



Safety and Right Society

ANTI-TERRORISM POLICY

Adopted from: Manusher Jonno Foundation (MJF)

Adopted by: Safety and Rights Society (SRS)

Approved By: Governing Body of SRS

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LIST OF ABBREVIATIONS

DFID- Department for International Development

INGO-International Non-governmental Organization

SRS-Safety and Rights Society

NGO- Non-government Organization

UK-United Kingdom

SAM-System Award Management

Annexure:

01. Checklist

1. INTRODUCTION

Safety and right Society is a local non profit organization, registered under the society's registration Act 1860. We work to ensure the overall decent working condition at the very least in compliance with the law. We also work toward ensuring public protection from unacceptable risks from the food, the good they purchase, the transports they use, or the work undertaken by others.

To consider the present context and address ongoing practical situation, SRS management feel necessity to develop an anti-terrorism policy which will help SRS to avoid the stain of terrorism in future project implementation.

Safety and Rights Society (SRS) renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activities.

2. OBJECTIVES OF THIS POLICY:

This policy is a supporting tool which will help SRS to watch whether any concerned staff, project, stakeholder; suppliers are getting involved knowingly or unknowingly with terrorism activities.

This policy is also sets out SRS's response to the risk of dealing with individuals and organizations associated with terrorism and Bangladesh Government legislation associated with this.

Relevant legislation in Bangladesh can be found in:

- The Anti Terrorism Act, 2009 which came into force on 11 June, 2008. (Amended in 2013)

Failure to comply with Government requirements could have significant impact on the reputation of SRS as well as expose the organization to potential penalties.

Therefore, First SRS will follow the related Acts, Laws, and rules of Bangladesh Government, Secondly- UK aid restrictions, Part 4 of the Charter of United Nations Act 1945 ('the UN Charter Act') and then other rules and regulations.

3. PROCEDURES

3.1 Safety and Rights Society(SRS) acknowledges that Bangladesh Government legislation prohibits dealing with listed terrorist organizations and/or proscribed persons or entities. SRS will at all times adopt measures intended to facilitate compliance with this legislation.

3.2 SRS will confirm the identity, credentials and good standing of the people or organizations it supports.

SRS will seek to ensure that none of the funds or assets provided under this Arrangement are made available or used to provide support to individuals, groups or entities associated with terrorism including those named on the following lists as updated from time to time:

- **HM Treasury's Office of Financial Sanctions Implementation** – [Financial sanctions: consolidated list of targets](#)
- **UK Home Office** – [Proscribed terrorist groups or organizations](#)
- **European Union** – [Consolidated list of sanctions](#)
- **United Nations** – [United Nations Security Council Sanctions List](#)
- **World Bank** – [World Bank Listing of Ineligible Firms & Individuals](#)

3.3 SRS will report any known or suspected terrorist links to the relevant counter terrorism national authority of Bangladesh Government.

4. RESPONSIBILITIES

4.1 The SRS Board is committed to compliance with Bangladesh anti-terrorism legislation to avoid dealing with individuals and organizations associated with terrorism.

4.2 ED will be responsible for ensuring that employees of SRS carry out the following procedures at least annually to minimize the risk of dealing with terrorist organizations or individuals.

5. PROCESSES

5.1 SRS staff members must know the identity, credentials and good standing of their partners and recipient organizations (i.e. **what they do, where they operate, who are their key decision makers and staff**).

5.2 A checklist (*Annex-1*) to be filled up by the assessment team as a part of due diligence check before transferring the fund to the selected Organization.



Anti Terrorism
checklist-MJF.doc

5.3 Care will be taken to only transmit funds from SRS using reputable and Govt. recognized banks for this purpose.

5.4 Prior to funding any organization, details of funded entities and their office bearers will be compared to the above mentioned lists of terrorist and proscribed organizations.

Where recipient organizations or individuals are found to be on either list, forwarding funds will cease and the national security/counter terrorism unit will be informed immediately.

6. RELATED DOCUMENTS

6.1 UK Government - Compliance Toolkit: Protecting Charities from Harm, found at:

<https://www.gov.uk/government/collections/protecting-charities-from-harm-compliance-toolkit>

6.2 Anti-terrorism Act 2009 Bangladesh:

https://www.satp.org/satporgtp/countries/bangladesh/document/papers/AntiTerrorism_Act2009.pdf