

IMRO

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IMRO ANTI-CORRUPTION POLICY

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Table of Contents

1. Introduction.....	2
1.1. Definition	3
1.2. Scope/Applicability	3
2. Background of Ihorere Munyarwanda Organisation (IMRO)	4
2.1. Vision	4
2.2. Mission	4
2.3. Core Values.....	5
3. Purpose of the Policy	5
4. Policy statement.....	5
5. Legal framework	6
6. Strategies to prevent and fight corruption at IMRO.....	6
6.1. Training and awareness.....	6
6.2. Criminal and disciplinary measures	6
6.3. Protection of whistle blowers.....	7
6.4. Assets declaration	7
7. Structure for fighting anti-corruption	7
7.1. Example of corruption and related offenses and risky areas in IMRO	7
7.2. Composition of anti-corruption committee.....	7
7.3. Mandate and operations of the committee.....	8
7.4. Internal audit reviews.....	8
7.5. How to report corruption internally and externally	8
7.6. Handling corruption cases.....	9
7.7. Management/implementation authority	9
8. Operational procedures.....	9
8.1. Table 1: Strategies to fight corruption at IMRO	10
8.2. Review	10

1. Introduction

IMRO Anti-Corruption Policy, represents IMRO's commitment under IMRO's regulations to attain good governance through preventing and fighting all forms of corruption. It is based on the staff, and the management commitment to building a culture of justice and fairness. IMRO is establishing an environment where integrity is valued and corruption and its related offenses are abhorred and rejected.

IMRO Anti-Corruption Policy aims at supporting national development by inculcating right morals into people that are under the care of IMRO, and who are the agents of change in society. IMRO 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.

IMRO 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 in IMRO. IMRO Anti-Corruption Policy will contribute to the achievement of public service that embraces integrity, upholds transparency and accountability, and ensures full compliance with regulatory and legal frameworks.

1.1. Definition

By definition corruption means:

- a) Any act of abuse of a position, power or honor 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 others or requiring an illegal benefit of a service or contrary to the law;
- b) Any act leading to the accumulation of property without legal justification;
- c) Using a person with position, power or honor 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 way or to reward the provider of the service or act rendered, either by the recipient or an intermediary.

1.2. Scope/Applicability

This policy applies to IMRO Management, staff and outsourced service providers of the organization.

2. Background of Ihorere Munyarwanda Organisation (IMRO)

Ihorere Munyarwanda Organisation(IMRO) is a Non-Governmental Organization that was founded in 1999 and legally operating in Rwanda. It was granted legal personality No 03/11 and have fulfilled all requirements for compliance with the new Law number 04/2012 of 17th February 2012 governing the Organization and Functioning of National Non-Governmental Organizations/RGB-Rwandan Law.

IMRO has 17 years' experience implementing interventions in the context of Poverty Alleviation, Gender Equality, Nutrition, GBV, HIV, Education, Environment, Peace Building, Health Promotion, accountability, Advocacy and Networking in order to improve lives of IMRO's beneficiaries at individual, family and, community levels for sustainable social economic development.

This is achieved through broad consultation, partnership and transparent management with different Stakeholders.

The organization works towards the vision of IMRO as a national organization of excellence in harmonization and synergy for a healthy society, targeting Women Adolescents, Youth, Key Populations, Women with Low income and other vulnerable populations to have Access to services with Human Right based approach.

2.1. Vision

IMRO works towards the vision as a National Organization of excellence in harmonization and synergy for a healthy society by targeting General Population, Women, Youth, Children, Key Populations and vulnerable groups with Human Rights based approach in Rwanda and beyond.

2.2.Mission

IMRO's ultimate mission is to serve the general population by implementing socio-economic interventions, advocacy, networking and by promoting sustainable socio-economic development.

2.3. Core Values

IMRO's core values are:

- a) Gender Sensitive;
- b) Good Governance;
- c) Creativity and innovation;
- d) Human rights based;
- e) Self-confident and team work;
- f) Integrity and commitment;
- g) Time consciousness and management;
- h) Equal opportunities and equity;
- i) Equal opportunities and equity;
- j) Ready to work together with interested partners;
- k) Transparency, accountability and responsibility.

3. Purpose of the Policy

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

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

4. Policy statement

This policy is a determination of IMRO's management commitment to Zero tolerance for corruption. Furthermore, IMRO 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, IMRO 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 IMRO will be guided by the IMRO Anti-Corruption Policy.

5. Legal framework

IMRO's 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 protection of whistle-blowers

6. Strategies to prevent and fight corruption at IMRO

IMRO recognizes that corruption and related offences damage the social and institutional fabric of the country, and this is why IMRO is committed to prevent and fight corruption and any other related offences. The strategies that IMRO elaborated to prevent and fight corruption are:

6.1. Training and awareness

IMRO commits itself to continuous training of staff in matter of ethics and integrity. To this end, IMRO will annually support civic education activities including National Service activities to embed the culture of integrity.

6.2. Criminal and disciplinary measures

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

6.3. Protection of whistle blowers

IMRO, will in accordance with the law No.35/2012 relating to the protection of whistle blowers, make sure that the 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 wrong doers.

6.4. Assets declaration

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

7. Structure for fighting anti-corruption

IMRO is committed to constitute and empower the IMRO corruption prevention committee chaired by the National Coordinator toward Zero Tolerance on any corruption incidence within the organization.

IMRO will set up mechanisms to allow the organization stakeholders to pin point corruption and other related cases. To this end, all the IMRO stakeholders who encounter a corruption case will be encouraged to speak with or write anonymously to IMRO National Coordinator as soon as the possibly can.

7.1. Example of corruption and related offenses and risky areas in IMRO

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

7.2. Composition of anti-corruption committee

The IMRO Central Anti-Corruption Committee shall be established and it shall comprise the following:

1. IMRO National Coordinator;
2. IMRO Human Resource Manager;
3. IMRO Legal Adviser;
4. IMRO Staff Representative.

7.3. Mandate and operations of the committee

- a) Spearheading anti-corruption campaigns within the organization;
- b) Setting priorities in the prevention of corruption within the organization;
- c) Coordinating corruption prevention strategies;
- d) Integrating all corruption prevention initiative's in the organization;
- e) Receiving and reviewing reports on corruption prevention initiatives and recommend appropriate action;
- f) Receiving and taking action on corruption reports made by staff, and other stakeholders;
- g) Monitoring and evaluating the impact of corruption prevention initiatives;
- h) Promote research on corruption;
- i) Receiving and taking action on report on information of corruption gathered in information boxes;
- j) Meeting on quarterly basis and when necessary.

7.4. Internal audit reviews

The National Coordinator and the designated Anti- Corruption Committee members, will be at the forefront of corruption prevention through control environment, risk assessment, control of activities, information and communication (free and open communication throughout the organization) and monitoring (assessing the quality of the internal control system over time). The internal Auditor's reports on corruption are submitted to the National Coordinator.

7.5. 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, IMRO's Central Corruption Committee will avail the telephone number and e-mail for this purpose. The organization will also provide toll free numbers to facilitate reporting of any form of corruption. Confidentiality is of paramount importance.

7.6. 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 Institution policies and the laws of the Republic of Rwanda. This will avoid victimization of the staff members, and the organizations stakeholders spuriously accused of engaging or being involved in corrupt activities.

7.7. Management/implementation authority

The IMRO team is responsible for the implementation of this Policy. Specifically, IMRO staff and the Anti-Corruption Committee will take the lead to ensure the implementation and positive impact of this policy.

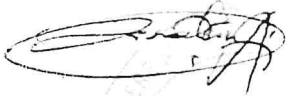
8. Operational procedures

8.1. Table 1: Strategies to fight corruption at IMRO

Strategy	Action	Key activities	Responsibility
Strengthen Capacity of staff to resist and report corruption	Increase awareness	-Training and sensitization of staff members -Initiate awarding to recognize and encourage exemplar character -Organize regular dialogues and conferences	National Coordinator and outsourced experienced personnel
Initiate a strong Institutional and legal framework within the institution	Improve internal control system	-Adopt corruption reporting guidelines; -Strengthening control mechanisms to prevent cheating; -Strengthen internal audit; -Adopt corruption reporting guidelines; -Elaborate internal rules and regulation	Anti-Corruption Committee
Initiate a corruption reporting system		-Provide a toll free - Put in place mechanisms of protecting whistle-blowers -Establish corruption reporting boxes	National Coordinator
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	-National Coordinator, Finance Manager & Human Resource Manager

8.2. Review

The policy shall be subject to review by the entire organization Management every 2 years (24 months) or more frequently as the management may determine.



Aimable MWANANAWE
IMRO National Coordinator

Flavienne NDAYISHIMYE

Legal Representative

