

លិខិតបញ្ជាក់សុក្រឹតភាពនៃសំណៅបកប្រែ

ក្រុមហ៊ុនសូមបញ្ជាក់ថាសំណៅបកប្រែឯកសារស្តីពី “**គោលនយោបាយស្តីពីការប្រឆាំងអំពើពុករលួយ**” ដែលមានលេខកូដ **001-60677FCOPEK** ពិតជាត្រឹមត្រូវតាមឯកសារភ្ជាប់ចំពោះគ្រប់ខ្លឹមសារមូលដ្ឋានទាំងអស់ប្រាកដមែន។ សេចក្តីបញ្ជាក់នេះពុំបានកំណត់អំពីយថាភាពនៃច្បាប់ដើម ឬអំពីភាពត្រឹមត្រូវនៃព័ត៌មានដែលបានរៀបរាប់នៅក្នុងសំណៅនេះឡើយ។

ភ្នំពេញ ថ្ងៃទី០១ ខែសីហា ឆ្នាំ២០២៤



ក. លីម គ្រុយ
អគ្គនាយក



សហគមន៍បណ្តាញយុវជនកម្ពុជា
CAMBODIAN YOUTH NETWORK ASSOCIATION

គោលនយោបាយស្តីពី

ការប្រឆាំងអំពើពុករលួយ

Anti-Corruption Policy

ANTI-CORRUPTION POLICY

1. Introduction

Cambodian Youth Network Association (CYN) is committed to the highest possible standards of openness, transparency, and accountability in all its affairs. We wish to promote a culture of honesty and opposition to corruption in all its forms.

CYN operates in Cambodia, and in common with many large and decentralized organizations, the size and nature of our operations puts us at risk of loss due to corruption.

The target group of this anti-corruption policy is CYN employees. As CYN employees, we are obligated to follow this anti-corruption policy, and any breaches of this policy shall be reported through the CYN complaint mechanism (specified below). The purpose of this policy is to provide:

- A clear definition of what we mean by “corruption”;
- A definitive statement to staff forbidding fraudulent activity in all its forms;
- A summary to staff of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs;
- Guidance to employees as to action which should be taken where they suspect any fraudulent activity;
- Clear guidance as to responsibilities for conducting investigations into corruption-related activities;
- Protection of employees in circumstances where they may be victimized due to reporting or being a witness to fraudulent activities.

This document is intended to provide guidance and should be read in conjunction with:

- The relevant Human Resource Policies,
- Finance Policies & Procedures for Reporting Fraud/Theft and Negligence.

This document will be reviewed periodically to determine whether it remains useful, relevant, and effective.

2. Definitions

CYN defines corruption as:

"The theft or malpractice of CYN's funds or other resources, by an employee or a third party, which may or may not also involve misstatement of financial documents or records to conceal the theft or malpractice."

For example, corruption includes but is not limited to the following:

- Theft of funds or any other CYN's property
- Falsification of costs or expenses
- Forgery or alteration of documents
- Destruction or removal of records
- Inappropriate personal use of CYN's assets
- Employees seeking or accepting cash, gifts, or other benefits from third parties in exchange for the preferment of the third parties in their dealings with CYN
- Blackmail or extortion
- Conflict of interest
- Paying excessive prices or fees to third parties for personal gain.

3. CYN Policy

Corruption in all its forms is wrong and is unacceptable to CYN. This is because where corruption occurs:

- It is not just a loss to CYN, but ultimately to our beneficiaries, people living in extreme poverty and the neediest of the world's citizens
- It may have a major impact on our reputation, donor confidence, and therefore our beneficiaries.

CYN's objective is to eliminate corruption from its activities. Any indications of corruption will be rigorously investigated and dealt with in a firm and controlled way.

4. Responsibilities of Employees

a. Executive Committee

It is the responsibility of the executive committee (EC) to be familiar with the types of corruption that might occur in their area, be alert for any indication of corruption or improper activity, and maintain controls to avoid such occurrences.

EC must ensure that all staff under their control are given a copy of this policy in a language they can understand, and acknowledge its receipt.

EC should also encourage staff to report suspected issues of corruption.

b. All Staff

It is the responsibility of all employees to carry out their work in such a way as to prevent corruption from occurring in the workplace. Employees must also be alert for occurrences of corruption, be aware that unusual transactions or behaviors could be indications of corruption, and report potential corruption cases as outlined below.

5. Reporting Suspected Corruption

Employees are required to report issues of suspected corruption. Employees should report their suspicions where the corruption is more than 10 USD as follows:

- Intern, Assistant/ Officer/Senior officer: To Coordinator
- Coordinator: To head of program/head of operation
- Head of program/operation: To President
- President: To BoD

Any suspected corruption of less than 10 USD shall be reported to the head of the operation.

Employees who suspect corruption should not do any of the following:

- Contact the suspected individual(s) directly to determine facts, demand explanations or restitution
- Discuss the issue with anyone within CYN other than the people listed above
- Discuss the issue with anyone outside of CYN, except as required by law

If the circumstances are such that reporting a suspicion as above is inappropriate, or if the person to whom it is reported is unable to assist, the issue may be reported to the CYN confidential helpline. Email: complaint@cyncambodia.org

6. Dealing with Reports of Suspected Corruption

Any suspicions of corruption will be taken seriously by CYN. CYN expects its EC to deal firmly and quickly with any reports of suspected corruption where the corruption is over 10 USD.

EC receiving reports of suspected corruption must immediately notify the issue and propose actions to the following:

- Coordinator: To EC
- EC: To President
- President: To BoD

The purpose of this prompt notification is to allow the sharing of experiences of similar situations that may already have arisen elsewhere.

7. Investigation Guidelines

In consultation with the persons notified, arrangements must be made to comprehensively investigate the issue. The following are responsible for managing these investigations:

- EC: President, Head of Program, Head of Operation, and Staff Representative
- BoD: Members of the Board of Directors

Investigations should be done either by appropriately experienced independent CYN staff or by independent third parties. An investigation is required without regard to any person's relationship with CYN, position, or length of service. During the investigation, a suspected staff is suspended from doing his/her job until the investigation is completed.

The safeguards for reporting employees must be applied in all cases - see below.


All work of the investigation team should be documented, including interview transcripts. The conclusion of all corruption investigations must be documented.

The responsible EC member should forward the written report/conclusions to the persons requiring notification – see above – and agree on the appropriate action.

The person(s) who initially reported the suspicions should be informed of the outcome of the investigation, but this should only be done once the report and proposed course of action have been finalized.

8. Safeguards for Employees

Issues reported to line management and the helpline will be investigated with the following safeguards.

Harassment or Victimization: CYN recognizes that the decision to report a suspicion can be difficult, not least because of the fear of reprisal/revenge from those responsible for the malpractice. According to its Human Resource Policies, CYN will not tolerate harassment or victimization and will take all practical steps to protect those who raise an issue in good faith. 

Confidentiality: CYN will endeavor to protect an individual's identity when they raise an issue and do not want their name to be disclosed. It should be understood, however, that an investigation of any malpractice may need to identify the source of the information and a statement by the individual may be required as part of the evidence.

Anonymous Allegations: CYN discourages anonymous allegations. Issues expressed anonymously will be considered at the discretion of CYN. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the allegations and the supporting facts
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations: If an allegation is made in good faith but is not confirmed by an investigation, CYN guarantees that no action will be taken against the complainant. If individuals make malicious or vexatious allegations, disciplinary action will be considered against an individual making the allegation.

9. Actions Arising from Corruption Investigations

9.1 Disciplinary procedures

Persons judged guilty of corruption have committed gross misconduct and will be dealt with following the Staff Policy on Disciplinary Action. Proven allegations of corruption may result in dismissal.

Where appropriate, CYN will refer significant corruption to the local law enforcement agencies to initiate criminal prosecution. Consideration should be given to the local context and the consequences in terms of human rights of initiating criminal prosecution against the individuals involved. In every case, the final decision on whether or not to prosecute should be taken by:

- EC: President
- BoD: Board of Director

9.2 Changes to systems of controls

The corruption investigation is likely to highlight where there has been a failure of supervision and / or a breakdown or absence of control; the action required to improve systems should be documented in the investigation report and implemented when this report is finalized.

9.3 Recovery of losses

Where CYN has suffered loss, full restitution of any benefit or advantage obtained and the recovery of costs will be sought from the individual(s) or organizations responsible for the loss.

If the individual or organization cannot or will not make good the loss, consideration will be given to taking civil legal action to recover losses. This is in addition to any criminal proceedings which may result.

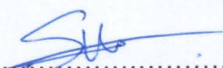
10. Review of this Policy

To maintain best practices, the EC will review the contents of this Anti-Corruption Policy every two years.


11. Effective Date


The Anti-Corruption Policy will come into effect immediately upon the date of BoD approval.

Reviewed and Approved by:

Signature: 
Name: Sant Lycheang
Position: Chairman
Date: 10 / June / 2024

Proposed by:

Signature: 
Name: Heng Kim
Position: President
Date: 10 / June / 2024



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