

Anti-corruption Policy

Forman Christian College (A Chartered University),takes a zero-tolerance approach to any kind of corruption. All employees of Forman Christian College are expected to be transparent, ethical and honest in their work. Employees who are non-transparent, unethical or dishonest in their work will be disciplined.

Below are forms that corruption and fraud can take. Neither the list nor the examples are exhaustive but are intended to give a good idea.

3.1.1.1 Embezzlement

Embezzlement is when entrusted assets of the institution are used for personal benefit rather than for the institution. This is not to be confused with "employee benefits" which are legitimately provided for the employee for the purpose of attaining a good performance in a healthy, equitable environment.

Examples:

- a. Making unauthorized payments from University funds for personal gains.
- b. Willful concealment of University funds.
- c. Use of University property for own benefit without approval.

3.1.1.2 Donations and Contributions

The concepts of donations, contributions and gifts are sensitive and can be manipulated into inducements for someone's personal interest. Since we accept donations for the support of our student body, it is important to be sure that the source of the donation is well-governed and the donations are further distributed in accordance with the donor's wishes.

3.1.1.3 Facilitating Payments

A facilitating payment is when one pays money to expedite a process that one is already entitled to. The danger of this (sadly sometimes necessary) practice is the potential for personal gain that compromises benefit to the institution. There must be no personal benefit.

Example:

a. A facilitation payment is made so the justly entitled work of the institution is done. But the person making the payment then benefits personally by way of another favor done for him/her. Because of that personal benefit, they are more likely to make the payment when it can be avoided.

3.1.1.4 Bribery and Extortion

Bribery and extortion are both forms of corruption because they alter someone's behavior in a way that may not be possible through morally governed processes. It is important to mention the presence of "gifts". Gifts, if excessive and unduly lavish can be a breach of laws that ensure good governance, be it public or private. Employees receiving gifts because of their position in excess of Rs.1000 in value must report them to their supervisor.

3.1.1.5 Financial Books

Financial books are there to ensure accurate accounting. Unfortunately "off-the books" payments or fraudulent accounting practices to cover up payments made for personnel gains are also prevalent in the corporate world and thus financial books should only be maintained in such a way as to capture the true financial picture.

3.1.1.6 Misuse of Authority or Abuse of Power

Abuse of power may involve unjustified use of institutional property for one's own good causing a decrease in facilities that can be more appropriately used for the purpose of facilitating institutional needs. The red flag is existence of unprofessional and immoral practices undertaken by employees, who have the power to alter the ways in which the subordinates work, and manipulate the assets and resources belonging to the institution for their own good.

Examples:

- a. Forcing junior staff to do personal tasks of senior.
- b. Forcing sub-ordinates to make payments that are not legitimate by exercising seniority.
- c. Out of the ordinary special gifts to seniors, etc.

3.1.1.7 Nepotism

Nepotism in simple terms is favoritism. It is a potential hazard for the institution's operations because it violates the solemn criteria of merit and thus disrupts the performance measures that can ensure good growth for the institution.

Examples:

- a. Hiring relatives for positions regardless of their qualification or experience.
- b. Giving extra privileges to related persons.

3.1.1.8 Conflict of Interest

Conflict of interest can be a cause of a corrupt act on the part of an individual participating in the operational processes and thus can yield unfavorable results with its effects on the institution as a whole. If someone faces a conflict of interest, it is their responsibility to disclose it to the management so appropriate action can be taken.

Examples:

- a. Person being on interview panel which is going to interview his relative.
- b. Supplier of a particular product also being member of the procurement committee of the same.
- c. Person involved in decision making of organization has a personal business of the same nature.

In conclusion, we have limited the examples in this document to some main elements that are commonly encountered in our operations. However, this policy is not limited to these few main categories but also applies to any practice that takes from the University or discourages transparency or healthy operations.

Any irregular practices can be communicated to the Rector directly – preferably through email fraudhotline@fccollege.edu.pk or a phone call at 042 35874312 or a written sealed letter to the Rector labeled as "confidential". These messages will go directly to the Rector and no one else. This hotline email address and phone number will be posted in prominent places to encourage "whistle blowing".

3.1.1.9 Consequences

Anyone found guilty of participating in an act of corruption may face one or more of the below mentioned consequences:

- a. Termination of Employment
- b. Legal proceedings leading to imprisonment
- c. Expropriation of accumulated provident fund contributions through the tenure or any funds that the company owes to the individual
- d. Charging in order to pay for the recovery of the damage sustained by the corrupt act
- e. Publishing the corrupt act in the news which may blacklist the individual for future hiring purposes outside the institution
- f. Any employee who knows of corrupt practices in Forman Christian College and does not report them will be deemed to be complicit and so subject to discipline

Despite the fact that the existence of such practices is highly probable, we nevertheless seek to manage our processes in such a way as to mitigate and hopefully eliminate the damaging effects of corruption. We will work at all levels towards managing and sustaining a culture that supports transparent and honest practices for the betterment of the University and the moral development of both students and staff alike.