Date: 10 February, 2015

**COAST Trust** 



# **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 possik 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 als 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,	Whether gender insensitive words / behaviors are used/expressed if the	The possibility of mental, social and economic losses, including the	The social and economic harm of the employee may be happened.	<ul> <li>Arrange meeting regularly for staff and member at all level to aware them to identify risks.</li> </ul>	<ul><li>Meeting minutes.</li><li>All documents</li></ul>	

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Exploitation and Abuse.	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 affaires 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.	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 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> <li>If you go for collection installments at night, then the employee may be subjected to false allegations of sexual harassment.</li> <li>The employee's productivity may be reduced.</li> <li>The organization's reputation and staff's reputation may be destroyed at the same time.</li> <li>The possibility of project's activities can be ended.</li> </ul>	<ul> <li>Encourage people to file complaints.</li> <li>Quick action should be taken according to the relevant policy of the organization.</li> <li>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.</li> <li>Providing awareness building information regularly.</li> </ul>	and complaints  Signboard and employee's visiting Card. Register book.
Life and livelihood	<ul> <li>Loans are not given as members demanded.</li> <li>Any incident of not using loan in proper way.         Whether the socio-social development is interrupted.</li> </ul>	<ul> <li>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.</li> <li>The possibility of losing a member's capitals because of not using loan in proper way.</li> <li>If a member does not return loan regularly, you may lose confidence and faith.</li> </ul>	<ul> <li>If overdue is being increased staff can loss their confidence.</li> <li>If you do not use the loan in rightly then the staff's time and money are wastage to recover the loan.</li> <li>If staff loss their job, then they may lose their family and social dignity.</li> </ul>	Advice to use the loan rightly.	Economic and social change of a member.
Security, dignity and protection	The probability of being displaced	Because of the extra borrowing loan from multiple agencies, members fail to repay the	A member of the organization has been forced to leave the job.	Provide regular messages to the members.  Begum Shamsun Nah	The minutes of the meeting.

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Executive Director
COAST Trust

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<ul> <li>Non-cooperation of local elites</li> <li>Adolescents club members or other members are being insecure by the staff.</li> </ul>	loan properly. Then the members suffer from insecurity. As a result, they quit the place.  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> <li>Employees can lose their job.</li> <li>The probability of the employee becoming defamatory.</li> </ul>	<ul> <li>Include the Jana         Sangathan to regular meetings.     </li> <li>Discuss the topics at regular meetings with members of the club.</li> </ul>	
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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
Managing Audit	<ul> <li>Misappropriation or financial irregularitie would not find out properly due to lack skill some auditors.</li> <li>Some staff auditors r have undue financial non-financial benefit from the staff in orde to hide or avoiding the misappropriation or irregularities.</li> <li>Staff auditors can unprofessional behave with respective staff collecting informatio</li> </ul>	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	<ul> <li>Staff might engage with financial irregularities and misappropriations</li> <li>Organization will loss financially and will hamper the program quality and performance.</li> <li>Long term financial sustainability might be hampered.</li> <li>Staff may leave the organization due to feel insult or hampering social status.</li> </ul>	<ul> <li>Orient audit staff on professional auditing and process.</li> <li>Regular follow up on auditing performance.</li> <li>Adequate audit staff to be deployed.</li> </ul>	<ul> <li>Follow up and analysis of different audit report and cross check with field.</li> <li>Discussion with field staff</li> </ul>





	<ul> <li>Staff shortage for planned audit completion.</li> </ul>			-	***
Gender	<ul> <li>Staff might use slang or unsocial word at group level to collect information.</li> <li>Staff might engage with undue relation with other female staff for hiding misappropriation</li> </ul>	<ul> <li>Hampering social status of beneficiaries.</li> <li>Beneficiaries will face financial loss due to hiding misappropriation.</li> </ul>	<ul> <li>Beneficiaries may leave the group and migrate with loan.</li> <li>Organization will face financial loss and will damage institutional goodwill.</li> <li>Taking risk of staff dismissal.</li> </ul>	<ul> <li>Orient staff on professional standard and moral ethics.</li> <li>Regular follow up at field level on auditing and auditors performance.</li> </ul>	<ul> <li>Discussion at group level and ask question on audit issues.</li> <li>Audit report cross check with branch office report &amp; group level</li> </ul>

# **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> <li>Received foreign donation before make sure whether the donor agency is blacklisted by the government or UN Security Agencies.</li> <li>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.</li> <li>The donation is likely to be used in militancy and terrorism.</li> </ul>		<ul> <li>As a result, the organization can be blacklisted.</li> <li>There is a possibility of facing legal problems.</li> <li>Violation of donor agreement.</li> <li>Reputation and Dignity of the organization may be spoiled.</li> </ul>	<ul> <li>Before receiving the donation should be confirm that whether the donor agency is in black listed.</li> <li>Country law should be fellow in terms of receiving foreign donation</li> <li>No donation can be accepted without written agreement</li> <li>All foreign donation should be received through banking channel.</li> </ul>	<ul> <li>UN security agency provided blacklisted donor list.</li> <li>Bangladesh government approved blacklisted donor list.</li> <li>Money laundering act.</li> <li>Agreement.</li> <li>Bank statement.</li> </ul>

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Rezaul Karim Chowdhur Executive Director COAST Trust Chairperson-Board of Trustee
COAST Trust

	<ul> <li>Not to take proper approval for purchase out of budget.</li> <li>Purchase without approved requisition</li> <li>Completed procurement without formation of purchase committee in applicable cases.</li> <li>Completed procurement without market survey, collecting quotation and seeking tender.</li> <li>Participation of relative of any staff in procurement procedure.</li> <li>Not to compare prices and prepare comparative analysis.</li> <li>Not to entered asset/product/material in respective register</li> <li>Not to received "no objection certificate" form procurement committee and technical expert if applicable.</li> </ul>	<ul> <li>Employ can influence the procurement system.</li> <li>Chances to procure less quality product.</li> </ul>	<ul> <li>All procurement should be within the approved budget.</li> <li>Approval should be taken for the procurement which is out of budget (in case of organization).</li> <li>Purchase requisition should be approved.</li> <li>Market survey should be done for best price offer and best quality.</li> <li>Comparative analysis should be prepared.</li> <li>Any relative of COAST employee should not participate in procurement procedure.</li> <li>Make sure that vendor is not engaged in terrorist activities.</li> </ul>	Purchase requisition     Asset and stock register     Inventory list
Microfinance management	<ul> <li>Fail to select right scheme for right person</li> <li>Fail to judge whether the member may have chance to migrate or the fraud person.</li> </ul>	  <ul> <li>Possibility of increase defaulter</li> <li>There is a possibility of losing capital.</li> <li>Members can use loan money in terrorism and extremism.</li> </ul>	<ul> <li>Loan disbursement has to be made at right person and right scheme.</li> <li>Make sure whether the member may have chance to migrate or the fraud person.</li> </ul>	<ul> <li>Audited report</li> <li>Discussed in member meeting.</li> <li>MRA policy.</li> <li>Check and verify</li> </ul>
Rezaul Karim Chow Executive Director GOAST Trust		5	Begum Shamsun Nah Chairperson-Board of Th COAST Trust	

	Not to conduct     balance audit in every     three month	Embezzlement savings return and loan past insurance adjustment (for • Ca	ember ss book. sh book
	Not to invest member according to the MRA policy		d bank tement.
	Fail to deposit all collection in bank on same day	Area Manager (test basis).  • Balancing audit has to be	
	Fail to ensure security in cash transportation	conduct on half yearly basis to examine the balance of loan and	
	Money may be used in terrorist financing and to influence terrorism.	savings with members pass book and office	
	<ul> <li>Money may be used in drug dealing and</li> </ul>	collection sheet/register/member ledger.	
	gambling.	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	
Fixed Asset	Not to maintain and updated Fixed Asset	<ul> <li>Absence of asset register         it's difficult to confirm the         land.         <ul> <li>Fixed assets register has to be maintained at all</li> <li>reg</li> </ul> </li> </ul>	et ister
	register.  Not to affix Asset identification number.	value and quantity of total assets of the organization. • Fixed assets report will rep	ancial ort
	Not to conduct inventory at least two times in a year.	<ul> <li>Organization faces financial losses for misusing of asset</li> <li>Organization faces financial in favor of central Estate</li> <li>Agr</li> </ul>	eement
	No to take prior concern from asset department before	Fixed assets inventory has asset to be conduct of half yearly basis.	use of et
Rezaul Karim	procure and sale any fixed asset item.	Prior concern has to be taken from concern staff  egum Shamsun Nahar	7

Rezaul Karim Chowdhury,
Executive Director
COAST Trust

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Segum Shamsun Nahar
Chairperson-Board of Trustee
COAST Trust

-	Not to prepare asset report quarterly basis.	of Estate department in terms of assets purchase	Tros
	Not to make	and auction sale.	K K
	agreement with the	If nay assets gone damage	Tice.
	user for uses	or lost then it has to be	
	organization asset like,	informed to Estate	
800	mobile, laptop, Tab,	department through	
	motor cycle and	written or email.	
	vehicle.	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 Karino Chowdhury Executive Director

COAST-Trust

Rezaul Karlm Chowdhury, Executive Director COAST Trust Begum Shamsun Nahar Chairperson-Board of Trustee

Begum Shamsun Nahar

Chairperson, Board of Trustee COAST Trust