

we ensure development for all



RISK MANAGEMENT POLICY

a community development organization

CHANDRADIP DEVELOPMENT SOCIETY -CDS

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জাহানারা বেগম স্বপ্না
সম্পাদক
চন্দ্রদ্বীপ ডেভেলপমেন্ট সোসাইটি


খাদিজা বেগম
সভাপতি
চন্দ্রদ্বীপ ডেভেলপমেন্ট সোসাইটি

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Introduction:


Chandradip Development Society –CDS is a woman headed community development organization working since 2000 in the southern coastal belt region focusing disadvantaged community empowerment on social rights and service issues with special attention to women and children. The word Chandradip derives from 'Chandradwip' is the historical name of ancient Barisal District region which was surrounded by several small islands & 'Chandradip' was the focal point of these greater islands region. To ensure all kinds of possible development efforts for the most disaster prone vulnerable, disadvantaged, poverty stricken community people of this region, CDS-Chandradip Development Society has been established in 1st July 1999 by its present chief-executive along with other likeminded enthusiastic fellows as a not for profit, non political and community based voluntary organization with a motto 'we ensure development for all'. CDS has been registered with the Department of Social Welfare, NGO Affairs Bureau, Jubo Unnayan Adhidaptar (Department of Youth Development) & Women Affairs Bureau. The Head Office of the organization located in Barisal, the southern divisional city of Bangladesh. In 2000 CDS started its development initiative with a program for disadvantaged women empowerment through promoting their rights, leadership and upgrading their situation by IGAs with an Institution Capacity Building Project supported by Southern NGO Network-SNN under Leading Organization BDS, Barisal. At present Chandradip Development Society –CDS is directly implementing projects on Maternal, Child Health & Nutrition; Safe Water Supply & Sanitation; Preserving Rights for Women & Children; Legal Aid Support and Education; Literacy Education for the Underprivileged; Food Security, Safety Net & Social Protection; Hazardous Child Labor Elimination & Rehabilitation; Health Rights Establishment Advocacy; Combating Violence Against Women & Children; Strengthening Local Government Institutions; Climate Change Adaptation & DRM; Establishing Agricultural Rights of the Women Farmers; HIV/AIDS Prevention among Young Generation; National Level Advocacy & Campaign etc. covering 95 unions in 15 upazilas of Barisal and Bhola District under Barisal Division supported by different international and national funding partners. CDS has its Branch Offices in all the working area's focal point of Barisal and Bhola District including the remote and char areas. The organization is equipped with capable, skilled and committed manpower, adequate facilities & materials, modern information technology system.

CDS works with different stakeholders like civil society, farmers' societies, local Government representatives, fishers folk, youth groups, teachers, children, adolescent and socially disadvantaged women. CDS always tries to address the emerging needs of the working communities and collaborates with various local, national and international NGOs and government departments in realizing common goal of social development. Currently, CDS has been working with about 35 thousands poor and socially disadvantaged households in different issues of Health, Nutrition & WatSan; Good Governance, Rights & Justice; Education, Gender and Empowerment; Environment, Disaster Risk Reduction and Climate Change Adaption; Livelihood & Food Security in Barisal and Bhola District of Southern Coastal Belt.

CDS has been working for the last 23 years and has earned a good reputation within the community, local administration, funding agencies and other stakeholders at local, national and international level. Chandradip Development Society has gained many exciting and challenging experiences working in different sectors of development. From individual action research to collaborative efforts support since inception Chandradip Development Society gaining multifaceted and diversified experiences of working in different development sectors. Long working experience in Health, Good Governance, and Education and IGA program implementation at field level makes the organization competitive. CHANDRADIP is now in a position to attain the rights to claim itself an expert in major development sectors to implement any program or project by skill & experienced human resources following its strategic planning.

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Vision, Mission & Objectives:

Vision:

To establish a sustainable development ensuring equal community participation

Mission:

To ensure a hygienic & balanced environment for the safe growth of new generation

Goal:

Develop equitable and sustainable development process for ensuring community participation for sustainable development of ultra poor, poor, and marginalized population of the community.

Objectives:

- ✦ To establish and uphold the social and human rights of the disadvantaged and vulnerable community people.
- ✦ To increase active involvement of the disadvantaged and vulnerable community
- ✦ To develop capacity of vulnerable community of disaster prone areas to mitigate the magnitude of natural disasters for safe lives and reducing of damages.
- ✦ To promote democratization process for creating opportunity to increase accountability and transparency of the different segments of stakeholders.
- ✦ To make people understand and aware about the way and path for changing their lifestyle for the livelihood development of the ultra poor, poor and marginalized community.
- ✦ To assist the vulnerable communities to increase family income by engaging them in alternative income generation activities.
- ✦ To develop the capacity of the organization to provide need based back up support to achieve policy issues related to socio-political and cultural issues

Strategies:

- Develop and institutionalize alternatives in the field of people's participatory development approach, methods and tools.
- Enhancing capacity of development actors as effective facilitator of people's participatory development process
- Implement innovative programmes directly for linking and institutionalizing experiential learning.
- Explore utilize promote and facilitate people's capacity for innovativeness and undertaking different development initiatives.
- Identify, explore and mobilize local, public and private resources including human potentials for optimum output and overall development of the country
- Policy Advocacy.
- Networking & Coalition.

Values of Chandradip Development Society -CDS:

- **Equality & equity:**
Our development goal is to ensure equal community participation and promoting equity in case of justice, rights and accessing opportunities;
- **Respect to community and local culture:**
Give values to local culture, tradition & customs and use those in the development Programmes. We welcome and respect people's opinion always;
- **Participation & ownership development:**
Active participation of people allow them voice out their needs and establish ownership in the development Programmes;
- **Democratic practices:**
Allow people to exercise their rights to elect right person for the right position as well as to ensure better access to services;
- **Believe on people's potentiality and capacities:**
Recognize people's potentials and they can give best output if they are facilitated properly and recognizing people's contribution
- **Professionalism & service:**
We provide the highest level of professional service and support to all our stakeholders;
- **Team work:**
Everyone of the organization is equally important; group effort is the working technique to ensure maximum and effective outputs. We support and equip each team member for job success;
- **Good governance, accountability and transparency:**
Operating organization and its activities in accordance with the policies, provisions and methods ensuring highest transparency at all levels;
- **Holistic approach (total/100%coverage):**
Working with all segments of people is much better than an individual peace-meal;
- **Address disadvantage/disable:**
Disadvantaged are most vulnerable and neglected by the community. They cannot establish their rights or protection without facilitation support from external sources;
- **Gender sensitive:**
Participation of men and women are equally important for all development Programmes
- **Zero tolerance:**
We do exercise '0' level tolerance in case of any sorts of violence against women and children
- **Innovation:**
We embrace ideas that move us forward and serve our stakeholders;
- **Environment friendly:**
Environment should be preserved friendly for all living creature.

Purpose of the policy:

This Policy aims to set out approaches and procedures to identify risk and to mitigate it. The policy is creating a risk free environment for community people and different stake holder of Chandradip Development Society. It applies to all aspects of Chandradip Development Society works and to everyone working for it, including community, volunteers, Staffs consultants, members of the Governing board and staff members of the partner organizations, beneficiaries, contractors and vendors

Methodology of Preparation of this Policy:

At initial stage of the policy it was discussed 03 (Three) several times with the senior staffs at Field and Principal office level and made it update according to their comments. Accordingly, the 2'd draft policy was given to the Executive Director for seeking his comments. After getting comments from ED, the Director has finally reviewed it and made it as final draft for taking final approval from the President of Chandradip Development Society.

Approval and updated:

This policy has been approved by General Committee on 9th March, 2019 and it will be effective from 10th March, 2019. The policy will be reviewed on need based in the following circumstances of changes in government laws and policies and updated version will be affected after approval of authority.

Strategic Context:

Chandradip Development Society is committed to provide an environment free from discrimination and harassment, where all individuals and other stakeholders are treated with respect and dignity and have equal opportunities at all level. Chandradip Development Society supports the principles contained in the Universal Declaration of Human Rights (UDHR) and the in the Constitution of Bangladesh. These clearly state that no one can be discriminated on the ground of class, gender, caste, religion, profession, ethnicity and sexual orientation. It always makes efforts to maintain an equal and safe environment for all at all levels. In consideration of sexual harassment, exploitation and abuse, a policy is being formulated to identify possible risks in life and livelihood of members and staff as well. This policy is always aimed at identifying possible risks to ensure safety, dignity and protection of members and staff. Through the policy, possible risks at all levels will be identified and measures will be taken to mitigate those. It is to be noted that, in relation to the protection from sexual harassment, exploitation and abuse policy and safety and security will be applicable in respective incidents.


As per Due Diligence Assessment (DDA) and action plan Chandradip Development Society has prepared the policy for Risk Management.


Objectives:

- ❖ To ensure equality and safe, sexual harassment free, safe place, life and livelihood for members and staff.
- ❖ To identify possible sexual harassment issues, risks in life and livelihood, members have been assigned to FGD at different levels such as members and staff.

Implementation Process:

In order to convince everyone in accordance with the following table, the orientation program will be organized for members and staff at all level. Then, once every three months, information will be collected in a specific form to know whether these things are happening. The forms filled up with the information will be sent to the head office. The concerned departments will take steps to address the issues if there is any on the basis of feedback received from field. It should be noted here that only the board members will be informed if there is any complaint against the Executive Director. Besides, if there is any complaint against others, then the concerned authority will be informed according to the complainant Response Mechanism –CRM.


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Program Perspectives (general category)

Risk: Gender Relation, Livelihood and Security, dignity and protection


Subject	Possible risk	Bad impact on Members level	Bad impact on staff and organizations level	Suggestion/ recommendation	Means of verification
Gender Relation Sexual Harassment Exploitation and Abuse	Whether gender Sexual / Insensitive words / Harassment, behaviors are expressed if the installment is not given in time. For example, whether anyone uses undignified words towards women. Whether any attempt to get Immoral (sexual) advantage in the name of giving loan. Any immoral or extra marital Affairs to return loan irregularly. Possibility of sexual harassment if return of installment irregularly (the definition of sexual harassment will be applicable here) Sexual harassment or gender insensitive/words behavior Without any reason	<ul style="list-style-type: none"> The possibility of mental, social and economic losses, including the dignity of a member, may be created. May make immoral relationships with a member in the name of collecting the installment. A member may be lost deprived of receiving a loan. It may be forced to create affair/relationships or to create immoral relationships But many times it cannot be prevented due to losing loans. Social status worsened. The possibility of leaving a group. Schools / colleges girls can be Dropped out. 	<p>The social and economic harm of the employee may be happened. If you go for collection installments at night, then the employee may be subjected to false allegations of sexual harassment.</p> <p>The employee's productivity may be reduced.</p> <p>The organization's reputation and staff's reputation may be destroyed at the same time.</p> <p>The possibility of project's activities can be ended.</p>	<ul style="list-style-type: none"> Arrange meeting Regularly for staff and member at all level to aware them to identify risks. Encourage people to file complaints. Quick action should be taken according to the relevant policy of the organization. The contact Number of the complainants have to be put on the signboard. Besides, there are contact numbers of the complainant behind the visiting card of all the employees. <p>Providing awareness information regularly.</p>	<p>Meeting minutes.</p> <p>All documents and complaints.</p> <p>Signboard and employee's visiting Card.</p> <p>Registerbook.</p>



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Program Perspectives (general category)

<p>Life and Livelihood</p>	<p>Loans are not given as Members demanded.</p> <p>Any incident of not using loan in proper way. Whether the socio-social development is interrupted.</p>	<p>If members do not get loan as their requirement they may not be able to use those properly and get back the loan as well.</p> <p>The possibility of losing a member's capitals because of not using loan in Proper way.</p> <p>If a member does not return loan regularly, you may lose confidence and faith.</p>	<p>If overdue is being increased staff can lose their confidence.</p> <p>If you do not use the loan in rightly then the staff's time and money are wastage to recover the loan.</p> <p>If staff lose their job, then they may lose their family and social dignity.</p>	<ul style="list-style-type: none"> • Advice to use the loan. • Rightly. 	<ul style="list-style-type: none"> • Economic and social change of a member.
<p>Security, dignity and protection</p>	<p>The probability of being displaced Non-cooperation of local elites Adolescents club members or other members are being insecure by the staff.</p>	<p>Because of the extra borrow in g loan from multiple agencies, Members fail to repay the loan properly. Then the members suffer from insecure.</p> <p>As a result, the quit the place. If members fail to get back loan in time they may be lost their social status.</p> <p>Therefore their economic development may also be hampered.</p> <p>A member of the community /teenage girl's social security may be hampered</p>	<p>A member of the organization has been forced to leave the job employees can lose.</p> <p>The probability of the employee becoming defamatory.</p>	<p>Provide regular messages to the members.</p> <p>Include the CBO, Food Bank and VSLA to regular meetings.</p> <p>Discuss the topics at regular meetings with members of the club.</p>	<p>The minutes of the meeting.</p>


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Risk: Internal Audit:

Subject: Internal Audit	Possible risk	Bad impact on Members level	Bad impact on staff and organization's level	Suggestion/recommendation	Means of Verification
<p>Managing Internal Audit</p>	<p>Misappropriation or financial irregularities would not find out properly due to lack of skill some auditors.</p> <p>Some staff auditors may have undue financial & non-financial benefits from the staff in order to hide or avoiding their misappropriation or irregularities.</p> <p>Staff auditors can unprofessional behave with respective staff for collecting information</p> <p>Staff Shortage for planned audit completion.</p>	<ul style="list-style-type: none"> Group members or Beneficiaries might loss financially and loss confidence toward organizations might loss financially and loss confidence toward organization. Indiscipline arises among the beneficiaries and hampers repayment in MF. Beneficiaries loss their confidence in engaging with NSS's program. Some beneficiaries may take scope of stop and deferring their loan repayment and entice chaotic situation. 	<ul style="list-style-type: none"> Staff might engage with financial irregularities and misappropriations. Organization will loss financially and will hamper the program quality and performance. Long term financial sustainability might be hampered. Staff may leave the organization due to feel insult or hampering social status. 	<ul style="list-style-type: none"> Orient audit staff on professional Auditing and process. Regular follow up on auditing performance. Adequate audit staff to be deployed. 	<ul style="list-style-type: none"> Followup and Analysis of different audit report and cross check with field. Discussion on with field staff

<p>Gender</p> <ul style="list-style-type: none"> Staff might use slang or unsocial word at group level to collect information. Staff might engage with undue relation with other female staff for hiding misappropriation. 	<ul style="list-style-type: none"> Hampering social status of beneficiaries. Beneficiaries will face financial crisis due to hiding misappropriation. 	<ul style="list-style-type: none"> Beneficiaries may leave the group and migrate with loan. Organization will face financial loss and will damage institutional goodwill. Taking risk of staff dismissal. 	<ul style="list-style-type: none"> Orient staff on professional standard and moral ethics. Regular follow up at field level on auditing and auditors performance. 	<ul style="list-style-type: none"> Discussion at group level and ask question on audit issues. Audit report cross check with branch office report & group level
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Risk: Finance Department

Subject: Accounts and finance	Possible risk	Bad impact on staff and organization's level	Suggestion/recommendation	Means of verification
Foreign donation management	<p>Received foreign donation before make sure whether the donor agency is blacklisted by the government or UN Security Agencies.</p> <p>In case of receiving foreign donation, do not comply with the existing laws of the country, like money laundering and foreign donations regulation.</p> <p>The donation is likely to be used in militancy and terrorism.</p> <p>Receiving foreign donation without written agreement.</p> <p>Receiving foreign donation through several bank account.</p>	<p>As a result the Organization can be blacklisted.</p> <ul style="list-style-type: none"> There is a possibility of facing legal problems. Violation of donor agreement. Reputation and Dignity of the organization may be spoiled. 	<ul style="list-style-type: none"> Before receiving the donation should be confirm that whether the donor agency is in black listed. Country law should be follow in terms of receiving foreign donation No donation can be accepted without written agreement. All foreign donations should be received through banking channel. 	<p>UN security agency provide d blacklisted donor list.</p> <p>Bangladesh government approved blacklisted donor list.</p> <p>Money laundering act.</p> <p>Agreement</p> <p>Bank statement.</p>

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<p>Bank and cash transaction</p>	<p>No to record Banks and cash transactions in Books of Accounts.</p> <p>Not to check all day transaction with cash book and not to close the cash book with proper approval.</p> <p>Not to maintain and Recorded cash balance in volt register.</p> <p>Not to follow the organization rules in terms of cash and bank payment.</p> <p>Not to maintain individual check register for every individual bank account.</p> <p>Not take any security measure for cash carrying and for cash in hand.</p> <p>Not to prepare bank reconciliation on end of month.</p>	<p>Every transactions should be recorded in books of Accounts.</p> <p>Should check all transaction with cash book and should close cash book end of day with proper approval.</p> <p>Should maintain volt register and cash in hand should be written in volt register.</p> <p>Should maintain check register for every individual bank account.</p> <p>Should take appropriate security measure for cash carrying and cash in hand.</p> <p>Should reconcile each bank account end of every month and take approval from authorized person.</p>	<p>Books of Accounts</p> <p>Check register</p> <p>Financial policy of organization.</p> <p>Audited accounts</p> <p>Volt register</p> <p>Discuss with finance department.</p>
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<p>Procurement procedure</p>	<p>Unapproved and unnecessary procurement. Not to take proper approval for purchase out of budget. Purchase without approved requisition Completed procurement without formation of purchase committee in applicable cases. Completed procurement without market survey, collecting quotation and seeking tender. Participation of relative of any staff in procurement. Not to compare prices and prepare comparative analysis. Not to entered asset/product/material in respective register Not to received no objection certificate form procurement committee and technical expert if applicable.</p>	<p>Unnecessary procurement causes financial loss. Violation of procurement policy. Possibility of losing asset. Employ can influence the procurement system. Chances to procure less quality product.</p>	<p>Procurement should be approved and appropriate. All procurement should be within the approved budget. Approval should be taken for the procurement which is out of budget (in case of organization) Purchase requisition should be approved. Market survey Should bedone for best price offer and best quality. Comparative analysis should be prepared. Any relative of NSS employee should not participate in procurement procedure. Make sure that vendor is not engaged in terrorist activities.</p>	<p>Approved Procurement budget policy. Purchase requisition on Asset and stock register Inventory list</p>
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<p>Microfinance Management</p>	<p>Fail to select right scheme for right person Fail to judge whether the member may have chance to Migrate or the fraud person. Not to conduct balance audit in every three month. Not to invest member according to the MRA Policy Fail to deposit all collection in bank on same day Fail to ensure security in cash transportation Money may be used in terrorist financing and to influence terrorism. Money may be used in drug dealing and gambling.</p>	<p>Possibility of increase defaulter There is a possibility of losing capital. Members can use loan money in terrorism and extremism. Scope of fund Embezzlement Violation of MRA policy</p>	<p>All loan disbursement savings return and loan insurance adjustment (for death case) has to be verified physically by the Br. Manager (100%) and Area Manager (test basis). Balancing audit has to be conduct on half yearly basis to examine the balance of loan and savings with members pass book and office collection sheet/register /member ledger. As per MRA rules, FDR investment is must against members savings fund. To ensure the financing is not using for Money laundering and terrorist financing and other any illegal way as per law of land.</p>	<p>Audited report Discussed in member meeting. MRA policy. Check and verify.</p>
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<p>Fixed Asset</p>	<p>Not to maintain and updated Fixed Asset register. Not to affix Asset identification number. Not to conduct inventory at least two times in a year.</p> <p>No to take prior concern from asset department before procure and not to prepare 'asset report' quarterly basis.</p> <p>Not to make agreement with the user for uses organization asset like, mobile, laptop, Tab, motor cycle and vehicle..</p>	<p>Absence of asset register it's difficult to confirm the value and quantity of total assets of the organization. Possibility of losing asset.</p> <p>Organization faces financial losses for misusing of Asset and property.</p>	<p>Fixed assets register has to be maintained at all offices. Fixed assets report will have to be sent by all offices on quarterly basis in favor of central Estate department. Fixed assets inventory has to be conducted of half yearly basis.</p> <p>Prior concern has to be taken from concern staff of Estate department in terms of assets purchase and auction sale. If any assets gone damage or lost then it has to be informed to Estate department through written or email.</p> <p>Asset ID no. is must at each assets and Estate department will fix or instruct the Assets ID.</p>	<p>Asset register Financial report Inventory report Agreement for use of asset.</p>
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Risk Assessment Matrix an Guide Line

Chandradip Development Society has developed this guideline for all relevant stakeholders and staff to identify and understand the area of risks. Risks can be determined with few weights and indicators. In terms of safeguard, gender and CP issue it has been defined in policy and risk matrix and has been developed and updated based on level of harm and likelihoods of occurrences/re-occurrences, or whether it is high-medium-low. The risk management policy defined the word abuse as a violation of an individual's human and civil rights by any other person or persons. So, risk assessment matrix may bedrawn as below:

Risk Assessment Matrix

LIKELIHOOD OF RE-OCCURRENCE	High	3	6	9
	Med	2	4	6
	Low	1	2	3
		Low	Significant	High
	LEVEL OF HARM/IMPACT			

How to assess the issues :

- ❖ The safeguard, gender and CP risk assessment matrix should be used to assess risk for each and every category of abuse, i.e. Physical, Sexual, Psychological, Financial, Neglect, discrimination and Institutional abuse.
- ❖ Need to decide on the level of harm e.g. Low, Significant or High.
- ❖ Decide the likelihood of this harm re-occurring e.g. Low, Medium or High.
- ❖ Cross reference level of harm with likelihood of re-occurrence on the safeguard, gender and CP risk assessment matrix to score the risk. For example, where the level of harm is identified as significant (2) and the likelihood of re-occurrence is medium (2) the risk score will be 4 as per below definition and table.
- ❖ Calculate the risk score for **each** category of abuse; **If the risk score is 3 (light orange) or above** for any of the categories of abuse, then proceed to Strategy. **If the risk score is 2 (yellow) or below (Green)** consider logging as an Alert and managing via internal agency process/procedures.
- ❖ The issues need to be followed up by organizational disciplinary actions from Admin Section, complaint management and code of conduct. Other than that, the CRM committee should take into considerations few areas such as, like cumulative effect of all the risks identified and risk scores, any historical information, participatory judgment and principle of organization core standard.
- ❖ The Gender and CP focal person and Safeguarding Officer will provide support and guidance to committee members considering subsequent actions and interventions.

Guidelines to follow:

In order to assist the whole process a list and example has been set. At the same time it is acknowledged that predicting the likelihood of re-occurrence of harm is not always an exact science. The committee will have to conduct fact findings as per organizational procedures.

Sector	Low	Medium	High
Likelihood of re-occurrence	Not likely to happen/re-occur but it may do	Likely to happen or re-occur	Very likely to

Based on this policy and risk and matrix assign person maintain a risk register. After getting a complaint s/he will initiate for mitigation following CRM process. S/he also prepares a report on six monthly bases.

