



Jordan University of Science and
Technology (JUST)

Anti-Fraud & Bribery Policy (2022-2026)



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Contents

PART I	3
1 Scope of this Policy.....	3
2 Definitions of Corruption, Fraud, and Bribery	3
3 Zero Tolerance on Fraud or Bribery	3
4 Anti-Bribery Policy	4
5 Conflicts of Interest	5
6 Gifts and Entertainment	7
7 Speaking Up	9
8 Supporting Reporting Persons.....	10
PART II	11
9 Reporting Fraud and Bribery to Donors	11
10 Conducting Investigations.....	12
11 Reporting and Acting on Findings of Investigations	14
12 Induction, Training, and Awareness	15
13 Disciplinary Process	16
14 Contracts.....	16
Appendix I: Glossary Terms	18
Appendix II – Examples of Fraud and Bribery	20



PART I

1 Scope of this Policy

1.1 This policy applies to all relevant persons at Jordan University of Science and Technology (JUST). Relevant persons include staff, board members, volunteers, and short-term contractors.

1.2 Part I includes sections that are useful for and made available to all relevant persons and are publicly available on JUST's website.

1.3 Part II includes sections that are used for the board and senior leadership team (SLT) in responding to allegations and incidences of fraud and building an anti-fraud culture.

2 Definitions of Corruption, Fraud, and Bribery

2.1 Definitions of corruption, fraud, and bribery are found in Appendix I.

2.2 It is bribery to make unofficial payments (known as 'grease' or 'facilitation' payments) to a public official to secure or speed up a routine action to which you may feel entitled to.

2.3 Some examples of fraud and bribery relevant to JUST are described in Appendix II.

3 Zero Tolerance on Fraud or Bribery

3.1 JUST's position on fraud and bribery is to take a zero-tolerance approach, and JUST is committed to pursuing this approach throughout its operational practices for the following reasons:

- JUST recognizes the significant risk that fraud and bribery pose to achieving its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to accomplish JUST mission.
- Corrupt behaviour also seriously damages JUST reputation. The eradication of fraud and bribery in the way JUST operates is greatly important to securing its stakeholders' trust and confidence.



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

- JUST owes it to JUST communities to condone fraud or bribery. Corruption creates unstable societies. It destroys public and business standards and forces ordinary people to use ill-advised resources in their interactions with the government and other public bodies.

3.2 All members of staff and the board, together with volunteers and contractors, are required to sign the zero-tolerance declaration.

3.3 JUST supports the application of the zero-tolerance policy by providing:

- **Direction** and rules to establish appropriate and expected behaviour.
- Effective **deterrents** to inappropriate behaviour in the form of meaningful consequences.
- **Prevention** measures to reduce the risk of fraud or bribery occurring.
- **Detection** measures to identify fraud or bribery.
- **Response** measures to ensure JUST reacts well to suspicions, allegations, and proven incidents of fraud and bribery, including protection and fair treatment for the accusers and accused.
- **Measurement** processes to evaluate the impact and success of JUST anti-fraud and bribery policy and management of risk.
- Deliberate proactive steps to embed anti-fraud & bribery thinking into JUST **culture**, including staff training and awareness.

3.4 Anyone found guilty of fraud or bribery will be subject to disciplinary measures, which ordinarily include dismissal, prosecution, and recovery of losses.

4 Anti-Bribery Policy

4.1 JUST employs all legal and safe tactics to avoid and resist paying bribes to public officials, even if it results in denials, delays, inconvenience, and increased cost to JUST operations.

4.2 No person is authorized to pay a bribe on behalf of JUST or use JUST funds.



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

4.3 In extreme situations, only the board may authorize payment of a bribe if all other options have been exhausted. In such a circumstance the meeting minutes must document the case and all steps taken before reaching this decision, and lessons learned to avoid a similar situation arising in the future. The payment must be properly and transparently recorded in the accounting system and appropriate parties (e.g., donors) informed.

4.4 Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

5 Conflicts of Interest

5.1 A conflict of interest exists where an employee or a board member has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of JUST.

5.2 The purpose of this policy is to ensure that all conflicts of interest are declared, declared conflicts are managed to mitigate the associated risks, and that decisions and actions are documented to ensure transparency and accountability.

5.3 Examples of conflicts of interest include (but are not limited to):

- Relationships between members of the Senior Leadership Team, accounts staff, procurement staff, HR staff or board members, and any other staff member.
- Relationships between any person and their line manager
- Relationships between JUST staff or board members and suppliers, donors, grantees, or beneficiaries.
- A 'relationship' in this context could include family, personal relationships, being a bank signatory, advisor, or board member.

5.4 The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed promptly.

5.5 The following people are required to make annual conflict of interest declarations.

- Board members
- Senior Leadership Team members
- Staff in finance (accounting), procurement, and HR



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

5.6 All staff (including those listed above) are required to disclose conflicts of interest as soon as they arise, or the staff member becomes aware of the conflict of interest. Examples of such disclosures would include:

- A close friend of a staff member applies for a job with Jordan University of Science and Technology.
- A potential supplier presented to the procurement committee is a company where a committee member is a board member.

5.7 The recruitment conflict of interest declaration should be signed by all relevant persons involved in the development or design of selection tools, those with access to the selection tools, and those involved in the selection process. It should be signed as soon as all the applications are received and before any short listing.

5.8 The Procurement Committee meeting agenda should always include a clear listing of all suppliers on the approved suppliers list, and all who have provided quotes for the purchases under consideration. All members present should be required to declare that they have no interests in any of the suppliers under consideration at that meeting, and this should be recorded in the minutes.

5.9 If a conflict arises or is discovered, it should be immediately declared and reported to the legal department.

5.10 Appropriate actions should be taken to resolve the conflict of interest, which may be temporary or permanent, for example:

- A procurement committee member is removed from a particular supplier selection decision in which they are conflicted.
- A staff member ceases to act as a board member, signatory, or advisor which is causing the conflict.
- A conflicted staff member is removed from all aspects of the recruitment and selection process.
- One person in a personal relationship within JUST leaves.

5.11 The steps taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.



6 Gifts and Entertainment

6.1 Gifts and entertainment should never be used or allowed to influence business decision-making.

6.2 When offers of gifts and entertainment are made or accepted in situations where they are inappropriate, they can look like, or may be, bribes. They can expose JUST to accusations of unfairness or even break the law and can put JUST reputation for ethical behaviour at risk.

6.3 Positive, healthy, normal business practices can include accepting and making offers of gifts and entertainment, which develop and maintain positive and strong business relationships. JUST should be able to accept and make offers of gifts and entertainment ONLY when they are appropriate, i.e., when they:

- Are proportionate in the context; and
- Do not create any sense of expectation or obligation on the recipient or the giver.

6.4 The following gifts may never be offered or accepted and will always be deemed inappropriate.

- Cash of any amount
- Any gift with a value exceeding 10 JD.
- Any entertainment worth more than 10 JD.
- Any gifts or loans from existing suppliers or prospective suppliers while a tender process is underway.
- Any gifts or loans to staff involved in supplier selection decisions (e.g., procurement officer or member of procurement committee)
- An entertainment that goes against the cultural values on the community.

6.5 JUST never allowed to request a gift or entertainment.

6.6 Gifts or entertainment below the limits above [6.4] are not necessarily appropriate.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

6.7 In some circumstances, an element of judgment is required to decide whether a gift is appropriate or not. If any staff or board member is in any doubt, they should consult a leadership team member (or the board chair in the case of the Executive Director) and obtain written permission before accepting or offering a gift.

6.8 The following circumstances imply the giving or receiving of a gift or entertainment offer may be appropriate:

- The giving and receiving of the gift or entertainment strengthens a genuine business relationship.
- The gift or entertainment does not constitute an attempt to apply undue influence and does not create an undue obligation.
- The gift or entertainment is given or accepted in the open rather than in secret.
- The gift or entertainment is given to celebrate a recognized cultural event or holiday.
- The gift or entertainment is given to the organization or a group (department) rather than an individual.
- The gift or entertainment is branded marketing materials (pens/notebooks etc.).
- The value of the gift or entertainment is not excessive or abnormal in a social context.
- The timing of the gift or entertainment is not suspicious.

6.9 The following circumstances imply the giving or receiving of the gift or entertainment may be inappropriate:

- The timing, nature, or circumstances of the gift means it could be perceived as an attempt to influence a business decision.
- The value of the gift is excessive in the circumstances (despite being below the limit of 6.4).
- The receiver feels obligated, or the giver feels entitled.
- The gift is given or received in secret.

6.10 If any staff or board member is offered an inappropriate gift, they should politely decline it and inform their line manager or board chair.



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

- 6.11 In the event that declining an inappropriate gift in the moment might be culturally inappropriate or embarrassing, it should be returned within no less than a week, with appropriate documentary evidence to prove that the gift was returned.
- 6.12 In the event that an inappropriate gift is received publicly, steps should be taken to restore the organization's reputation, in addition to returning the gift.
- 6.13 In the event that inappropriate gifts are received without consent (such as courier deliveries, bank, or mobile money transfers), these should be declared immediately using the conflict-of-interest declaration form. Steps should be taken to return the gift or notify authorities if money laundering is suspected.
- 6.14 Inappropriate gifts received by employees and subsequently declared should not be received into the organization's funds – rather they should be returned in all cases.
- 6.15 Appropriate gifts, given to the organization as a whole, or to a particular team, should normally be enjoyed or shared by all relevant staff members (e.g., gift basket or flowers). Where an appropriate item is not easily sharable, it should be raffled off by random and transparent means.

7 Speaking Up

- 7.1 JUST's policy on speaking up is designed to build confidence to report genuine concerns about fraud, bribery, or other types of misconduct. For many cases of misconduct, someone reporting it is the only way it can be discovered and dealt with.
- 7.2 A genuine concern is sincerely felt and based on information the reporting person believes to be true or trustworthy. Upon further investigation, a genuine concern may or may not turn out to be true. The motivation of the person reporting a genuine concern is not relevant to its definition as a genuine or not.
- 7.3 A false accusation is when the reporting person knowingly fabricates information or reports information, they know to be false.
- 7.4 JUST's whistle-blower lines should be used by all relevant persons to raise any genuine concerns.



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

7.5 JUST has zero tolerance to anyone who is found to have wilfully and deliberately abused a speaking up line to knowingly make false accusations. Appropriate disciplinary measures will be taken.

7.6 A genuine concern should be reported when there is evidence or a strong suspicion of misconduct in any of the following areas:

- Fraud or bribery
- Sexual misconduct
- Harassment
- Any illegal act

7.7 Concerns may be reported, either in person or by email, using Email, phone number, or web link.

7.8 All relevant persons are strongly encouraged to report genuine concerns. They should report as much detail as possible, including who, when, where, and how and whether they have evidence for the basis of their suspicion.

7.9 Concerns may be reported anonymously, but people are encouraged to give their name and/or contact details. It is easier to investigate allegations when follow-up questions with the reporting person is possible.

7.10 JUST will address any concerns raised with the reporting person within 24 hours, assuming contact details have been provided.

8 Supporting Reporting Persons

8.1 JUST has zero tolerance to any form of retaliation against reporting persons (also known as 'whistle-blowers').

8.2 All relevant persons who report genuine concerns will be properly protected and supported.

8.3 Details of any allegations or suspicions raised should be recorded on a Fraud, Bribery, and Misconduct report to be submitted to the Executive Director/CEO.

8.4 JUST commits to take the support through:



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

- Taking care not to underestimate or disregard the risk that a reporting person may be exposed to, or the level of fear or anxiety they may be experiencing.
- Appointing someone with responsibility to support the reporting person (the 'support person'). Usually, this will be their line manager.
- Providing the support person with relevant information to share with the reporting person unless they are a member of the Fraud Response Team.
- Assuring the reporting person that their concern is being handled and taken seriously.
- Explaining that their identity will be protected to every extent possible but cannot be guaranteed.
- Answering questions as appropriate and providing emotional support but not sharing confidential information with the reporting person.
- Informing the person of any decision to investigate or not, investigation outcome, and actions taken as appropriate.
- Taking necessary steps to ensure the safety of any reporting person, even if there is a cost implication, in cases where the person experiences or fears retaliation or harassment.

PART II

9 Reporting Fraud and Bribery to Donors

9.1 JUST takes its contractual and fiduciary responsibility to report fraud and bribery to donors very seriously.

9.2 The Fraud Response Team's duty for communicating with donors should include the following actions:

- Appoint a donor contact person to channel all communication with the donor with respect to the suspected fraud or bribery.
- Consult the donor agreement concerning the terms and conditions about reporting suspected fraud or bribery and ensure that they are met. If in doubt, communicate within 48 hours if the fraud may impact a particular donor's funds.
- Protect the identity of the suspect and reporting person. Avoid sharing any confidential details.
- Reassure the donor by explaining the process being followed to handle the allegation.
- Confirm verbal communications in writing.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

- Keep the donor updated with progress and the outcome of the investigation.

9.3 The full investigation report or disciplinary report should not be shared with the donor unless required to do so, and if so, only in an anonymous form.

9.4 Fraudulent losses that donors disallow can only be financed from unrestricted funds.

9.5 JUST will take out a fidelity insurance policy to mitigate the impact of losses from fraud or bribery.

10 Conducting Investigations

10.1 The purpose of investigating is to gather evidence and facts to establish whether suspicions or allegations are true, and whether any proven incidents are isolated or more widespread.

10.2 All investigations should be impartial, thorough, timely, and confidential.

10.3 Any relevant persons investigated will be considered innocent until proven guilty. False or mistaken accusations are not uncommon.

10.4 All reported allegations or suspicions of misconduct should normally be investigated. This includes cases where:

- There is a belief that the genuine concern may have been reported due to malicious motives.
- The allegation relates to attempted fraud or bribery.
- The accused staff member has since left the JUST.

10.5 The Fraud Response Team (formed by the president) may decide not to investigate in exceptional cases where a reported allegation or suspicion:

- Is frivolous, trivial, or has clearly arisen from a misunderstanding.
- Is wholly unbelievable, i.e., there is no conceivable way the facts it related to could have occurred.
- If there is insufficient information to investigate.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

- 10.6 Investigations may be carried out by in-house staff, senior staff and internal auditor (which may be an outsourced function), an audit firm, donor, or a specialist investigation firm, depending on the case.
- 10.7 Investigators should be objective and unbiased, thorough, able to maintain confidentiality, competent in investigative techniques, empowered with sufficient seniority and confidence, honest, and independent of any possible subsequent disciplinary process.
- 10.8 The Fraud Response Team should set clear terms of reference for the investigator including background, allegations made, the scope of investigation, and the timeline for expected work and reports.
- 10.9 Care should be taken not to compromise evidence. This may include:
- Two full backups of hard drives/electronic files – one copy left untouched and the other used for the investigation.
 - Keeping documents in the files they were filed in, and in the order they were filed in. If documents are removed, take a note of where they were located.
 - Adding hole punches to or writing comments on documents that may be admitted as evidence.
 - Considering fingerprint contamination if appropriate.
- 10.10 The following factors should be considered when deciding whether or not to suspend staff:
- Could the staff member's presence result in the risk of loss or damage to evidence, influencing witnesses, or interfering with the investigation in any way?
 - Would the impact on other staff or operations be excessive?
 - Are there local labor laws regarding the maximum length of any formal suspension?
 - Have other alternatives been considered, such as requiring them to take leave?
- 10.11 The legal and other rights of interviewees should be considered when conducting interviews during an investigation. This may include ensuring that:
- All interviews are completely and accurately documented.
 - There is a complete ban on coercion or coercive techniques.
 - The assistance of a translator is provided if necessary.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

- The date, time, and location of interviews are, unless required, within office hours.
- The interviewees' wish or right to have a witness or lawyer present is respected as appropriate.

10.12 A formal documented investigation report should be submitted to the Fraud Response Team, according to the agreed timing, which outlines the case's findings, facts, and conclusions.

10.13 The investigation report should make recommendations about weaknesses. It should avoid making any recommendations associated with disciplinary consequences.

11 Reporting and Acting on Findings of Investigations

11.1 The Fraud Response Team will agree on the appropriate actions to be taken in light of the findings of an investigation.

11.2 Where fraud is collusive and involves more than one staff member, junior employees should never be used as a scapegoat to protect more senior employees.

11.3 The Fraud Response Team may choose to offer concessions to witnesses who are prepared to give information or evidence about other staff, provided the evidence is proved correct and leads to disciplinary action against those other staff.

11.4 Once receiving the investigation report, the Fraud Response Team may choose to take the following actions, as appropriate to the case:

- Take legal advice
- Pass the matter to the HR department to take action against guilty individuals, in accordance with the disciplinary policy, which should usually be dismissal.
- Organize appeal hearings in accordance with disciplinary policy in case of individuals' appeal.
- Clear the reputations of those accused but found innocent of wrongdoing.
- Recover losses from individuals
- Prosecute in courts of law
- Make improvements to internal control systems to ensure that similar frauds do not happen again



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

- Implement recommendations from investigation report
- Communicate with donors, staff, and public as necessary
- Discuss with donors with respect to the treatment of fraudulent losses, making a repayment if required.
- Make a claim against fidelity insurance policy
- Initiate the recruitment to replace terminated staff (by HR department)
- Initiate the revision of budgets and cash flow forecasts (by Finance department)

11.5 All decisions and actions of the Fraud Response Team shall be documented and filed on an incidence file.

11.6 A one-page summary of the case (allegation, response, and outcome) should be prepared, shared with the board, and filed on the front of the incidence file.

12 Induction, Training, and Awareness

12.1 All relevant persons should receive training through the HR unit in the following elements (starred items at induction):

- Definitions of fraud and bribery, with relevant examples
- Relevant sections of this policy (zero tolerance, conflicts, gifts, speaking up)
- Reporting suspicions
 - What to report
 - How to report
- Confidentiality and protection
- Signing declarations (code of conduct, conflict of interest, zero tolerance, etc)
- Fraud triangle and zero tolerance principle
- Role play reporting a fraud to explore associated emotions
- Building confidence to report by explaining key steps of how reported suspicions are handled, e.g., Fraud Response Team commissions fair and unbiased fact-finding investigation, and appropriate is action taken.

12.2 In addition, the following topics should be covered by every manager (starred items should be addressed as part of the manager's induction):

- What to do if someone reports a suspicion to you
- Maintaining confidentiality



Jordan University of Science and Technology (JUST) Anti-Fraud & Bribery Policy (2022-2026)

- Supporting and protecting people who speak up
- Communication with donors, staff, public, suspect/s, and the reporting person
- Roles and responsibilities of the Fraud Response Team
- Documentation (incidence report and fraud register)
- Investigations
- Actions to take after an investigation

12.3 Refresher training will be organized for all staff at least every two years.

12.4 The HR department will monitor to confirm everyone has received appropriate training.

12.5 Day-to-day awareness of anti-fraud and bribery culture will be encouraged by the following:

- Standing item on Leadership Team meeting agenda of 'fraud risk'
- Anti-fraud and bribery posters in the office

13 Disciplinary Process

13.1 Where evidence of fraud or bribery is discovered, JUST's disciplinary policy should be followed.

13.2 Per JUST Zero Tolerance Policy, the usual outcome for committing or attempting to commit fraud or bribery or deliberate abuse of the speaking up lines will be dismissal.

13.3 In the event of collusion or coercion, consideration may be given to a degree of leniency if it results in information against a more senior staff member.

14 Contracts

14.1 All standard staff contracts should include a clause that allows JUST to terminate the agreement with immediate effect if the employee commits any act of gross misconduct, including fraud, bribery, or theft.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

14.2 JUST supplier application form or contract should overtly discourage any form of misconduct. The following clauses should include:

- JUST will provide quotations at best value when requested.
- JUST will accept payment by check or bank transfer.
- JUST will not offer or pay any incentive to the NGO or its officers, to win bids to supply goods or services, or as personal gifts or loans.
- JUST will not provide quotations in return for favour or payment from the NGO or its officers.

14.3 The sub-grantee application form and sub-grantee grant agreements or contracts should include the following clauses:

- JUST awards grants and contracts on a free and fair basis, without requesting or accepting any payment or favor. If a partner is requested for any kind of payment or favor as a condition or implied condition for being awarded a grant or contract, the partner should contact the University president via email (president@just.edu.jo) immediately.
- The partner must notify JUST as soon as it becomes aware that fraud is likely to have occurred which may impact the project and / or funds of JUST.
- The partner is responsible for refunding any fraudulent losses.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

Appendix I: Glossary Terms	Definition
Attempted fraud or bribery	An unsuccessful effort to commit fraud or bribery.
Bribery	The unlawful act of offering or receiving any gift, loan, fee, reward, or other advantage (taxes, services, donations etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties.
Corruption	The abuse of entrusted power for private gain.
Embezzlement	To steal money that people trust you to look after as part of your work.
Entertainment	Invitations to attend events with a social aspect, such as meals and conferences, and entertainment events including shows or games, which are offered free of charge or at reduced rates.
Error	An accidental mistake, for example, in a calculation or a decision.
Extortion	Act of utilizing one's access to a position of power or knowledge, either directly or indirectly, to demand unmerited cooperation or compensation due to coercive threats.
Fraud	The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political, or otherwise).
Gift	Goods, services, or cash offered to or by staff or board members, or their friends, family, or associates, at free or preferential rates. Unpaid loans are considered gifts for the purposes of this policy.



Jordan University of Science and Technology (JUST)
Anti-Fraud & Bribery Policy (2022-2026)

Money Laundering	The concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.
Negligence	Failure to give care or attention, especially when this causes harm or damage.
Nepotism	Form of favoritism based on familial relationships whereby someone in an official position exploits his or her power or authority to provide a job or favor to a family member, even though he or she may not be qualified or deserving.
Public Official	Any person holding legislative, executive, administrative, or judicial office, whether he/she is appointed or elected, permanent or temporary, paid or unpaid.
Robbery	The crime of taking money or property illegally, often by using threats or violence.
Theft	The crime of stealing.



Appendix II – Examples of Fraud and Bribery

The following are examples of fraud and bribery relevant to JUST's context. The list is by no mean exhaustive.

- A grant officer requires or accepts kickbacks from partners for grant awards or payment remittances.
- A staff member submits fake receipts in an expense claim.
- A manager requires payment for authorizing an expense claim.
- A staff or board member fails to disclose a conflict of interest with a partner, supplier, or another staff member.
- A staff member bribes an auditor to ignore or fails to report an audit finding.
- A staff member colludes with a supplier to get a kickback on overpriced goods or services.
- A Finance staff member records transactions in the accounting records they know to be false.
- A Finance staff member knowingly posts entries to incorrect codes to conceal fraudulent payments.
- A staff member driving on JUST business makes an un-receipted cash payment to a traffic officer to avoid a traffic offense fine, whether or not the expense is charged to JUST.
- An unofficial payment is made to a Government Officer to access work in a particular district.
- An unofficial payment is made to the police or judiciary to facilitate the release from detention or dropping of charges against a JUST employee or board member.