Anti-Fraud Policy

Created: August 2018

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Organizational Profile

Bargad is a youth development organization actively working to promote peace, justice and cooperation amongst the youth[1] in Pakistan. The organization has focused on creating opportunities and amplifying the voices of the youth ever since its inception in 1997, leading to a vast network of around 3000 youth volunteers, known as the Bargad Volunteer Network (BVN) throughout the country.

Bargad's Vision:

Politically, socially and economically empowered youth and women, respect, protect and promote peace and harmony

Bargad's Mission:

a. Engage vulnerable youth and women in all diversity to their full potential through education, mentorship and innovative interventions designed to enhance their overall well-being.
b. To invest in youth-led and youth-centred ideas, to convene key stakeholders in the sector and advocate for systems and policy changes that meet youths' needs.
c. Engage youth to end violence against women.

Bargad has implemented more than 100 projects on youth training[2], youth mobilization and policy advocacy, including the provision of technical assistance to all the provincial governments of Pakistan, regions of Gilgit-Baltistan and the State of Azad Jammu Kashmir (AJK) for the formulation of their respective youth policies. These policies have been approved by the provincial governments of Punjab (2012), Khyber Pakhtunkhwa (2016) and Sindh (2018), and Balochistan (2024) resulting in governments' pledges to allocate 4% budget to sports and youth affairs, 15% on the women employment quota, implementation of the E-Rozgar programs, and on youth participation in the local governments, respectively. Bargad has also conducted Capacity Enhancement workshops on youth development with officials of the youth affairs departments of Punjab, Balochistan and Sindh.

Bargad has a youth network of 782 individuals, civil society organizations and government institutions, with Youth engagements with 64 Universities, 40 Colleges and 35 Higher Secondary Schools.

The organization has previously partnered with 26 membership based student organizations and 15 Youth Groups over Pakistan; producing the largest pool of researches and publications on

[1] Adolescents: 12-19; Youth age bracket in Pakistan: 15-29

[2] Since 2003, the organization has trained 7880 youth activists and young faculty only through training workshops and peer sessions in issues of social development.

various aspects of youth than any other civil society organization in Pakistan, while also pioneering a youth track of peace and diplomacy in the South Asian region.

The hallmark of the organization is that its core youth volunteers participate in all aspects of the projects - from action-planning to project execution, while also mapping in the course of its work; issues as well as challenges identified by the youth across the country[3].

[3] The Youth in the mapping is part of the Youth Cohorts in the districts where Bargad has actively worked or is presently working.

1. Policy Statement

BARGAD Society for Human Resources is committed to the highest standards of integrity, transparency, and accountability in the management of its financial, administrative, and programmatic resources. BARGAD maintains a zero-tolerance approach to fraudulent practices, corruption, and all forms of dishonest or unethical conduct.

This policy establishes BARGAD's framework for preventing, detecting, reporting, and responding to fraudulent practices, and ensures that allegations are handled fairly, confidentially, and in accordance with organisational values, donor expectations, and applicable legal requirements.

Fraud-related conduct may constitute offences under applicable Pakistani laws, including relevant provisions of the Pakistan Penal Code, 1860, and other financial or anti-corruption regulations. The policy is also informed by recognised international donor and governance standards, including principles of financial integrity, transparency, and accountability promoted by major development partners and humanitarian organisations.

2. Purpose

The purpose of this policy is to:

- Define fraudulent practices and related misconduct
- Clarify roles and responsibilities for prevention and reporting
- Establish investigation and response mechanisms
- Protect individuals who report concerns in good faith
- Ensure consistent disciplinary and corrective action

This policy supports BARGAD's commitment to ethical governance and responsible stewardship of funds.

3. Scope

This policy applies to Board members, management, employees, interns, volunteers, consultants, contractors, partners, vendors and any individuals representing BARGAD in any capacity.

It covers fraudulent practices or suspected fraudulent practices involving financial, operational, administrative, or programmatic activities.

4. Definition of Fraudulent Practice

Fraudulent practices refer to any deliberate acts or omissions intended to deceive, mislead, or obtain an improper advantage. Such conduct may include, but is not limited to, the theft or misappropriation of funds or organisational assets, the falsification of financial or programmatic records, the submission of false expense or reimbursement claims, bribery or corrupt practices, the abuse of conflicts of interest, manipulation of procurement processes, misuse of donor funds, and forgery or tampering with official documents.

Fraudulent practices may be committed by individuals within or outside the organisation and may involve collusion between multiple parties.

5. Responsibilities

5.1 Board of Directors

The Board of Directors holds ultimate oversight responsibility for fraud-risk management and shall ensure that appropriate systems, controls, and responses are in place.

5.2 Senior Management

Senior Management is responsible for implementing internal controls, promoting ethical conduct, ensuring staff awareness of this policy, and acting promptly on suspected fraudulent practices.

5.3 Complaint Resolution Committee

The Complaint Resolution Committee provides independent oversight of serious cases of fraudulent practice, ensures impartial review, and recommends corrective or disciplinary action in accordance with the Complaint Mechanism Policy.

5.4 All Representatives of BARGAD

All individuals representing BARGAD have a duty to act honestly and to report suspected fraudulent practices.

6. Prevention Measures

BARGAD shall implement reasonable fraud-prevention measures, including clear financial procedures, segregation of duties, transparent procurement processes, conflict-of-interest disclosures, and regular audits or reviews.

The risk of fraudulent practice shall be monitored in line with BARGAD's Risk Register and internal control systems.

7. Reporting and Investigation Process

All allegations or suspicions of fraudulent practice shall be reported and addressed promptly, fairly, and confidentially.

Concerns relating to fraudulent practice may be reported through any of the following channels:

- Directly to the Complaint Resolution Committee, which serves as the primary reporting and oversight mechanism for fraud-related matters;
- Via the dedicated reporting email complaints@bargad.org.pk or contact number +92 Tel: 042-35779030/35779031;

All reports received through any channel shall be logged and treated as confidential.

Upon receipt of a report, an initial assessment shall be conducted to determine whether the concern falls within the scope of this policy and whether immediate protective, financial, or risk-mitigation measures are required. Where a report is received directly by the Complaint Resolution Committee, the Committee shall be responsible for determining the appropriate course of action, including whether a formal investigation is required and who should conduct it.

Where a report is received by Senior Management, Human Resources, or Operations, the recipient shall be responsible for conducting the initial assessment. If the assessment indicates that the allegation involves significant financial risk, misuse of donor funds, potential conflicts of interest, or governance concerns, the matter shall be referred without delay to the Complaint Resolution Committee for oversight and further direction.

Where a formal investigation is warranted, the investigation may be conducted by Senior Management, Operations, or an independent internal or external investigator, as determined by the Complaint Resolution Committee based on the nature, sensitivity, and seriousness of the case. Allegations involving senior management or matters presenting heightened risk to organisational integrity shall be subject to direct oversight by the Complaint Resolution Committee.

All investigations shall be conducted in a manner that ensures due process, confidentiality, impartiality, and respect for the rights of all parties involved. Findings and recommendations shall be documented and submitted to the Board of Directors for decision-making, corrective action, and, where necessary, referral to external authorities.

8. Disciplinary and Corrective Action

If fraudulent practice is confirmed, BARGAD may take appropriate action, including disciplinary measures up to and including termination of employment, recovery of losses, legal referral where required, termination of contracts with partners or consultants, and strengthening of internal controls.

Actions shall be proportionate, fair, and consistent with organisational policies and applicable labour laws.

9. Protection from Retaliation

BARGAD strictly prohibits any form of retaliation against individuals who, in good faith, report concerns, raise complaints, participate in investigations, or provide information relating to suspected misconduct, fraudulent practices, safeguarding issues, discrimination, or other breaches of organisational policies.

Retaliation includes, but is not limited to, dismissal, demotion, intimidation, harassment, discrimination, threats, coercion, or any adverse treatment intended to discourage reporting or penalise individuals for speaking up.

The Complaint Resolution Committee shall monitor for retaliation and recommend disciplinary action where retaliation occurs. Any individual found to have engaged in retaliatory conduct shall be subject to disciplinary action, up to and including termination of employment or contractual engagement.

This protection applies regardless of the outcome of the investigation, provided the report was made honestly and without malicious intent.

10. Confidentiality

All fraud-related reports and investigations shall be handled confidentially. Information shall be shared only on a need-to-know basis for investigation, legal, or safeguarding purposes. Confidentiality shall not be used to conceal wrongdoing or prevent accountability.

11. Training and Awareness

BARGAD shall ensure that staff and relevant representatives are informed about this policy, reporting mechanisms, and ethical standards through induction and periodic training.

12. Policy Review

All policies shall be reviewed if required by law, donor requirements, or organizational changes.