

Security Risk Management Procedure and Policy

Transparency International Cambodia

September 2013



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1- Introduction

Transparency International Cambodia (TIC) is committed to its staff including their immediate family members, interns and volunteers' safety and security. All levels of organizations aim to integrate security risks in a way that is relevant to its program implementation. Good security management is about good program management – it enables us to work safely and securely. Therefore, the implementation of an effective Security Risk Management Procedure and Policy at TIC is a necessary requirement. .

This Security Risk Management Procedure and Policy (SRMPP) is an internal document providing various precautions, measures, procedures and plans to address the most anticipated and sensitive security risk. It is an addendum to the existing TIC HR policy, while the plan for staff safety is mainly included in TIC's HR policy. The SRMPP will be included/incorporated in the HR policy in the next revision.

All staff, volunteer and intern are required to read this SRMPP, become familiar with the plan, and comply with it to the best of their knowledge. Moreover, new staffs, interns and volunteers will be oriented on Security Risk Management Procedure and Policy by Human Resources Manager within the first two weeks following their starting dates of employment with TIC.

Immediate family members refer to children under the age of 18 and are single, and spouse if he or she does not work and is not covered by any insurance.

This SRMPP is aimed at dealing with security risk for current TIC's staffs including their immediate family members, interns and volunteers. However since TIC is committed to their safety and security, those who used to work with TIC and face with the security risk shall be carefully monitored and provided with solution/support if it is relevant to TIC's work. In addition, TIC may consider dealing with the security risk which happens during the conduct of TIC's events. All of these shall be determined by the SRMC members on a case by case basis.

2- Background

Transparency International is the global civil society organization leading the fight against corruption. It brings people together in a powerful worldwide coalition to end the devastating impact of corruption on men, women, and children around the world. TI's mission is to create change towards a world free of corruption.

TIC was founded in July 5, 2010 and has officially registered with the Royal Government of Cambodia in July 2011. It is an official National Contact of [Transparency International](#). The mission of TIC is to work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia.

TIC's strategic activities are in line with the United Nations Convention against Corruption (UNCAC)'s core chapters on preventive measures, law enforcement, international cooperation and implementing mechanism to promote and strengthen measures to prevent and combat corruption and to promote integrity and social accountability.

TIC's strategic activities are also complementary to the efforts and commitments being made by the Anti-Corruption Unit (ACU) of the Royal Government of Cambodia set forth in the Anti-Corruption Strategic Foundation which requires a three-headed arrow to promote and fight against corruption in Cambodia, which includes: (1) public education, (2) prevention, and (3) enforcement of anti-corruption law.

TIC is currently implementing its program called "Together Against Corruption" in order to achieve the three strategic goals outlined below:

Goal 1: Diagnose corruption issues and use findings as a reference to stimulate more informed debates and formulate further anti-corruption projects

Goal 2: Build and support partnerships and coalitions of civil society organizations to fight against corruption more effectively.

Goal 3: Engage citizens and young people in promoting integrity more actively.

TIC receives its core fund from SIDA and AusAID for the period: April 2012-September 2015

3- Causes of Security Risks

In reference to the nature of TIC's work, the following security risks might arise due to:

- **Taking side in politics**

When TIC implements its strategy and programs, the other stakeholders might think that the organization is taking side in politics, if they do not fully comprehend our strategy and programs.

- **TIC's media/communication:**

This relates to the press release/conference, radio interview, public speech, IEC material, ICT...

- **Being accused of being a secessionist group**

This may happen during our program implementation period if other stakeholders or the governments see TIC's program activities linked to a secessionist group.

- **Report findings (CPI, GCB, NISA, YIS)**

TIC is responsible for the launch of Corruption Perception Index (CPI) and Global Corruption Barometer (GCB) every year. In addition, TIC will finish the National Integrity System Assessment (NISA) and Youth Integrity Survey (YIS) in the following year. The reports are subsequently released, which could lead to other stakeholders discounting the report or reacting negatively to their findings. This may lead to TIC, staff including their immediate family members, interns and volunteers receiving criticisms, threats or fuel anger...

4- Security Risks Classification and Analysis

Since TIC is working on the sensitive issue of promoting transparency and combating corruption, the following security risks may be encountered:

Security Risks	Category
Threat /intimidation	Medium
Kidnap/hostage	Medium
Arrest	Medium
Legal action (court case, defamation)	High
Framing Accusation	Medium
Terrorist	Low
Civil unrest	Low
Fake/artificial accident	Medium

5- Security Risk Precautions

Security risk precautions are always required while implementing TIC's program which involves working on politically/socially sensitive issues. The following are some general precautions which TIC staff, interns and volunteers shall follow:

- **Public awareness** on TIC's work being neutral. This shall be broadcasted publicly, so the public are made familiar with and understand TIC's work.
- **All staff, interns, and volunteers** are encouraged to follow and understand the political situation of the country closely and continually through any communication means.
- **Press releases/media interviews** need be conducted carefully and needs to include clear meanings, wordings, and consider people's reactions toward a certain issue. Consulting with at least one third of the Senior Management Team (SMT) members in advance is required to ensure that the Press Statement or Press Release is properly reviewed and if it involves risks, the mitigation of such risk is prepared. Only the Executive Director, appointed Board Members and authorized staff can produce press releases or conduct media interview on behalf of TIC.
- **Individual staff, interns and volunteers' social medias (Facebook, blogger, LinkedIn, Twitter,...).** According to the media policy, staff, interns and volunteers cannot be prevented from posting their views on their personal Facebook pages, as their privacies are respected. However, TIC advises that they should be aware of the consequences of posting anything

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that could compromise the image of TIC (please refer to the media policy for further information). Additionally, they shall not show any bias to any political party on their own personal social media's pages. They shall behave neutral in the way they express their own perception in the public.

- **Staff's speech** on behalf of TIC in any public event shall be approved in advance by a direct supervisor and by one third of the SRMC members. This does not apply to the Executive Director.
- **Sensitive activity**, even though it is in plan, the conduct of any sensitive activity requires approval by one third of SRMC members.
- **Continual training/orientation** shall be conducted for TIC staff, interns and volunteers on security risk precautions and management.

5.1- Day/Night guards

- The Guards need to close the front gate door at all times.
- The Guards are required to be on guard outside of the premises all the time, and patrol as much as possible.
- The Guards shall not allow unidentified person(s) to enter the office premises at all.
- The Guards need to inform HR and the Administration Manager immediately should he see any strange/suspect person near the office premises.
- The Guards need to greet visitors warmly and ask them who they have arranged to meet. The Guards are then required to contact the relevant staff in the office to confirm the arrival of their visitors. If staffs are unable to identify the visitors, they are not permitted to enter the building.
- A landline phone or radio shall be installed at the Guard's desk so that the Guard can communicate with the receptionist to identify the focal person to respond to the visitors.
- The Guards shall stay within the premises when any TIC staff leaves the office in the evening.
- The in-out record shall be made available for the Guards to record staffs who come to work during weekend/public holiday/night time.
- All Guards will be strictly oriented about the SRMPP and observed by HR and Admin Manager.

5.2- Office security

- The TIC office front door needs to be locked by the last staff member who leaves the office.
- Staff, interns and volunteers need to take care and lock their office rooms when leaving work. Certain staff will be assigned keys for their office rooms.



- Staff, interns and volunteers need to keep all important and confidential documents in a locked cabinet.
- Staff, interns and volunteers who need to come to work at the office during the weekend/public holidays/or at night need to inform their Line Manager and keep HR and the Administration Manager informed.
- Staff who come to work at the office during the weekend/public holiday or late at night time need to sign the in-out record which is available with the guards.

5.3- Vehicle and driver

- The driver will regularly check TIC's vehicles ensuring they are well maintained. He shall inform the HR and Admin Manager immediately if there is something wrong with TIC's vehicles.
- The driver will ensure he knows the streets and prime destinations well.
- The driver will ensure he drives safely at all times and needs to inform the passengers of any potential security risks.
- In case of an emergency, the driver shall drive the passengers to a safe place such as an embassy if they are exposed to any threat/intimidation, or to the hospital if any of the passengers are injured. Always ensure the SRMC are informed of any risks.
- The driver must carry along the contact list of concerned people such as local authority, phone list, ambulance list, embassy list...etc.
- Each TIC vehicle will have a memo confirming it is an official TIC vehicle and will include the name of the main contact person that should be contacted if anything should happen to the driver. The memo can also be used to show to a concerned authority or embassy in the case of an urgent intervention. The memo shall be kept in the vehicle at all times for special security reasons. The contacts, address and maps of concerned department/embassy/offices shall be made available in TIC's vehicles.
- Driver will acquire knowledge on defensive driving skill.

6- Solutions in the Instance of Security Risks and the Procedures

100% risk prevention cannot be ensured. However, the following are general recommendations in the case of a security risk:

- The concerned staff, interns and volunteers must inform the Security Risk Management Committee (SRMC) and direct supervisor immediately in the case of a security risk.
- The SRMC must call for an immediate meeting to assess the risks, and determine an immediate solution. This may include:

- Advising the concerned staff, interns or volunteers to stay in a safe location, offer them counseling and inform their immediate family members.
- Inform all staff, interns and volunteers of the security risk experienced by the concerned staff member, interns or volunteers, and brief them on being cautious.
- Seek advice for legal support when necessary.
- File a complaint to authorities.
- Seek support/intervention from Transparency International-Secretariat (TI-S)/TI Chapters, or the relevant Embassies, Donors, Partners, Government Ministries and Local Authority.
- Maintain close communication with the concerned members of staff, interns, volunteers and document all the necessary information of the case.
- Be more cautious on TIC's office premise.
- If the driver is under threat, he should remove himself from danger immediately and find the nearest and safest location.
- If injured, the driver must evaluate his/her injury and decide whether to go to the nearest and trusted hospital/clinic OR escape for safety first.
- If the security risk will result in the member of staff including their immediate family members, interns or volunteers needing to leave the country, the SRMC needs to be consulted to help him or her seek asylum.

6.1- Solutions for each security risk

The following are proposed solutions to address each security risk. Working with 2 or 3 solutions simultaneously is viable when the human resources are available. Additional solutions, which shall be approved by the SRMC, can be devised when and if necessary:

6. 1.1-Threat/intimidation

Solutions to be taken	Responsible person	Comment
TIC lawyer is the first priority	TI Lawyer /SRMC/direct supervisor	Contact the outside lawyer if needed for legal advice or action
Contact Embassies/donors/local partner	Director of Programs/HR and Admin Manager	Contact relevant embassy/donors/local partner etc.for support, intervention, joint statement
Contact TI-S/Chapters	Director of Operations/SRMC	Contact TI-S/Chapters for intervention, joint statement



File complaint to local authority	TI Lawyer /SRMC/direct supervisor	File complaint to relevant local authority if needed
Security risk report	Concerned staff and lawyer	It is important that the security risk report shall be made soon after the risk appends
Reallocation if necessary	Direct supervisor/SRMC team	Advise and propose the way for relocation of the concerned staff if needed
Media (press release/interview if necessary)	ED/Communication Officer/ SRMC team	If needed, press release shall be released
Evacuation if needed	Direct Supervisor/SRMC	Advise and propose the way for evacuation if needed

6.1.2-Legal action/Frame Accusation/Artificial Accident

Measure to be taken	Responsible person	Comment
TIC lawyer is the first priority	TI Lawyer /SRMC/direct supervisor	Contact the outside lawyer if needed for legal advice or action
Contact Embassies/donors/local partners for intervention and support	Director of Programs/HR and Admin Manager	Contact relevant embassy/donors/local partner..... for support, intervention, joint statement
Contact TI-S/Chapters for intervention and support	Director of Operations/SRMC	Contact TI-S/Chapters for intervention, joint statement
File complaint to local authority if necessary	TI Lawyer/Legal support organization/SRMC/direct supervisor	File complaint to the relevant local authority if needed
Security Risk Report	Concerned staff and lawyer/SRMC	It is important that the security risk report shall be made soon after the risk takes place

6.1.3- Arrest

Solutions to be taken	Responsible person	Comment
TIC lawyer is the first	TI Lawyer	Contact the outside lawyer if needed for



priority	/SRMC/direct supervisor	legal advice or action
Contact Embassies/donors/local partners for intervention and support	Director of Programs/HR and Admin Manager	Contact relevant embassy/donors/local partner etc. for support, intervention, joint statement
Contact TI-S/Chapters for intervention and support	Director of Operations/SRMC	Contact TI-S/Chapters for intervention, joint statement
File complaint to local authority if necessary	TI Lawyer/SRMC	File a complaint to relevant local authority if needed
Seek the release of concerned staff from prisons	All the SRMC team	The SRMC shall make every possible means to release the concerned staff from the prison
Security Risk Report	Concerned staff and lawyer	It is important that the security risk report shall be made soon after the risk takes place
Visit the concerned staff	SRMC team and other staff	This shall be done more often if possible
Contact and provide counseling to the concerned family members	Direct supervisor/SRMC	This shall be done as soon as possible
Medical support including doctor	Direct supervisor /SRMC	Provide medical support including a doctor to diagnose and treat the concerned staff
Looking for fund to support the concerned staff	Finance Manager/SRMC	Try all the best to look for fund to support the person who is arrested

6.1.3-Kidnap

Solutions to be taken	Responsible person	Comment
TIC lawyer is the first priority	TI Lawyer /SRMC/direct supervisor	Contact the outside lawyer if needed for legal advice or action
Contact	Director of	Contact relevant embassy/donors/local



Embassies/donors/local partners for intervention and support	Programs/HR and Admin Manager	partner etc for support, intervention, joint statement
Contact TI-S/Chapters for intervention and support	Director Operations/SRMC	Contact TI-S/Chapters for intervention, joint statement
File complaint to local authority and ask for their support	TI Lawyer/SRMC	File complaint to relevant local authority if needed
Negotiation with the kidnappers	SRMC members	The SRMC members will negotiate with the kidnapper in order to release the concerned staff
Security Risk Report	Concerned staff and lawyer	It is important that the security risk report shall be made soon after the risk has been identified
Contact and provide counseling to the concerned family members	Direct supervisor/SRMC	This shall be done as soon as the risk happens
Financial resources	Finance manager/SRMC	Try all the best to look for funds to support the person who was kidnapped
Ensure that the office operations still functions	ED or acting ED	The office shall be continuing to operate as normal although the risk will happen
Communication and negotiation with captors	SRMC	Communicate and negotiate with captors carefully

6.1.4-TIC office is ordered to close

Solutions to be taken	Responsible person	Comment
TIC lawyer is the first priority	TI Lawyer /SRMC/direct supervisor	Contact the outside lawyer if needed for legal advice or action
Contact Embassies/donors/local partner	Director of Programs/HR and Admin Manager	Contact relevant embassy/donors/local partner etc for support, intervention, joint statement
Contact TI-S/Chapters	Director of	Contact TI-S/Chapters for intervention,

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	Operations/SRMC	joint statement
Security risk report	Concerned staff and lawyer	It is important that the security risk report shall be made soon after the risk has taken place
Media (press release/interview if necessary)	ED/Communication Officer and SRMC team	If needed, the press release shall be done
SRMC meeting	ED/SRMC	Strategy to deal with this situation
Updated information to staff on TIC office status	HR and Admin Manager/SRMC	Need to inform staff for any update of TIC office
Work from home	HR/Admin Manager/SRMC	Staff can work from home and communicate through email and phone. Any cost which may incur during those time shall be covered by TIC office
Documents security	Staff/SRMC	During the absence from office, staff need to take high precautions, i.e, keeping documents in a secured and locked cabinet. If needed, some documents can be kept at staff's home as approved by SRMC.
Cash security	Finance manager/SRMC	Ensure we have enough cash flow during these periods of time by having cash available in stock..
Security guard	HR and admin manager/SRMC	Ensuring that guards shall continue their duties as normal to keep watch of the office and full security is always provided.

6.2- Staff, intern and volunteer phone tree

This is a list of all TIC staff, interns and volunteers which includes their phone numbers and their family members contact. This is based on the organizational structure of the TIC team. TIC has developed the staff, interns and volunteers' phone tree to be used in case of an emergency.

7- Financial Arrangement:

Cash in USD reserved for the security risks shall be made available by the finance team. SRMC members are responsible to look for funds which can be reserved for security risks. At least 50% of SRMC members could decide on the expense of this budget.



8- Security Risk Management Committee (SRMC)

The Security Risk Management Committee members consist of the Chair of the Board of Directors, Executive Director, Communication Officer, Lawyer, Director of Program, Director of Operations, Finance Manager, Human Resource and Admin Manager, two Program Managers.

The SRMC's meeting shall be led by the Chair of the Board or Executive Director. In their absences, either the Director of Programs or Director of Operations will chair the meeting. In the absence of the Director of Program and Director of Operations, a manager shall be appointed by SRMC's members to act as the Chair of the meeting.

The SRMC's meeting can be preceded with a minimum quorum of 50 +1. The decision of the meeting can be made with the voice of at least 50% out of 100%. In this respect, if the Chair of the meeting belongs to any group, that group shall win.

The main roles and responsibilities of the SRMC members are to identify security risks, conduct security risk analysis, and provide general precaution measures and advice on appropriate solutions.

Below are the described tasks and responsibilities of the SRMC members:

- Provide orientation on a Security Risk Management Procedure and Policy to all TIC staff, interns and volunteers.
- New staff, interns and volunteers will be oriented on Security Risk Management Plan in his/her first 2 weeks by HR and Admin Manager.
- SRMC conducts regular meetings once a month to reflect on the previous strategies implemented, take appropriate measure and foresee the future.
- In the case of any risks, a meeting can be called by any member of the SRMC in order to discuss and take appropriate measures.
- Seek supports from stakeholders in advance such as TI-S and other TI chapters, Embassies, UN agencies, donors, partners, etc.
- List of contact detail such as UN agency, embassies, local authority and emergency hotline number, etc. They shall be made available in advance and shall be updated annually.
- A communication line for emergency will be set up. This will be used to determine which line manager will call their staff, interns, volunteers and their family member to ensure they are safe and out of danger for any emergency.
- A front line SMS system shall be installed and managed by HR and the Admin Manager to inform staff of any specific security reasons such as demonstrations, natural disasters, man-made disasters and so on.
- The memo for each TIC vehicle shall be made available so that concerned staff can use it to prove that he/she is TIC staff and requires immediate assistance and who should be contacted if that staff is unconscious.
- Alert TIC staff including their immediate family members, interns, volunteers to be cautious and to avoid any risks.
- The SRMC may appoint a focal person, if needed, to help coordinate in the event of a security risk.
- The SRMC shall amend this policy annually to catch up with the real situation. If there is a strong need, this policy amendment can be done earlier.
- Any other tasks as determined by SRMC



9- Security-Related Entitlements and Benefits

9.1- Compensation for death, injury or illness attributable to service for staff including their immediate family members, interns and volunteers

According to the TIC Human Resource Management Policy, all staffs are covered with insurance for accidents and hospitalization. TIC will look for better options for insurance coverage including life insurance for staff and their immediate family members. This will be determined by the funds which are available at the time.

The following shall be applied in case staff members including their immediate family members, interns and volunteer are not covered by the insurance.

9.1.1- In the event of death of concerned staff including their immediate family members, interns and volunteers caused by TIC's sensitivity, TIC will cover:

- A reasonable amount for funeral expenses, including preparation of the remains;
- Medical, hospital and directly-related costs incurred; and return transportation of the deceased staff member including their immediate family members, interns and volunteers to their normal place of residence, or their official duty station or, with some limitations, to another place specified by SRMC;
- Any other support costs which may be necessary and approved by the SRMC members which are also dependent on fund availability.

9.1.2- In the event of injury or illness of concerned staff including their immediate family members, interns and volunteers resulting in total disability which is attributable to the performance of official duties, TIC will cover:

- All reasonable medical, hospital and directly-related costs;
- If salary and allowances cease to be paid because the staff member, interns or volunteers is unable to return to work, there shall be a final payment with the approval from the SRMC and subject to fund availability;
- Any other support which may be necessary and approved by the SRMC members, which is also subject to fund availability.

9.1.3-In the event of injury or illness of concerned staff including their immediate family members, interns and volunteers resulting in partial disability, TIC will offer the following:

- Pay all reasonable medical, hospital and directly related costs;
- If able to return to work but, due to partial disability, he/she is reassigned to a post at a lower grade.
- Any other support which may be necessary and approved by the SRMC members and

subject to fund availability.

9.1.4-In the event that the concerned staff including their immediate family members, interns and volunteers face with the legal action such as defamation or other court cases resulted from their fulfillment of the TIC's roles and responsibility, TIC will cover the following:

- Pay all defamation or other court cases fees.
- Pay any other fees which may be necessary and related to defamation or other court cases. This is subject to the approval by the SRMC members and subject to fund availability.

9.2- Compensation in the event of relocation

Depending on the actual situation, and in consultation with the SRMC members, the concerned staff interns and volunteers shall be able to gain permission for Special Leave With Pay. He/she may be relocated to a safe place in the country with the authorized payment of DSA for an initial period of up to 30 days, and half of that amount for immediate family members. Following that period, it is subject to SRMC's prior approval. The concerned staff, interns and volunteers may be given three month salary in advance including a grant to cover transportation costs for themselves and their immediate family members.

Any other support shall be determined by the SRMC members.

9.3- Compensation for asylum seeker

When the situation is too dangerous for the concerned staff including their immediate family members, interns or volunteers to remain in the country, it is then necessary for them to seek for asylum in a country abroad.

In such a case, the SRMC shall find the best option to help evacuate them. All related cost shall be covered by TIC. The duration for this support shall be under the discretion of the SRMC.

9.4- Compensation for kidnapping

In the case of staff including their immediate family member, interns or volunteers being kidnapped, the SRMC will negotiate with the kidnaper in order to get them back to safety. When necessary, the SRMC will request the local authority and other stakeholders to cooperate in managing the situation. The duration for this support shall be under the discretion of SRMC and depend on available funds.

9.5- Payroll and other benefits

If staff, interns or volunteers are at risk or experience an accident which could lead to a criminal conviction or imprisonment, compensation, benefits and contractual status with TIC will not be affected. In this case, payroll including benefits for the concerned staff, interns or volunteers shall be maintained as usual. His or her monthly salary, allowance and benefits shall be transferred to their designated bank account or via other means as they prefer. In the case of imprisonment, the concerned staff, interns or volunteers will be provided with special support by

TIC. Their employment contracts shall be maintained and renewed in the same manner as other staff.

10- TIC's Business Continuation Plan

In order to ensure the organization can continue to function in any circumstance, especially in a tense security situation, functional management lines are created in order to ensure that TIC's operations are maintained. The decision must be discussed and decided among the SRMC members. Acting in the absence of Executive Director, the Director of Program, Director of Operations, Program Managers, HR/Admin Manager and Finance Manager shall be continued until the new persons appointed. The structure is outlined below:

- If the Executive Director (ED) is absent from work, one of the two directors (the Director of the Program and the Director of Operations), will step in as the Acting Executive Director.
- If the Director of Program is absent from work, one of the Program Managers will step in as the acting of Director of Program. If the Program Manager is absent, one of the Program Officers will act as the Program Manager
- If the Director of Operations is absent from work, either HR/Admin Manager or Finance Manager will step in as the Director of Operations. If HR/Admin Manager, and Finance Manager are absent, either the HR/Admin Officer or Senior Finance Officer will act as HR/Admin Manager or Finance Manager respectively.

11- Notification to Board of Directors





Chair of the TIC's Board shall be well notified as s/he is one of the members of SRMC (point 8) and part of the Security Risk Precaution and Solution. In addition, the Board of Directors shall be updated with any security risk situations at all times. The ED or Acting ED notifies the Board of Directors on a regular basis/adhoc basis if needed. The notification shall be done through phone, text, email or letter.

12- Annexes:

- Annex 1: - TIC Staff, Intern and Volunteer Phone Tree
- TIC Staff and Immediately Family Members
 - List of TI-S/Chapters
 - List of Donors/Embassy/UN Agency/Partners/
 - List of Lawyer (Legal Support Organization)
 - Government Official and Authority
 - Hospital/Clinic

- Annex 2: - Security risk report

This SRMPP is approved on 8- Sep -2013 by

	Name	Title	Signature
1.	Mr. Rath Sophoan	Chairman of Board of Directors	
2.	Mr. Soeung Saroeun	Treasurer	
3.	Ms. Houth Ratanak	Board Member	
4.	Mr. Thorn Vandong	Board Member	
5.	Mr. Lor Saly	Board Member	