



Subject: Risk Assessment Policy

Introduction:

Coast Trust believes in equality of men and women. It always makes efforts to maintain an equal and safe environment for all at all levels. In consideration of possible 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 also 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.

Objectives:

The policy will work for equal and safe, sexual harassment free, safe place, life and livelihood for members and staff.

Method:

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. After that the following possible risks have been identified.

Implementation Process:

In order to convince everyone in accordance with the following table, the orientation programme will be organised 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 policy.

Core Programs and Social Development (general category)

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

Subject: Gender relation	Possible risk	Bad impact on Members level	Bad impact on staff and organization's level	Suggestion/recommendation	Means of verification
Sexual Harassment,	<ul style="list-style-type: none"> Whether gender insensitive words / behaviors are used/expressed if the 	<ul style="list-style-type: none"> The possibility of mental, social and economic losses, including the 	<ul style="list-style-type: none"> The social and economic harm of the employee may be happened. 	<ul style="list-style-type: none"> Arrange meeting regularly for staff and member at all level to aware them to identify risks. 	<ul style="list-style-type: none"> Meeting minutes. All documents


Rezaul Karim Chowdhury
Executive Director
COAST Trust


Begum Shamsun Nahar
Chairperson-Board of Trustee
COAST Trust

Exploitation and Abuse.	<p>installment is not given in time. For example, whether anyone uses undignified words towards women.</p> <ul style="list-style-type: none"> • 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. 	<p>dignity of a member, may be created.</p> <ul style="list-style-type: none"> • May make immoral relationships with a member in the name of collecting the installment. • A member may be lost membership or may be 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 (Samity) • Schools / colleges girls can be dropped out. 	<ul style="list-style-type: none"> • If you go for collection installments at night, then the employee may be subjected to false allegations of sexual harassment. • The employee's productivity may be reduced. • The organization's reputation and staff's reputation may be destroyed at the same time. • The possibility of project's activities can be ended. 	<ul style="list-style-type: none"> • 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. • Providing awareness building information regularly. 	<p>and complaints</p> <ul style="list-style-type: none"> • Signboard and employee's visiting Card. • Register book.
Life and livelihood	<ul style="list-style-type: none"> • Loans are not given as members demanded. • Any incident of not using loan in proper way. Whether the socio-social development is interrupted. 	<ul style="list-style-type: none"> • 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. • The possibility of losing a member's capitals because of not using loan in proper way. • If a member does not return loan regularly, you may lose confidence and faith. 	<ul style="list-style-type: none"> • If overdue is being increased staff can loss their confidence. • If you do not use the loan in rightly then the staff's time and money are wastage to recover the loan. If staff loss their job, then they may lose their family and social dignity. 	<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.
Security, dignity and protection	<ul style="list-style-type: none"> • The probability of being displaced 	<ul style="list-style-type: none"> • Because of the extra borrowing loan from multiple agencies, members fail to repay the 	<ul style="list-style-type: none"> • A member of the organization has been forced to leave the job. 	<ul style="list-style-type: none"> • Provide regular messages to the members. 	<ul style="list-style-type: none"> • The minutes of the meeting.





	<ul style="list-style-type: none"> • Non-cooperation of local elites • Adolescents club members or other members are being insecure by the staff. 	<p>loan properly. Then the members suffer from insecurity. As a result, they quit the place.</p> <ul style="list-style-type: none"> • If members fail to get back loan in time they may be lost their social status. Therefore, their economic development may also be hampered. • A member of the community / teenage girl's social security may be hampered. 	<ul style="list-style-type: none"> • Employees can lose their job. • The probability of the employee becoming defamatory. 	<ul style="list-style-type: none"> • Include the Jana Sangathan to regular meetings. • Discuss the topics at regular meetings with members of the club. 	
--	---	--	---	---	--

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
Managing Audit	<ul style="list-style-type: none"> • Misappropriation or financial irregularities would not find out properly due to lack of skill some auditors. • Some staff auditors may have undue financial & non-financial benefits from the staff in order to hide or avoiding their misappropriation or irregularities. • Staff auditors can unprofessional behave with respective staff for collecting information. 	<ul style="list-style-type: none"> • Group members or beneficiaries might loss financially and loss confidence toward organization. • Indiscipline arise among the beneficiaries and hamper repayment in MF. Beneficiaries loss their confidence in engaging with COAST 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"> • Follow up and analysis of different audit report and cross check with field. • Discussion with field staff



	<ul style="list-style-type: none"> Staff shortage for planned audit completion. 				
Gender	<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 loss 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

Risk: Finance Department-

Subject: Accounts and finance	Possible risk	Bad impact on Members level	Bad impact on staff and organization's level	Suggestion/recommendation	Means of verification
Foreign donation management	<ul style="list-style-type: none"> Received foreign donation before make sure whether the donor agency is blacklisted by the government or UN Security Agencies. In case of receiving foreign donation, do not comply with the existing laws of the country, like money laundering and Foreign Donations (Voluntary Activities) Regulation Law 2016. The donation is likely to be used in militancy and terrorism. 	-	<ul style="list-style-type: none"> As a result, the organization can be blacklisted. 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 fellow in terms of receiving foreign donation No donation can be accepted without written agreement All foreign donation should be received through banking channel. 	<ul style="list-style-type: none"> UN security agency provided blacklisted donor list. Bangladesh government approved blacklisted donor list. Money laundering act. Agreement. Bank statement.

Rezaul Karim Chowdhury,
Executive Director
COAST Trust

Begum Shamsun Nahar
Chairperson-Board of Trustee
COAST Trust




	<ul style="list-style-type: none"> Receiving foreign donation without written agreement. Receiving foreign donation through several bank account. 				
Bank and cash transaction	<ul style="list-style-type: none"> No to record Banks and cash transactions in Books of accounts. No to check all day transaction with cash book and not to close the cash book with proper approval. Not to maintain and Recorded cash balance in volt register. Not to follow the organizational rules in terms of cash and bank payment. Not to maintain individual check register for every individual bank account Not take any security measure for cash carrying and for cash in hand. Not to prepare bank reconciliation end of month. 	-	-	<ul style="list-style-type: none"> Every transaction should be recorded in books of Accounts. Should check all transaction with cash book and should close cash book end of day with proper approval. Should maintain volt register and cash in hand should be written in volt register. Should maintain check register for every individual bank account. Should take appropriate security measure for cash carrying and cash in hand. Should reconcile each bank account end of every month and take approval from authorized person. 	<ul style="list-style-type: none"> Books of Accounts Check register Financial policy of organization Audited accounts Volt register Discus with finance department
Procurement procedure	<ul style="list-style-type: none"> Unapproved and unnecessary procurement. 	-	<ul style="list-style-type: none"> Unnecessary procurement causes financial loss. Violation of procurement policy. Possibility of losing asset. 	<ul style="list-style-type: none"> Procurement should be approved and appropriate. 	<ul style="list-style-type: none"> Approved budget Procurement policy



	<ul style="list-style-type: none"> • 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 procedure. • 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. 		<ul style="list-style-type: none"> • Employ can influence the procurement system. • Chances to procure less quality product. 	<ul style="list-style-type: none"> • 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 be done for best price offer and best quality. • Comparative analysis should be prepared. • Any relative of COAST employee should not participate in procurement procedure. • Make sure that vendor is not engaged in terrorist activities. 	<ul style="list-style-type: none"> • Purchase requisition • Asset and stock register • Inventory list
Microfinance management	<ul style="list-style-type: none"> • Fail to select right scheme for right person • Fail to judge whether the member may have chance to migrate or the fraud person. 	-	<ul style="list-style-type: none"> • Possibility of increase defaulter • There is a possibility of losing capital. • Members can use loan money in terrorism and extremism. 	<ul style="list-style-type: none"> • Loan disbursement has to be made at right person and right scheme. • Make sure whether the member may have chance to migrate or the fraud person. 	<ul style="list-style-type: none"> • Audited report • Discussed in member meeting. • MRA policy. • Check and verify

	<ul style="list-style-type: none"> 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. 		<ul style="list-style-type: none"> Scope of fund Embezzlement Violation of MRA policy. 	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> member pass book. Cash book and bank statement.
Fixed Asset	<ul style="list-style-type: none"> 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. No to take prior concern from asset department before procure and sale any fixed asset item. 	-	<ul style="list-style-type: none"> Absence of asset register it's difficult to confirm the value and quantity of total assets of the organization. Possibility of losing asset. Organization faces financial losses for misusing of asset and property. 	<ul style="list-style-type: none"> 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 conduct of half yearly basis. Prior concern has to be taken from concern staff 	<ul style="list-style-type: none"> Asset register Financial report Inventory report Agreement for use of asset



	<ul style="list-style-type: none"> • Not to prepare asset report quarterly basis. • Not to make agreement with the user for uses organization asset like, mobile, laptop, Tab, motor cycle and vehicle. 			<p>of Estate department in terms of assets purchase and auction sale.</p> <ul style="list-style-type: none"> • If nay assets gone damage or lost then it has to be informed to Estate department through written or email. • Asset ID no. is must at each assets and Estate department will fix or instruct the Assets ID. 	
--	---	--	--	--	--

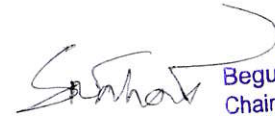
Approved by The Trustee Board: This policy has been approved unanimously in the 99th BoT meeting held on 22 March, 2019.

Review of this policy: This policy can be reviewed with the significant changes made in the national and international laws, policies, human rights declaration.



Rezaul Karim Chowdhury
Executive Director
COAST Trust

Rezaul Karim Chowdhury,
Executive Director
COAST Trust



Begum Shamsun Nahar
Chairperson-Board of Trustee
COAST Trust

Begum Shamsun Nahar
Chairperson,
Board of Trustee
COAST Trust