

“FRAUD/ Anti-Corruption Policy”

OF

NATIONAL DEVELOPMENT PROGRAMME

(NDP)

1st Published

Effective from February 2017

NATIONAL DEVELOPMENT PROGRAMME

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FRAUD REGISTER

Fraud no.....

Sl. no	Particulars with steps and actions	Results and Remarks
1.	Name, address & telephone no. of the person/organization against the fraud raised	
2.	Particulars of complaint relating to fraud with receiving date	
3.	Name & address of the informer/finder/anonymous	
4.	Name of the person with position who bring the issue to the fraud management committee/Senior Management	
5.	Discussion and decision about the fraud by the Fraud management committee/Senior Management with date	
6.	The decision of the Fraud management Committee/ senior management team with action plan	
7.	Name of the investigation team member (if needed) with their responsibility (ToR) with last date of reporting	
8.	The summary of the investigation team report with the date of submission	
9.	The decision of the Fraud management committee/ Senior management team based on the report with date	
10.	Action implemented/not with date (if not what are the reason/s)	
11.	Final settlement of the fraud with date	
	Decision of Fraud management Committee/Senior management team about reporting or not reporting to NDP/ Donors with justification and date	
12.	Follow up action if any:	

If necessary separate sheet/s may be used to write the results/actions or any other information

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Fraud

Fraud is usually taken to mean the gaining of an illicit advantage through deception and in particular the manipulation of financial information or accounting records. The word "fraud" has been used for many years in this context, but an exact internationally recognized definition is less easy to determine.

It also includes the following actions:

- False representation;
- Failing to disclose information;
- Abuse of position and
- many other offences relating beyond the purview.

NDP Policy towards Irregularities

NDP maintains "NDP Policy towards Irregularities" in regard to financial and programming irregularities. This policy is in line with the true spirit of partnering, which is based on mutual trust, accountability and transparency. Financial and programming irregularities, also known in NDP as "defalcation" or "misappropriation", refer, but are not limited to:

- Any dishonest or fraudulent act or violation of clause/clauses in the signed Agreement;
- Forgery or alteration of any document or account(including but not limited to timesheet, payroll and associated leave records and accounts, travel and expense reports, advance reports and account, procurement documents, inventory records);
- Forgery or alteration of a check, bank draft, or any other financial documents;
- Misappropriation of funds, commodities, supplies, spare parts, project materials and equipment, or other assets;
- Impropriety in the handling or reporting of money, financial transactions, or bidding procedures;
- Accepting or seeking anything above nominal material value from vendors or persons providing services/materials (this does not apply to calendars, agendas, etc);
- Destruction or misappropriation of records, furniture, fixtures, or equipment;
- Diversion, alteration, or mismanagement of documents or information, and/or any similar or related irregularity.
- Unauthorized deduction or underhand dealing with any party.

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If it is revealed that the any Project/Program/Sub Partners/Sub-organization providing less salary than what is charging to NDP Project or realizing any money from the salary of any staff or deducting any non-refundable salary, NDP may terminate the Sub-partnership immediately.

If any complain received in writing from any person/s in employment or ex-employment in Sub-PO, that the said Sub PO is (was) providing less salary than what is (was) charging and/or realizing any money by the Sub PO from the staff in underhand dealing, the issue shall be dealt with the Policy Towards Irregularities and if it is apparent or proved, the Sub partnership shall be terminated instantly and will be blacklisted in the NDP Database.


It is impossible to build a successful partnership when either of the two organizations allows or routinely practices the above acts. Therefore, NDP's "Policy towards Irregularities" will apply to any Sub partner or Su- sub-partner that has been judged to have committed any of these actions consciously, purposefully, and with the knowledge of the organization's Executive Staff. Once such acts have been detected and verified, the partnership in question will be summarily terminated and all ties with the organization will be severed.

However, if the nature of the defalcation is such that the partnership is not terminated, a plan to rectify the irregularities must be developed by the organization. This plan will then be approved and monitored by NDP Senior Management. Then, if the monitoring process indicates that the plan has not been implemented properly or within the stated time frame, the partnership will be terminated at that point.

NDP encourages all of its partners to seek to detect and deal with financial irregularities internally, before they are identified by an external auditor. Such efforts will be supported by special coaching and on-the-job training provided by NDP.



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