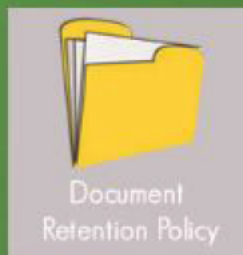
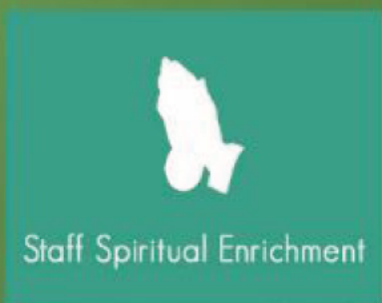
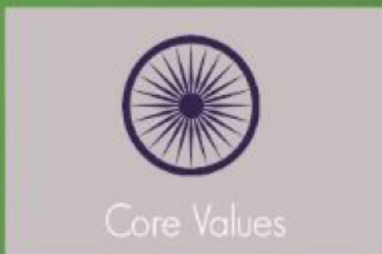


# JK DAG HR Manual



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# JK DAG HR MANUAL

## ORGANISATION POLICIES

### JK DAG ANTI-FRAUD, BRIBERY & CORRUPTION POLICY

JK DAG  
Anti-fraud,  
Bribery &  
Corruption  
Policy

**JK DAG is working to establish a just, responsible and compassionate society,**

- It is committed to promote an environment that is of mutual respect and understanding.
- It believes in creating a safe and secure environment that enables people and communities to achieve their full potential to Glorify God.
- It believes in the principles of stewardship, transparency, accountability and inclusivity.
- To further the objectives and the principles it embodies, the board of JK DAG has resolved to create policies and guidelines to achieve its stated objectives.

#### **The Source of its Values, Principles and Practices**

1. Our understanding, principles, and practices are guided by the law of the land
2. Our involvement will be based on the voices of different groups in a community and primary and secondary data.

#### **Application of the Policy**

This Policy applies to

- Any Staff Member who are defined in JK DAG Employment Policy.
- Any Representatives, which includes: Board and Society Members, Guests, Visitors, Supporters. Consultants, Journalists, Photographers, Media Persons, Interns etc.

JK DAG Anti-fraud, Bribery & Corruption policy states as under.

#### **Definition:**

Fraud is defined as the use of deception by an individual staff or group of staff with the intention of obtaining an advantage for himself/ herself/ themselves or for a third party or parties, avoiding an obligation, or causing loss to another party.

The Board directs the Management to draft and implement appropriate rules, guidelines and actions to be taken to fulfil the Anti-fraud, Bribery & Corruption policy.

#### **JK DAG Child Safeguarding and Protection, rules, regulations and processes**

The Board of Management at its meeting dated July 26, 2019, adopted “JK DAG Anti-fraud, Bribery & Corruption Policy”. The Board of Management approved the rules, regulations and processes as recommended by the Management for the implementation of the policy.

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#### JK DAG Anti-fraud, Bribery & Corruption rules, regulations and processes

JK DAG has a “Zero Tolerance” Policy towards fraud, bribery and corruption. This means that JK DAG:

- Does not accept any level of fraud, bribery or corruption within the organization or by any other individual or any organization receiving fund from or representing JK DAG.
- Will always seek to take appropriate action against those who found to have perpetrated, be involved in, or assisted with fraudulent or other proper activity in any of its operations.
- Is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.
- Considers fraud as a criminal offence and gross misconduct.

#### A. DEFINITION OF FRAUD

The term fraud is used to describe offences such as, but not just limited to the following:

1. Forgery, falsifying cheques, bank drafts or any financial data.
2. Improprieties in handling or reporting of monetary transactions.
3. Authorizing or receiving payments for goods or services not received or rendered.
4. Receiving personal benefits from suppliers (kickbacks).
5. Falsifying timesheets or payroll records.
6. Falsifying expenses to be claimed from JK DAG and/or using organizational financial resources to pay for personal expenses.
7. Fictitious reporting of receipts from suppliers or consignments to supporters.
8. Misappropriation of funds, securities, supplies or any other asset.
9. Theft or intentional loss/misuse of any asset.
10. Misappropriation of the organization’s computer hardware, software, data or other records.
11. Deliberate misreporting of information on documents.
12. Failing to disclose information on fraud, which may include misappropriation of resources and positions.
13. Abuse of positions.
14. Paying/receiving bribes.
15. Any violation of laws related to dishonest activities or fraud inclusive of extortion, deception, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.
16. Passing/copying on any (Classified / non-classified) data (soft copy) through any mode without appropriate approval / prior permission.
17. Allowing mediators with vested interests and placing orders through them instead of placing the order directly.
18. Delay in taking decision / initiating in time by the Management to show favouritism or vested interest leading to financial loss to the organization.

#### B. FRAUD PREVENTION

JK DAG will work along with the staff and representatives to promote and ensure that

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they are equipped to:

1. Understand JK DAG Anti-fraud, Bribery & Corruption Policy.
2. Articulate verbally or in writing against fraud without fear or inhibition.
3. Have internal and external process for safe reporting of fraud (whistle blowing).
4. Inform community to report if the staff or representative of JK DAG commits any fraud. They will be oriented to use Whistle Blower Policy while reporting.
5. Establish operational practices that actively minimize the risk of fraud.
6. Undertake a fraud risk-assessment of their operating environment.
7. Develop and implement systems to effectively prevent, detect and investigate fraud.
8. Understand the appropriate disciplinary action to remedy the harm from fraud.
9. Map out the process for the recovery/compensation of funds lost via fraudulent activity.
10. Train organizational staff in fraud awareness and control activities.

#### C. FRAUD DETECTION

1. Any staff or volunteer who has knowledge of or suspects the occurrence of fraudulent activity should immediately notify their immediate supervisor or another senior JK DAG representative.
2. If the staff or volunteer has reason to believe that their supervisor may be involved in the fraudulent activity, they should immediately notify JK DAG Executive Director. Should the suspicion involve the Executive Director or a member of JK DAG Board, the Chair of the Governance Committee or the Chair of the Board should be notified immediately via email.
3. If the community members where JK DAG is working has the knowledge of or suspects the occurrence of fraudulent activity should immediately notify the Executive Director or the Convenor, Governance Standing Committee or the Chairperson of JK DAG Board. The contact details will be updated time and again at the community meetings and the same will be minuted in the Community Committee Meetings.
4. **Anonymous Notification:** If the staff or volunteer would like to report the knowledge or suspicion of fraudulent activity and remain anonymous, they should contact the Executive Director through the following means: Email: [hr.jkdag@gmail.com](mailto:hr.jkdag@gmail.com), by phone ask for the President at: (+91-7006081756) and can send by post addressed to the President marked "Strictly Confidential". They can also contact the Governance Committee Chair person through mail and phone calls which will be updated time and again in the website, through posters and Community Committee Meetings.
5. The person revealing the fraud should provide as much information relating to the suspected fraudulent activity as possible, including:
  - a. Names of those involved.
  - b. Location where the activity took place.
  - c. Date and time of fraudulent activity.
  - d. Description of fraudulent activity.
6. Once notified of the suspected fraudulent activity, the direct supervisor (where the activity has occurred within any JK DAG office) should immediately communicate

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the information to JK DAG Executive Director or Chairperson Governance Committee who will take appropriate action.

7. JK DAG Executive Director or Chairperson Governance Committee will communicate the information to the Governance Standing Committee, and any relevant donors (should the fraudulent activity involve specific donor funds).

#### D. MANAGING FRAUD INVESTIGATIONS

##### Where fraud is alleged, suspected or detected:

1. A full investigation shall be undertaken, led by a team consisting of the Executive Director/ one Governance Committee member, personnel from Finance, Human Resource Development, one Manager. The team can also be constituted within the Management team taking into consideration the intensity of the Fraud reported.
2. The suspected staff / representative should be kept away (leave / suspension / transfer / reporting to HQ etc.) from the existing work place immediately after receiving suspicious call / letter / email in order to prevent the manipulation of evidence and to have fair investigation.
3. Offenders shall, where deemed appropriate, be reported to the police. Employees or volunteers found guilty will be subject to immediate cessation of duties and/or employment.
4. Where possible and appropriate, funds or assets lost should be recovered from the offender.
5. Recovery can be through any of the following:
  - a. Criminal proceedings,
  - b. Civil proceedings, and/or
  - c. Administrative remedies
6. Process: The suspected staff / volunteer should be kept away (leave / suspension / transfer / reporting to HQ etc.) from the existing work place immediately after receiving suspicious call / letter / email in order to prevent the manipulation of evidence and to have fair investigation.
  - a. Seizing of official Mobile or any other communication modes including the backups or hard disks and official files.
  - b. Investigation report to be reported immediately after completion of their investigation.
  - c. Intimation to Enquiry committee without any further delay.
  - d. Enquiry should happen within a week time from the date of investigation report.
  - e. Proper action should be initiated based on the evidence / findings and suggestion from the enquiry committee immediately if it is proven or latest by a week.
  - f. Update the information on action taken in his /her personal file.
  - g. Communicate the outcome of the action to the concerned supervisor and the concerned staff.
  - h. If there is any financial & material recovery from the offended staff, the action taken to recover to be intimated to Finance/concern Unit for recovery.

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At the end of each investigation, a summary of learnings should be produced and forwarded to the Governance Standing Committee and the Chairperson of JK DAG.

#### E. FRAUD INVOLVING JK DAG FUNDS AMONG PARTNERS

##### 1. Notification of Fraudulent Activity

- a. If a partner suspects, or has actual evidence of, fraudulent activity, an authorized partner representative must immediately notify JK DAG.
- b. If fraud is reported to JK DAG, the concern Manager will consult with his/her respective Director, Director (RFD), and the Executive Director to determine a course of action. Except in cases where the allegations are judged to have no credibility, JK DAG will communicate directly with the partner organization's governing authority or an alternate authority and request that the allegations be considered and responded to.
- c. If staff of JK DAG suspect or have actual evidence of fraudulent activity within a Partner organization, the concerned Manager will consult with respective Director, Director (Finance & Admn), and the Executive Director to determine a course of action. JK DAG will communicate directly with the partner organization's governing authority or an alternate authority and request that the allegations be considered and responded to.

##### 2. Notification Information

When a Partner launches their own fraud investigation into activity involving funds or capital items provided by JK DAG, or a project co-funded by JK DAG, they should provide JK DAG as much information relating to the suspected fraudulent activity as possible, including:

- a. Position of those involved.
- b. Location where the activity took place.
- c. Date and time of fraudulent activity.
- d. Description of fraudulent activity.
- e. How the fraud was discovered.
- f. What has been done so far

##### 3. Fraud Notification Escalation

- a. Once notified of a suspected fraudulent activity, the Committee comprising of JK DAG Executive Director, respective Director, Director (Finance & Admn), concerned Managers will assess the fraud notification and determine the best way of supporting the partner.
- b. JK DAG will work closely with other co-funders and consider the possibility of a joint partner response.
- c. JK DAG Executive Director will communicate the information to the Governance Standing Committee, and inform any relevant supporting partners (should the fraudulent activity involve specific supporting partner's funds).

##### 4. Managing Fraud Investigations

- a. Where fraud is alleged, suspected or detected, the Committee referenced

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in 3.a. will determine a course of action. This may include, but is not limited to, the following:

- i. Sending a staff member or an appointed consultant to visit the partner.
  - ii. Discussing and mutually agreeing upon a course of action to address the fraud.
  - iii. Discussing with co-funding partners the possibility of a joint response.
  - iv. Requesting a financial status report.
  - v. Requesting the Board to respond to the allegations.
  - vi. Requesting the partner to refer the matter to the police.
  - vii. Withholding the transfer of funds approved till matters are dealt with.
  - viii. Requiring the partner to freeze existing JK DAG funds held in their account till matters are dealt with.
  - ix. Requiring the partner to return existing JK DAG funds held in their account.
  - x. Requiring the partner to undertake an investigative financial audit periodically.
  - xi. Whether co-funding agencies should be informed of the allegations.
- b. Where possible and appropriate, JK DAG Partner should attempt to recover funds or assets lost from the offender.
- c. Recovery can be through any of the following:
- i. Criminal proceedings,
  - ii. Civil proceedings, and/or
  - iii. Administrative remedies
- d. Investigation of Partner organization fraud may impact decisions for future funding. If the fraud case has not been resolved, the responsible units will be informed of alleged, suspected or detected fraud to determine its impact on continued financial support.
- e. At the end of each investigation, JK DAG Partner will be asked to share a summary of what the organization has learned from the case.

#### F. LESSONS LEARNT

JK DAG is committed to ensuring that the lessons learnt from incidents of fraud, bribery and corruption are acted on within the relevant programme or head office. This is achieved by the following means:

1. Through project learning reviews
2. Sessions on current issues on fraud
3. Risk Management being included in Governance Standing Committee meetings.
4. Staff and partner training programmes.
5. Training materials being periodically updated to capture learning from recent fraud cases inclusive of case studies.

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