereby it is necessary to create a collective culture that fosters a free and fair digital world, respecting the informational privacy of individuals and organization.

Sabuj Sangha needs to gather and use certain information about individuals. These can include beneficiaries, suppliers, business contacts, employees, and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled, and stored to meet the organization's data protection standards- and to comply with the law.

It is important to make provisions:

- to protect individuals personal data and its usage,
- to create a relationship of trust between persons and organization processing their data,
- to create a framework for implementing organisational and technical measures in processing personal data, and
- to establish a **Data Protection & Privacy Officer** for overseeing data processing.

The Board of Sabuj Sangha keeping the Personal Data Protection Bill, 2018, Govt. of India and Sabuj Sangha's Code of Ethics & Business Conduct into larger consideration, has approved the Policy on Data Protection and Privacy of Sabuj Sangha.

Any actual or potential violation of the Code as such would be a matter of serious concern for the Organisation. The role of employees in pointing out such violations of the Code cannot be undermined. Accordingly, this Policy on Data Protection and Privacy ("the Policy") has been formulated to reinforce the organization's commitment to its values, attitudes, and ethics towards data protection and maintaining the utmost lawful privacy of an individual as well as that of organization.

II. POLICY

This data protection and privacy policy ensure Sabuj Sangha:

- Complies with data protection law and follow good practice
- Protects the rights of staff, beneficiaries, and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

This policy applies to all staff of Sabuj Sangha and those of Partner organizations, as well as Vendors and Vendor organizations who are in a relationship with Sabuj Sangha. The purpose of this policy is to maintain the privacy of employees, contractors, vendors, interns, associates, and partner organizations, protect their personal information, and ensure compliance with laws and regulations applicable.



The policy covers the responsibility to report all wrongful acts committed to the **Data Protection & Privacy Officer (DPPO)**, who is officially appointed to receive complaints and initiate the investigation. The DPPO will also keep track of all reported cases and report the same to Board.

The Organisation is committed to adhering to the highest standards of ethical, moral, and legal conduct of business operations.

III. SCOPE

This policy applies to all employees (full-time, part-time, trainees, and those on contractual assignments) of the organization including all associated vendors and partner organizations.

This policy applies to all Sabuj Sangha employees, contractors, vendors, interns, associates, and partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization, regardless of geographic location. All employees of Sabuj Sangha are expected to support the privacy policy and principles when they collect and/or handle personal information, or are involved in the process of maintaining or disposing of personal information. This policy provides the information meeting successfully the organization's commitment to data privacy.

All partner organizations and any Third-Party working with or for Sabuj Sangha, who have or may have access to personal information, will be expected to have read, understood, and complied with this policy. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

IV. DATA PROTECTION RISKS/APPLICABILITY

This Policy covers all directors, managers, employees, third-party vendors, consultants, interns, and partners operating out of any location of the Organisation. This policy helps to protect Sabuj Sangha from some very real data security risks, including:

- **Breaches of confidentiality:** For instance, information being given out inappropriately;
- **Failing to offer a choice:** For instance, all individuals should be free to choose how the organization uses data relating to them;
- **Reputational damage:** For instance, the organization could suffer if hackers successfully gained access to sensitive data;
- **Data theft:** For instance, the organization could suffer if any data related to Sabuj Sangha's programs, financials, contracts, survey data, beneficiaries details, funders documents, plans, etc.

V. RESPONSIBILITIES

Everyone who works for or with Sabuj Sangha has some responsibility for ensuring data is collected, stored, and handled appropriately.



Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Director, Sabuj Sangha is ultimately responsible for ensuring that organization meets its legal obligations.
- The **DPPO** is responsible for:
 - Keeping the Director updated about data protection responsibilities, risks, and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data Sabuj Sangha holds about them (also called ‘subject access requests’).
 - Checking and approving any contracts or agreements with third parties that may handle the organization’s sensitive data.
- The **IT manager or assigned person** is responsible for:
 - Ensuring all systems, services, and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software are functioning properly.
 - Evaluating any third-party services the organization is considering using to store or process data. For instance, cloud computing services, etc.
- The **marketing manager or assigned person** is responsible for:
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

Custodian for the Data Protection & Privacy Policy shall be the DPPO. The DPPO shall be responsible for the maintenance and accuracy of this policy. Any queries regarding the implementation of this Policy shall be directed to the DPPO.

This policy shall be reviewed for updates by the Data Protection & Privacy Review Team in consultations with the DPPO, the Director, and other concerned stakeholders on an annual basis. Additionally, the data privacy policy shall be updated in-line with any major changes within the organization’s operating environment or on recommendations provided by internal/ external auditors.

VI. GENERAL STAFF GUIDELINES

- The only people able to access data covered by this policy should be those who need it for their work.



- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- Sabuj Sangha will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the organization or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the DPPO if they are unsure about any aspect of data protection.

VII. DATA STORAGE

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller or the person assigned.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to approved cloud computing services or as decided by Sabuj Sangha from time to time.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the organization's standard backup procedures.



- Data should never be saved directly to laptops or other mobile devices like tablets or smartphones.
- All servers and computers containing data should be protected by approved security software and a firewall.

VIII. DATA USE

Personal data is of no value to Sabuj Sangha unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption, or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside the specified region.
- Employees should not save copies of personal data on their computers. Always access and update the central copy of any data.

IX. DATA ACCURACY

The law requires Sabuj Sangha to take reasonable steps to ensure data is kept accurate and up-to-date. The more important it is that the personal data is accurate, the greater the effort Sabuj Sangha should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated.
- Sabuj Sangha will make it easy for data subjects to update the information the organization holds about them.
- Data should be updated as inaccuracies are discovered.

X. SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Sabuj Sangha are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed on how to keep it up to date.
- Be informed about how the organization is meeting its data protection obligations.

If an individual contacts the organization requesting this information, this is called a subject access request. Subject access requests from individuals should be made by email,



addressed to the data controller at the designated person's email id. The data controller can supply a standard request form, although individuals do not have to use this. The data controller will always verify the identity of anyone making a subject access request before handing over any information.

XI. DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, personal data has to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, Sabuj Sangha will disclose the requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the organization's legal advisers where necessary.

XII. PROVIDING INFORMATION

Sabuj Sangha aims to ensure that individuals are aware that their data is being processed and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the organization has a privacy statement, setting out how data relating to individuals is used by the organization.

XIII. POLICY COMPLIANCE

“Data Protection & Privacy Review Team (DPPRT)” as formed by the organization to ensure continuous compliance monitoring through the implementation of compliance measurements and periodic review processes shall review compliance to the data protection & privacy policy on an annual basis. It will also take care of the detection of data breaches proactively.

In cases where non-compliance is identified, the DPPO shall review the reasons for such non-compliance along with a plan for remediation and report them to DPPRT.

Depending on the conclusions of the review, the need for a revision to the policy may be identified. In instances of persistent non-compliance by the individuals concerned, they shall be subject to action following the Sabuj Sangha's Disciplinary Policy.

XIV. DATA PROTECTION & PRIVACY PRINCIPLES

This Policy describes **generally accepted privacy principles (GAPP)** for the protection and appropriate use of personal information at Sabuj Sangha. These principles shall govern the use, collection, disposal and transfer of personal information, except as specifically provided by this Policy or as required by applicable laws:

- **Notice:** Sabuj Sangha shall provide data subjects with a notice about how it collects, uses, retains, and discloses personal information about them.
- **Choice and Consent:** Sabuj Sangha shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.



- **Rights of Data subject:** Sabuj Sangha shall provide individuals with the right to control their personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of their information and for withdrawal of earlier given consent to the notice.
- **Collection:** Sabuj Sangha shall collect personal information from data subjects only for the purposes identified in the privacy notice/contract agreements and only to provide the requested product or service.
- **Use, Retention, and Disposal:** Sabuj Sangha shall only use personal information that has been collected for the purposes identified in the privacy notice/contract agreements and by the consent that the data subject shall provide. Sabuj Sangha shall not retain personal information longer than is necessary to fulfill the purposes for which it was collected and to maintain reasonable business records. Sabuj Sangha shall dispose of the personal information once it has served its intended purpose or as specified by the data subject.
- **Access:** Sabuj Sangha shall allow data subjects to make inquiries regarding the personal information about them, that Sabuj Sangha shall hold and, when appropriate, shall provide access to their personal information for review, and/or update.
- **Disclosure to Third Parties:** Sabuj Sangha shall disclose personal information to Third Parties/partner organizations only for purposes identified in the privacy notice/contract agreements. Sabuj Sangha shall securely disclose personal information, with assurances of protection by those parties, according to the contracts, laws, and other segments, and, where needed, with the consent of the data subject.
- **Obligations for Sub-processor:** Where a processor (vendor or a third party acting on behalf of Sabuj Sangha's data processor) engages another processor (Sub-processor) for carrying out specific processing activities on behalf of Sabuj Sangha (controller), the same data protection obligations as set out in the contract or other legal act between Sabuj Sangha and the processor shall be applicable on the Sub-processor by way of a contract, in particular providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of **General Data Protection Regulation (GDPR)**. Where the Sub-processor fails to fulfill its data protection obligations, the initial processor (relevant vendor or a third party acting on behalf of Sabuj Sangha's data processor) shall remain fully liable to Sabuj Sangha for the performance of that Sub-processor's obligations.
- **Security for Privacy:** Sabuj Sangha shall protect personal information from unauthorized access, data leakage, and misuse.
- **Quality:** Sabuj Sangha shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.
- **Monitoring and Enforcement:** Sabuj Sangha shall monitor compliance with its privacy policies, both internally and with Third Parties, and establish the processes to address inquiries, complaints, and disputes.



XV. NOTICE

Notice shall be made readily accessible and available to data subjects before or at the time of collection of personal information or otherwise, notice shall be provided as soon as practical thereafter. Notice shall be displayed clearly and conspicuously and shall be provided online (e.g. by posting it on the home portal, website, sending emails, newsletters, etc.) and/or offline methods (e.g. through posts, couriers, etc.). All the websites and any program or service that collects personal information internally, shall have a privacy notice.

In case of any external transfer of personal information, a notice sufficiently before the transfer shall inform the data subjects.

Privacy notices may include:

- the organization's operating jurisdictions, third parties involved, partner organizations and affiliates, lines of business/works, locations;
- types of personal information collected, sources of information who is collecting the personal information, including contact information;
- the purpose of collecting personal information;
- assurance that the personal information will be used only for the purpose identified in the notice and only if the implicit and/or explicit consent is provided unless a law or regulation specifically requires otherwise;
- any choices the data subject have regarding the use or disclosure of the information, the process, and the data subject shall follow to exercise the choices;
- the process for a data subject to change contact preferences and ways in which the consent is obtained;
- collection process and how the information is collected; how the information is used including any onward transfer to Third-Parties;
- retention and disposal process for personal information, assurance that the personal information to be retained only as long as necessary to fulfill the stated purposes, or for a period specifically required by law or regulation and will be disposed-off securely or made anonymous post the identified purpose is completed;
- process of accessing personal information, the costs associated for accessing personal information (if any), process to update/correct the personal information, the resolution of disagreements related to personal information, how the information is protected from unauthorized access or use;
- how users will be notified of any changes made to privacy notice;
- disclosure process for Third Parties, the assurance that the personal information is disclosed to Third Parties only for the purpose identified, the remedial actions in place for any misuse of personal information by the Third Parties;
- security measures in place to protect the personal information, ways of maintaining the quality of personal information;



- monitoring and enforcement mechanisms in place, description of the complaint channels available to data subjects; how the internal personnel, key stakeholders and the beneficiaries/organizations/vendors can contact Sabuj Sangha related to any privacy complaints or breaches, relevant contact information and/or other reporting methods through which the complaints and/or breaches could be registered;
- Consequences of not providing the requested information.

XVI. CHOICE & CONSENT

Choice refers to the options the data subjects are offered regarding the collection and use of their personal information. Consent refers to their agreement to the collection and uses, often expressed by how they exercise a choice option.

- Sabuj Sangha shall establish systems for the collection and documentation of data subject consents to the collection, processing, and/or transfer of personal data.
- Data subjects shall be informed about the choices available to them for the collection, use, and disclosure of personal information.
- The consent shall be obtained (in writing or electronically) from the data subjects before or at the time of collecting personal information or as soon as practical thereafter.
- The changes to a data subject's preferences shall be managed and documented. Consent or withdrawal of consent shall be documented appropriately.
- The choices shall be implemented in a timely fashion and respected. If personal information is to be used for purposes not identified in the notice/contract agreements at the time of collection, the new purpose shall be documented, the data subject shall be notified, and consent shall be obtained before such new use or purpose.
- The data subject shall be notified if the data collected is used for marketing purposes, advertisements, etc.
- Sabuj Sangha shall review the privacy policies of the Third Parties and types of the consent of Third Parties before accepting personal information from Third-Party data sources.

XVII. COLLECTION OF PERSONAL INFORMATION

Personal information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all personal information.

- Personal information shall not be collected unless either of the following is fulfilled:
 - the data subject has provided a valid, informed and free consent;
 - processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract;
 - processing is necessary for compliance with the organizations legal obligation;
 - processing is necessary to protect the vital interests of the data subject; or
 - processing is necessary for the performance of a task carried out in the public interest



- Data subjects shall not be required to provide more personal information than is necessary for the provision of the product or service that the data subject has requested or authorized. If any data not needed for providing a service or product is requested, such fields shall be clearly labeled as optional. The collection of personal information shall be avoided or limited when reasonably possible.
- Personal information shall be de-identified when the purposes of data collection can be achieved without personally identifiable information, at a reasonable cost.
- When using vendors to collect personal information on the behalf of Sabuj Sangha, it shall ensure that the vendors comply with the privacy requirements of Sabuj Sangha as defined in this Policy.
- Sabuj Sangha shall at minimum, annually review and monitor the information collected, the consent obtained and the notice/contract agreement identifying the purpose.
- The project team/support function shall obtain approval from the IT Security team before adopting the new methods for collecting personal information electronically.
- Sabuj Sangha shall review the privacy policies and collection methods of Third-Parties before accepting personal information from Third-Party data sources.

XVIII. USE, RETENTION, AND DISPOSAL

- Personal information may only be used for the purposes identified in the notice/contract agreements and only if the data subject has given consent;
- Personal information shall be retained for as long as necessary for business purposes identified in the notice/contract agreements at the time of collection or subsequently authorized by the data subjects.
- When the use of personal information is no longer necessary for business purposes, a method shall be in place to ensure that the information is destroyed in a manner sufficient to prevent unauthorized access to that information or is de-identified in a manner sufficient to make the data non-personally identifiable.
- Sabuj Sangha shall have a documented process to communicate changes in retention periods of personal information required by the business to the data subjects who are authorized to request those changes.
- Personal information shall be erased if their storage violates any of the data protection rules or if knowledge of the data is no longer required by Sabuj Sangha or for the benefit of the data subject. Additionally, Sabuj Sangha has the right to retain the personnel information for legal and regulatory purposes and as per applicable data privacy laws.
- Sabuj Sangha shall perform an internal audit on an annual basis to ensure that personal information collected is used, retained, and disposed-off in compliance with the organization's data privacy policy.

XIX. ACCESS

Sabuj Sangha shall establish a mechanism to enable and facilitate the exercise of data subject's rights of access, blockage, erasure, opposition, rectification, and, where



appropriate or required by applicable law, a system for giving notice of inappropriate exposure of personal information.

- Data subjects shall be entitled to obtain the details about their personal information upon a request made and outlined in writing. Sabuj Sangha shall provide its response to a request within 72 hours of receipt of a written request.
- The data subjects shall have the right to require Sabuj Sangha to correct or supplement erroneous, misleading, outdated, or incomplete personal information.
- Requests for access to or rectification of personal information shall be directed, at the data subject's option, to the manager of the project team or support function responsible for the personal information.
- The privacy coordinators shall record and document each access request as it is received and the corresponding action taken.
- Sabuj Sangha shall provide personal information to the data subjects in a plain simple format, which is understandable (not in any code format).

XX. DISCLOSURE TO THIRD PARTIES

Data Subject shall be informed in the privacy notice/contract agreement if personal information shall be disclosed to Third Parties/partner firms, and it shall be disclosed only for the purposes described in the privacy notice/contract agreements and for which the data subject has provided consent.

- Personal information of data subjects may be disclosed to the Third Parties/partner organizations only for reasons consistent with the purposes identified in the notice/contract agreements or other purposes authorized by law.
- Sabuj Sangha shall notify the data subjects before disclosing personal information to Third Parties/partner organizations for purposes not previously identified in the notice/contract agreements.
- Sabuj Sangha shall communicate the privacy practices, procedures, and requirements for data privacy and protection to the Third Parties/partner organizations.
- The Third Parties shall sign a **Non-Disclosure Agreement (NDA)** with Sabuj Sangha before any personal information is disclosed to the Third Parties partner organizations. The NDA shall include the terms on non-disclosure of information.

XXI. SECURITY

Information security policy and procedures shall be documented and implemented to ensure reasonable security for personal information collected, stored, used, transferred, and disposed of by Sabuj Sangha.

- Information asset labeling and handling guidelines shall include controls specific to the storage, retention, and transfer of personal information.
- Management shall establish procedures that maintain the logical and physical security of personal information.



- Management shall establish procedures that ensure the protection of personal information against accidental disclosure due to natural disasters and environmental hazards. Incident response protocols are established and maintained to deal with incidents concerning personal data or privacy practices.
- Individuals noticing or becoming aware of any breach of personal data shall notify the DPPO (by emailing at data.privacy@sabujsangha.org) within 24 hours. It shall be the DPPO's responsibility to analyze and act on the intimation of the same within 48 hours; furthermore under the Sabuj Sangha Data Protection and Privacy Policy (wherever applicable).

XXII. QUALITY

Sabuj Sangha shall maintain data integrity and quality, as appropriate for the intended purpose of personal data collection and use and ensure data is reliable, accurate, complete, and current.

- For this purpose, the DPPO and other privacy coordinators shall have systems and procedures in place to ensure that personal information collected is accurate and complete for the business purposes for which it is to be used.
- Sabuj Sangha shall perform an annual assessment on the personal information collected to check for accuracy, completeness, and relevance of the personal information.

XXIII. MONITORING AND ENFORCEMENT

(i). DISPUTE RESOLUTION AND RECOURSE

Sabuj Sangha shall define and document a Data Protection and Privacy policy, which addresses the privacy-related incidents and breaches.

- The incident and breach management program includes a clear escalation path up to the executive management, legal counsel, and the board based on the type and/or severity of the privacy incident/breach. It shall define a process to register all the incidents/complaints and queries related to data privacy
- Sabuj Sangha shall perform a periodic review of all the complaints related to data privacy to ensure that all the complaints are resolved promptly and resolutions are documented and communicated to the data subjects as the case may be.
- An escalation process for unresolved complaints and disputes, which shall be designed and documented.
- Communication of privacy incident/breach reporting channels and the escalation matrix shall be provided to all the data subjects as the case may be.

(ii). DISPUTE RESOLUTION AND ESCALATION PROCESS FOR EMPLOYEES

Employees with inquiries or complaints about the processing of their personal information shall first discuss the matter with their immediate supervisor. If the employee does not wish to raise an inquiry or complaint with an immediate manager, or if the manager and employee are unable to reach a satisfactory resolution of the issues raised, the employee



shall email at data.privacy@sabujsangha.org to bring the issue to the attention of the DPPO.

(iii). DISPUTE RESOLUTION AND ESCALATION PROCESS FOR THIRD PARTY

Beneficiaries/Third Party with inquiries or complaints about the processing of their personal information shall bring the matter to the attention of the DPPO in writing. Any disputes concerning the processing of the personal information of non-employees shall be resolved through arbitration.

(iv). COMPLIANCE REVIEW

The DPPRT shall conduct an internal audit annually (at minimum) to ensure compliance with the established privacy policies and applicable laws.

- The internal audit shall consist of a review of the following:
 - personal information collected from data subjects;
 - the purposes of the data collection and processing;
 - the actual uses of the data;
 - disclosures made about the purposes of the collection and use of such data;
 - the existence and scope of any data subject consents to such activities;
 - any legal obligations regarding the collection and processing of such data, and
 - the scope, sufficiency, and implementation status of security measures.
- The DPPRT shall document all the instances of non-compliance with privacy policies and procedures and report the same with the **Privacy Management Committee** headed by the Director, Sabuj Sangha.
- The DPPO along with Privacy Coordinators shall take action on the findings from the internal audit and work on the recommendations for improvement of the privacy posture.
- Any changes made to the policies shall be communicated to all the employees, the stakeholders, and the beneficiaries/funders (wherever required).

XXIV. DEFINITIONS

- “**Data Subject**” means a data subject who is the subject of personal data.
- “**Personal Data or Personally Identifiable Information (PII)**” means any information about an individual (the data subject) which can be used to distinguish or trace an individual’s identity or, any other information that is linked or linkable to an individual (Examples included but not limited to: Name, Address, Date of birth, etc.)
- “**Sensitive Personal Information (SPI)**” means personal data consisting of information but not limited to the following attributes of the data subject:
 - password;
 - financial information such as bank account or credit card or debit card or other payment instrument details ;
 - physical, physiological and mental health condition;



- sexual orientation;
- medical records and history;
- genetic or biometric information;
- racial and ethical origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- any detail relating to the above clauses as provided to the organization; and
- any of the information received under above clauses by the partner organizations or stakeholders for processing, stored or processed under lawful contract or otherwise:

Provided that, any information that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for these rules.

- **“Third Party”** means all external parties – contractors, interns, summer trainees, and vendors – who have access to Sabuj Sangha information assets or information systems.
- **“Disciplinary Action”** means any action that can be taken on the completion of /during the investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties, or any such action as is deemed to be fit considering the gravity of the matter.
- **“Data Protection and Security”** means anyone collecting personal and beneficiaries information must fairly and lawfully process it, process it only for limited, specifically stated purposes, use the information in a way that is adequate, relevant and not excessive, use the information accurately, keep the information on file no longer than necessary, process the information following your legal rights, keep the information secure and never transfer the information to others unlawfully and outside the country without adequate protection;
- **“Employee”** means every employee of Organisation (whether working in India or abroad)
- **“Complaint”** means the reporting of any such breach of privacy or data protection violation to the DPPRT made in good faith would constitute a complaint.
- **“Data Protection & Privacy Review Team (DPPRT)”** means a team as formed by the organization to ensure continuous compliance monitoring through the implementation of compliance measurements and periodic review processes
- **“Privacy Management Committee”** means the Committee constituted by the Board of the Organisation by the applicable law headed by the Director, Sabuj Sangha.
- **“Data Protection & Privacy Officer (DPPO)”** means an officer who is officially appointed to receive complaints and initiate the investigation.

XXV. MONITORING AND EVALUATION

Sabuj Sangha recognises the importance of monitoring this data protection and privacy policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.



Supervisors, managers and those responsible for dealing with any privacy breaches will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done yearly. As a result of this report, the organization will evaluate the effectiveness of this policy and make any changes needed.

XXVI. NOTIFICATION

1. All Managers are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively.
2. The onus of making the Partners aware of their responsibilities vests with Director or the person assigned for the purpose by Sabuj Sangha Management who will ensure that program staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of Sabuj Sangha staff in the execution of a Partnership agreement.

XXVII. RETENTION OF DOCUMENTS

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto, shall be retained by Sabuj Sangha for a minimum period of 7 years as a normal practice.

XXVIII. COMMUNICATION

1. This policy as amended from time to time shall be disclosed on the website of the Organization and in the report of the Board of the Organization.
2. The Audit Committee reviews the policy and its implementation periodically and is provided a quarterly update on the status of various complaints received and investigated.

XXIX. CONCLUSION:

In conclusion, the organization reiterates its commitment to providing its employees, a workplace having its data and privacy protected. The onus is on the employees and all concerned stakeholders to protect the data and maintain its privacy as well.



POLICY ON SEXUAL HARASSMENT AT WORKPLACE

(PREVENTION, PROHIBITION AND REDRESSAL)

Sabuj Sangha's Code of Ethics & Business Conduct at Work



SABUJ SANGHA

30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107



I. PREFACE

The Organisation has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Organisation and its employees.

The Policy on Sexual Harassment of Women at Workplace of Sabuj Sangha has been approved by the Board of Sabuj Sangha as per the terms of the provisions of the Sexual Harassment Of Women At Workplace (Prevention, Prohibition And Redressal) ACT, 2013 (POSH). The Act aims to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Organisation. The role of employees in pointing out such violations of the Code cannot be undermined. Accordingly, in line with the POSH Act, this Policy on Sexual Harassment of Women at Workplace (“the Policy”) has been formulated with an aim to reinforce the organization’s commitment to its values, attitudes and behaviours towards women for their overall safety and for preserving the dignity of women.

II. POLICY

This policy applies to all staff of Sabuj Sangha and those of Partner organizations, as well as Vendors and Vendor organizations who are in a relationship with Sabuj Sangha. Our organization is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The organization is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Sabuj Sangha is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The organization will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Sabuj Sangha will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

The policy covers responsibility to report all wrongful acts committed by staff of Sabuj Sangha, partners and members of the governing body only to the **Sexual Harassment Complaint Committee**, who are officially appointed to receive complaints, initiate the



investigation. The Presiding Officer will also keep track of all reported cases and report the same to Board.

The Organisation is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Organisation encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This policy aims to provide an avenue for employees to raise concerns on any form of sexual harassment or violations.

III. SCOPE

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the organization including all associated vendors and partner organizations. The organization will not tolerate sexual harassment, if engaged in by funders/clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the organization's business is conducted.
2. All organization-related activities performed at any other site away from the organization's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

This Policy defines and lays down the process for raising a 'Complaint', the safeguards in place for the person raising a Complaint, the roles and responsibilities of all stakeholders and also sets the time lines for all processes to be followed. In all instances, the Organisation retains the prerogative to determine when circumstances warrant an investigation and the appropriate investigative process to be employed, in conformity with this Policy and applicable laws and regulations.

Complaints related only to Sexual Harassment of women at workplace will be dealt by this Policy. Any other complaints will be addressed by other competent authority under appropriate policies of the Organization.

IV. APPLICABILITY

This Policy covers all directors, managers, employees, third party vendors, consultants, and partners operating out of any location of the Organisation.

V. DEFINITIONS

- **“Sexual harassment”** is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations



which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging,
- fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct:

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct:

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering



- **“Act”** means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto.
- **“Disciplinary Action”** means any action that can be taken on the completion of /during the investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- **“Aggrieved Woman”** means any female Employee of Sabuj Sangha or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- **“Employee”** means every employee of Organisation (whether working in India or abroad)
- **“Respondent”** means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.
- **“Complaint”** means the reporting of any such sexual harassment or violation to the Complaint Committee made in good faith would constitute a complaint.
- **“Complaint Committee”** means the Committee constituted by the Board of the Organisation in accordance with the applicable law.
- **“Presiding Officer”** means any individual appointed to independently carry out an initial investigation of the Complaints lodged by the said victim of the Organisation.

VI. POLICY DETAILS

It is the duty of all directors, managers and employees to notify the organization if they observe, or learn of, any such Practices. Failure to promptly raise a known or suspected violation is considered as an unethical behaviour and contravene of this policy.

VII. REPORTING RESPONSIBILITY REGARDING SEXUAL HARASSMENT

It is obligatory for all of Sabuj Sangha staff to have a personal responsibility to ensure that their behaviour is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment. Any wrongful acts or suspected wrongful acts in accordance with this policy needs to be reported. Staffs of Partner organizations are also required to report such acts committed by Sabuj Sangha staff or their own staff in the execution of their Partnership agreements.

VIII. COMPLAINT MECHANISM

An appropriate complaint mechanism in the form of **“Complaints Committee”** has been created in the organization for time-bound redressal of the complaint made by the victim.. The committee will be responsible for ensuring that the case is dealt with in accordance with the policy on Sexual Harassment of Women at workplace.



IX. COMPLAINTS COMMITTEE

Sabuj Sangha has instituted a *Complaints Committee* for redressal of sexual harassment complaint (made by the said victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members:

1. **Presiding Officer:** Woman employee at the level of Manager or above
2. Senior Woman Employee from HR (**Member**)
3. Personnel Head, Manager or any other Senior employee of the location from where the complaint has originated (**Member**)
4. Member from Legal (**Member**)

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment,
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment, and
- Discouraging and preventing employment-related sexual harassment.

X. COMPLAINT PROCEDURE

The complaint can be made in any of the following methods:

1. **Written Complaint:** A written complaint can be sent to any of the following address:

**The Presiding Officer,
Complaints Committee for Redressal of Sexual
Harassment Complaint,
Sabuj Sangha,
30/9, Rajdanga Main Road,
(East) Kolkata, West Bengal- 700 107**

2. **Email Complaint:** A complaint can be sent via email to the Presiding Officer, Complaints Committee for Redressal of Sexual Harassment Complaint (CCRSHC) at "ccrshc@sabujsangha.org".

All complaints received will be immediately reported to the Presiding Officer appointed by Sabuj Sangha.

XI. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The organization is committed to providing a supportive environment to resolve concerns of sexual harassment as under:



A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome she wants
- ensure that the victim understands the organization's procedures for dealing with the complaint
- discuss and agree the next steps: either informal, formal or outside complaint mechanisms, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the organization through the relevant legal framework of the country

The Presiding Officer should be able to try to solve the grievance informally before escalating the matter to the formal Committee within a period of three months from the date of incident.

B. Formal Resolution Mechanism

The Aggrieved Woman with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of 3 months. Alternately, the victim can send complaint through an email. The aggrieved employee is required to disclose her name, department, division and location she is working in, to enable the Presiding Officer to contact her and take the matter forward.

Aggrieved woman may also write directly to the Presiding Officer, Complaints Committee for Redressal of Sexual Harassment Complaint, appointed by Sabuj Sangha, at ccrshc@sabujsangha.org.



The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event preferably within 30 days of the complaint being made. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons, and communicate the same to the complainant.
- If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- Where such conduct, on the part of the accused, amounts to a specific offence under the law, the organization shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations on action to be taken to the “Presiding Officer” appointed by the organization as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Presiding Officer, Head- Personnel & Administration and the Director of the organization will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- Sanctions and Corrective action:
Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:
 - (i). Formal apology (verbal or written warning)
 - (ii). Counselling
 - (iii). Written warning to the perpetrator and a copy of it maintained in the employee’s file.
 - (iv). Change of work assignment / transfer for either the perpetrator or the victim.



(v). Suspension or termination of services of the employee found guilty of the offence. The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

C. Outside Complaints Mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the organization. She can do so through the mechanism depending on country's legal framework – i.e. employment tribunal, under the Indian Penal Code, etc. She may inform the Sabuj Sangha management of the same, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the IPC appropriately.

XII. PUNISHMENT FOR FALSE COMPLAINTS

Where the Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, appropriate disciplinary action may be taken by the Director as per service rules applicable on recommendations of the committee.

XIII. CONFIDENTIALITY

1. The organization understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.
2. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.
3. The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation. However, in certain cases, this may not be possible, particularly in instances warranting police investigation or when a disciplinary hearing is held, where individuals will need to make a statement.

XIV. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the organization except where disclosure is required under disciplinary or other remedial processes.

XV. PROTECTION TO COMPLAINANT / VICTIM

The organization is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.



The organization will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XVI. MONITORING AND EVALUATION

Sabuj Sangha recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the organization will evaluate the effectiveness of this policy and make any changes needed.

XVII. NOTIFICATION

1. All Managers, are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.
2. The onus of making the Partners aware of their responsibilities vests with Director or the person assigned for the purpose by Sabuj Sangha Management who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of Sabuj Sangha staff in the execution of a Partnership agreement.

XVIII. RETENTION OF DOCUMENTS

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto, shall be retained by Sabuj Sangha for a minimum period of 7 years as a normal practice.

XIX. COMMUNICATION

1. This policy as amended from time to time shall be disclosed on the website of the Organization and in the report of the Board of the Organization.
2. The Audit Committee reviews the policy and its implementation on periodic basis and is provided a quarterly update on the status of various complaints received and investigated.

XX. CONCLUSION:

In conclusion, the organization reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.



POLICY ON SUB-COMMITTEES

(FOR TRANSPARENCY AND ACCOUNTABILITY)

Sabuj Sangha's Code of Ethics & Business Conduct at Work

SABUJ SANGHA

30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107



The Organisation has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Organisation and its employees. The organization has developed a system driven process for its smooth and transparent functioning and for inclusive project implementation. This policy applies to all staff of Sabuj Sangha and those of Partner organizations, as well as Vendors and Vendor organizations who are in a direct relationship with Sabuj Sangha. The recommendations of these sub-committees are expected to be followed in the best possible ways

With an aim to reinforce the organization's commitment to its values, the following sub-committees are formed for the purpose:

- I. Procurement-cum-Purchase Sub-committee;
- II. Finance Sub-committee;
- III. Grievance Redressal Sub-committee;
- IV. Statutory and Policy Compliance Sub-committee;
- V. Project Review Sub-committee

The current names of the sub-committee compositions shall be displayed at the appropriate place in the office for better visibility and operational purposes. The list shall be updated from time-to-time.

I. PROCUREMENT-CUM-PURCHASE SUB-COMMITTEE

Sabuj Sangha has constituted a *Procurement-cum-Purchase Sub-Committee* for the smooth and transparent procurements and purchases. All the procurements for the organization and the projects shall be made in accordance with the decision of the procurement-cum-purchase sub-committee.

The Procurement-cum-Purchase Sub-Committee is responsible for:

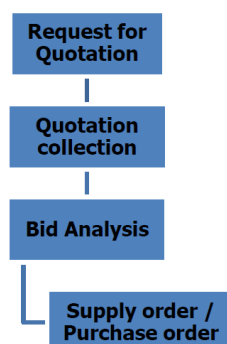
- Reviewing the proposal, quotations, and related documents
- Discuss the need of procurement/purchase with reasonable justification, and
- Recommendations.

Process:

Procurement up to Rs 10,000 shall be made through documentation and with due justification. Procurements above Rs 10,000 shall be made by the decision of the procurement-cum-purchase sub-committee by obtaining 3 quotations and ranking the same. The following steps will be followed at procurement process:

- Request for Quotation.
- Quotation collection
- Tabulated Comparative Statement for Procurement
- Supply order / Purchase order

Flowchart for Procurement Process



The sub-committee shall consist of 5 Persons at organizational level. The advice of the relevant external expert depending on the nature of procurement shall be obtained.

Composition of sub-committee –

1. Secretary/Director – (Head)
2. Head of Programme– (Member)
3. Head of Finance/Accounts Officer– (Member)
4. One member from Senior Management Team – (Member)
5. One Governing Body Representative– (Member)

The proposal for procurement/purchase with related documents will be sent to the sub-committee for review and recommendation. All the recommendations of the sub-committee will be adopted after duly signed by the members and finally approved by the Secretary and Director. The concerned department will further implement it within the stipulated time period.

There will be five region specific sub-committees such as Kolkata, Sundarban, East Midnapur, Peri-urban, and Alipurduar to cater the decentralized region specific requirement.

II. FINANCE SUB-COMMITTEE

Sabuj Sangha has constituted a *Finance Sub-Committee* for the smooth and transparent financial decisions. The Finance Sub-Committee provides financial analysis, advice, and oversight of the organizations budget. Their sole responsibility is to ensure the organization is operating with the financial resources it needs to provide programs and services to the community.

The sub-committee shall consist of 8 Persons at organizational level. The advice of the relevant external expert depending on the nature of the requirement shall be obtained. Composition of sub-committee –

1. Secretary/Director – (Head)
2. Treasurer (Member)
3. Head of Finance– (Member)
4. Head of Programme– (Member)
5. Head of External Relations– (Member)
6. Respective Programme Manager having over 10years of experience (Member)
7. Respective Regional Head (Member)
8. Internal Auditor– (Invitee)

Meeting Schedule

From time-to-time, the sub-committee will convene for planning meetings and training. Sub-committee members will be asked to attend special events and assist in the developing donor base.

Scope of work for the Finance Sub-Committee:

1. Ensure that accurate and complete financial records are maintained:
 - Monitor income and expenditures against projections
 - Review and recommend financial policies to the Governing Body, including ensuring adequate internal controls and maintaining financial records in accordance with standard accounting practices
2. Ensure that accurate, timely, and meaningful financial statements are prepared and presented to the Governing Body:
 - Present monthly financial statements to the Governing Body
3. Oversee budget preparation and financial planning:
 - Propose for Governing Body approval a budget that reflects the organization's goals
 - Ensure that the budget accurately reflects the needs, expenses, and revenue of the organization
4. Safeguard the organization's assets:
 - Review proposed new funding for ongoing financial implications, recommending approval or disapproval to the Governing Body
 - Ensure that the organization has the proper risk-management provisions in place
5. Help the full Governing Body understand the organization's financial affairs:



- Ensure that the Governing Body as a whole is well informed about the organization's finances
 - Educate the Governing Body about financial matters
6. Ensure compliance with the centre, state, and other requirements related to the organization's finances
- Ensure that organization maintains adequate insurance coverage
 - Ensure that the ITR Form, other forms, Provident Funds and employment and other taxes required by government are filed completely, correctly, and on time

III. GRIEVANCE REDRESSAL SUB-COMMITTEE

Sabuj Sangha has constituted a *Grievance Redressal Sub-Committee* that aims to reinforce the organization's commitment towards providing fair and equitable work opportunities to all employees. The objective of the grievance redressal process is to provide employees with an easily accessible mechanism for the settlement of their individual grievances. It is also meant for the time-bound redressal of any such grievance of employee or other than employee working directly with the organization, recorded officially. The grievance should be made in writing to the sub-committee for further action.

As envisaged in the policy on Grievance Redressal of Sabuj Sangha, it applies to all staff of Sabuj Sangha and those of Partner organizations who are in a relationship with the organization. For the purpose of the policy, Grievances "means individual grievance and includes all matters but excludes the following:

- annual performance appraisal
- grievance pertaining to, or arising out of, disciplinary action or appeal against such actions
- grievance arising out of termination/dismissal

Initially, and till further notice, the sub-committee will comprise of the following four members:

1. Secretary/Director (**Presiding Officer**)
2. Senior Employee (men for male & women for female) from HR (**Member**)
3. Head/Manager or any other Senior employee of the location from where the complaint is related (**Member**)
4. Member from Legal (**Member**)

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the sub-committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

The Grievance Sub-Committee is responsible for:

- Investigating every formal written grievance/complaint,
- Taking appropriate remedial measures to address the grievance amicably, and
- If complainant still is not satisfied with the remedial measures taken, this may be referred to the group of senior members of the organization as deems fit.

IV. STATUTORY AND POLICY COMPLIANCE SUB-COMMITTEE

Sabuj Sangha has constituted a *Statutory and Policy Compliance Sub-Committee* for the smooth and timely compliance of statutes and policies. The word statutory means “of or related to statutes”- rules and regulations. Compliance means adherence. Thus, Statutory Compliance means adhering to rules and regulations. Statutory and Policy Compliance refers to the legal framework that an organization should adhere to in dealing with its policies and statutes.

The key role of the sub-committee is:

- Plan strategy for mitigation of risks and increasing awareness about statutory and policy compliance in the organization. With compliance in place, there is a lower risk of an adverse incident and Penal actions and financial losses to the organization.
- Prevent loss of reputation and business integrity
- Prevent Donors’/Funders’ belief and loyalty for the organization to get impacted severely
- Prevent legal troubles as the organization is fully compliant

The sub-committee shall consist of 7 Persons at organizational level. The advice of the relevant external expert depending on the nature of compliance requirements shall be obtained. Composition of sub-committee –

1. Secretary/Director – (Head)
2. President– (Member)
3. Head of Finance/Admin Officer– (Member)
4. Head of Programme– (Member)
5. Head of External Relations– (Member)
6. Respective Regional Head (Member)
7. Internal Auditor/Legal– (Member)

Assessment Report on statutory and policy compliance being followed in the organization with related documents shall be presented to the sub-committee by Head of Finance, Head of External Affairs, and Head of HR/Admin Officer jointly for review and recommendation. All the recommendations of the sub-committee will be adopted after duly signed by the members and finally approved by the Secretary and Director and the Governing Body. The concerned department will further implement it within the stipulated time period.

Also, the sub-committee shall conduct an annual evaluation of its effectiveness. The sub-committee shall review and reassess its policies on a periodic basis and submit any recommended changes to the Governing Body for its consideration. The sub-committee shall perform such other functions and have such other powers as may be necessary or convenient for efficient discharge of its duties.

V. PROJECT REVIEW SUB-COMMITTEE

Sabuj Sangha has constituted a *Project Review Sub-Committee* for the quality project implementation as per deliverables. It will also review whether all the components of the project have been implemented as per the Terms of Reference (TOR) or not.

The Project Review Sub-Committee is responsible for:

- Reviewing quality implementation of all the components of the project
- Reviewing compliance of the TOR to be observed by Sabuj Sangha
- Review all the reports-project as well as financial, and
- Further suggestions and recommendations to help final project report submission to the donor/funder

The sub-committee shall consist of 5 Persons at organizational level. The advice of the relevant external expert depending on the nature of procurement shall be obtained. Composition of sub-committee –

1. Secretary/Director – (Head)
2. Head of Programme– (Member)
3. Head of Finance/Accounts Officer– (Member)
4. Head of External Affairs – (Member)
5. Thematic Expert– (Invitee)

All the project related documents will be sent to the sub-committee for review and recommendation. All the recommendations of the sub-committee will be adopted after duly signed by the members and finally approved by the Secretary and Director. The concerned department will further implement it within the stipulated time period and enable Sabuj Sangha to submit the report to the donor/funder.

SABUJ SANGHA

CHILD SAFEGUARDING POLICY

“Creating safe environment expresses the organisation’s accountability to children and young people which rely on a ‘Whole System Approach’ with many components and parts needing to be put in place and implemented consistently across all parts of the organization”

We commit to create an environment that is safe for every ‘child and young people’ within the organisation and outside where we work.

Children and Young Persons Safeguarding Policy

- I. Content:
- II. Introduction and overview/Policy overview
- III. Objectives /Purpose of the policy
- IV. Introduction of the organization including its vision , mission and activities(in a concise form)
- IV. What safeguarding is
 - a. Guiding principles
 - b. Who are we safeguarding?
- V. Scope of the policy
- VI. Our Role
- VII. This policy does not cover:(optional)
- VIII. Policy Statement
- IX. Who are vulnerable children/childhood vulnerabilities
- X. Who are vulnerable adults (if it is mentioned in the policy)
- XI. Types of Abuse & Exploitation:
(e.g Child abuse, physical abuse, sexual abuse, neglect, sexual exploitation , online exploitation of children)
- XII. This policy will address the following areas of Safeguarding: (e.g-child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse .It commits to addressing safeguarding throughout its work, through the three pillars of **Prevention, Reporting and Response.**
- XIII. **Prevention:**
 - a) Risk Mapping to Develop a Code of Conduct when working with Children
 - b) Reviewing a Code of Conduct

| You Should | You must never |
|------------|----------------|
| | |

 - c) Responding to Child Abuse: Dealing with disclosures and supporting children
Responding to Adult Safeguarding issue:
 - d) Dissemination of the Policy

e) Safeguarding in Recruitment

f) Responsibilities:

XIV. Accountability Structure

XV. Reporting:

How to Report a Safeguarding Concern

Specific responsibilities:

XVI. Response:

(It will include the follow up of safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations , applying disciplinary measures to staff found in breach of policy, offering support to survivors of harm etc.)

XVII. Safeguarding during Emergency

XVIII. Review & Approval (A Living Document: This policy is a living document that will be reviewed and revised every 2/3 (whichever the organisation decides) years to embed and incorporate the organisation's emerging contexts and relevance.

XIX. Confidentiality (optional- can be clubbed with other points)

XX. Ramification of Breach

XXI. Glossary of Terms

ANNEXURES:

Annexure 1 : Incident Reporting Form

Annexure 2 : Final outcome

Annexure 3: Response checklist

Annexure 4 : Reporting Flow Chart

Annexure 5: Self audit Tool (It would help to generate progress reports and plan for future work)

II. Introduction and Policy overview:

This policy on Safeguarding of children and young persons is an organizational commitment and through this Sabuj Sangha will put-in place appropriate procedures, practices and standards to ensure that the projects or programs, the staff within the organisation and others (all) associated with Sabuj Sangha do no cause any harm to the children, young people (CH. & YP) and to others who are supported through the organisation. It includes protection from sexual exploitation and abuse (SEA), and protection of vulnerable children and young people with diverse gender, sexualities, social, cultural, religious background, specially abled or affected by emergencies.

While the primary purpose of developing this policy is to safeguard children & Young Persons in all its work, at the same time Sabuj Sangha as an organisation aspires to create a model of a “Child Safe Organisations” by ensuring ‘Protection of Children and YP’ in all its work across geographies. We have tried to keep this policy document fully aligned to the “UN Convention on Rights of the Children -1989”.

In course of developing this policy, references have drawn from different elements of good practices of other leading Child Rights organisations. After drafting the current policy, the observations, recommendations and solutions which have been mentioned in the current documents have been triangulated using different participatory approaches. This will help to make the Safeguarding of Children & Young Persons Policy (SCYPP) a live document which can be adapted to different contexts where Sabuj Sangha is working over the years (including emergency response operations). This document is aimed to be able to provide implementable solutions to safeguarding concerns that, the organisation may come across or face in course of its work.

The current Safeguarding of Children and Young Persons Policy (SCYPP) Policy is based on a “5P” model. The 5P model includes: (i). **Perspective of Children:** which has been considered as a key approach towards developing this policy. In the process of implementation of this policy, we will also impart appropriate skills and knowledge amongst its staff, volunteers, visitors, interns, vendors and others associated and promote their active participation to safeguard children and young people. (ii) **Personal Values & Attitudes** plays a critical role in shaping our attitude, behaviour and practice towards children, it influence the basis on which we hold these; understanding which of these support or hinder the safeguarding of children and how such values, attitudes and behaviours may impact on our ability to be effective protectors of children. (iii) **Problems of Child Abuse:** It has been attempted to look into the different forms of child abuse. Special emphasis is given on ‘Sexual Abuse and Exploitation’ in the light of current rise of CSA in the country (& globally as well). We have tried to reflect on the modus operandi of the ‘sex offenders’ in various settings especially which may have some connection/ relevance to the pieces of work done by the organisation like us; learn to identify the signs, symptoms and impacts of abuse. (iv). **Providing Safeguarding and Preventing Harm:** this helps to develop understanding on the difference between child safeguarding and child protection programme interventions; helps to reflect on the measures and framework an organisation should put in place to support the safeguarding of children and to understand how organisations like us can develop their own policies and procedures; and finally to (v). **Passing on Concerns** – which will provide understanding on what is required to be done to ensure effective and efficient responses to child safeguarding concerns.

III. Objectives /Purpose of the policy:

In nutshell, Child Safeguarding means “protecting children and young persons from harm” that come from within the organisation, its staff or other people who may be associated with the organizational processes or interventions. Sabuj Sangha as an organisation with major constituency of its work as children and young persons must be responsive to the specific needs of children and young people. We ought to be responsible and undertake measures to prevent and safeguard children and young people so that, there is no abuse or no harm caused in course of their participation in any program or their association with Sabuj Sangha.

It is well known that, children under 18 years of age are particularly vulnerable. The key purpose of developing and adopting this is to make an organisational commitment to safeguard the children and young persons that we work with. In all our projects and programs, we will ensure their wellbeing, and prevent harm to their health or development to give them a good start in life by allowing them to grow in a safe environment. Safeguarding children and YP means implementing variety of policies, procedures and best practices depending on the situation and the context/s the Ch. & YP belong to.

IV. Introduction of the organization including its vision , mission and activities(in a concise form):

Sabuj Sangha started its journey in 1954 in Nandakumarpur village of Mathurapur -II block in the district of South 24 Pargana, West Bengal. The Organisation got registered under West Bengal Society Registration Act 1961 in the year 1975. We are also registered under the ‘Foreign Contribution (Regulation) Act, 1976’; registered under the Section 12A of Income Tax Act, 1961. Sabuj Sangha is empaneled under NITI – Aayog (erstwhile Planning Commission of India); National CSR Hub, West Bengal State AIDS Prevention and Control Society and is also accredited by the Credibility Alliance. Since its beginning, primary focus of the organization is to improve the lives of the people, especially women and children from the disadvantaged communities in West Bengal through integrated, sustainable development approach by ensuring participation of the communities that it works with.

From a humble beginning as a small development initiative, Sabuj Sangha has grown to a vibrant development organization and is currently working on myriad issues and challenges faced by the people especially in the state of West Bengal. Sabuj Sangha undertake long-term development intervention to address the vulnerabilities and challenges faced by the people, especially from disadvantaged and marginalised communities; enhance their capacities and empower them to be able to withstand the challenges, overcome them and live a life with dignity. Sabuj Sangha is also known for its incredible work on responding to emergencies, especially for the people of Sundarbans and East Midnapore who are prone to natural calamities and often get affected by cyclonic storms, floods etc. Over the last few decades the organisation has undertaken several emergency response operations, helped the people in the time of crisis by providing basic service and then helped in their process of recovery, resettlement and to prepare them from the threats of future emergencies and the potential threats of climate change in Sundarban Sub-region. Sabuj Sangha currently works in South 24 Parganas, North 24 Parganas, Murshidabad, Alipurduar, Kolkata, East Medinipur and Nadia Districts of West Bengal India.

Organization's Vision:

Sabuj Sangha looks forward to a society where all people will enjoy equal rights and access to equal opportunities.

Mission:

Sustainable development of marginalised and vulnerable people to ensure a quality of life through empowerment, education, information, infrastructure development, healthcare service and economic self-reliance through convergence of services provided by local self-help governments

Our Values:

Equality – Sabuj Sangha believes that all people should be treated equal. We will not discriminate or show prejudice against any person regardless of race, religion, gender or social background.

Respect – Sabuj Sangha and its employees are committed to treating all staff, beneficiaries and stakeholders with the utmost respect at all times.

Service Beyond Self – Sabuj Sangha works for the well- being of others and will endeavour in all efforts to serve communities as best we can.

Transparency – Sabuj Sangha is committed to operating in a transparent and honest manner at all times and will never knowingly or purposely misled, deceive or lie for organisational gain.

Accountability – Sabuj Sangha takes full responsibility for our actions and will be held accountable to each other, beneficiaries, donors, Government, volunteers and all other stakeholders for those actions.

Aims and Objectives of the Organisation:

- i. To do all social welfare activities including sanitation, public health and road development
- ii. To afford its members means of social intercourse, mutual cooperation, mental development, moral upliftment, to provide educational and social benefits for its members. To establish and maintain basic and adult education centres.
- iii. Organise physical culture, indoor and outdoor games, band party and other types of sports and amusement.
- iv. To organise library and print, publish and sell and distribute journals, periodicals, books and leaflets for the promotion of the objects and the spread education, to imbibe moral consciousness and to spread universal brotherhoods. To maintain free reading rooms for study of the Indian culture.
- v. To arrange for presentations of plays, operas, dramas etc. from different languages into Bengali and to develop through them cultural ties between different parts of India and the entire world.
- vi. To cultivate the spirit of culture among the members by holding drama, dance drama, jatra etc.
- vii. To promote sympathy, fellow feeling and unity among the followers of different faiths so as to evolve a sense of social and religious toleration.

- viii. To arrange ladies section separately and to arrange lectures, classes, demonstrations of social welfare and family planning methods.
- ix. To collect donations and subscriptions for the purpose of the society
- x. To do all such things as may be deemed incidental or conducive to the attainment of the following objectives.

V. What safeguarding is:

Safeguarding is to put in place appropriate policies, procedures and put them in practices to ensure that the organizational staff, Governing Body members, volunteers, interns, vendors and all associates can do no harm to the people (especially children and young persons) that we work with.

Child Safeguarding means “protecting children and young people from harm” that come from within the organisation, its staff or other people who may be associated with the organisational processes or interventions. The Organisation must be responsive to the specific needs of children and young people, be responsible and undertake measures to prevent and safeguard children and young people so that, there is no abuse or no harm caused in course of their participation in any program or their association with the organisation.

Children under 18 years of age are particularly vulnerable. Safeguarding them ensure their wellbeing, prevent harm to their health or development, and give a good start in life by allowing them to grow up in safe environment. Safeguarding children and YP mean implementing and following a variety of procedures and best practices depending on the situation and the context.

c. Guiding principles:

Simultaneous to the development of this Safeguarding of Children and Young Persons Policy (SCYPP), Sabuj Sangha as an organisation would like to influence and bring positive changes in its culture that would provide safety and security to every child and young person irrespective of their gender, caste, creed, religion, sexual preferences, disabilities etc. This SCYP would be the key instrument to guide and support all staff & associates to equip them with proper knowledge, appropriate skills and common understanding on the concepts of unconscious biases, power relations, privileges and how that impact the individuals’ attitudes and professional behaviour. With this policy, we commit to ensure safety, protection, wellbeing and development of children and YP through all its programmes.

Based on rounds of internal consultations, the organisation has agreed on the following guiding principles:

- i. Children & young people with whom we work with are our first and foremost priority.
- ii. Protect the best interests of children and their rights.

- iii. We would always follow and adhere to a “Zero Tolerance” for child abuse while dealing with any identified or suspected case of Child & YP abuse.
- iv. Integrate safeguarding of children in every aspect of organizational policy, strategy, human resources and programs.

d. Who are we safeguarding?

Safeguarding children & young people with whom we work with are the first and foremost priority of this Safeguarding Policy. Through this policy Sabuj Sangha commits to protect all children and young persons in all their diversities across its project locations. Sabuj Sangha currently works with the children & YP especially from marginalised communities which includes children from socially and economically backward communities, children of the urban migrants, slum dwellers, Children in street situations, single parent, orphan or separated from parents and children affected by natural disasters or calamities.

Important terminologies - definition for understanding:

Who is a child?

We are committed to adhere to United Nations Convention on the Rights of the Child. For us a Child is defined as “Any person – a girl or a boy and children of other gender identities under the age of 18 years (UNCRC, 1989; Article 1).

Who is a Young Person?

Young Person means individuals, a young women or men, and/ or young persons of other gender identities who are aged between 15 to 24 years. This group spans the categories of Children, Adolescents’ and ‘Young adults. But regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Safeguarding Children is used to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm. Safeguarding children” applies to protection of children and young person who is covered under any of Sabuj Sangha’s project or program and includes causing harm to self as well.

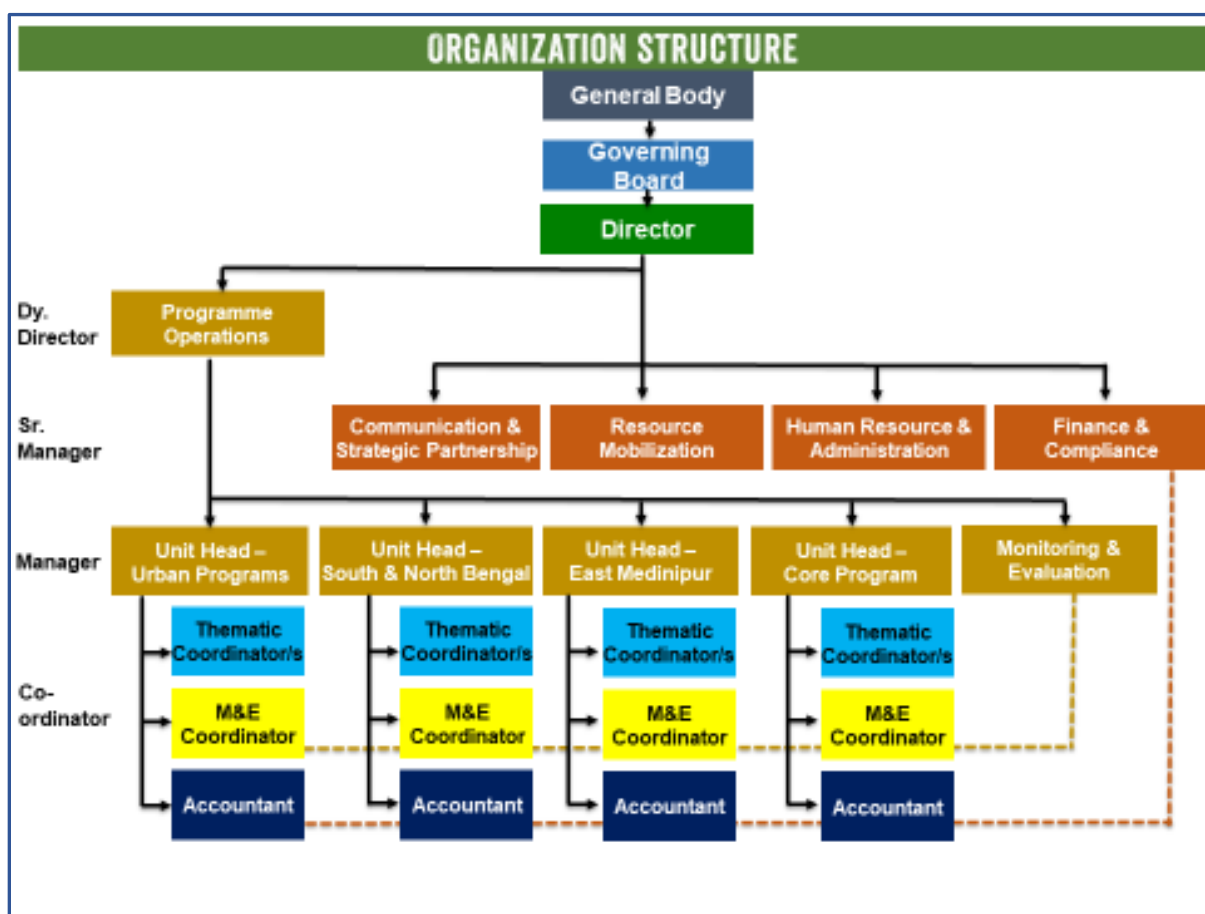
VI. Scope of the policy:

SCYPP (Safeguarding Children and Young Persons Policy) of Sabuj Sangha is the “**Statement of Intent**” of the organisation that demonstrates its commitment to protect children from harm and helps to identify specific requirement/s of the organisation to protect and safeguard the Children/ YP, to create a safe environment for them which would help to demonstrate the organization’s duty of care for the Children & YP. Safeguarding Ch. & YP concerns include suspected, alleged, self-disclosed, or witnessed abuse of a child by anyone associated within

or outside the program and need to be investigated as per the organization's Safeguarding Standard Operating Procedures (SOP).

VII. Our (Sabuj Sangha) Role:

Sabuj Sangha completed the development of the Organisational Strategy 2022-27 through extensive primary and secondary research, consultation and analysis of larger socio-economic and political trends and developments. Taking cognizance of the organizational growth, policy environment, funding potentials, the larger organizational structure has also been revamped which would be ready to excel depending upon organizational need and requirements. The structure will encompass every aspects of planning, execution, management, safeguarding and future growth of the organisation. The organogram clearly outlined special and specialised roles of every staff member within the organisation.



Specific safeguarding roles and responsibilities have been identified different staff members at different levels across geographies based on the programmatic presence. The individual and team roles (Starting from the Governing Board Members to Outreach Workers) have been specified in detail as part of its roll out and implementation plan later in this document. However there are some overarching roles and responsibilities that the organization would have to adhered to are as follows:

- a. Sabuj Sangha would have to implement the SCYPP as per the international standard, which would include:
 - 1. Policy:** SS would design a comprehensive policy in consultation with its, Volunteers, Donors, strategic partners, Ch. & YP and Experts.
 - 2. People:** SS would ensure on-boarding of competent staff with designated roles, responsibilities through a structured recruitment process. It will develop guidelines for staff, vendor, volunteer, intern and all associated on appropriate & inappropriate behaviour etc.
 - 3. Procedures:** SS will conduct local mapping exercises, undertake Safeguarding Risk assessments and develop risk mitigation strategies. SS will integrate CS measures with existing processes and systems, would encourage reporting and responding process
 - 4. Accountability:**
 - b. Ensure budget availability for its SCYPP implementation and related processes
 - c. Set up a comprehensive Information Technology system
 - d. Define Media and Communication protocol
 - e. Identify and decide resource organisation and support systems for Rehab. Work
 - f. Keep the Govt. informed to avoid any confusion, intervention and to avoid duplication of efforts

VIII. This policy does not cover:(optional):

Sabuj Sangha's larger Child Protection program and approaches will work to create community based child protection mechanisms; will continuously monitor functioning of the community level vigilance system to ensure protection of children from any form of abuse and exploitations within their communities. However this policy will not be responsible to report safeguarding concerns as mentioned in this SCYPP which may be caused by family members/ others within their communities who are not related to Sabuj Sangha. Through Child Protection projects, the organisation will undertake different activities to protect children who are vulnerable, likely to suffer or already suffering from significant harm in the society.

IX. Policy Statement (Our pledge and commitment):

- a. Protect children and YP from abuse and maltreatment.
- b. Prevent harm to children's health or development.
- c. Ensure children grow up with the provision of safe and effective care.
- d. Enable all children and young people to have the best chance in life.

Sabuj Sangha is committed to protect children and young people from harm and to would make the responsibility clear to all its staff, volunteers, interns, Board Members, Donors & Visitors, Vendors and Suppliers and anyone else associated with the organisational program or processes. In the process of developing this, we have done a sector benchmarking, take a cognizance of the policies and best practices in the sector.

Sabuj Sangha's SCYP Policy will encompass all aspects of protection and prevention and will outline approaches of safeguarding children and YP. The role of the organisation would not be confined to handling of reported or identified cases; it would rather help to restore the rights of children & Young Persons (when violated); will help to create an environment where CH & YP will feel safe and remain protected from abuse, exploitation, cruelty or neglect. The larger framework of the policy is aligned to the UN Convention on the Rights of the Child (UNCRC) and UN Interagency Standing Committee on PSEA Task force and the "Keeping Children Safe Coalition"

X. Who are vulnerable children/childhood vulnerabilities:

Sabuj Sangha works for welfare and development of Children and Young Persons, especially from marginalised communities in rural and urban settings of West Bengal. In the areas where Sabuj Sangha works is characterised with high rate of gender discrimination which is socially & culturally accepted. It works in the areas where 1/3rd of women could complete 10 years of schooling. School drop-out rate at the secondary level is more than 10% in the districts of North & South 24 Parganas, East Medinipur, Jalpaiguri and Murshidabad. Three-fourth of the kids have no access to digital education. Learning level assessments amongst the girls in the selected districts is extremely poor. More than 1 in every 3 girls get married before their 18th birthday in East Medinipur, North & South 24 Parganas, Nadia and Murshidabad. Along with Kolkata, target districts have a very high Crime Rate against children and women. Children in street situations are exposed to all forms of abuse, exploitation, cruelty and neglect. Coastal areas of North & South 24 Parganas and East Midnapore are flood prone and under recurrent threats of cyclone which causes large scale distressed migration, trafficking, school dropout and early forced marriage.

The scenario clearly reflects the risks and vulnerabilities of the children and young people and subsequently emphasize their protection and safeguarding needs in Sabuj Sangha's operational areas.

XI. Who are vulnerable adults (if it is mentioned in the policy): NA

XII. Types of Abuse & Exploitation:

(e.g. Child abuse, physical abuse, sexual abuse, neglect, sexual exploitation, online exploitation of children):

Abuse: refers to any form of child abuse, as defined below and also "Offences" prescribed under the "Protection of Children from Sexual Offences" (POCSO) Act, 2012 and the Rules made thereunder. The POCSO Act, 2012 is an Act to protect children from offences of sexual assault, sexual harassment and pornography and provide for establishment of Special Courts for trial of such offences and for matters connected therewith or incidental thereto.

It is necessary for the proper development of the child that his or her right to privacy and confidentiality be protected and respected by every person by all means and through all stages of a judicial process involving the child.

It is imperative that the law operates in a manner that the best interest and well-being of the child are regarded as being of paramount importance at every stage, to ensure the healthy physical, emotional, intellectual and social development of the child.

What is abuse?

Abuse consists of anything that individuals, institutions or processes do (or fail to do) that directly or indirectly harm children or adults, or damages their prospect of a safe and healthy development.

Abuse, sexual exploitation, harassment involves people within or connected with the organisations using their power in harmful ways against Children, YP or people who are less powerful, either in the organisation, in partner organisations or in the communities where the organisation works. Powerful people can also perpetrate physical and emotional violence. These forms of violence are referred as safeguarding violations. Most child abuse is inflicted by someone the child knows, respects or trusts. Staffs should be knowledgeable of the potential reasons why children may not be able to talk about any victimization they might have experienced.

Sexual exploitation and sexual abuse of children are heinous crimes and need to be effectively addressed. All offences against any child are tried under POCSO in special courts. A person may abuse a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional (e.g. school) or community setting; children may be abused by individuals known to them, or more rarely, by a stranger. Often children may experience multiple forms of abuse simultaneously, further complicating the problem.

Signs and Symptoms of different types of abuses:

- a. **Physical Abuse:** Physical abuse is the actual injury to a child, or failure to prevent physical injury. It includes any action that could result in physical injuries such as burns, body injuries and broken bones.
 - Burns, bites, bruises, shrinks at the approach of adult
 - Always watchful and “on alert,” as if waiting for something bad to happen
 - Injuries have a pattern like marks from a hand or belt.
 - Unnecessary fear to come to the centre or project
 - Wears inappropriate clothing to cover up injuries
- b. **Emotional Abuse:** It is actual or likely persistent or severe emotional ill treatment or rejection of a child, which is likely to have an adverse effect on the child’s emotional and behavioural development.
 - Extreme behaviour, overly compliant or demanding.
 - Extremely passive or aggressive

- Inappropriate adult behaviour
- Frequently rocking or head-banging
- Show suicidal tendency
- Reports a lack of attachment

c. **Sexual Abuse:** Involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society

- Difficulty in walking or sitting
- Refuse to participate in physical activities
- Reports nightmares or bedwetting
- Experiences a sudden change in appetite
- Efforts to avoid a specific person
- Don't want to change clothes in front of

d. **Neglect:** Neglect refers to the abandonment of children or the persistent or severe failure by a caregiver to meet a child's basic physical and psychological needs or failure to protect a child from danger, which could result in serious impairment to the child's health and development.

- Frequently late/absent in school
- Beg/steal food or money
- Lacks needed medical/dental care
- Hygiene is consistently bad
- Clothes are ill-fitting, filthy
- Abuses alcohol or drugs
- Left alone/ play in unsafe situations

N.B. *Children and young people may experience more than one of these forms of violence– for example, a child or young person experiencing physical violence is also likely to be emotionally abused. Abuse becomes violence when it causes you to fear for your life. Violence impacts every part of us—physical, emotional, spiritual and mental.*

Violence is an action that causes destruction, pain, or suffering whilst abuse refers to prolonged maltreatment that can cause emotional as well as physical trauma. In the eyes of the law, violence is usually perceived as an action (occurring once or twice) that causes physical harm whereas abuse is a form of sustained emotional and physical mistreatment that can span months or years.

XIII. This policy will address the following areas of Safeguarding: (e.g.-child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. It commits to addressing safeguarding throughout its work, through the three pillars of **Prevention, Reporting and Response.**

The SCYPP of the organisation would entail two key components, i.e. Preventive Approach and Reporting & Response (Rehabilitative) Approach.

A. Preventive Approach:

a) Risk Mapping to Develop a Code of Conduct when working with Children:

As an integral part of the SCYPP, Sabuj Sangha will also do/ undertake a risk assessment to review/ examine different aspects of its program support and services that are offered to the Ch. & YP from a safeguarding lens. We would review if there's any of our program delivery system/ practice/ processes that have a potential to put children at risk. For example location or our outreach centres, privacy and safety in our residential programs, health delivery mechanisms etc. We would also do risk assessment of programs of different nature like, emergency response, health programs, education program, events, sports etc.

SS would undertake this exercise under supervision/ guidance of a Child Safeguarding Specialist who's familiar to local contexts, culture and different situations. Risk assessment exercise would enable us to:

- Identify potential risks
- Develop SOPs to minimise risks and to be able to respond on-time to potential risks
- Ensure preparedness and take precautions to eliminate or reduce potential risks
- The 'Code of Conduct' would be reframed/ updated to put in place the safeguarding policy and procedures of the organisation and to effectively manage the identified risks through risk mapping exercise.

Safeguarding 'Code of Conduct:

In an organisation like us which is growing and diversifying, it is critical to develop a proper code of conduct for working with children and young people because of the following reasons:

- **Protect Children and Young Persons:** It will help to keep children and young people safe and protected by ensuring the organisation is safe for them.
- **Protect Staff** – as staff are clear on expectations on their behavior with children and young people, it reduces the risk of unintentional harm and false allegations.
- **Important to protect the organisation** i.e. the organizational credibility and reputation
- **Important** that everyone across the organisation understand what is expected of you in relation to your interactions with children and young people.
- It is mandatory for all staff to read the Safeguarding Code of Conduct and the SCYPP.
- Sabuj Sangha will ensure development and circulation of its own **code of conduct**

❖ ***The Preventive Approach would include following steps:***

- i. Selection of Focal Point of the organisation, Child Protection Officers (focal points in the Program Unit/ outreach units), Child Protection Facilitator (who would educate, sensitize and work to keep children safe at the program sites and formation of the Child Protection Committees at the Core Organisation Level.
- ii. Form alliance with Child Protection Agencies and networks at the Program Unit levels for the medical attention, psycho-social support, Shelter and Legal Aid when it may be needed.
- iii. Promote Awareness: Ensure regular training of staff and volunteers on Safeguarding of Ch. & YP. Ensure all vendors, Intern, all associates are aware about the organizations' safeguarding policy and sign on it as proof of their agreement to adhere to the SCYPP of Sabuj Sangha.
- iv. Educate and empower children by informing them on their rights, personal safety and necessary steps they should take in case they face any challenge/ problem.
- v. Encourage all staff member to and children, volunteers or interns and the community members to speak out if they come across any incident of abuse of Ch. & YP.
- vi. Prevent abuse by staff and volunteers, or Visitors at Unit/ outreach centres, project offices or at the community level. We are committed to ensure the best interest of the children and they are our first and foremost priority. In case of a reporting against any staff or other associate of Sabuj Sangha, there will be temporary suspension of the person from the duty until the investigation is completed. Necessary disciplinary action to be taken as per the Organisational policy and the law of the land without any hesitation or consideration.
- vii. Ensure a systematic 'Reference Check' during new recruitment, proper Induction of new Joiners on organisational policies, procedures and SCYPP.
- viii. The Safeguarding Focal Points at the Centre and Unit level will ensure that, no video or photos that may help to identify individual children shall be included in the organization's website or in any publicity materials like report, case story, testimony, face-sheet etc. In case there is a specific need of such information about a child or group of children, SS Staff will ensure Parental Consent before using such pictures or videos.
- ix. Training of Children on Cyber Safety and Security: We are in the era of digital technology. While it had brought the entire world to our door-steps at the same time, it has also brought different risks and complexities in our life. In the post COVID-19 era, children and YP became more vulnerable to different forms of abuse and exploitation in the cyber-space. Taking into cognizance such realities, Sabuj Sangha will make sure that, all its staff are trained on Cyber Safety and the Children & YP are also given adequate orientation so that, they don't fall into the trap of Cyber-crimes, abuse and exploitations. They would be trained on rational use of

Mobile Phone, Computer and Internet and would also be encouraged to report if the receive any sensationalized text or image with sexual contents or with or degrading language, images in which children are inappropriately clothed etc.

B. Reporting & Response (Rehabilitative) Approach would include the following steps:

- i. Bring suspected or confirmed cases of abuse to the attention of the Unit Head/ Project Manager and Child Protection Focal Point (**CPFP**) by the staff or volunteers. Ensure that child is protected from further abuse or harm.
- ii. For any Child or YP in Sabuj Sangha's operational area, Unit Head/ Project Manager would ensure a visit to the child/ YP within an hour of the reporting of any incident; would consult with CP Focal Point for any assistance.
- iii. Refer the child to listed referral sites for required measures as per the need of the child.
- iv. Follow up visit by member of Child Protection Committee as required. Regular follow up with the child by the Unit Head/ PM.

b) . Reviewing a Code of Conduct:

| You Should | You must never |
|--|---|
| <ol style="list-style-type: none"> i. Recognize safeguarding responsibility even if a child behaves in an inappropriate or provoking way. ii. Develop clear rules to address physical safety issues related to local physical environment of a project (e.g. projects based near water, heavy road traffic, railway lines and construction sites; emergency response). iii. Safety of Ch. & YP the utmost priority. Link them with supports in their respective communities who work within a Code of Conduct. iv. Avoid any form of sexual behaviors with any child, that include seductive speech, gestures, inappropriate physical contact for which Ch. & YP may feel uneasy. v. Always be watchful of high-risk situations like unsupervised mixing of Ch. & YP and minimize such risks to the extent possible. vi. Always follow the 'two-adult' rule, wherein two or more adults supervise all activities where children or YP are involved at all times. vii. Foster a culture of openness within the office and communities to enable any issues or concerns to be raised and discussed. | <ol style="list-style-type: none"> i. Not practice corporal punishment (hitting or punishing children). ii. Should not stay alone with one or more children from the project or programs in project location/center/ training hall etc. iii. Should not take a child or young person to a private place out of view of other adults. iv. Do not share personal contacts and exchange personal/ private messages with a Ch. or YP. v. Don't get into any form of physical contact with a child/ YP. Be aware about appropriate and inappropriate behaviour in regular activities that you/ staff conduct. vi. Touching is always a concern! Don't touch a Ch. or YP in secrecy or isolation from others or for sexual gratification. "Good touch" usually refers to hugs, encouraging pats, and other positive gestures. |

| | |
|---|--|
| <p>iii. Maintain confidentiality of all recorded information, sharing information which could identify a child or an alleged perpetrator, can be shared purely on a “need to know” basis.</p> <p>ix. Must report when you come across any safeguarding concern or an incident through appropriate authority as defined by the SCYPP</p> | <p>vii. Not reporting is not an option. You must never hide/ try not to report a safeguarding concern of a Ch. or YP. Non reporting would be considered as a violation of Child Safeguarding Policy of the organisation.</p> |
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c). Responding to Child Abuse: Dealing with disclosures and supporting children

Primary responsibility of all staff and associates of Sabuj Sangha is to report and encourage others to report to any safeguarding concern they may come across:

This means:

- ☐ You don't have to know if it's true
- ☐ You don't need to have understood any or some of what has been reported to you
- ☐ You don't have to find a witness or a survivor
- ☐ You don't have to investigate it further (and you shouldn't)
- ☐ You don't need to have evidence
- ☐ Your first and foremost responsibility is timely and proper reporting following organisation's defined reporting structure (SoP) and you should do as soon as possible.

d). Dissemination of the Policy:

i. **Dissemination of SCYPP** and its implementation would be an integral part of the organizational process and would begin with a formal roll out of the policy within the organisation. A “Cycle of Development” for SCYPP roll out and dissemination would be followed and look like: **Response - Review** (policies, procedures and practices) **and Improve** (depending upon the requirements at the best interest of the children). The review of the process and outcomes would be considered at absolutely critical to strengthen the SCYPP and make it comprehensive.

ii. **Training, sensitization and capacity building:** All staff would undergo a mandatory orientation training on SCYPP once it is formally launched by the Sabuj Sangha Board. To keep everyone abreast on any change in SCYPP or any development in the legal framework on the country, a refresher training would be organised once in every a year for all staff and the management. The orientation training would include a briefing on safeguarding of children & young persons, appropriate and inappropriate behavior toward children and failure to adhere the SCYPP. All must be informed that, non-adherence to safeguarding policy and protocols will lead to disciplinary action including retrenchment.

All Volunteers, Intern, Short-term Consultant, Visitors including Donors would be provided a short induction on the SCYPP before they start working on the ground. Vendors and all external service providers would have to sign a Safeguarding Code of Conduct at the beginning of their association with Sabuj Sangha.

Safeguarding of Ch. & YP is an organizational commitment and any action or part of this process can never remain unaddressed or incomplete. In case of an incident reported or suspected, all necessary steps would have to be adhered and completed as outlined in the SCYPP. It is critical to adhere to an end to end cycle of organizational processes starting from recruitment of staff.

Safe Recruitment: Thorough reference check of all new joiners (staff/intern/ volunteer) need to be done. This would be very critical and non-negotiable for all staff who may be in direct contact with the children or YP. All staff, associates would be informed about Sabuj Sangha's SCYPP; they need to go through, understand, sign and give it back to HR as an acceptance to the policy as well as their commitment to keep children young people safe within the organisation across its project and programs.

Internal communication: Internal communication is critical for proper implementation of the SCYPP. All designated staff members should follow their duty of care and as a part of that, document incident, maintain confidentiality and report through designated staffs within the organisation. Internal communication should be clear and transparent and there should not be any fact to hide which may negatively impact the child's well-being and development. Internal communication also must take in timely manner as specified in the SCYPP.

Peer learning and review: SCYPP is an evolving concept, being practiced by NGOs especially over last two decades. It's an extremely sensitive issue and must be handled sensitively since children or young person and associates including staff of the organisation maybe involved in this matter. In course of dealing with it, there would be different types of learnings. Every case or incident may also be very special in nature, so there might be special and specialised approaches required in dealing with them. In current environment NGOs, INGOs, Govt. are dealing with these things and it would always be good to learn elements of good practices from the Peer Organisations which would help to strengthen Sabuj Sangha's SCYPP in practice. Peer learnings would also help to add new elements if that may remain in the existing policy to make it more comprehensive.

Safeguarding Audit: Safeguarding Audit is critical to ensure the effectiveness of the existing policy, efficiency of the team involved with it. It will also help to identify areas where additional safeguarding measures may have to be implemented especially in case of emergencies. The Audit would develop a culture of care for children and young people in every unit/ operational area of the organisation. This must be undertaken every year, to be led by the CS-FP under the guidance and supervision of the Director – Sabuj Sangha. Safeguarding Audit is also an effective tool, helps to strengthen the organisational credibility and to communicate with donors and supporters of the organisation.

e). Safeguarding in Recruitment:

A thorough reference checks of all new joiners (staff/intern/ volunteer) need to be done. This would be very critical and non-negotiable for staff who will be in direct contact with children or YP. Relevant staff and associates would have to be informed about Sabuj Sangha's SCYPP. All need to go through, understand, sign and give it to HR as an acceptance to the policy as well as their commitment to keep children young people safe within the organisation across its project and programs.

f). Safeguarding Responsibilities:

- ✓ It is important to remember that reporting safeguarding concerns is a mandatory responsibility of all staff and associates of Sabuj Sangha.
- ✓ Report your concerns to the designated Safeguarding Focal Point or to the respective Line Manager/ Supervisor as defined in the SCYPP.

XIV. Accountability Structure:

To ensure proper roll out and implementation of the SCYPP, Sabuj Sangha Organisation management will form its "Child Safeguarding Team" and define individual and team responsibilities and accountabilities of its staff and the Governing Body. The following structure and 'line of response' will be followed towards proper execution of the policy:

- **Child Safeguarding Focal Point (CSFP):** Responsible for all issues and actions related to child & YP safeguarding. Organisation management to decide to nominate the CP Focal Point as the Child Safeguarding Focal Point or nominate a different person/ staff member in consultation with the Management Committee.
- **Child Safeguarding Coordinator:** Every Unit/ Outreach Centres will have a nominated Ch. Safeguarding Coordinator. S/he would deal with all issues and actions related to child protection of/ under that particular program unit.
- **Human Resource Coordinator (CSC):** At the City/ Coordination Office, the Executive Assistant to the Director/ Secretary would help to address the child safeguarding issues and concerns at the organisation level in consultation with the CS-FP.
- **Extended Committee:** The Extended Committee would be comprised of the CSFP, CSC, HRC and all the Unit Head/ Project Managers. The Extended Committee will have representation from the Management Team/ Governing Body of the organisation.
- **The Advisory Team/ Committee:** A lawyer with knowledge on Child Rights, Safeguarding of Children & YP along with the Legal Advisor of Sabuj Sangha would be the member of the Advisory Team/ Committee. A senior Child Rights and Organisation Development Professional (external) would be invited to be part of the Extended Committee to who would bring the larger. Inter-organisational perspective on Safeguarding to the organization.

XV. Reporting:

- i. The staff, volunteer, child or parents need to inform the Child Safeguarding Coordinator (CSC)/ Project Manager/ Unit Head at the earliest possible when s/he comes across any confirmed or suspected case of abuse.
- ii. The Unit Head/ Project Manager (PM) and/ or Child Safeguarding Coordinator (CSC) must visit the child within an hour and consult with CS-FP for any guidance. During the visit, respective staff must ensure the child receives the service based on his/her need.
- iii. In the entire process, utmost confidentiality must be maintained.
- iv. Then Unit Head/ PM must report the matter to the CS-FP via email within an hour of his/her visit.
- v. After receiving the information, the CS-FP will inform about the incident to the Director of Sabuj Sangha via email.
- vi. Depending on the nature of the abuse and the trauma, the child should be referred to any of the resource organisation for necessary rehabilitative measures/services for the affected child.
- vii. The alleged Staff/ volunteer/ visitor will have to be suspended till the investigation is completed. S/he would have to be disconnected from all sorts of Organisational information during the course of the investigation.
- viii. The CS –FP will lead the investigation in consultation with the Director and the Advisory Team / Extended Committee if required for any legal support or guidance in relation to the reported incident.
- ix. The Staff /volunteer/ visitor would have to be informed that, s/he would be given an opportunity to respond in regard to the allegation against him/ her.
- x. Unit Head/ CSC will have to prepare and share weekly updates with the CS-FP until advised by CS – FP that those updates would no longer required.
- xi. Unit Head/ PM/CSC must submit a full **Child Protection Incident Report (CPIR)** within 3 business days of incident being reported to CS-FP.
- xii. The CS -FP will have to send the CPIR to the Director of Sabuj Sangha within 5 business days of the incident being reported.
- xiii. The Director of Sabuj Sangha must notify all of the following to the Governing Board within 5 business days depending upon the severity of the incident.
- xiv. The first draft of investigation report shall be submitted by the CS-FP within 15 days of the incident being reported to the Unit Head/ PM/ CSC.
- xv. The CS - FP as the Head of the Safeguarding Children Committee will have to submit the **complete investigation report** of the incident along with action points within 30 days to the Director – Sabuj Sangha.
- xvi. The Director of Sabuj Sangha will send the final investigation report to the Governing Board within 3 days of receiving the report from CS -FP.
- xvii. A follow up report of the incident will be submitted by the CSC to the CS –FP within 2 months of the CPIR. The CS –FP will send the follow up report with his/ her observations and inputs to the Director - Sabuj Sangha within 3 days of receiving the follow up report.

- xviii. The alleged Staff/ Volunteer/ Visitor under investigation will be informed whether the allegation against him/her has been proven or not.
- xix. The Staff/ Volunteer/ Visitor/ Child or YP's parents who has raised the issue will also be informed about if the allegation brought on by him/her has been proven or not.
- xx. In case the complaint is proved, then the Staff/ Volunteer / Visitor/ Associate shall be recommended for disciplinary action according to the HR Policy of the organization and also as per the law of the land depending upon the nature of the case/ incident.
- xxi. Sabuj Sangha shall reserve the right to disclose such information if requested by a prospective employer, in accordance with applicable local laws.

a. How to Report a Safeguarding Concern:

Primary responsibility of all staff and associates of Sabuj Sangha would be to report and encourage others report if they come across safeguarding concern of Ch. or YP:

This means:

- ☐ **You don't have to know if it's true**
- ☐ **You don't need to have understand if any or some of it has been reported**
- ☐ **You don't have to find a witness or a survivor**
- ☐ **You don't have to investigate further (and you shouldn't)**
- ☐ **You don't necessarily need to have evidence**
- ☐ **Your responsibility is timely and proper reporting, which you should do as soon as possible**

- *If the alleged perpetrator is a Staff, Associate or Visitor, all safeguarding concerns and breaches of the policy must be reported.*
- *If the alleged perpetrator is outside the scope of the policy (i.e. none of the above) only safeguarding concerns relating to sexual abuse & exploitation, and concerns of violence which suggest a crime has been committed, should be reported. Comprehensive legal framework exist in the country including the recent developments like POCSO, Nirbhaya Act. And the alleged/ perpetrator would be tried in a Court of Law.*
- *All types of violence regardless of who the perpetrator is must be reported.*

XVI. Response:

(It will include the follow up of safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations, applying disciplinary measures to staff found in breach of policy, offering support to survivors of harm etc.)

- **Best interest of the Child:** Individual staff, Volunteer, GB Member and associates of Sabuj Sangha would be responsible to look into wellbeing and development of Ch. & YP at their best interests (UNCRC). An important role of the staffs in the organisation is to understand the organisational policy and procedures in place to safeguard children. All actions relating to child safeguarding would have to be taken in the best interests of the Ch. or YP as outlined by UNCRC.
- **Recognise – Respond – Report:** It should be the commitment of all staff/ volunteers/ associates to follow this pathway. There is no excuse to hide or not to report of child safeguarding concerns. Staff who may try to hide or not to report would be found similarly guilty like the offender and organisation will have every right to take disciplinary action against the said staff/ volunteer/ member.
- **Continue to support Ch. or YP:** After experiencing an incident of abuse or exploitation, the Ch. or YP may require medical attention or psychosocial support or a safe shelter or any other rehabilitative care for a period of time. Sabuj Sangha will extend/ provide necessary support depending upon the specific need of the particular Child/ YP adhering to organizational safeguarding standards and protocols. Medical attention to be provided through a qualified medical practitioner or by an authorized medical institution. Psycho-social support to be provided by a trained Counsellor and shelter can only be as affiliated with the organisation and would have to be duly approved by the state authorities.
- **Facilitate referral (as required):** To ensure dissemination and roll-out the SCYPP, Sabuj Sangha, under the leadership of the CS-FP would network and form alliance with different service providers i.e. Medical, Psycho-social, Shelter etc. after reviewing their service standards. The process would be completed following proper due-diligence procedure. After due approval of the Director – Sabuj Sangha, MOU/ Partnership Agreement would be signed between Sabuj Sangha and the Service Providers. The referral services to be provided through these empaneled facilities/ institutes.

XVII. Safeguarding during Emergency:

Safeguarding risks increases for people affected by humanitarian settings and as always Ch. or YP affected by emergencies tend to be at increased risk of neglect, abuse, and sexual exploitation. For children, YP, people living with disabilities, the risk of abuse is always heightened due to inherent stigma, isolation, discrimination and a lack of support.

Larger part of Sabuj Sangha's operational area is prone to recurrent flooding, cyclone, earthquake, waterlogging, fire and displacements. Multiple safety risks get involved in such situations. Young people and adults with diverse genders, sexualities and bodies are also at increased risk of harm in the urban contexts. Ch. & YP become more vulnerable to sexual abuse, exploitation and other forms of harm in a fragile situations which cause imbalance of power. Emergencies affect livelihoods, increase food insecurity and cause large scale distress migration, trafficking, separation from parents etc.

Considering such realities SS would put in place a separate Safeguarding measure which would be specifically responsible to deal with safeguarding issues during and the post emergency situations. Ideally the Child Protection Focal Point of the organisation would take interim charge of Safeguarding Focal Point for the Emergency Operations and would work under the direct supervision of the Director and in coordination of the CS-FP of the organisation. As mandatory steps, all volunteers, interns who may have to be deployed to the response operations would be given condensed training on SCYP Policy of the organisation. Each one (new or old) to be deployed to the field would be informed about the consequences of ramification of breach.

As necessary steps, the support systems and referral units (allies/ resource organisations as mentioned in the policy) would be alerted for referral or treatments. The CS-FP and Director would keep a vigil and take stock of any safeguarding concerns in the field on a daily basis to ensure that, no concern can emerge and if it emerges can be dealt with utmost priority.

XVIII. Review & Approval (A Living Document): This policy is a living document that will be reviewed and revised every 2/3 (whichever the organisation decides) years to embed and incorporate the organization's emerging contexts and relevance.

The current document/ SCYPP would be placed before the SS Board by the Director for review and approval. The Director would present the summary of the document to the GB for understanding.

To reiterate that, Sabuj Sangha's SCYP Policy is a living document and would be improved and strengthened over the years taking into cognizance the observations of the Safeguarding Audits, Peer Learning & Reviews, Learnings in course of dealing specific safeguarding concerns and from feedback and recommendations of the Ch. and YP.

XIX. Confidentiality (optional- can be clubbed with other points)

XX. Ramification of Breach:

- **Maintain Confidentiality:** Sabuj Sangha is committed to keep all recorded information confidential as a safeguarding code of conduct. Disclosure of information which may help others/ alleged/ perpetrator to identify the Ch. or YP would be considered as a breach or trust.
- **If anyone on receiving any information shares those with any other person who does not need to be informed,** will be considered as a violation of SCYPP of Sabuj Sangha. In such instances She/he will be liable for disciplinary action according to the HR Policy of the organisation.
- **Not Reporting of Cases:** If it is noted that an employee (payroll / contractual), volunteer, despite having knowledge about any confirmed or suspected incident, does not report about it to the CS-FP/ PM/ Unit Head/CSC, it will then be considered as a violation of the SCYPP of

the organisation. In such cases he/she will be liable for disciplinary action according to HR Policy of SS.

- Punishment for intention to malign: If it is proven after investigation that an employee (payroll / contractual), volunteer raises an incident of abuse with the intention to malign any employee, appropriate action as prescribed under the provisions of the Protection of Children from Sexual Offences Act, 2012 would be initiated against the complainant.

XXI. Glossary of Terms

ANNEXURES:

Annexure 1 : Incident Reporting Form

Annexure 2 : Final outcome

Annexure 3: Response checklist:

Annexure 4 : Reporting Flow Chart:

Annexure 5: Self audit Tool (It would help to generate progress reports and plan for future work):



CHILD PROTECTION INCIDENT REPORT

General Information:

| | |
|---|--|
| Office Location / Name: | |
| Report submitted by (Staff name) | |
| Position / Job Title (designation) | |
| Date of abuse (incident) was reported to the field/ Office location | |
| Date of report submission to Child Safeguarding Coordinator | |

Section I: Child Information:

| | |
|---|--|
| Name of Child/Young Person | |
| Sponsored Child or Non-Sponsored | |
| Child ID (in case of a Sponsored Child) | |
| Age | |
| Gender/ Sex | |
| Detailed address | |
| Contact number (Parents/ Guardian): | |

Section II: Information about the Family:

| Name | Gender/ Sex | Age | Relation with the child/ Young Person | Occupation |
|------|----------------|-----|--|------------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Section III: Type of incident

- a. Is the alleged person/ perpetrator associated with Sabuj Sangha? If yes, please specify (Staff/ Volunteer/ Intern/ Visitor/ Member/ Vendor etc.):



| |
|---|
| |
| b. Place of occurrence of the incident: (Outreach Centre / Training Centre/ School / Hospital or Health Centre/ Office or extended Office Premises or within the Community during some event? |
| c. Type of Incident (happened to the child / YP: |
| <ul style="list-style-type: none">- Physical abuse- Sexual Abuse- Emotional Abuse- Neglect- Child gone missing- Any other endangerment |
| - |
| d. By whom was the incident first reported to Field Location staff (Mother, father, grandmother, volunteer, self-reported by child/youth, other community member, etc.)? |
| e. To which staff the person reported the incident first: Centre In-charge / Teacher / Instructor / Child Safeguarding Coordinator / Nurse or a Doctor / A Field Worker / Any other (specify): |
| f. Please identify the suspected perpetrator's relationship to the child/ young person (in this incident): Teacher / Centre Staff / Doctor / Nurse / Trainer / Instructor / any other |
| g. Describe the details of the incident as it is known to the Field Location (add separate sheet as required): |



| |
|--|
| <p>h. Describe the action taken by the staff at the Field Location as specified below:</p> <p>i. Medical assistance: First Aid / Hospitalization</p> <p>Legal assistance:</p> <p>Psycho-social support:</p> <p>Safe Shelter</p> <p>Any other type of assistance:</p> |
| <p>i. Indicate the current location of the Child/ YP:</p> <ul style="list-style-type: none">- Home:- Shifted to an external institution (shelter)- Shifted to a relative's place- Shifted to a hospital: |
| <p>j. If the child is currently in an external 'Institution' for some specialised support; is that support being provided by Sabuj Sangha?</p> <p>k. Does Sabuj Sangha staff/ CSC/ CS-FP Have access to the Child/ YP?</p> |
| <p>Name of the Staff</p> <p>Date:</p> |

Please Note: A Follow-up Report needs to be submitted to the Child Safeguarding Focal Point of Sabuj Sangha within two months of submission of this report.



Child and YP Safeguarding Pledge & Code of Conduct for Staff/ Employees

I declare that during my course of appointment at Sabuj Sangha, to the best of knowledge & conscience:

- I will update myself about Sabuj Sangha's Safeguarding of Children & Young Person's Policy (SCYPP) and the Code of Conduct.
- I will treat Children and Young Persons with respect and dignity and respect their right to equal participation, freedom of expression and right to privacy.
- As a part of my role and responsibilities within the organisation I will create an enabling and inclusive environment for every child and young person irrespective of their gender, caste, religion or of having any disability.
- I will provide an enabling environment for children's personal, physical, social, emotional, moral and intellectual development.
- I will never use corporal punishment or punitive measures for disciplining children.
- I will maintain confidentiality in the best interest of the child.
- I will refrain from any sexual behavior or act with any child or young person or in their presence which includes sexual gestures, seductive speech and inappropriate physical contact that exploits, abuses, harasses or may make them uncomfortable.
- I will adhere to the acceptable standards of good touch and bad touch especially while working or coming in contacts of children and youth.
- I will be cognizant of high-risk peer situations, unsupervised mixing of older and younger children and be vigilant in such occasions to minimize these risks.
- I will never take a child/ children or young person/s to a private place out of supervision of other adults.
- I will always follow the 'two-adult' policy, wherein two or more adults supervise all activities where children are involved.
- I will never enter into a room, classroom/ training centre or any such spaces (public or private) if the Child or YP is alone/ unsupervised.
- I will encourage and foster a culture of openness within office, trainings, workshop and in the community centres so that, the issues or concerns could be raised openly and discussed.
- I commit to response and report to any incident of child & YP abuse, violation of the SCYPP within Sabuj Sangha's operational area/s.
- I will ensure physical safety of Ch. & YP if/ when they are near to or exposed to a physical environment like the Centre is based near water, sewage/ canals/ road traffic, railway tracks or construction sites etc.

I have read / received training on SABUJ SANGHA child protection policy and protocol. I have also understood that as a condition of my employment with SABUJ SANGHA, I am required to comply with the policies set forth. I agree to abide with all the policies enumerated in the Sabuj Sangha Child & YP Safeguarding Policy and Protocol.

Signature.....

Date.....

Name & Designation of the Staff:

Place:



Child and YP Safeguarding Pledge & Code of Conduct

(Volunteer / Intern / Donor / Visitor)

Name:

Address:

I am associated with Sabuj Sangha as a: _____ and to the best of my knowledge:

- I will update myself about Sabuj Sangha's Safeguarding of Children & Young Person's Policy (SCYPP) and the Code of Conduct.
- I will treat Children and Young Persons with respect and dignity and respect their right to equal participation, freedom of expression and right to privacy.
- As a part of my role in the organisation I will create an enabling and inclusive environment for every child and young person,
- I will create an enabling environment for children's personal, physical, social, emotional, moral and intellectual development.
- I will never use corporal punishment or punitive measures for disciplining children.
- I will maintain confidentiality in the best interest of the child.
- I will refrain from any sexual behavior or act with any child or young person or in their presence which includes sexual gestures, seductive speech and inappropriate physical contact that exploits, abuses, harasses or may make them uncomfortable.
- I will adhere to the acceptable standards of good touch and bad touch especially while working or coming in contacts of children and youth.
- I will be cognizant of high-risk peer situations, unsupervised mixing of older and younger children and be vigilant in such occasions to minimize these risks.
- I will never take a child/ children or young person/s to a private place out of supervision of other adults.
- I will always follow the 'two-adult' policy, wherein two or more adults supervise all activities where children are involved.
- I will never enter into a room, classroom/ training centre or any such spaces (public or private) if the Child or YP is alone/ unsupervised.
- I commit to response and report to any incident of child & YP abuse, violation of the SCYPP within Sabuj Sangha's operational area/s.
- I will ensure physical safety of Ch. & YP if/ when they are near to or exposed to a physical environment like the Centre is based near water, sewage/ canals/ road traffic, railway tracks or construction sites etc.

I have read the SCYPP of Sabuj Sangha and have understood that as a condition of my association with the organisation as a Volunteer/ Intern, I need to comply with their SCYPP. I agree to abide with all the protocols and Code of Conduct as outlined in the SCYPP of Sabuj Sangha.

Signature of the Volunteer/ Intern

Date

Place:



Child and YP Safeguarding Pledge & Code of Conduct

(Vendor/ External Service Provider)

Name:

Nature of Association with the Organisation:

Detailed Address:

I declare that during the course of my assignment with Sabuj Sangha:

- I will read the Safeguarding of Children & Young Person's Policy (SCYPP) and the Code of Conduct. Sabuj Sangha.
- I will treat Children and Young Persons with respect and dignity and respect their right to equal participation, freedom of expression and right to privacy.
- I will never use corporal punishment or punitive measures for disciplining children.
- I will maintain confidentiality in the best interest of the child.
- I will refrain from any sexual behavior or act with any child or young person or in their presence which includes sexual gestures, seductive speech and inappropriate physical contact that exploits, abuses, harasses or may make them uncomfortable.
- I will adhere to the acceptable standards of good touch and bad touch especially while working or coming in contacts of children and youth.
- I will never take a child/ children or young person/s to a private place out of supervision of other adults.
- I will always follow the 'two-adult' policy, wherein two or more adults supervise all activities where children are involved.
- I will never enter into a room, classroom/ training centre or any such spaces (public or private) if the Child or YP is alone/ unsupervised.
- I commit to response and report to any incident of child & YP abuse, violation of the SCYPP within Sabuj Sangha's operational area/s.
- I will ensure physical safety of Ch. & YP if/ when they are near to or exposed to a physical environment like the Centre is based near water, sewage/ canals/ road traffic, railway tracks or construction sites etc.

I have read the SCYPP of Sabuj Sangha and have understood that as a condition of my association/ business with the organisation, I need to comply with the Organisation SCYPP. I agree to abide with all the protocols and Code of Conduct as outlined in the SCYPP of Sabuj Sangha.

Signature of the Vendor/ Service Provider

Date.....

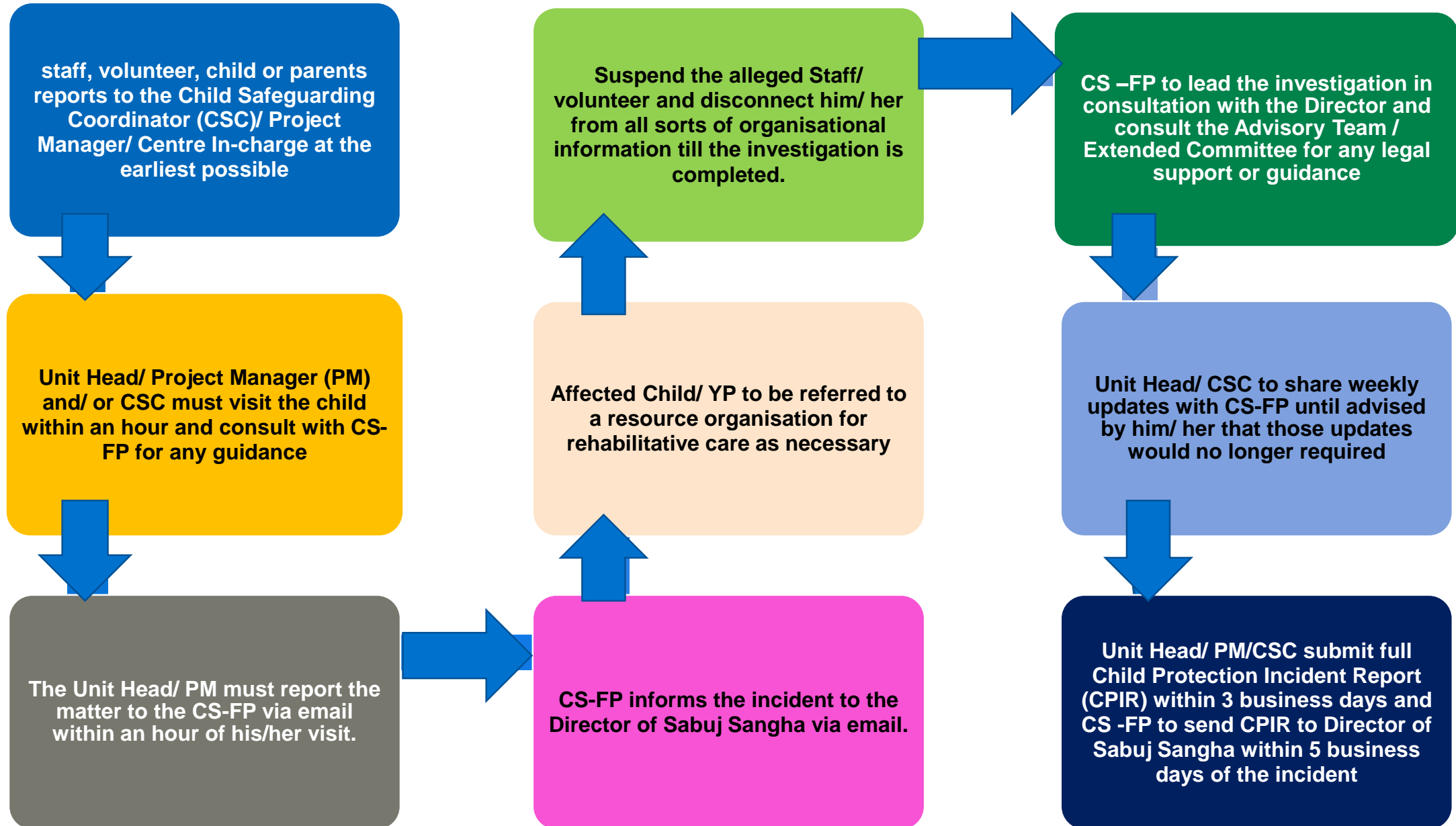
Place:

SELF-ASSESSMENT CHECKLIST
SAFEGUARDING OF CHILD AND YOUNG PERSON'S

| Standard 1: Policy | A | B | C |
|--|---|---|---|
| SS's Safeguarding of children and young person's policy has been approved by its Governing Board which will have to be adhered by all staff and associates of S Sangha | | | |
| The SCYPP of the organisation informs UNCRC and other Conventions and guidelines pertaining to children and young persons. | | | |
| The policy is clear, aligned to local contexts and easily understandable, shared with all relevant stakeholders, including children and young persons. | | | |
| SCYPP clearly mentions and reiterates equal rights to protection and safeguarding for all children and Young Persons particularly who are at risks and difficulties in getting required support because of their ethnicity, gender, age, religion or disability, sexual orientation. | | | |
| The policy addresses safeguarding children and YP from harm through misconduct by staff, associates and others from its operational activities where these may harm children or put them at risk due to poor design and/or delivery, for example. | | | |
| S Sangha outlined clear about the safeguarding roles and responsibilities of children & YP which rests on the organisation management, Director, CS-FP and other senior staffs. | | | |
| Standard 2: People | A | B | C |
| Recruitment processes have strong child safeguarding reference checks in place. | | | |
| Code of Conduct provide guidance on appropriate behaviour, expected standards towards children and YP. | | | |
| Ch. & YP are made aware on their rights, provided information on how to keep themselves safe from abuse and information provided to Ch. YP, parents/care-givers on where to go for help. | | | |
| The organisation is open and informed when it comes to safeguarding of Ch. & YP such that issues can be easily identified, raised or discussed. All members of staff, volunteers and associates have training on child safeguarding. | | | |
| SS has designated responsible people at different levels as "Safeguarding Focal Point" with clear and defined responsibilities to support, implement and communicate child & YP safeguarding policy | | | |
| Standard 3: Procedures | A | B | C |
| Sabuj Sangha will carry out local mapping exercises to analyse legal, social and child protection arrangements in the areas where it works. | | | |

| | | | |
|--|----------|----------|----------|
| Sabuj Sangha established an appropriate process for reporting and responding to CH. & YP safeguarding incidents and concerns aligning to the local systems to deal with an incident of abuse/ harm (as defined in the mapping exercise). | | | |
| Adequate human and financial resources are made available to support development and implementation of child safeguarding measures. | | | |
| Clear procedures are put in place to provide step-by- step guidance on reporting safely which are linked to the organisations disciplinary policy and procedures. | | | |
| Safeguarding of Ch. & YP are integrated with mainstream processes & systems (planning, budgeting, recruitment, programme implementation and management, performance appraisal, procurement, etc.) to ensure safeguarding of Ch. & YP | | | |
| Standard 4: Accountability | A | B | C |
| Systems are put in place to monitor implementation of child safeguarding policies and procedures in compliance to specific measures that are put in place within the organization like quality assurance, risk management, audit, monitoring and review. | | | |
| System of regular reporting to key management forums, including Director and Governing Board are put in place to track progress, compliance on safeguarding of Ch. & YP. | | | |
| External or independent bodies such as Advisory Team, Extended Committee formed to monitor performance in this area of CH. & YP Safeguarding; which can hold Director, CS-FP/ Unit Head accountable in relation to safeguarding issues. | | | |
| Policies and practices are reviewed at regular intervals and formally evaluated in 3 years. | | | |
| Progress, performance and lessons learnt are reported to Governing Board, Peer NGOs, independent bodies where relevant) and included in organisations' annual reports. | | | |

REPORTING FLOW CHART





RISK ASSESSMENT REPORT

Name of the Unit / Outreach Centre:

Date of generation of the report:

Name of the Unit Head / Child Safeguarding Coordinator:

Name of the Centre In-Charge:

| Sl. no. | Who is at risk? | Factors putting them at risk? | What is the risk? | Risk rating (High / Medium/ Low) | Types of control in place? | Additional controls to be put in place to minimize risks? | By whom? | By when? |
|----------------|------------------------|--------------------------------------|--------------------------|---|-----------------------------------|--|-----------------|-----------------|
| 1. | | | | | | | | |
| 2. | | | | | | | | |
| 3. | | | | | | | | |
| 4. | | | | | | | | |





WHISTLEBLOWING POLICY

Sabuj Sangha's Code of Ethics & Business Conduct at Work



SABUJ SANGHA

30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107



I. PREFACE

The Organisation has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Organisation and its employees.

The Whistleblowing Policy of Sabuj Sangha has been approved by the Board of Sabuj Sangha as per the terms of the provisions of the Whistle Blowers Protection (WBP) Act, 2014. The Act aims to protect people who bring to the notice of the authorities concerned allegations of corruption, wilful misuse of power or commission of a criminal offence against a public servant.

Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Organisation. The role of employees in pointing out such violations of the Code cannot be undermined. Accordingly in line with the WBP Act, this Whistleblowing Policy (“the Policy”) has been formulated with an aim to reinforce the organization’s commitment to its values, attitudes and behaviours.

II. POLICY

This policy applies to all staff of Sabuj Sangha and those of Partner organizations, as well as Vendors and Vendor organizations who are in a relationship with Sabuj Sangha. The policy covers responsibility to report all wrongful acts committed by staff of Sabuj Sangha, partners and members of the governing body only to the Ombudspersons, who are officially appointed to receive complaints, initiate the investigation. The Ombudspersons will also keep track of all reported cases and report the same to Board. The Organisation is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Organisation encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This policy aims to provide an avenue for employees to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

III. OBJECTIVE

The objectives of this Policy are:

- To create a window for any person who observes an unethical behaviour, actual or suspected fraud, or violation of the Organisation’s code of conduct or ethics policy, either organisationally or individually to be able to raise it;
- To encourage timely, safe and open reporting of serious misconduct includes alleged wrong doings or suspected impropriety, corruption, bribery or theft. This may include, but is not limited to:



- (i). Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority;
 - (ii). Falsification of organizational records for personal gain or gain for others on the part of Staff, partners and members of the Governing Body;
 - (iii). Miscarriage of justice;
 - (iv). Attempting to cover up any of the above; and/or
 - (v). Being aware of a misconduct or misuse and not reporting it
- To ensure consistent and timely institutional response;
 - To ensure appropriate reporting of Whistleblowing investigations;
 - To encourage ethical and lawful conduct;
 - To provide adequate safeguards against victimization of persons.

IV. SCOPE

This Policy defines and lays down the process for raising a 'Complaint', the safeguards in place for the person raising a Complaint, the roles and responsibilities of all stakeholders and also sets the time lines for all processes to be followed. In all instances, the Organisation retains the prerogative to determine when circumstances warrant an investigation and the appropriate investigative process to be employed, in conformity with this Policy and applicable laws and regulations.

Complaints related only to Unethical and Improper Practices will be dealt by this Policy. Any other complaints will be addressed by other competent authority under appropriate policies of the Organization.

V. APPLICABILITY

This Policy covers all directors, managers, employees, third party vendors, consultants, and partners operating out of any location of the Organisation.

VI. DEFINITIONS

- “**Disciplinary Action**” means any action that can be taken on the completion of /during the investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- “**Employee**” means every employee of Organisation (whether working in India or abroad)
- “**Protected Disclosure**” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature.
- “**Subject**” means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation under this Policy.



- **“Whistle blower”** means a person or entity making a disclosure of any actual or suspected Unethical and Improper Practice that they have observed. Whistle blowers could be directors, managers, employees, contractors, contractor’s employees, funders, partners, vendors, internal or external auditors, law enforcement/regulatory agencies or other third parties.
- **“Whistleblowing Committee”** means the committee constituted to deal with Complaints under this Policy.
- **“Chairman”** means the Chairman of the Whistleblowing Committee. The Chairman of this Committee shall be the Chief Financial Officer or equivalent of the Organization or such other person as may be appointed by the Board.
- **“Complaint”** means the reporting of any such Unethical and Improper Practice or violation to the Whistleblowing Committee (as defined above) by a Whistle blower made in good faith would constitute a complaint.
- **“Ombudsperson”** means any agency/ individual/ department appointed to independently carry out an initial investigation of the Complaints lodged by directors, managers, employees, vendors, partners, funders, or consultants of the Organisation.
- **“Audit Committee”** means the Audit Committee constituted by the Board of the Organisation in accordance with applicable law.

VII. GUIDING PRINCIPLES

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Organisation will:

1. Ensure that the Whistle blower and/or the person processing the Protected Disclosure is not victimized for doing so;
2. Treat victimization as a serious matter, including initiating disciplinary action on person/(s) indulging in victimization;
3. Ensure complete confidentiality;
4. Not attempt to conceal evidence of the Protected Disclosure;
5. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made; and
6. Provide an opportunity of being heard to the persons involved especially to the Subject.

VIII. POLICY DETAILS

It is the duty of all directors, managers and employees to notify the organization if they observe, or learn of, any Unethical and Improper Practices. Failure to promptly raise a known or suspected violation is considered as an unethical behaviour.

IX. REPORTING RESPONSIBILITY

It is obligatory for all of Sabuj Sangha staff to report wrongful acts or suspected wrongful acts in accordance with this Whistleblowing policy. Staffs of Partner



organizations are also required to report such acts committed by Sabuj Sangha staff or their own staff in the execution of their Partnership agreements.

X. PRIMARY FORUM FOR RAISING CONCERNS

Any member of the staff or partners believing they have suspicion or evidence of serious misconduct on the part of anyone associated with the organization, should in the first instance bring the matter to the attention of the appointed Ombudsperson. The Ombudsperson will be responsible for ensuring that the case is dealt with in accordance with the Whistleblowing policy.

XI. PROCEDURE FOR REPORTING

The Whistle Blower's role is that of a reporting party with reliable information through Protected Disclosure. Protected Disclosure means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. The Whistle Blower(s) is/are not required or expected to act as investigators or fact finders, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

XII. PROCEDURE TO SUBMIT A COMPLAINT

The complaint can be made in any of the following methods:

1. **Written Complaint:** A written complaint can be sent to any of the following address:

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|--|
| <p>The Chairman, Whistle blower Committee, Sabuj Sangha, 30/9, Rajdanga Main Road, (East) Kolkata, West Bengal- 700 107</p> |
|--|

2. **Email Complaint:** A complaint can be sent via email to the Ombudsperson at "whistleblower@sabujsangha.org"

All complaints received will be immediately reported to the Ombudsperson appointed by Sabuj Sangha.

XIII. CONFIDENTIALITY

1. The Whistle Blower will be accorded protection from victimization, 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 disclosure with honest intention, and without malicious intent or malevolence.
2. The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation. However, in certain cases, this may not be



possible, particularly in instances warranting police investigation or when a disciplinary hearing is held, where individuals will need to make a statement.

XIV. PROCEDURE OF INVESTIGATION OR HANDLING OF REPORTED CASES BY THE OMBUDSPERSON

1. The Ombudsperson who receives such report will acknowledge receipt of the report within five working days.
2. The Ombudsperson will carry out preliminary investigation of a complaint to decide if a full investigation is required based on the facts alleged in the complaint. If a full investigation is not required, the Ombudsperson shall submit its report to the Whistle blower Committee.
3. For other complaints, if the Ombudsperson decides that a full investigation is required, such complaints shall be forwarded to the Head of Internal Audit. The Head of Internal Audit shall decide upon further investigation and the next steps. The Head of Internal Audit shall submit its final report to the Whistle blower Committee, and any disciplinary action shall be decided by the Whistle blower Committee. A periodic update shall be provided by the Head of Internal Audit to the Audit Committee.
4. All reports should be properly investigated by the Ombudsperson through an external team for investigation as he/she deems appropriate.
5. 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.
6. Upon completion of the investigation, the Management should take the appropriate corrective action as warranted by the outcome of the investigation and recommended by the Ombudsperson.
7. The Whistle blower would also be notified of the outcome of the investigation whenever it deems fit.
8. There may be occasions when external bodies such as donors and regulators may also be notified of the outcome of an investigation.
9. On an annual basis, issues raised through whistleblowing will be tracked and reported to the Board of the Organization by the Ombudsperson.

XV. PROTECTION

1. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. Sabuj Sangha condemns any kind of discrimination, harassment, victimization or any other unfair employment practices being adopted against Whistle Blowers. Thus, if the Whistle Blower is required to give evidence in criminal, or disciplinary proceedings, Sabuj Sangha will arrange for the Whistle Blower to receive advice about the procedure, etc.
2. The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under the law of the land.



3. Any other employee indirectly assisting in the said investigation shall also be protected to the same extent as the Whistle Blower is.

XVI. DISQUALIFICATION AGAINST 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 the existing established procedures and complaint may be disqualified.

XVII. PREVENTION OF REPORTING

If some person tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, Sabuj Sangha will take this to be a serious disciplinary misdemeanour and such instance will be investigated in accordance with Disciplinary Policy.

XVIII. ANONYMOUS REPORTING

Anonymous reporting is not to be encouraged, but this may possibly occur from time to time. In all such cases, while not taking formal cognizance of such reporting, Sabuj Sangha Management 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.

XIX. NOTIFICATION

1. All Managers, are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.
2. The onus of making the Partners aware of their responsibilities vests with Director or the person assigned for the purpose by Sabuj Sangha Management who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of Sabuj Sangha staff in the execution of a Partnership agreement.

XX. RETENTION OF DOCUMENTS

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto, shall be retained by Sabuj Sangha for a minimum period of 7 years as a normal practice.

XXI. COMMUNICATION

1. This policy as amended from time to time shall be disclosed on the website of the Organization and in the report of the Board of the Organization.



2. The Audit Committee reviews the policy and its implementation on periodic basis and is provided a quarterly update on the status of various complaints received and investigated.

ANNEXURE 1: LIST OF UNETHICAL OR IMPROPER PRACTICES:

| | |
|----|--|
| 1 | Unethical business practices like bribery taken / given |
| 2 | Non-financial significant favours, gifts beyond the defined guidelines |
| 3 | Misuse of organization funds, assets, property, facilities etc. |
| 4 | Negligence causing substantial risk to public health and safety |
| 5 | Manipulation of organization data / records |
| 6 | Financial irregularities, including fraud, or suspected fraud |
| 7 | Abuse of authority |
| 8 | Criminal offence |
| 9 | Theft of confidential / proprietary / customer information |
| 10 | Violation of law / regulation organization wide |
| 11 | Embezzlement of organization funds/assets |
| 12 | Breach of employee Code of Conduct or Rules |
| 13 | Any other unethical behaviour |