



**UCEP**

Bangladesh

# **Anti-Terrorism Policy 2022**

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## 1. Objective

UCEP Bangladesh denounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism. The objective of this policy is to prevent UCEP Bangladesh to give shelter to or work with any person or organization directly or indirectly associated with any terrorist activity nationally and internationally. It ensures efficient and responsible delivery of aid with the means and the resources that have been entrusted to UCEP Bangladesh and is determined to prevent its program and activities from being used directly or indirectly for terrorist activities.

## 2. Scope

UCEP Bangladesh ensures none of its association or BoG members, staff, vendors, suppliers, development partners or any other partner is directly or indirectly involved in terrorist activities in Bangladesh or outside Bangladesh. This policy ensures prevention, detection and set out clear direction.

## 3. Dissemination

The Anti-terrorism policy will be available on UCEP Bangladesh's websites. This policy and all its updates will be communicated to all association and BoG members, staff, partners, donors and consultants. The Anti-terrorism policy will be mentioned in all legal agreements with staff, partner organizations, donors, consultants and suppliers.

## 4. Related Policies, Process and Tools

This policy will be aligned with the below mentioned policies, process and tools:

- Policies:
  1. Policy on Prevention of Fraud and Corruption
  2. General Code of Conduct for staff
  3. Code of Conduct for third parties
  4. Donation Guideline
  5. Procurement policy

- 6. Partner Alliance policy
- 7. Risk Management policy
- Process:
  - 1. Partner Contracting
  - 2. Partner Monitoring process
  - 3. Partner Reporting
  - 4. Vendor/suppliers selection
  - 5. Recruitment and Selection
  - 6. New membership of Association
  - 7. Renewal of Association membership
  - 8. Contract renewal or extension process
- Tools:
  - 1. Partner Risk Assessment
  - 2. Anti- Terrorism Software
  - 3. Due Diligence Assessment

## 5. Definition

A terrorist activity is an act, or a threat to act, or fund or laundering of the funds to support such act, if:-

- terrorism intends to force or influence the public or any government by intimidation to advance a political, religious or ideological cause
- terrorism causes one or more of the following: death; serious harm or danger to a person; serious damage to property; a serious risk to the health or safety of the public; and serious interference with, disruption to, or destruction of critical infrastructure such as a telecommunications or electricity network.

Advocating, protesting, dissenting or taking industrial action are not terrorist acts where the person doing the activity does not intend to cause serious harm to a person or create a serious risk to public safety.

## 6. Prevention

**6.1 Due Diligence on partners, suppliers and donors:** UCEP Bangladesh will have a partner alliance policy, procurement policy and donation policy in place that prescribe the limitations to the type of organizations with whom UCEP Bangladesh can in-corporate. For all new partner organizations a partner risk assessment will be performed, indicating the different risks of working together with this partner. Based on the assessment, risk mitigating measures will be taken to reduce the identified risks. To make sure that UCEP Bangladesh does not enter into financial relations with terrorist or criminal organizations, new partners, suppliers and donors and their executive board members go through Anti-Terrorism Software check. In case the software check reveals potential risks in relation to terrorism, additional research will be done. Only when additional research ensures no suspicion, cooperation with the organization can be considered.

**6.2 Code of Conduct:** UCEP Bangladesh will enforce a Code of Conduct among its staff and its contract partners. Staff and contract partners sign up to the Code of Conduct on joining the organization or signing a contract with UCEP Bangladesh. The Code of Conduct specifically mentions that staff and contract partners will not involve directly or indirectly to any terrorism activity and should contribute to preventing unethical, criminal and terrorist activities.

**6.3 Police Clearance:** During recruitment process a Police Clearance Certificate must be collected from Special Branch, Bangladesh Police and documented.

## 7. Detection

**7.1** Program department will be responsible for Due Diligence Assessment/Risk Assessment and Anti-Terrorism Software check while incorporating with new partners and donors in programmatic aspects.

**7.2** Administration unit will be responsible for Risk Assessment and Anti-Terrorism Software check while contracting with new vendors and suppliers.

7.3 HR Unit will be responsible for Anti-Terrorism Software check for employee recruitment-selection, job contract renewal and job contract extension purpose.

7.4 ED's Secretariate will be responsible to provide all support to the Chairperson of BoG for Anti-Terrorism Software check during new membership processing or renewal of membership of the Association Members and formation of new Board of Governors.

7.4 Concern department/unit will conduct regular Anti-Terrorism Software check twice in a calendar year for existing staff, donors, partners and suppliers.

## 8. Anti-Terrorism Software:

Anti-Terrorism Software is a tool consists of a database of terrorists' information published by the renowned organization like ADB, World Bank, DFAT, IMF etc. The software will check and show information which fully or partially match with the person or organization is being checked by the UCEP Bangladesh. Concern department/unit will further investigate whether the person or organization is the same person or organization showed by the software by matching other information like address, father's name, mother's name, country of origin, nationality etc. properly. The investigation report will be submitted to the SMT and SMT will determine the person or organization as terrorist or release from the suspicion. According to the decision from the SMT, entry will be marked at the software and report will be generated and documented.

## 9. Zero Tolerance Approach

UCEP Bangladesh adopts zero tolerance approach towards terrorism. Any association member, board member, staff, partner, vendor or suppliers are identified as a terrorist by the Anti-Terrorism Software check or police report, immediately is reported and suspended from all kind of association and work.

## 10. Monitoring & Reporting

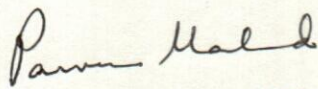
All incidents of possible terrorist activities that are proactively and/or retroactively noticed within UCEP Bangladesh, will be reported to the Senior Management Team (SMT)

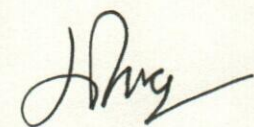
directly. SMT will deal with such suspicions of terrorism and report to the BoG; it will be reported to donors as well if UCEP Bangladesh has such provision in contract with the Donor.

## 11. Ownership

The Board of Governors (BoG) is the owner of this Anti-terrorism policy and approves the policy. The Executive Director is responsible for keeping this procedure up to date and review the policy at least on an annual basis. All departments will be consulted when updating the policy.

-The End-

  
Parveen Mahmud FCA  
Chairperson  
UCEP Board of Governors

  
Md. Abdul Karim PhD  
Executive Director  
UCEP Bangladesh