

Counter-Terrorism Policy

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People's Oriented Program Implementation

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Table of Contents

1.0	Definition of Terrorism	3
2.0	Rationale (with regard to POPI)	3
3.0	Scope of the policy	3
4.0	Purpose of the policy	3
5.0	Applicable Laws/Acts and Rules	4
6.0	POPI Policy Objectives	4
7.0	POPI Focus Areas	4
8.0	POPI's Initiatives to combat Terrorism	5
9.0	Reporting, reviewing and relevance to other POPI guidelines and policies	5
	Annex 1: Objectives and Indicators	6
	Annex 2. Glossary	7
	Annex-3: Resource and Reference list	8

1.0 Definition of Terrorism

Terrorism is the unlawful use of force and violence against persons or property to intimidate or coerce government, the civilian population, or any segment for creating political and social disturbance which seriously hampers human life.

Terrorism causes uncountable harms to society and humanity. It causes:

- death, serious harm to people and their families
- destroys human rights
- ruins globalization and international relations with foreign countries

2.0 Rationale:

POPI works with different types of people from all over the country such as employees, vendors and beneficiaries. It also maintains professional relationship with different local and foreign donors.

Beneficiaries are the people who receive benefits from POPI's programmes. As POPI's programmes spread across the country, beneficiaries are diverse in terms of religion, caste, creed or ethnicity. POPI should confirm that beneficiaries are not the part of any kind of terrorism.

Vendors are suppliers that provide POPI with supply of goods and services. POPI does not allow any partnership with vendors who are, by any means, part of any kind of terrorism.

Donors and technical partners who are in the black list of the government of Bangladesh or any other government of the world should not be allowed to work with POPI. The major rationales of the policy include:

- Beneficiaries might have criminal background regarding terrorism too
- Possibility of using the charitable fund to finance terrorism
- Possibility of setting fund for illegal use
- Possibility of using POPI in money laundering case
- Possibility of using fund to purchase weapons for exuberance to terrorism

3.0 Scope of the Policy

As POPI works for the development of people irrespective of religion, caste, ethnicity, creed and belief, combating terrorism should be one of its chief principles. Humanity and perseverance, equity and justice, are most essential priorities of POPI. POPI must monitor how the funds and grants are used by people. It should be fully aware that the fund should not be used in promoting terrorism. POPI must resolve these issues peacefully and with great care so that human rights are not hindered.

4.0 Purpose of the Policy

This policy is undertaken by POPI to ensure:

- To regulate and monitor strictly and on a regular basis that funds are not used to stimulate terrorism or any illegal activities regarding it.
- Funds and grants are only use to better off the living conditions of target people and no third parties can take unfair advantage of these funds.
- Best endurance should be applied by POPI to demolish money laundering case and usage of funds in the most effective way.

5.0 Applicable Laws/Acts and Rules

Bangladesh Government has profoundly taken some effective measures to counter terrorism and enacted required laws and acts. The acts which are to be complied are as follows:

- Anti-Terrorism Act 2009
- Anti-Terrorism (Amendment) Act 2013
- Money Laundering Prevention Act 2012
- Money Laundering Prevention (Amendment) Act 2012
- Mutual Legal Assistance on Criminal Mutual Act 2012

By admiring this policy POPI reassures the partners, fund providers, sub-contractors and workers are well aware of domestic rules and regulations and not to take the aid of any individual, firms and organizations that are co-related with terrorism, like:

- The List of Terrorist Organizations which are outlawed by the Bangladesh Government as means to participate in terrorist acts.
- The World Bank's Listing of Ineligible Firms and Individuals
- The Asian Development Bank's Sanctions List
- USAID and other relevant donors list of terrorist/terrorist organizations

6.0 POPI Policy Objectives

The core objective of this policy is to make POPI and its workers to be fully cooperative in the time to combat terrorism. By accepting this policy, the workers will make themselves abide to stop terrorism acts in the surroundings, restrain themselves from such illegal activities. This culture will ensure that POPI is effectively managing its duty of the nation through transparency and ebullience.

7.0 POPI's Focus Areas

Nowadays, terrorism is one of the most alarming situations globally. Due to terrorism the number of deaths is increasing worldwide, and it is impacting the global economy adversely. The Major risk factors include:

- The field workers who are hired by POPI are often from various backgrounds. Sometimes it is difficult for POPI to trace their background in a densely populated country like Bangladesh
- It is an arduous task to mitigate where the funds are used. To monitor any money laundering case that can provide assistance to terrorism
- POPI has elaborated field programmes. There is always a danger that any of the beneficiaries might be engaged in any kind of Terrorist acts both directly or indirectly by being influenced third parties.
- Partners or vendors of POPI may be listed in Terrorism Organizations. POPI may also be funded by donor agencies that can be engaged in Terrorist activities. These agencies can negatively influence POPI in promoting such criminal activities.

POPI is ready to face these consequences any time and with sought determination it can rescue the society from Terrorism.

8.0 POPI's Initiatives to Combat Terrorism:

As a development organization of Bangladesh, POPI has some enterprising measures to stand against Terrorism. It has sound acknowledgements to nurture and generate best explicable practice of the policy and manage and cease the risks possessed by individuals and partner organizations. Especially

- Educate field staff about terrorism and its eradications by providing training and making them attend workshops, seminars to realize the adversity effects of Terrorism. POPI should not take anyone in work who had criminal records and should regulate that with extreme attention.
- If they see any suspicious and illegal acts, they must report to POPI's office along with the nearby police station within 48 hours, they must stay absolutely tranquil and handle the matter professionally without being panic and not informing the criminals
- Staff at the field level, must gain expertise through training, to handle the situation if any terrorism act is performed by any of the beneficiaries. They must counsel the beneficiaries and provide correct information and education to them.
- Before receiving any fund from any partner organizations, POPI should go thoroughly their profile, past records and could consult with other NGOs who were funded before by that organization.
- POPI must allow any local or foreign donor agency to enquire about them as per their requirements and POPI must cooperate with them fully.

POPI will undertake these actions and minimize the possibility of terrorist acts within its jurisdiction. POPI understands that it would never give access to criminals and illegal partner organizations.

9.0 Reporting, reviewing, relevance to other POPI guidelines and policies

POPI should review this policy once in three years and work on a regular basis to update the policy that could be beneficial for the society. Moreover, it will take the help of concerned authorities to enhance and strengthen its policy to combat terrorism more boldly and affluently.

Annex I: Objectives and Indicators

Objectives	Indicators	Activities
To ensure POPI does not assist individuals or organizations associated with terrorism	POPI ensures against inadvertently or indirectly providing support for terrorism	<ul style="list-style-type: none"> • POPI checks that all employees of POPI, key POPI partner organizations, key POPI vendors are not listed in Terrorist Organizations outlawed by Bangladesh Government. • Records of checks performed will be kept in register and reviewed on yearly basis. • POPI reassures activities regarding financial transactions are attentively examined and reported with clarification. • POPI investigates all financial risk procedures as risk increases.
	POPI ensures cross-examining each job seeker/vendors with great detail	<ul style="list-style-type: none"> • During the time of job interview/vendor meetings each of the candidates/potential vendors will be elaborately questioned to understand the person's motive about terrorism
	POPI ensures preserving anti-terrorism declaration	<ul style="list-style-type: none"> • Before completing job contact agreements or providing work orders, preserving declaration against terrorism of each employee (to be recruited) and each vendor (to be enlisted) has to done
	POPI immediately reports terrorist risks for encountering and preventing damages and stimulating correct response actions	<ul style="list-style-type: none"> • If any suspicious actions regarding terrorism occurs, the employees of POPI are to report in the nearby Police Station within 24 hours of the activity • Any suspicious terrorist acts will be informed to Counter Terrorism and Transnational Crime Unit of Dhaka Metropolitan Police

Annex 2. Glossary

Beneficiaries: refers to those natural persons, or groups of natural of persons who receive support, assistance and services from POPI. This assistance can be material or non-material.

Funds: refers to assets of any kind or property of any kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including, but not limited to, bank credits, travelers cheque, money orders, share, securities, bonds, debt instruments, drafts and letters of credit.

Listed of Terrorist Organizations: organizations which have been proscribed by the Bangladeshi Government and other concerned organization of home abroad as terrorist organizations under the Criminal Code because they advocate the doing of a terrorist act, or because they are directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act.

Suspicious activity: is any activity where a known or suspected terrorist individual or organization is involved, or where a known or suspected terrorist act is to occur. This includes, but is not limited to, any activity involving any listed individuals or organizations.

Third Party: 'Third Party' includes, but it not limited to, partners, intermediaries, contractors, sub-contractors and service providers.

Annex-3: Resource and Reference list

1. Money Laundering Prevention (Amendment) Act, 2015
<https://www.bb.org.bd/bfiu/openpdf.php>
2. Money Laundering Prevention Act, 2012
<https://www.bb.org.bd/bfiu/openpdf.php>
3. Anti-terrorism Act, 2009
<https://www.bb.org.bd/bfiu/openpdf.php>
4. Anti Terrorism (Amendment) Act, 2013
<https://www.bb.org.bd/bfiu/openpdf.php>
5. Mutual Legal Assistance on Criminal Matters Act, 2012
<https://www.bb.org.bd/bfiu/openpdf.php>
6. Counter Terrorism Unit, Dhaka Metropolitan Police
<http://dmp.gov.bd/counter-terrorism/>
7. Reporting crime at Rapid Action Battalion (RAB)
<http://www.rab.gov.bd/english/report-crime-2/>
8. Counter Terrorism App “Hello CT”
<http://dmp.gov.bd/police-apps-hello-ct/>
9. “Report 2 RAB” App
<https://play.google.com/store/apps/details?id=com.solvercircle.cspotterpub>