



ANTI-CORRUPTION POLICY

May 2017

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ACRONYM

ACP: Anti-Corruption Policy

HQs: Headquarters

UR: University of Rwanda

HRM: Human Resource Management

DVC AAR: Deputy Vice Chancellor in charge of Academic Affairs and Research

DVC IA: Deputy Vice Chancellor in charge of Institutional Advancement

DVC FA: Deputy Vice Chancellor in charge of Finance and Administration

PREAMBLE

The University of Rwanda Anti-Corruption Policy represents UR's commitment under UR Law No71/2013 of 10/09/2013 to attain good governance through preventing and fighting all forms of corruption. It is based on the students, the staff, and the management commitment to building a culture of justice and fairness. UR is establishing an environment where integrity is valued and corruption and its related offences are abhorred and rejected.

The Anti-Corruption Policy aims at supporting national development by inculcating right morals into young people that are under the care of the University, and who are the agents of change in society. The University will build a strong base of ethical future leaders who will be able to sustain a better quality of life for the people of Rwanda and establish a strong, effective and efficient state that is corruption free.

The University will demonstrate justice and fairness in and through the work of its staff, and those who engage in corrupt practices will not have a place at the University. The UR Anti-Corruption Policy will contribute to the achievement of a public service that embraces integrity, upholds transparency and accountability, and ensures full compliance with regulatory and legal frameworks.

1. BACKGROUND HISTORY OF UNIVERSITY OF RWANDA

The University of Rwanda (UR) was established by the Government of Rwanda through the law no 71/2013 of 10/09/2013. It resulted from the merger of the seven public Higher Learning Institutions into a consolidated entity governed by the Board of Governors and an Academic Senate with staff and student representation, along with the Vice Chancellor who is the University's Chief Executive Officer. The Vice Chancellor leads the University's senior management team of the three Deputy Vice Chancellors and six College Principals.

UR is committed to graduating the next generation of leaders in Rwanda who are prepared and dedicated to building a more just and sustainable world. The University of Rwanda supports the development of Rwanda by discovering and advancing knowledge, by being committed to the highest standards of academic excellence, and by creating a place where students are prepared for lives of service, leadership and solutions. UR is charged with responsibility of establishing an environment that enhances the quality of Rwanda's higher education provision.

2. VISION OF UR

To be a leading University that develops highly enterprising graduates prepared and dedicated to building a more just and sustainable society locally, nationally and globally through appropriate innovations that advance quality of life.

3. MISSION OF UR

The UR will support the development of Rwanda by discovering and advancing knowledge, and being committed to the highest standards of academic excellence, where students are prepared for lives of service, and leadership, transforming communities through finding solutions.

4. CORE VALUES OF UR

The University of Rwanda will strive to be characterized by the following values:

- ✓ **Academic excellence:** Excellence in teaching, research, creative endeavours, students' services and all aspects of the University's operations is continuously pursued at the University.
- ✓ **Nation-centred:** The University is inextricably linked with the nation's development. The University community is compelled to be compassionate in the services it renders to the nation and this demands commitment, sensitivity, selfless service, courage, understanding and care.

- ✓ **Student-focussed:** The University was created for students. They are at the forefront of all University's activities, listened to and involved at all levels of decision-making in the University.
- ✓ **Honesty and integrity:** Integrity and honesty give the UR community the ability to realize the greater good in their actions and programs, be held accountable by doing what is right and ethical, and communicating with honesty, directness and respect.
- ✓ **Freedom of inquiry:** The University is open and welcoming to people, ideas and perspectives from all over the world. This strengthens the academic programs and prepares students to be competitive on the international stage.
- ✓ **Innovation and creativity:** Creativity and innovation are hallmarks of the University's journey to create a niche in higher education in Africa. It will seek new approaches to service delivery, new academic programs, and new products and provide a conducive environment for curiosity and imagination.
- ✓ **Social justice:** The University is committed to transformative education that empowers qualified students to consider their greater place within a global society. The University will play a significant role in shaping the world's next generation of progressive and ethical leaders.
- ✓ **Accountability:** The University is accountable to its students, staff, stakeholders and the public for fulfilling its mission through a strong and effective stewardship of resources and assets – financial, infrastructural and human - and an open exchange of ideas by engaging the public.

5. PURPOSE OF THE POLICY

The University of Rwanda is committed to conducting its business fairly, honestly and openly, to the highest standards of integrity, and in accordance with all national legal requirements. The purpose of this policy is:

- To provide a clear statement that the University will not tolerate any form of corruption and other related offences,
- To emphasize the University's commitment to prevent employees, students or other persons associated with the University from engaging in corruption and other related offences and to deal with this should it occur;
- To adopt strategies of preventing corruption and related offences in University of Rwanda
- To set out review and monitoring procedures to ensure compliance with this policy.

6. POLICY STATEMENT

This policy is a determination of the University of Rwanda Management's commitment to zero tolerance for corruption. Furthermore, UR is committed to creating a work environment free

from any form of discrimination, dehumanization, intolerance and genocide ideology which are also other forms of corruption.

Recognizing the benefits of fighting corruption, the university management accepts the responsibility of spearheading the fight in a decisive, sustainable and all-inclusive manner and with the involvement of all stakeholders. All activities of the University will be guided by the University Anti-Corruption Policy.

7. LEGAL FRAMEWORK

The University of Rwanda Anti-Corruption Policy is governed by the following legal texts:

- Constitution of the Republic of Rwanda
- Organic law instituting the penal code
- Organic law on leadership code of conduct
- Law on prevention, suppression and punishment of corrupt and related offences
- Law on the protection of whistle-blowers
- Law of public procurement
- Law on State Finances and property
- Law establishing the University of Rwanda and determining its mission, powers, organization and functioning
- Law establishing the General Statutes for public service
- Presidential order determining modalities of imposing disciplinary sanctions to public servants
- Presidential Order establishing the code of professional ethics for public servants

8. SCOPE/APPLICABILITY

This policy applies to the University Management, students, all staff and outsourced service providers of the University.

9. DEFINITION OF KEY TERMS

Corruption means:

- a) any act of abuse of a position, power or honour one enjoys within a state organ, in a public or private institution, in a foreign company or international organization working in the country, or power conferred by any other function which is used contrary to the law, by giving to oneself, giving to others or requiring an illegal benefit or a service contrary to the law;

- b) any act leading to the accumulation of property without legal justification;
- c) using a person with a position, power or honour mentioned under item (a) of this schedule, in order to benefit from an illegal advantage or a service contrary to the law;
- d) giving or agreeing to give a gift in cash or any other illegal benefit, for the provision of a service or act in unlawful giving or agreeing to give a gift in cash or any other illegal benefit, for the provision of a service or act in unlawful way or to reward the provider of the service or act rendered, either by the recipient or an intermediary;
- e) requiring, receiving or accepting to receive a gift in cash or any other illegal benefit for the provision of a service in an unlawful way or to be rewarded once the service is provided or the act is done either by the recipient or an intermediary

10. EXAMPLES OF CORRUPTION AND RELATED OFFENSES AND RISKY AREAS AT THE UNIVERSITY OF RWANDA

Corruption and other related offences can arise in day-to-day operations mainly in finance processes, procurement, human resource management and academic management. The examples given below are not exhaustive and do not limit the range of corrupt activities.

For finance processes, corruption and other related offences may be perpetrated by using University funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose. The potential areas of corruption and other related offences, in the administration and finance include transgressing rules and procedures, embezzlement, favouritism, and nepotism.

As far as procurement is concerned, corruption may arise in appointing preferred suppliers, contractors and agents or in bypassing criteria, falsifying deliveries, fraud in public tendering and purchase of unnecessary goods.

Corruption may arise in staff appointment and management; in the appointment and deployment of staff based on favouritism, nepotism, bribes, gifts, falsification of credentials and the use of fake diplomas or in bypassing criteria. In addition, corruption may arise from academic staff professional misconduct such as ghost teachers, absenteeism, charging irregular fees, discrimination and sexual harassment or exploitation.

The significant potential areas of corruption and related offences in the University are in examinations and diplomas, admission, selling exam information, examination fraud such as the impersonation, cheating and altering the entry of grades in University records. Furthermore, giving or accepting bribes for high marks, grades, selection to specialized programmes, diplomas, diploma mills and false credentials, fraudulent research and plagiarism are all examples of academic corruption.

Manipulating data to misrepresent the real situation, suppressing information, irregularity in producing and publishing information or payment for information that should be provided freely are considered as corruption.

11. STRATEGIES TO PREVENT AND FIGHT CORRUPTION AT UR

The University of Rwanda recognises that corruption and related offences damage the social and institutional fabric of a country, and this is why the University is committed to prevent and fight corruption and related offences.

a) TRAINING AND AWARENESS

The University of Rwanda commits itself to continuous training of staff and students in matters of ethics and integrity. To this end, UR will annually support civic education activities including Itorero and national service activities to embed the culture of integrity. Additionally, UR is committed to invite global, regional and national colleagues to sensitize and share the best practices with UR community. The UR is also committed to encourage and support student anti-corruption clubs.

b) CRIMINAL AND DISCIPLINARY MEASURES

Staff members, students and other outsourced service providers who violate this Policy will face criminal and administrative actions as provided for by applicable laws, rules and regulations, and contract terms as the case may be.

c) PROTECTION OF WHISTLE-BLOWERS

The University will, in accordance with the Law No. 35/2012 relating to the protection of whistle-blowers, make sure that whistle-blowers who report corruption cases are managed with the utmost confidentiality and protection and do not suffer from any disadvantage as a result of reporting wrongdoers.

d) ASSETS DECLARATION

The University will make sure that staff who have to declare assets will respect their legal obligations in a timely manner.

12. STRUCTURES FOR FIGHTING CORRUPTION

The University is committed to constitute and empower the University Corruption Prevention Committee chaired by the Vice-Chancellor and College Corruption Prevention Committees chaired by the College Principals.

The University and Colleges will set up mechanisms to allow the University stakeholders to pinpoint corruption and other related cases. To this end, all the University stakeholders who encounter a corruption case will be encouraged to speak with or write anonymously to University officials as soon as they possibly can.

a. COMPOSITION OF ANTI-CORRUPTION COMMITTEES

The following Anti-Corruption committees shall be established:

The UR Central Anti-Corruption Committee:

This committee will be comprised of the following:

1. Vice-Chancellor (**Chair**)
2. Deputy Vice-Chancellor AAR
3. Deputy Vice-Chancellor FA
4. Deputy Vice-Chancellor IA (**Secretary**)
5. UR University Lawyer
6. UR Director of internal audit
7. UR Director of Human Resources Management
8. Executive Committee of the Guild Council (Guild President, Vice President and Secretary General)
9. One Representative of academic staff nominated through Senate
10. One Representative of non-academic staff elected from representatives of non-academic staff in the College anti-corruption committees

The College Anti-Corruption Committee:

This committee will be composed of the following:

1. Principal (**Chair**)
2. Director Teaching and Learning Enhancement
3. Director of Research Innovation and Post-Graduate Studies
4. Director of HRM
5. Executive Committee of the Guild Council (Guild President, Vice President and Secretary General) of the Campus where the College is headquartered.
6. Representative of academic staff nominated College Senate
7. Representative of non-academic staff elected by their peers

b. MANDATE AND OPERATIONS OF THE COMMITTEES

- a) Spearheading anti-corruption campaigns within the University.
- b) Setting priorities in the prevention of corruption within the University.
- c) Coordinating corruption prevention strategies.

- d) Integrating all corruption prevention initiatives in the University.
- e) Receiving and reviewing reports on corruption prevention initiatives and recommend appropriate action.
- f) Receiving and taking action on corruption reports made by staff, students and other stakeholders.
- g) Monitoring and evaluating the impact of corruption prevention initiatives.
- h) Preparing and submitting quarterly progress reports to the Board of Governors.
- i) Promote research on corruption.
- j) Receiving and taking action on report on information of corruption gathered in information boxes.
- k) Meeting on quarterly basis and when necessary.

c. INTERNAL AUDIT REVIEWS

The Internal Auditor's office will be at the forefront of corruption prevention through control environment, risk assessment, control of activities, information and communication (free and open communication throughout organisation) and monitoring (assessing the quality of the internal control system over time). The Internal Auditor's reports on corruption are submitted to the Vice Chancellor.

13. HOW TO REPORT CORRUPTION INTERNALLY AND EXTERNALLY

All forms of communication are encouraged including: the use of telephone, email, suggestion box or verbal communication. Stakeholders can also report anonymously.

To this end, the UR Central Corruption Prevention Committee will avail the telephone number and e-mail for this purpose. The University will also provide toll free numbers to facilitate reporting of any form of corruption. Confidentiality is of paramount importance.

Boxes for anonymous reporting of corruption will be established at UR headquarters and in all Colleges and will be well managed. Information gathered in the College shall be submitted to the College Anti-Corruption Committee for analysis and appropriate response. Information gathered at UR Headquarters will be submitted to UR Anti-Corruption Committee for analysis and appropriate response.

14. HANDLING CORRUPTION CASES

Prior to taking action in any case of alleged corruption and related offences, the Committee must first gather evidence and take into consideration the existing University policies and the laws of the Republic of Rwanda. This will avoid victimization of staff members, students or University stakeholders spuriously accused of engaging or being involved in corrupt activities.

15. MANAGEMENT/IMPLEMENTATION AUTHORITY

The University of Rwanda community is responsible of the implementation of this Policy. Specifically, the University and College Anti-Corruption Committees will take the lead to ensure the implementation and positive impact of this policy.

16. OPERATIONAL PROCEDURES

Table 1: Strategies to fight corruption at UR

Strategy	Action	Key activities	Responsible
Strengthen capacity of students and staff to resist and report corruption	Increase awareness	<ul style="list-style-type: none">-Training and sensitization of students and staff of University-Initiate awarding to recognize and encourage exemplar character-Create anti-corruption clubs of students, lecturers and other staff members of University-Organize regular dialogues and conferences-Conduct research and publish articles-Ensure that concerned staff members declare their assets at the Office of the Ombudsman on time.	SMC
Initiate a Strong institutional and legal frame work within the University	Improve internal control system	<ul style="list-style-type: none">-Setting up anti-corruption committees-Elaborate internal rules and regulations-Adopt corruption reporting guidelines-Strengthen internal audit-Put in place electronic system to detect plagiarism-Strengthening control mechanisms to prevent cheating.	VCO
Initiate corruption		<ul style="list-style-type: none">-Establish corruption reporting boxes	VCO

reporting system		- Provide a toll free - Put in place mechanisms of protecting whistle-blowers	
Minimizing risks of corruption	-Promote E-Systems and ensure effective management of staff	-Implement e-payment, e-recruitment and e-procurement systems effectively -Job rotation	SMC

17. REVIEW

The policy shall be subject to review by the University Management every two years (24 months) or more frequently as the management may determine.

18. EFFECTIVE DATE OF THE IMPLEMENTATION OF THE POLICY

This policy shall come into effect on the date of its approval by the Board of Directors of the University of Rwanda



Professor Philip Cotton

Vice Chancellor, University of Rwanda

