

GUIDELINES

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Acronyms

CSR - Corporate Social Responsibility
DD - Due Diligence
FCRA - Foreign Contribution (Regulation) Act
IT - Income Tax
NGO - Non-Governmental Organization
TSG - Tata Sustainability Group

Introduction

Introduction

The Tata group has recognized its larger responsibilities towards society from its inception, and has undertaken a variety of social development activities to meet these. Some of these activities have been undertaken directly, and others indirectly through government agencies and non-governmental organizations (NGOs). There is considerable experience within the group, and more so within the Tata Trusts who are specialized in the field of grant-making, in selecting suitable NGOs to work with and then working with them to bring about societal change and betterment in India.

The Companies' Act 2013 requires companies to spend a proportion of their profits on corporate social responsibility (CSR) initiatives. This has been welcomed by NGOs for the possibility of transformation of operational practices, improvement in efficiency, an impetus for innovation that this may bring about, and the expectation of significant inflows of funds into the social sector at a time when NGOs face a resource crunch from their traditional funding sources. At the same time, company CSR departments too are seeking partnerships with NGOs in the expectation that NGOs have the expertise, skills and connections that enable better CSR outcomes. As a result, there is more interaction between companies and NGOs. Company CSR departments are increasingly being approached with proposals for financial support from a variety of NGOs in a variety of ways, and need to build the skills to deal with these efficiently, effectively, and in a way that keeps up the Tata group's reputation for fairness and correctness in its dealings.

A major step in responding to the more credible approaches from NGOs is the undertaking of a 'due diligence' (DD) exercise, which ascertains that the NGO is not an unworthy recipient of the company's CSR money. This note sets out a minimalist standard for Tata group companies' CSR departments for undertaking a DD exercise. It lays out the need for guidelines for DD, fleshes out what a DD is before delving into the mechanics of it, and end with suggested contents of a DD report.

The note suggests that a DD should address five sets of questions:

- 1 Does the NGO exist?
- 2 Is the NGO adequately governed?
- 3 Are the NGO's financial systems sound, and will it use the grant correctly?
- 4 Does the NGO work effectively on the ground?
- 5 Is the project worthy of support? Does the NGO have the skills and systems to implement the project effectively?

The DD framework suggested here is layered; with an initial desk review that is resource light, a subsequent visit to the NGO's office and to the community where it works that is resource heavies, and the use of advisory, consulting and audit firms only if there are critical questions that remain unanswered.

It is expected that Tata group companies that do not have DD guidelines in place will use this one for their CSR-NGO partnerships. Those companies that do have one will compare this document with their own guidelines and ensure that all critical aspects are included.

It is also expected that, in the case of continuation grants (wherein a company makes a grant to an NGO to continue an existing relationship), the decision to make the grant will be based on the company's actual experience with the NGO in implementing the existing project as assessed by the company's monitoring and evaluation system. There will be no requirement to undertake another DD, except to ensure that the NGO's registration and tax exemption status continue to be valid and all statutory compliances continue to be in place.

The Need for Guidelines on DD






The Need for Guidelines on Due Diligence

The need for a set of guidelines on undertaking DD of NGOs stems from three factors; the large number of NGOs that exist in India (of which considerably fewer make suitable CSR partners for a company), the changes in thinking on corporate funding brought about by the new Companies' Act, and the costs to a company of making wrong decisions on the choice of NGO partners.

The number of registered NGOs in India ranges from 2 to 3.2 million, depending upon one's source of information (the number registered to receive contributions from abroad is a more specifically quantifiable 43,527 as on 31st March 2012, according to the Ministry of Home Affairs' FCRA Annual Report 2011-12). Some of the NGOs that do not constitute this number actually exist (but do send out proposals for financial support). Some of those that exist either do not do anything, or do things that are not suitable for an association with the Tata group. Companies need to be able to identify those that they can (and cannot) work with to achieve their CSR objectives.

The CSR provisions of the new Companies' Act enable companies to collaborate with NGOs, who typically have skills and experience in community management and delivery of social development services that most companies lack, for efficient and effective use of CSR funds. CSR teams can and should seek such collaboration (though nowhere does the Act state that it is mandatory to provide money to NGOs). At the same time, the provisions are seen by some NGOs as a means by which they (i.e. NGOs) can raise money for their activities in what is otherwise a difficult funding environment for them, and CSR departments are being approached for funds more frequently, sophisticatedly and aggressively. They need to have means by which to separate the substantial proposals for CSR support from the fluff.

Making wrong decisions on the choice of NGO partners can at best be embarrassing (expenditure with incommensurate outcomes, for example) and at worst disastrous (the NGO becoming outed as a front for anti-national activities or a money laundering operation, for example, while being funded by a Tata group company) for the company and the Tata brand. At the same time, it is important to recognize that NGOs are not part of a company's ecosystem in the way that suppliers and distributors are – they have their own reasons for existence and logic of operation (aims, objectives, systems, processes, et al), these are usually fundamentally different from that of companies,



and the 'good' ones have strengths in areas (such as community relations, for example) that are not easily understood by companies and are not amenable to standard measures of assessment. There is a need for methods that appraise an NGO's suitability for partnership by identifying and assessing its real strengths and weaknesses vis-à-vis the task at hand.

These guidelines aim to provide a generic framework to Tata group companies' CSR departments for undertaking DD of NGOs for possible CSR partnership. The standards that need to be adhered to in a particular case, and the rigour of application of the framework, can vary depending upon the nature of the proposal, the size of the grant, and the importance of being 'right' in the choice of NGO partner. The framework has been formulated, discussed and fine-tuned at three workshops on 'NGO Due Diligence' held by the Tata Sustainability Group (TSG) for Tata group companies in July '15 (Mumbai), October '15 (Kolkata) and June '16 (Pune), and in discussions with selected Tata group company CSR heads in February 2017.

What is a Due Diligence of an NGO?

A Due Diligence is a detailed examination of an NGO, done prior to signing a contract with it or becoming formally involved with it. Undertaking a DD contributes to informed decision making by enhancing the amount and quality of information available to the decision makers. It is part of the appraisal process that decides whether a CSR project proposal from an NGO should be financially supported or not.

III.1 The timing of a DD

A DD is typically done after –

- There has been some initial contact with the NGO
- A proposal has been received from the NGO, has been discussed, and is seen to be worthy of support within the CSR mandate of the company
- It is ascertained that funds are available to support the proposal.

A DD is typically done before –

- The proposal is negotiated with the NGO and fine-tuned as per the requirements of the company
- The proposal is put up to the company's CSR committee for formal approval.

A company CSR team should be reasonably certain that a relationship with the NGO will develop in the near future before it commissions a DD exercise.

III.2 Key DD principles

III.2.a The 'suitable' NGO: Ideally, a company's CSR strategy should outline the sort of NGO that it would like to work with. This includes –

- The necessary attributes of the NGO – those which the NGO must have for the company to make a CSR grant to it. Examples of this could be –
 - ✓ Registration under Section 12-A of the IT Act
 - ✓ Honesty
 - ✓ Good attitude towards women, minorities, weaker sections of society, etc.

What is a Due Diligence of an NGO?



- The desirable attributes of the NGO – those which the NGO ideally should have for the company to make a CSR grant to it, but the absence of which do not negate the possibility of a grant. Examples of this could be –
 - ✓ Members of the beneficiary community sitting on its Board of Directors
 - ✓ Certification from Credibility Alliance
- An 'ultra vires' or negative list – characteristics that, if existent within the NGO, preclude the possibility of a CSR grant. Examples of this could be –
 - ✓ The NGO is not observing statutory minimum wage laws
 - ✓ A criminal is a member of the NGO's Board of Directors
 - ✓ There are cases in court against the NGO

If there is a clear articulation of the suitable and the unsuitable in the company's CSR strategy, the DD process would have a checklist to work against.

III.2.b Minimizing alpha errors: The main purpose of a DD is to reduce the chances of making a CSR grant to an unsuitable NGO. Please note that a DD is not done to identify or select good NGOs and projects – it is done so as to not select an unsuitable NGO. Table III.1 below outlines the difference.

Table III-A:

		Is the NGO actually a suitable partner?	
		Yes	No
Does the appraisal process deem the NGO a suitable partner?	Yes	No error. You have selected an NGO that is actually a suitable partner.	An Alpha error You have selected an NGO that is actually an unsuitable partner. The purpose of a DD is to minimize this possibility.
	No	A Beta error. You have rejected an NGO that is actually a suitable partner.	No error. You have rejected an NGO that is actually an unsuitable partner.

III.2.c Rigour and a DD: A DD requires resources – time, money, expertise, inter alia. Obviously, there has to be a balance between a perfunctory ticking of a 'DD undertaken? (Y/N)' box and undertaking a highly rigorous multiply triangulated method that involves high-end audit or consulting firms and expends significant resources. This balance should be decided upon by the CSR team based upon:

1. **The nature of the proposal:** i.e. its objectives, the proposed activities, the expected outputs and outcomes, and the ability of the NGO to implement it. This is sometimes reasonably obvious, such as when the NGO has a history of implementing similar projects successfully – but would require detailed investigation for innovative work, or work in new areas or fields.

2. **The size of the grant:** the larger the grant size, the greater should be the rigour of the DD process.
3. **Criticality of the project:** Some CSR projects are more critical than others. Making a wrong choice of NGO for work in a location in which the company proposes to acquire land in the near future, for example, has different implications for the company when compared with a CSR grant at a location in which the company has limited interests, with different rigour requirements of the DD process.

The suggested DD framework requires a layered process; with an initial desk review that is resource light, a subsequent visit to the NGO's office and to the community with whom it works that is resource heavier, and the use of advisory, consulting and audit firms only if there are critical questions that remain unanswered. It recognizes that most of the information required is easily and (reasonably) cheaply available, and that obtaining increasingly incremental information requires disproportionately additional resources.

Should a DD always be undertaken? The suggestion is that yes, it should – the rigour may vary depending upon the criteria identified above, but even miniscule grants require a minimal DD in the form of ascertaining the existence of the NGO and confirming the status of its statutory compliances. Continuation grants, where a company makes a grant to an NGO to continue an existing relationship (based upon its actual experience with the NGO in implementing the project as assessed by the company's monitoring and evaluation system) too would require a DD process that may be limited to ensuring that the NGO partner's registration and tax exemption status continue to be valid and all statutory compliances continue to be in place.

III.2.d The NGO and the project: The purpose of a DD is to identify and sift out NGOs that are unsuitable for CSR support by the company. Should the DD also appraise the project that is being proposed for CSR support?

At a basic level, a DD must include a look at the proposed project itself – this is to assess the ability of the NGO to successfully execute it. A watershed management project requires civil engineering expertise, a tertiary healthcare project requires medical knowledge, and the DD does need to assess whether the NGO has this. However, this is merely a component of project appraisal – an assessment of the NGO's ability to implement the project is not an assessment of the project itself.

At the same time, if the DD process does require a visit to the NGO's office and meetings with the proposed community of beneficiaries, it would be efficient to simultaneously appraise the suitability of the project itself for support.

The suggested DD framework separates the NGO assessment from the project appraisal, focuses on the former, and includes a basic checklist on the latter.

The Mechanics of a Due Diligence

The Mechanics of a Due Diligence

IV.1 Outline and Characteristics:

The building blocks of DD have been laid out in the previous section. This section identifies what actually needs to be done during a DD exercise. The framework outlined for this has the following characteristics –

- It assumes that there is a proposal in place that is broadly seen as worthy of support, there are funds in place to support the proposal, and there is intent within the company's CSR team to take this forward (unless the DD is adverse).
- It is applicable to NGOs that will spend the company's CSR funds. In the case of proposals in which an NGO receives funds in order to pass them on to other NGOs, it assumes that the latter NGOs too need to undergo a DD.
- It is minimalist, and can be used by a CSR professional with a basic knowledge of community organization, law and accounts, and with a rudimentary exposure to the functioning of NGOs. If there are red flags and/or unanswered questions, the DD team should access expertise within its organization and/or outside.
- It requires judgement – many matters are not a clear yes or no. An NGO with wonderful community connect may be chaotic in its paperwork, or vice versa, and the DD team will need to balance strengths and weaknesses and form an opinion on whether to go ahead or not without the aid of metrics and grades.
- It is best undertaken with the knowledge and support of the concerned NGO, and with its informed participation. Good NGOs rarely see DD teams as adversaries or policemen, and are happy to showcase their skills and systems. In turn, the framework does not require a DD team to have an adversarial or policeman-like mind-set vis-à-vis the NGO. The team should want the NGO to come out well.

A DD should seek to address the following sets of questions in order to assess the suitability of an NGO as a project partner –

1. Does the NGO exist? (Existence questions)
2. Is the NGO adequately governed? (Governance questions)
3. Are the NGO's financial systems sound, and will it use the grant correctly? (Finance questions)

4. Does the NGO work effectively on the ground? (Operational questions)
5. Is the project worthy of support? Does the NGO have the skills and systems to implement the project effectively? (Project proposal appraisal questions)

These sets of questions can be addressed using different methods that can be undertaken within the following broad steps –



The above steps are in an ascending order of resource intensity, and the subsequent steps need be undertaken only if the DD team feels that the NGO is deemed 'suitable' at the previous one and thereby that further investigation is required.

The following subsections flesh out each set of questions, identify methods by which to address them, and list the documents that can be accessed for this purpose. The information is encapsulated in a tabular form at the end of the subsection. In addition, Annexure 1 contains a master list of questions, methods and documents.

IV.2 Existence Questions:

This may sound strange, but some approaches for financial support may be from institutions that don't actually exist, or exist in a different form to that presented in the approach, or do not have the necessary licences to undertake the activities that they propose to undertake. A good first step in a DD is to ascertain that the approach is in fact from a legally registered and functioning organization with an intact tax relief status and up-to-date financial statements. In addition, a background check can ascertain the NGO's antecedents, typology, ownership (by which we mean the person / group controlling the NGO), values, aims and objectives, past activities, key functionaries, and donors. This information would enable the DD team to create a profile of the organization that can be used as a base document.

Inquiring into the NGO's existence would include addressing the following questions.

IV.2.a Is the NGO registered? Copies of an NGO's registration certificate, articles of association, FCRA (if applicable), tax exemption documents (cross-checked from the IT Department's website), audited financial statements and annual reports would establish that it is, in fact, an ongoing organization with an intact tax relief status.

NGOs are typically registered as Trusts, Societies, or Companies (under Section 8 of the Companies' Act), and all these are fine from a CSR grant perspective. It is important to note here that the NGO has to have been registered for at least three years (unless it is a company-controlled NGO) before it can receive a CSR grant.

Registration under section 12-A of the IT Act enables the NGO's financial inflows to be exempt from taxation. Without this, the CSR grant would be taxable thereby reducing the amount that actually reaches the ground. Similarly, registration under section 80G or 35ac enables the grant giver to avail of a tax exemption – while this may not be relevant for a CSR grant (unless the project looks to raise resources from other sources), it is an important housekeeping issue for the NGO. Its tax exemption registration and validity should therefore be ascertained as part of a DD exercise.

Some NGOs are also registered to receive funds from foreign sources, and therefore have an FCRA and submit an FC-3 return to the Ministry of Home Affairs that outlines the quantum, source and use of foreign funds over the course of a year. This too provides information as to what the NGO does, and is worth enquiring into as it implies that it has been subject to a higher degree of scrutiny; however, lack of an FCRA is not a disqualification.

Some NGOs have their registration documents written in the vernacular. It is up to the company to decide whether it requires these to be translated into English and, if so, whether the company or the NGO should bear the costs for this. It should be noted here that many excellent NGOs and suitable CSR partners fall within this category and excluding them based on the language of registration is not advisable.

IV.2.b What is the NGO's address? NGOs sometimes (legitimately) have multiple locations and therefore multiple addresses, and it is worth checking out whether the communication details provided in the project proposal are correct – especially when these differ from the details provided in the registration documents.

IV.2.c What type of NGO is it? A company needs to know –

- Whether the NGO is a business or a consulting firm registered as an NGO– the danger of a charity-based relationship with a quasi-business NGO (in addition to problems the NGO will face with the IT laws) is that the public purpose intent of the CSR grant would need to be continuously re-enforced by the CSR team.
- Whether the NGO works at the grassroots (i.e. works directly with beneficiary communities itself) or supports other institutions to do so by providing funds, expertise, networks, and other resources. This is often complicated – many NGOs mix it up, and do some resource support and some grassroots action. They should, however, have a focus upon one type and this should be clearly identifiable to a DD team. This is important because, ideally, a CSR-supported project should be in line with the strengths and inclinations of the NGO.
- Whether the NGO works with a service delivery (that focusses on providing basic services directly or in partnership) or a rights-based approach (that encourages communities to demand basic services from the state). Again, while many NGOs mix it up, they are typically ideologically comfortable with one or the other. The project (and the company) would need to be aligned with the NGO's approach.

- Whether the NGO is linked to a larger association of organizations and, if so, the nature of the association and extent of linkage. Many NGOs have social (to a particular caste or ethnic group, for example), political (to a particular political party) or faith-based (to a particular religion) linkages that may not be obvious in their documents but are important for assessing the suitability of a CSR support.

IV.2.d What are the NGO's values? What are its aims and objectives? An enquiry into this may reveal differences between those stated in its documents and those applied to its work. Values are important – these are usually deeply embedded within an organization and don't change from project to project, or donor to donor. If an NGO is focussed upon benefiting the poorest sections of society as a value, it will do so in all its work – and this emphasis can be taken as a given by the CSR team for its own project. An NGO's aims and objectives, too, need to align with those of the proposed project – an NGO that aims to bring about economic transformation of youth will be uncomfortable working on ante-natal care for pregnant women. Time spent by the DD team in discerning real values, aims and objectives of the NGO and assessing their alignment with the proposed project is unlikely to be wasted.

IV.2.e Who calls the shots? This may be obvious in some cases (Tata Power Community Development Trust, for example, is clearly controlled by Tata Power Limited) and opaque in others (a family business masquerading as an NGO, for example, is unlikely to clearly articulate this in its documents). Though all NGOs have Boards, the real control of an NGO may not be reflected in the Board structure, and will need to be discerned. Ownership is important because an NGO with a Founder-CEO who calls all the shots is likely to work differently to a Board-owned NGO with a CEO reporting to it and to an NGO run by a husband-wife couple. It is also useful for a CSR team to know where the power is held in its partner NGOs, and therefore where to pitch feedback on programme quality and performance.

IV.2.f Who are its donors? Current and past donors (discernible from annual reports and financial statements) are an important source of information about the antecedents and integrity of an NGO and the extent and efficacy of its work. Most significant donors would have also done a DD, and the report or the findings of this may be accessible to the DD team. In some cases, the presence of some organizations (such as the Tata Trusts) as donors to the NGO in itself would bring confidence about the suitability of the NGO for a CSR grant.

Table IV-A lists out a set of questions related to an NGO's existence, the methods by which these can be addressed, and the documents that would require perusal by the DD team in the process. All legally minimum requirements are in italics. A master list of questions, methods and documents are available in Annexure 1.

Table IV-A:

Due Diligence on Existence Issues		
Primary Question: Does the NGO exist?		
Subsidiary Questions	Methods	Documents
Is it registered? Under what Act?	Perusal of documents	Registration documents – MoA, registration certificate
What is its address?	Background check on the Internet	12A, 80G, 35ac, FCRA
What type of NGO is it?	Contact details check, including Board members, donors and references	Audited financial statements, FC-3
What are its values?		Annual reports
What is its vision and mission?	Physical verification of address at different locations	Credibility Alliance and other websites
What are its aims and objectives?		
Who calls the shots within the NGO?		
Who are its donors?		

IV.3 Governance Questions

This sub-section enquires into the NGO's ownership and governance so as to ascertain how the NGO is led, controlled and managed. It looks at –

- How strategic, tactical and operational decisions are taken
- The transparency (both within the organization and with the community) with which its work is conducted
- Its dealing with its employees
- The way its aims and objectives permeate into its activities and its creation and use of assets and infrastructure
- The extent to which the NGO is compliant with the letter and spirit of laws relating to its operations and to general human rights and safety.

Inquiring into the NGO's governance would include addressing the following questions.

Who is on the Board? Does it play a 'correct' role in the NGO? NGOs are supposed to be accountable to their Boards, and healthy, functional NGOs typically have vibrant Boards that –

- Provide strategic direction to the NGO
- Approve annual plans and budgets
- Act as a check and balance against management excesses
- Enable organizational accountability
- Ensure compliance with the law and the requirements of financial probity
- Bring in resources and connections

The Board of an NGO should meet two to four times a year, should discuss matters relating to the above, and should minute these discussions.

As a first, it is important to know who the NGO's Board members are (their identity is available in its registration documents and articles of association) and –

- ? • What does each member do for a living?
- Are the members related to each other?
- How many members are local to the NGO, and how many reside outside?
- What is the gender balance in the board?
- Do any of the members take a salary or earn any other form of income (consultation fees, rent, etc.) from the NGO? How many of them do this?
- Who among them calls the shots within the NGO on strategy and direction?

This can be discerned from conversations with Board members, the NGO's staff and the donors to the NGO. In addition, the DD team should have a look at the minutes of Board meetings to discern the regularity of meetings and the quality of discussion.

Insights from hereenable an answer to the question on the role of the Board in the functioning of the NGO, and to compare this with the ideal role as described above. Boards such as 'rubber stamp' ones, 'friends and relatives' ones, and Boards in which members have conflict of interest issues, are unlikely to contribute positively to the NGO's work (and the last mentioned attribute always has negative consequences). A good Board demands accountability, transparency and probity from the NGO's management, and this is reflected in the Board meetings.

And finally, beware of any NGO in which the chief functionary decides his/her own salary (even if this is a token amount) – this is a sure sign of a governance deficit.

IV.3.b Is the NGO meeting its statutory obligations? NGOs have to file statutory returns to the Registrars of Companies, Trusts or Societies (whichever is applicable) as well as to various other regulatory bodies such as the Provident Fund Commissioner, et al. It is useful to

check whether its accounts have undergone annual audits and whether its filings are up to date. This is best done in a sitting with the NGO's finance and administration departments in their respective offices.

IV.3.c How does the NGO deal with its employees? This ascertains whether the NGO is fair and correct in its dealings with its employees, including –

- ? • Does it pay minimum wages? By bank?
- Does it issue employment letters to all staff?
- If it has 20 or more employees, does it have a scheme for Provident Fund?
- Is there a defined organizational structure?
- Are trainings organized for current employees? Are they relevant and frequent?
- What is the gender balance among the NGO's employees?
- Does it have policies on conduct, sexual harassment, etc.? In writing? Does it adhere to them?

Information on this can be gleaned from a perusal of documents such as the employees' attendance register, salary register, the NGO's HR manual, code of conduct for employees and sexual harassment policy (assuming these documents exist), from a perusal of the NGO's accounts (especially the transactions relating to salary payments), and from a discussion with the NGO's staff.

IV.3.d Are the NGO's assets used to promote its aims and objectives? It is worth checking what the NGO owns in terms of infrastructure and assets (land, buildings, vehicles, computers, etc. – this is discernible from its audited financial statements) and how it uses these. This is especially important if the proposed project involves creation of assets that have usage beyond the project's duration – 'good' NGOs do not like to create assets for the sake of owning them (and do so only if they are necessary), and use their assets to enable work with their beneficiaries.

IV.3.e Is the NGO involved in ongoing litigation? A company needs to know this, as also the nature and status of such litigation. Ongoing litigation is a risk to the NGO (and therefore to the proposed project), and the nature of such litigation (and past litigation) says something about the NGO. The information can be ascertained from discussions with the NGO's chief functionary and staff in the administration department, and can be cross-checked in discussions with Board members.

Table IV-B below lists out a set of questions related to an NGO's governance (legal minimums are in italics), the methods by which the questions can be addressed, and the documents that would require perusal by the DD team in the process. A master list of questions, methods and documents are available in Annexure 1.

Table IV-B:

Due Diligence on Governance Issues		
Primary Question: Is the NGO adequately governed?		
Subsidiary Questions	Methods	Documents
Board related issues - Who is on the Board? - Does it play a correct role in the NGO?	Perusal of documents	Minutes of Board meetings
Statutory compliances Employee related issues • Does it pay minimum wages? By bank? • If it has 20 or more staff, does it pay Provident Fund? • Does it issue employment letters to all staff? • Is there a defined organizational structure? • Are trainings organized for current employees? Are they relevant and frequent? • What is its gender balance across hierarchical levels? • Does it have policies on conduct, sexual harassment, etc.? In writing? Does it adhere to them?	Meeting with Chairperson Meeting with Chief Functionary Meeting with one or more Board member Discussions with employees	Employees register HR Manual Code of conduct for employees Sexual harassment policy Audited financial statements Asset register
Are the NGO's assets used to promote its aims and objectives? Are there any ongoing litigations / cases against or filed by the NGO?		

IV.4 Finance Questions

This set of questions looks at the NGO's finances, enquires into the integrity and robustness of its financial systems, and assesses whether it will be able to manage the CSR grant correctly. Much of the DD process for this will take place at the NGO's office (the aspects that can be done as a desk check are a perusal of the annual audited financial statements and a discussion with the NGO's donors).

The dangers of DD overreach (especially given that NGOs' accounts are often different from that of corporate entities) should be noted here. A financial system that absorbs Rs. 5 lakhs a year is structurally different from one that absorbs Rs. 5 crores a year, and applying necessary standards for the latter to the former may not provide a correct or fair perspective. NGOs in remote regions typically tend to have a higher threshold for cash

usage, and employees in remote clusters and locations will tend to have higher cash advances against their names – issues that may not look correct from a corporate perspective but are an operational necessity for the NGO.

Table IV-C below lists out a set of questions related to an NGO's finances, the methods by which the questions can be addressed, and the documents that would require perusal by the DD team in the process. The questions are –

IV.4.a Is the NGO honest? This is a difficult question to address with certainty – many questionable practices (such as a high proportion of cash transactions, a large number of outstanding advances to employees, or a difference between paid and budgeted salaries) may have perfectly logical explanations. Discussions with the NGO's donors would usually be about its financial systems and management – few donors would admit to supporting a dishonest operation unless they have formally blacklisted the organization. This question has to be addressed by other means.

Dishonesty in the NGO sector takes some common forms. These include –

- Converting black money into white – done by taking in a large cash donation, showing it as multiple small donations and issuing receipts for these, and then doing some fictitious work which involves a fake contract (but real payments) to the original donor – all for a percentage of the donation.
- Converting white money into black – done by taking in a large formal donation and thereby enabling the donor to take a tax benefit, and then returning the money in cash by generating fake bills, again for a percentage of the donation.
- Diverting donated funds for private ends – usually done by over-invoicing on items such as salaries, meetings and trainings, paying for resources that are not actually used, or using the NGO's resources (such as an in-house training centre) for the project at inflated costs.
- Using multiple donors to pay for the same people, activities or infrastructure.

Information can be ascertained by doing the following –

- Check with donor agency networks and governmental institutions such as CAPART and the FCRA department of the Ministry of Home Affairs as to whether the NGO is or was on a blacklist.
- Check the sources of funds (especially individual donations), meet or speak with some of the individual donors and ascertain their intentions.
- Check the use of funds – this will be detailed out in the following sub-section.
- Ask the NGO's finance team how they deal with demands for bribes. Those that make such payments recover it from grants via the over-invoicing route.
- If there are any doubts (and the NGO scores well on other aspects of the DD), the DD team is best advised to expedite a financial audit of the NGO.

It is important to note that a financial system that is geared up to launder money or divert resources will do so for all its grants, and not distinguish between the resources of 'bad' donors and those of 'good' donors. Dishonesty does not have shades of grey – an NGO's financial system is either honest or it is not.

IV.4.b Are the NGO's financial systems sound, and will it be able to manage the proposed grant correctly? This can be ascertained from–

- A discussion with the NGO's finance team.
- A discussion with the NGO's donors on its financial management and reporting systems.
- A perusal of documents relating to the NGO's financial system (such as audited financial statements, cash book, bank book, asset register, ledgers, etc.).
- A perusal of selected vouchers and their supporting documents.
- If the NGO has a financial manual and/or a procurement policy, these should be examined as well.

These would tell the DD team whether the NGO's accounts are computerized, are up to date, are being prepared and recorded correctly (with appropriate separation of duties such as preparation and authorization), and are subject to audit.

In addition, the following tests are recommended –

- The petty cash test: Look at the NGO's day book, ascertain the petty cash available at that time, and compare this with the actual petty cash in the office.
- The small donation: Make a small personal donation to the NGO and ascertain how the cash enters the financial system, the nature of receipt provided, whether there is separation between making and signing, etc.
- Follow a voucher: Pick some vouchers at random and following the transaction through the financial system.

It is important to note that the sophistication of an NGO's financial system should be seen as a function of the quantum of funds and the number of financial transactions it handles in a year – a system that handles Rs. 5 lakhs per annum is structurally different from one that handles Rs. 50 lakhs, and similarly Rs. 5 crore. Therefore, the qualities that a DD team should look for in a financial system should change depending upon these factors. Applying Rs. 5 crore per annum standards on a Rs. 5 lakhs per annum system would become an exercise in both futility and irrelevance.

Table IV-C:

Due Diligence on Finance Issues		
Primary Question: Does the NGO use money correctly?		
Subsidiary Questions	Methods	Documents
Is the NGO honest?	Perusal of background documents	Audited financial statements
Are the NGO's financial systems sound?	Petty cash test	Day book
Will the NGO be able to manage the grant correctly?	Small donation test	Ledgers
	Follow a voucher test	Vouchers
	Meeting with auditor	Asset register
	Financial audit	Financial manual Procurement policy

IV.5 Operations Questions

This is where the DD moves to enquiring into the NGO's work – what the NGO actually does and how it does it, and therefore would it be able to do the work it is proposing to do efficiently and effectively. The DD also moves to the NGO's field area (and its beneficiary community) at this stage, and therefore provides an opportunity to cross check previously discerned information on values, aims, objectives, systems and processes. This stage particularly requires the DD team to make and internally discuss its own observations, and to use its judgement.

Table IV-D below lists out a set of questions related to an NGO's operations, the methods by which the questions can be addressed, and the documents that would require perusal by the DD team in the process. The questions include –

IV.5.a What are the resources the NGO has in its field area? It is worth sitting with the NGO's Chief Functionary and operational staff and listing out where the organization works (which states, districts, blocks, etc.) and understanding how it divides its people and other resources (training centres, campuses, vehicles, etc.) between these locations / clusters and its central office. This can be cross checked from a visit to one of the locations. The exercise will give the DD team a sense of the NGO's locational priorities and the extent of decentralization in its operational and financial decision making, and also enables a comparison with the locational emphasis of its project portfolio. Through this, the DD team will also obtain an idea of the NGO's existing resources in the proposed project area.

IV.5.b What is the nature of relationship between the NGO and its beneficiaries? Does it observe its own stated values in the field? Going in to the field and meeting beneficiaries and communities results in the DD team being at the receiving end of a kaleidoscope of viewpoints, each differing depending upon who the team speaks to, what they ask, and what the respondents' relationship with the NGO, understanding of the context, and expectations of the situation are. The DD team should factor these in; negative reviews at a meeting with the locality's established elite can be an endorsement for an NGO that is focussed upon Dalit empowerment, and all round rave feedback may well be the result of extensive pre-appraisal coaching and/or promises of a shower of benefits. A DD team is expected to triangulate its observations by having multiple meetings with different groups within the community, and by meeting other stakeholders such as the local administration and local elected representatives and obtaining their views as well.

The second part of the question can be discerned from observation, especially in the nature of interaction and discussion between the NGO staff and the community, in the sections of the community that attend and contribute to the meetings, and in the location of the meetings (in a common place, or someone's house? If the latter, who's house?). Sometimes, field visits are best undertaken sans the Chief Functionary – the knowledge, attitude and behaviour of the NGO's extension staff (who are the main point of contact with the community) is often the best indicator of whether the NGO's stated values are observed in its community relations.

IV.5.c What has the NGO done so far? A discussion with the community on this question would corroborate some of the details on the NGO's past and present projects that are gleaned from its annual reports and financial statements.

IV.5.d Is the NGO respectful of vulnerable sections of society? This question is with specific reference to women, scheduled castes, scheduled tribes, minority communities and undocumented migrants. While the NGO may not be working with a focus on these communities or sections within communities (it may be working on agriculture development, or with disabled people), it is important that it has a respectful attitude towards them – a company cannot afford a relationship with an NGO with a record of discriminatory or misogynistic behaviour. Answers to this question can be discerned from discussions and observations.

IV.5.e What is the media/communications policy of the NGO? A scan of the local media would reveal answers to the following questions –

- What does the local media say about the NGO and how does it cover its work?
- Does the NGO have an antagonistic relationship with the media?

This leads to the question of whether the NGO manages the media and, if so, how – including the existence of a media policy and the designation of a spokesperson. This is important in case the company is looking to showcase its CSR work in the media, and using the proposed project as an example.

Table IV-D:

Due Diligence on Operations Issues		
Primary Question: Does the NGO have the reach and ability to work effectively on the ground?		
Subsidiary Questions	Methods	Documents
What are the resources the NGO has in its field area – people, infrastructure, etc.?	Perusal of background documents	Evaluations and impact assessments
What is the nature of the NGO's relationship with its beneficiary communities? Does it observe its own stated values in the field?	Village visits/ meetings, site visits, beneficiary meetings	Donor agency reports Annual report
What has the NGO done so far? Does this conflict with what it says it has done?	Discussions with NGO field staff	
Is the NGO respectful of women and vulnerable sections of society?	Discussions with other donors	
What is the media / communications policy of the NGO?	Scan of external media sources	

IV.6 Project Proposal Appraisal

The prime purpose of a DD is to ascertain that an NGO is not unsuitable for financial support; whether it is a 'good' NGO, and whether it has the skills, systems and inclination to implement the proposed project successfully. However, given the resources expended, the work done and the insights gained by the DD team at this point, it would be useful to have the team's inputs into other questions that a project proposal appraisal should address. Table IV-E below lists out these questions and the component of the project proposal that should address them. It thereby also provides a company with a minimum outline and standard for a project proposal from an NGO, which it can communicate to the NGOs looking to it for financial support.

This step need not be undertaken for situations in which the company has requested for proposals from NGOs for company-specified CSR projects.

Table IV-E:

Project Proposal Appraisal	
Primary Question: Is the project worthy of support?	
Subsidiary Questions	Section of the Project Proposal
What is the problem the project seeks to address? <ul style="list-style-type: none">- Does it exist?- Is it a serious problem?- Does it fall within the donor's mandate / CSR policy?- Does it fall within the Objects of the NGO?	Introduction
Does the project address the problem? Is there a more efficient way of addressing the same problem?	Problem analysis, situation analysis
Is the NGO a 'good' one?	Project aims and objectives
Does it have the skills, inclination and systems to implement the project?	Project strategy and activities
How much does the project cost? Is it worth it? Will it be able to handle the money required for the project?	Project outputs and outcomes
How will the donor know that the project is on track?	Description of implementing agency
What will happen after the project?	Appendices – organogram and staff list, list of projects previously implemented, etc.
	Project budget
	Project monitoring and reporting
	Exit strategy

The Due Diligence Report

The Due Diligence Report

V.1 Contents of a DD Report

A DD exercise concludes with a report. This should include –

1 A brief introduction to –

- The company's CSR programme (including the CSR expenditure)
- The project being appraised (including the financial requirement)
- The NGO being assessed
- The DD team and the DD exercise (including dates)

2 A clear recommendation, either –

- Yes, the NGO is a suitable one for partnership, or
- No, the NGO is unsuitable for partnership, or
- The decision requires an additional step, including –
 - A detailed financial audit
 - A detailed appraisal by an assessment agency

3 Clear reasons for the recommendation

4

A listing of the activities undertaken by the DD team, including –

- Desk appraisal, including listing of –
 - Documents perused
 - People met or communicated with
 - Key observations
- Visit to the NGO (if undertaken)
 - Documents perused
 - Departments and people met
 - Key observations
- Visit to the field (if undertaken)
 - Locations visited
 - People met
 - Key observations

5

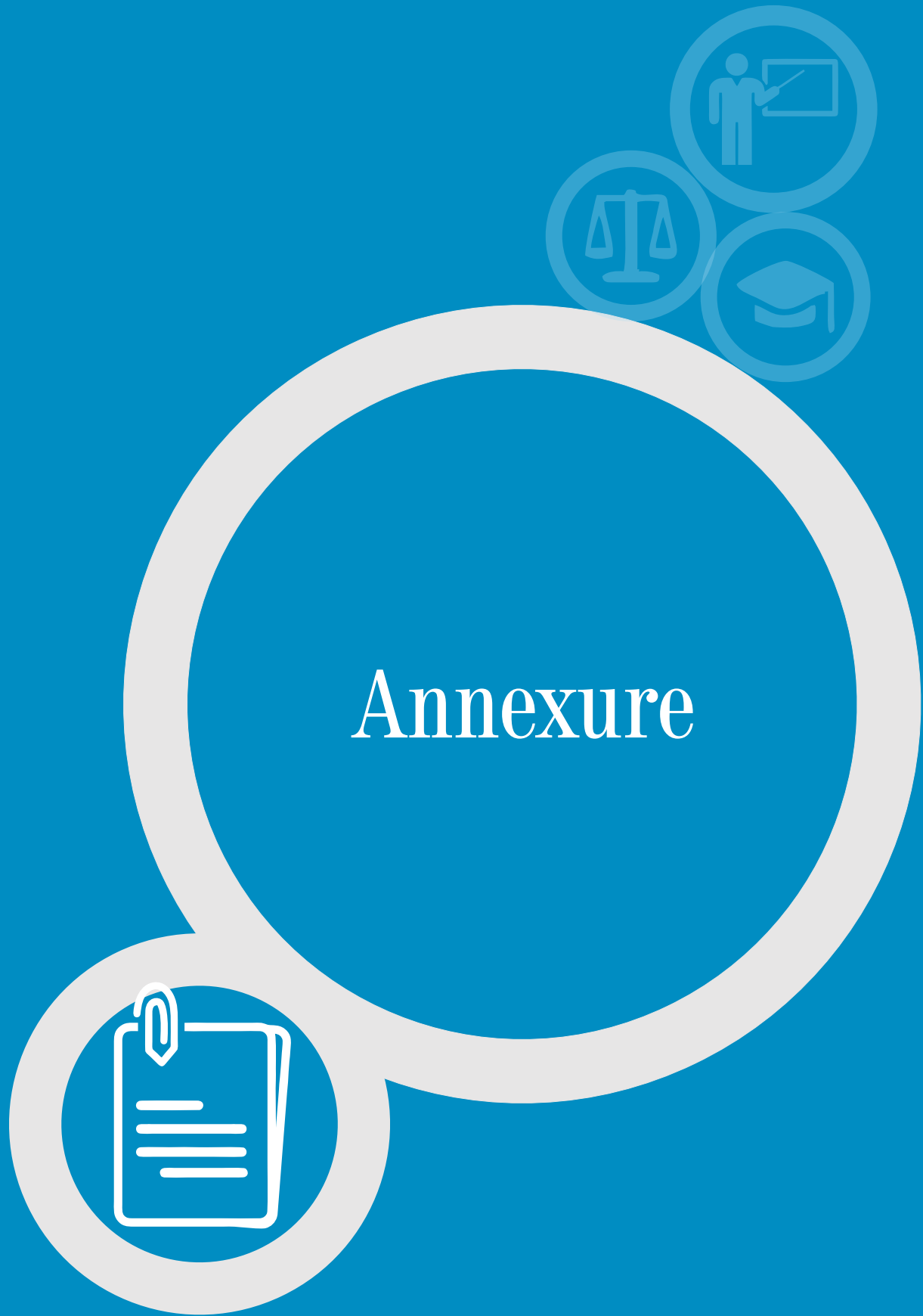
An executive summary

V.2 Using a DD Report

A DD report would inform the company CSR team as to whether an NGO is not deemed unsuitable to be a CSR partner to the company (or the alternative). Assuming the former, the report can be used in two ways. The first is in fine tuning the proposal in question and building upon strengths and addressing weaknesses that have been identified in the DD. The second is in taking forward the approval process – the report (or its executive summary) can be included in the documents provided to the company's CSR committee to enable a decision to support.

Annexure:

Master Framework for Due Diligence



QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
What type of NGO is it?	Existence	Desk Check	Perusal of documents	Annual Reports	Audited Financial Statements
What type of NGO is it?	Existence	Desk Check	Conversation with selected Board members		
Is the NGO registered?	Existence	Desk Check	Perusal of documents	Registration Certificate	Articles of Association
Is the NGO registered?	Existence	Desk Check	Verification on Internet	80-G, 35ac, etc.	FCRA, FC-3, etc.
What are the NGOs values?	Existence	Desk Check	Perusal of documents	Articles of Association	Annual Reports
What are the NGOs values?	Existence	Desk Check	Conversation with selected Board members		
What are the NGOs values?	Existence	NGO Visit	Conversation with NGO staff		
What are the NGOs values?	Existence	Field Visit	Conversation with community		
What are the NGO's aims and objectives?	Existence	Desk Check	Perusal of documents	Articles of Association	Annual Reports
What are the NGO's aims and objectives?	Existence	Desk Check	Conversation with donors		
What are the NGO's aims and objectives?	Existence	Desk Check	Conversation with selected Board members		
What are the NGO's aims and objectives?	Existence	NGO Visit	Conversation with NGO staff		
What are the NGO's aims and objectives?	Existence	Field Visit	Conversation with community		
Who are the NGO's owners?	Existence	Desk Check	Perusal of documents	Articles of Association	Annual Reports
Who are the NGO's owners?	Existence	NGO Visit	Meeting with selected Board members		
Who are the NGO's owners?	Existence	NGO Visit	Meeting with NGO's Board		
Who are the NGO's owners?	Existence	NGO Visit	Conversation with donors		
Who are the NGO's owners?	Existence	NGO Visit	Conversation with NGO staff		
Who are the NGO's donors?	Existence	Desk Check	Perusal of documents	Articles of Association	Audited Financial Statements
Who are the NGO's donors?	Existence	Desk Check	Conversation with donors		

QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
Who is on the NGO's Board?	Governance	Desk Check	Perusal of documents	Articles of Association	
Does the Board play a correct role in the NGO?	Governance	NGO Visit	Perusal of documents	Board Meeting Minutes	
Does the Board play a correct role in the NGO?	Governance	Desk Check	Conversation with selected Board members		
Does the NGO pay minimum wages? By bank?	Governance	NGO Visit	Perusal of documents	Attendance Register	Letters of Employment
Does the NGO pay minimum wages? By bank?	Governance	NGO Visit	Perusal of documents	Bank Statement	Books of Accounts
Does the NGO pay minimum wages? By bank?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO issue employment letters to all staff?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO issue employment letters to all staff?	Governance	NGO Visit	Perusal of documents	Staff Registers	HR Manual
Does the NGO have a defined organizational structure?	Governance	Desk Check	Perusal of documents	Annual Reports	Organization Chart
Does the NGO have a defined organizational structure?	Governance	Desk Check	Conversation with selected Board members		
Does the NGO have a defined organizational structure?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO organize training for employees?	Governance	Desk Check	Perusal of documents	Annual Reports	
Does the NGO organize training for employees?	Governance	NGO Visit	Conversation with NGO staff		
What is the NGO's gender balance across hierarchies?	Governance	Desk Check	Perusal of documents	Annual Reports	Organization Chart
What is the NGO's gender balance across hierarchies?	Governance	Desk Check	Conversation with selected Board members		
What is the NGO's gender balance across hierarchies?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO have written policies on conduct?	Governance	Desk Check	Perusal of documents	Code of Conduct	Sexual Harrassment Policy
Does the NGO have written policies on conduct?	Governance	Desk Check	Conversation with selected Board members		
Does the NGO have written policies on conduct?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO adhere to its policies on conduct?	Governance	Desk Check	Conversation with selected Board members		
Does the NGO adhere to its policies on conduct?	Governance	NGO Visit	Conversation with NGO staff		
Are the NGO's assets used to promote its objectives?	Governance	Desk Check	Perusal of documents	Audited Financial Statements	
Are the NGO's assets used to promote its objectives?	Governance	Desk Check	Conversation with selected Board members		
Are the NGO's assets used to promote its objectives?	Governance	NGO Visit	Conversation with NGO staff		

QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
Are the NGO's assets used to promote its objectives?	Governance	Field Visit	Direct observation		
Are the NGO's assets used to promote its objectives?	Governance	Field Visit	Conversation with community		
Is the NGO involved in ongoing litigation?	Governance	Desk Check	Perusal of documents	Annual Reports	Audited Financial Statements
Is the NGO involved in ongoing litigation?	Governance	Desk Check	Conversation with selected Board members		
Is the NGO involved in ongoing litigation?	Governance	NGO Visit	Conversation with NGO staff		
Does the NGO meet statutory compliances?	Governance	Desk Check	Perusal of documents	Annual Reports	Audited Financial Statements
Does the NGO meet statutory compliances?	Governance	Desk Check	Conversation with selected Board members		
Does the NGO meet statutory compliances?	Governance	NGO Visit	Conversation with NGO staff		
Is the NGO honest?	Finance	Desk Check	Conversation with donors		
Is the NGO honest?	Finance	Desk Check	Conversation with references and contacts		
Is the NGO honest?	Finance	NGO Visit	Conversation with NGO staff		
Is the NGO honest?	Finance	Field Visit	Direct observation		
Are the NGO's financial systems sound?	Finance	Desk Check	Conversation with NGO staff		
Are the NGO's financial systems sound?	Finance	NGO Visit	Perusal of documents	Financial Manual	Books of Accounts
Will the NGO be able to manage the grant correctly?	Finance	Desk Check	Perusal of documents	Audited Financial Statements	
Will the NGO be able to manage the grant correctly?	Finance	NGO Visit	Perusal of documents	Books of Accounts	
Will the NGO be able to manage the grant correctly?	Finance	NGO Visit	Conversation with NGO staff		
Does the NGO work effectively on the ground?	Operations	Desk Check	Perusal of documents	Annual Reports	Project Evaluation Reports
Does the NGO work effectively on the ground?	Operations	Desk Check	Conversation with selected Board members		
Does the NGO work effectively on the ground?	Operations	Desk Check	Conversation with donors		
Does the NGO work effectively on the ground?	Operations	NGO Visit	Conversation with NGO staff		
Does the NGO work effectively on the ground?	Operations	Field Visit	Conversation with community		
Does the NGO work effectively on the ground?	Operations	Field Visit	Direct observation		
What resources does the NGO have in its operational area?	Operations	Desk Check	Conversation with selected Board members		
What resources does the NGO have in its operational area?	Operations	NGO Visit	Conversation with NGO staff		

QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
What resources does the NGO have in its operational area?	Operations	Field Visit	Conversation with community		
What resources does the NGO have in its operational area?	Operations	Field Visit	Direct observation		
How is the NGO's relationship with the community?	Operations	Desk Check	Conversation with selected Board members		
How is the NGO's relationship with the community?	Operations	Desk Check	Conversation with donors		
How is the NGO's relationship with the community?	Operations	NGO Visit	Conversation with NGO staff		
How is the NGO's relationship with the community?	Operations	Field Visit	Conversation with community		
How is the NGO's relationship with the community?	Operations	Field Visit	Direct observation		
Does the NGO observe its values in the field?	Operations	Desk Check	Conversation with selected Board members		
Does the NGO observe its values in the field?	Operations	Desk Check	Conversation with donors		
Does the NGO observe its values in the field?	Operations	NGO Visit	Conversation with NGO staff		
Does the NGO observe its values in the field?	Operations	Field Visit	Conversation with community		
Does the NGO observe its values in the field?	Operations	Field Visit	Direct observation		
What has the NGO done so far? How successful is this?	Operations	Desk Check	Perusal of documents	Annual Reports	Project Evaluation Reports
What has the NGO done so far? How successful is this?	Operations	Desk Check	Conversation with selected Board members		
What has the NGO done so far? How successful is this?	Operations	Desk Check	Conversation with donors		
What has the NGO done so far? How successful is this?	Operations	NGO Visit	Conversation with NGO staff		
What has the NGO done so far? How successful is this?	Operations	Field Visit	Conversation with community		
What has the NGO done so far? How successful is this?	Operations	Field Visit	Direct observation		
Is the NGO respectful of women?	Operations	Desk Check	Perusal of documents	Annual Reports	Sexual Harrassment Policy
Is the NGO respectful of women?	Operations	Desk Check	Conversation with selected Board members		
Is the NGO respectful of women?	Operations	Desk Check	Conversation with donors		
Is the NGO respectful of women?	Operations	NGO Visit	Conversation with NGO staff		
Is the NGO respectful of women?	Operations	Field Visit	Conversation with community		
Is the NGO respectful of women?	Operations	Field Visit	Direct observation		

QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
Is the NGO respectful of vulnerable sections of community?	Operations	Desk Check	Perusal of documents	Annual Reports	Project Evaluation Reports
Is the NGO respectful of vulnerable sections of community?	Operations	Desk Check	Conversation with selected Board members		
Is the NGO respectful of vulnerable sections of community?	Operations	Desk Check	Conversation with donors		
Is the NGO respectful of vulnerable sections of community?	Operations	NGO Visit	Conversation with NGO staff		
Is the NGO respectful of vulnerable sections of community?	Operations	Field Visit	Conversation with community		
Is the NGO respectful of vulnerable sections of community?	Operations	Field Visit	Direct observation		
What is the NGO's media / communication policy?	Operations	Desk Check	Scan of external media sources		
What is the problem the project seeks to address?	Project Appraisal	Desk Check	Perusal of documents	Project Proposal	Background Documents
What is the problem the project seeks to address?	Project Appraisal	Desk Check	Conversation with selected Board members		
What is the problem the project seeks to address?	Project Appraisal	NGO Visit	Conversation with NGO staff		
What is the problem the project seeks to address?	Project Appraisal	Field Visit	Conversation with community		
What is the problem the project seeks to address?	Project Appraisal	Field Visit	Direct observation		
Is this a suitable problem to address?	Project Appraisal	Desk Check	Conversation with selected Board members		
Is this a suitable problem to address?	Project Appraisal	NGO Visit	Conversation with NGO staff		
Is this a suitable problem to address?	Project Appraisal	Field Visit	Conversation with community		
Is this a suitable problem to address?	Project Appraisal	Field Visit	Direct observation		
Does the project work to address the problem?	Project Appraisal	Desk Check	Perusal of documents	Project Proposal	Background Documents
Does the project work to address the problem?	Project Appraisal	Desk Check	Conversation with selected Board members		
Does the project work to address the problem?	Project Appraisal	NGO Visit	Conversation with NGO staff		
Does the project work to address the problem?	Project Appraisal	Field Visit	Conversation with community		
Is the NGO a 'good' one?	Project Appraisal	Desk Check	Perusal of documents	Company CSR Policy	Due Diligence Report
Is the NGO a 'good' one?	Project Appraisal	Desk Check	Conversation with references and contacts		
Does the NGO have the skills to implement the project?	Project Appraisal	Desk Check	Perusal of documents	Project Proposal	Background Documents
Does the NGO have the skills to implement the project?	Project Appraisal	Desk Check	Conversation with selected Board members		

QUESTION	TYPE	STAGE	METHOD	DOCUMENT 1	DOCUMENT 2
Does the NGO have the skills to implement the project?	Project Appraisal	NGO Visit	Conversation with NGO staff		
Does the NGO have the skills to implement the project?	Project Appraisal	Field Visit	Conversation with community		
How much does the project cost? Is it worth it?	Project Appraisal	Desk Check	Perusal of documents	Project Budget	
How much does the project cost? Is it worth it?	Project Appraisal	Desk Check	Internal discussions within CSR team		
How much does the project cost? Is it worth it?	Project Appraisal	Desk Check	Conversation with selected Board members		
How will the project be monitored?	Project Appraisal	Desk Check	Perusal of documents	Project Proposal	M&E Manual
How will the project be monitored?	Project Appraisal	Desk Check	Conversation with selected Board members		
How will the project be monitored?	Project Appraisal	NGO Visit	Conversation with NGO staff		
What will happen after the project?	Project Appraisal	Desk Check	Perusal of documents	Project Proposal	
What will happen after the project?	Project Appraisal	Desk Check	Conversation with selected Board members		





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