



BHARAT DYNAMICS LIMITED
VIGILANCE DEPARTMENT
COPORATE OFFICE : : HYDERABAD

Ref: BDL/04/SI/VAW-2022

Dt:01.09.2022

SYSTEMIC IMPROVEMENT INITIATIVES BY VIGILANCE DEPARTMENT

As a part of preventive vigilance, regular checks, surprise checks and scrutiny of procurement and civil files were undertaken. Areas requiring systemic improvements were identified and corrective measures were suggested to the management.

A total of 19 systemic improvement suggestions have been given to the management by vigilance department during **Sept-2021 to Aug-2022**, and many of the systemic improvements suggestions have been accepted and implemented by the management.

SL NO.	REF NO.	SYSTEMIC IMPROVEMENTS CARRIED OUT
1	SI-44/2021/11 dated 27.09.2021	Systemic Improvement on recruitment of Meritorious Sports Persons in BDL- BDL Sports persons recruitment rules and regulations was studied and it was noticed that "as per the extant instructions on the subject, the selection is based on sports certificate after meeting the minimum qualification and experience criteria". It was suggested that certain precautions need to be followed before selection is made. The Systemic Improvement is under consideration of Management.
2	SI-45/2021/12 dated 10.11.2021	Systemic Improvement on Obtaining 1st & 2nd stage advice of CVO in disciplinary cases against below Board-Level officials- Vide CVC Circular No.08/12/14 dated 03.12.2014 and Circular No.05/07/18 dated 10.07.2018, CVC prescribed consultation mechanism in case of disciplinary cases. In case of action with respect to disciplinary cases against any below Board-Level official, concerned DA should obtain consultation from CVO at two stages- a) First Stage Advice (FSA) b) Seond Stage Advice (SSA) In order to align with policy of government, it was suggested that in all future cases of disciplinary action against below board-level officials, advice of CVO may please be ordered to be obtained so that instructions of CVC are fully followed and thereby no disciplinary authority is exposed for possible adverse view against them. The suggested improvements has been implemented.
3	SI-46/2021/13 dated 11.11.2021	Systemic Improvement Suggestion on Periodic Review of Below Board Level Executives on lines of FR 56(j)- It was suggested that a Representation Committee need to be constituted and time-limits may be prescribed for accepting and disposal of such representations received from the ex-executives who have been prematurely retired after review. Accordingly, the guidelines issued vide PC No.28/2020 need to be revised in-line with DoPT OM No. 25013/03/2019-Estt.A-IV dated 28.08.2020. Suitable formats for issuing notice / order under the said rules shall be prescribed. DoPT OM dated 28.08.2020 mentions that Chief Vigilance Officer in case of Gazetted officers, or his representative in case of non-Gazetted officers, will be associated in case of record reflecting adversely on the integrity of any employee. Suitable amendments may be made in BDL Rules in this regard. The suggestions are under consideration of Management.

4	SI-47/2021/14 dated 17.11.2021	<p>Feedback/ Suggestions received during the brainstorming session of mid-career training program-</p> <p>Suggestions were received from Teams on the following which are believed to improve the organization, if implemented :a) E- Governance, (b) Transparency (c) Technological enablers, (d) Ethical Dilemma, (e) Conflict of Interest f) Reducing-Discretion</p> <p>The feedback received from participants of Mid-career Development Program was considered by Management and various initiatives were taken for improvement in the areas suggested.</p>
5	SI-48/2022/01 dated 07.02.2022	<p>Undertaking by the Members of Tender Committee/Agency-</p> <p>Central Vigilance Commission vide its Office Order No.71/12/05 dated 09.12.2005 has issued directive on the subject above. The Office Order dated 09.12.2005 mentions that, ".... the Commission would advise that the members of the Tender Committee should give an undertaking at the appropriate time, that none of them has any personal interest in the Companies/ Agencies participating in the tender process. Any member having interest in any Company should refrain from participating in the Tender Committee."</p> <p>It was suggested that necessary provisions may be inserted in IMM Manual regulating submission of an undertaking by members of the Tender Committee at the time of Technical Evaluation, Price Bid opening/ evaluation and Price Negotiation.</p> <p>The Systemic Improvement is under consideration of Management.</p>
6	SI-49/2022/02 dated 06.06.2022	<p>Imprest Expenditure and Recoupment Procedure-</p> <p>Upon scrutiny of the files, it was observed that in few cases the expenditure were more than the sanctioned Imprest / Advance amount. Items of capital in nature were also purchased from the Imprest account. It was suggested that a detailed SoP for management of expenditure of Imprest and its recoupment may be prepared keeping in view the provisions of GFR-2017, BDL DoP and other financial instructions issued by Govt. of India, if any in this regard. Imprest amount should be utilized for meeting day-to-day contingent and emergent office expenses, purchase of goods or services or any other special purpose need for the management of the office, of small amounts which cannot be foreseen and cannot be paid through bank / cheque / DD / Online mode (RTGS / NEFT) by processing of the Invoice / Bill of the party. Items of capital in nature should not be purchased under Imprest. Possibilities of introducing Prepaid Debit Cards for Imprest and contingency advances may be explored and implemented. Ministry of Finance, Department of Expenditure OM No. R/20001/1/2020-GBA-CGA/548-658 dated 14.07.2021 may kindly be referred to in this regard. The suggestions are under consideration of Management.</p>
7	SI-50/2022/03 dated 06.06.2022	<p>Review on Instruction pertaining to Vigilance Clearance for Promotion-</p> <p>DOPT OM No. F.No.22034/4/2012 -Estt. (D) Date 02-Nov-2012 and O.M. No. 22012/1/99-Estt. (D) dated 25.10.2004 issued based on the O.M. No. 22011/4/1991-Estt. (A) dated 14.09.1992, mentions that Vigilance clearance for promotion may be denied only in the following three circumstances:-</p> <p>(i) Government servants under suspension; (ii) Government servants in respect of whom a charge sheet has been issued and the disciplinary proceedings are pending; and (iii) Government servants in respect of whom prosecution for a criminal charge is pending.</p> <p>At present when a request is forwarded to Vigilance Deptt. for vigilance clearance, the option available are- i) Accorded, ii) Not Accorded , iii)Returned to Corp-HR. It was suggested to create an additional 4th option of "withheld". The suggestion is under consideration of Management</p>

8	SI-51/2022/04 dated 08.06.2022	<p>Visit Report of Chief Vigilance Officer to Visakhapatnam Unit-</p> <ul style="list-style-type: none"> i) Material Returnable Gate Passes pending even after the expiry of due date across the units may be closed with immediate effect. This need to be ensured in all Units without fail. ii) All proposals/files/tenders involved in engagement of contract manpower (including Civil, Job Contracts, AMCs etc.) should be routed through Unit-HR without fail. Corporate HR need to direct all unit / HR / CLM Cells of respective units for proper maintenance and compliance of statutory provisions prescribed by various acts. iii) NITs with respect to the civil works should be floated only after the necessary approvals and proof checks of designs are obtained to keep a check on deviations and increase in project cost. Stage-wise planning, coordination and control of project from conception to completion. Periodical reviews, especially at high-level are recommended to track the progress and deviations so as to avoid time and cost overruns. iv) Realistic engineering estimate considering latest costs of material, labour, overheads and any other relevant costs etc. need to be prepared. v) E-reverse auction to be followed for the threshold value as specified in the BDL IMM Manual. vi) Online vehicle pass system recommended by Vigilance department to be implemented as soon as possible. <p>The suggestions is under consideration of Management</p>
9	SI-52/2022/05 dated 15.06.2022	<p>Improvement on Safety and Security Measures-</p> <p>It was recommended to conduct a review on the vulnerable areas at unit level to strengthen the Security. An Audit of the Safety and Security Measures to be commissioned at periodical intervals. The suggestions are under consideration of Management.</p>
10	SI-53/2022/06 dated 05.07.2022	<p>Report on AMC Contract for Baker Air Gauge Units at BDL Bhanur Unit-</p> <p>Responsibilities of Indenting Officers are clearly stated in Clause 3.8 of IMM Manual to obtain Budget Quotes to initiate Service Requisitions etc., whereas the Indenter i.e. Quality Control Dept. has floated enquiry obtained quotation and placed Service order which is against IMM Manual as per Clause 3.6 (Duties and Responsibilities of IMM). It was suggested that instructions may be given to educate officers involved in procurement other than IMM. The suggestions are under consideration of Management.</p>
11	SI-54/2022/07 dated 13.07.2022	<p>Guiding Principles for Suspension -</p> <p>It was observed in few of the proposals received at Vigilance department for clearance to open sealed cover proceedings that the employees were initially suspended, then charge sheet issued and disciplinary proceedings conducted. The proceedings also continued beyond 1 year, finally resulting in exoneration of the charged employees. With exoneration, the suspension period of the exonerated employees would now be treated as on duty and they would be eligible for full pay and allowances. Thus, the organization not only lost the services of the employees for suspension period but also now, has to pay them for doing no work. Further, the organization would have placed/ hired manpower to fulfill the need arose due to suspension resulting in absence of those employees during that period. Therefore, the decision to place an employee under suspension must be a carefully weighed and each case need to be considered on its merits. CCS (CCA) Rules, 1965 have certain guiding principles describing the circumstances where suspension can be resorted to and is desirable. The principles described therein may be brought to the notice of all Disciplinary Authorities for reference while dealing with cases of suspension. The suggestions are under consideration of Management.</p>

12	SI-55 dated 13.03.2020	Amendment to Rule 36.2(f) of BDL Recruitment & Promotion Rules, 1988- Circular issued by management vide PC No.04/2020 dated 10.03.2020 amending Rule 36.2 (f) of Recruitment & Promotion Rules, 1988 was examined and it was observed that such amendment is against the extant policy of the Government of India which has been communicated by DPE/DoPT/MHA/CVC from time-to-time. It was suggested that the circular dated 10.03.2020 issued may be rescinded without further delay. The suggestions was considered by Management and a detailed amendment was issued to Rule 36.2 (f) vide PC NO.21/2021 dated 12.07.2021.
13	SI-56/2022/08 dated 27.07.2022	Usage of Smart Watches/ Devices on Company Premises by Contract Labour- As a part of preventive vigilance activity, during a surprise visit to the CISF Punch Gate at Kanchanbagh Unit to observe the entry and exit of Contract Labour in BDL, it was observed that contract labourers wearing smart watches and entering into plant premises. Management has recently issued guidelines on Smart Phones allowing usage of Mobile Phone without camera and data card only. From features, smartwatches are almost equivalent to smart phones and there are other smart accessories which are capable of data theft. Vigilance wing has suggested that a Policy may be worked out regulating/ prohibiting the usage of Smart Devices/Watches by contract /casual employees in particular inside company premises. The suggestions are under consideration of Management.
14	SI-57/2022/09 dated 27.07.2022	SoP on conducting Departmental Inquiry- BDL has amended and implemented its CDA (Conduct, Discipline & Appeal) Rules 2020 with effect from 17.06.2020. However, it was noted that conducting Departmental Inquiry is major activity during Disciplinary Proceedings Procedures against an Officer. It is a quasi-judicial procedure, for which no specific Standard Operating Procedure (SOP) is formulated in existing CDA Rules 2020 of BDL. In absence of the detailed procedure on conducting inquiry, the Inquiring Officer may find himself/ herself extremely difficult to perform the role of Inquiry Officer as per the government guidelines. In view of this, an SOP on "Conducting Departmental Inquiry" was prepared and shared with Management suggesting to make the SoP part of CDA Rules after due approval. The suggestions are under consideration of Management.
15	SI-58/2022/10 dated 27.07.2022	Guidelines on Reservation for PWbD candidates- It was observed that several directions/Instructions with regard to applicability of instructions regarding reservation to PWbD were issued by Government Ministries/Departments to Central Public Sector Enterprises (CPSEs) from time-to-time. However, these instructions are not adequately reflected in the Recruitment Rule of the Company. Therefore, it was suggested that amendments to the policy on Recruitment and Promotions of Persons Physically Handicapped (PHC)/Persons with Benchmark Disability (Divyangjan-PwBD) may be made for ensuring successful implementation of Reservation policy of Government. The suggestions are under consideration of Management.
16	SI-59/2022/11 dated 04.08.2022	Transparency International Study (Defence & Security) Findings on BDL- Transparency International has issued an Online Defence Companies Index 2020 (DIC) on Anti-Corruption and Corporate Transparency which is available on public domain. It was observed that BDL has scored 21 out of 106 in the Report which was prepared by the Transparency International considering and assessing the documents placed on BDL's website. As CVC as part of House-keeping activities, precursor to VAW-2022, has advised organizations to update Circulars/Manuals and to update their websites, Management was suggested to go through the DIC report findings and to improve upon systems and procedures, if required. The suggestions are under consideration of Management.
17	SI-60/2022/12	Report On Procurement Of Printer Toner Cartridges- On examination of procurement of Printer Toner Catridges, it was observed that Compatible Cartridges were procured instead of Original Toner Cartridges manufactured

	dated 04.08.2022	by OEM. It was suggested that only original cartridges from the OEM or authorized OEM to be procured. It was suggested that in all the existing & future tenders where clauses of w.r.t. Submission of OEM authorization certificates are involved, the genuineness of the submitted "OEM authorization certificate" by L1 bidder may please be cross-verified with the actual OEM before placement of Order. IMM executives to be sensitized to ensure that the procured items are to be as per Purchase Requisition only. The suggestions are under consideration of Management.
18	SI- 61/2022/13 dated 08.08.2022	Marking Punishment Orders to the concerned for necessary action- It is suggested that a copy of the punishment order on issue by the Disciplinary Authority should be marked to concerned HR. The concerned HR should mark a copy of the order to concerned Finance for implementation of the order, as applicable. After implementation of the order, a letter should be marked by concerned HR to Corporate Vigilance after obtaining a compliance report from the concerned. The above suggestion need to be brought to the notice of all Disciplinary Authorities immediately for effective implementation of policy of BDL. The suggestions are under consideration of Management.
19	SI- 62/2022/14 dated 19.08.2022	Verification of PF & ESI remittances of Contract Manpower in BDL- Upon scrutiny it was observed that there is delay in PF & ESI remittances by contractors of Civil Dept.at KBU. It was suggested that in the interest of the organization, unit HR Dept. processes / awards the contract, monitors, certifies the attendance & and makes payments of all contracts involving contract manpower and the concerned Dept. (Civil) can supervise the execution of work only. Further, it was suggested to put in place a uniform "Statutory Checklist" across units and a detailed SoP for award of contract, certification, verification of PF & ESI remittances. The suggestions are under consideration of Management.
