



Our Health
Our Future

1. Introduction.....	2
2. Definition of fraud.....	2
3. Policy objective.....	3
4. Scope of the policy.....	3
5. Responsibilities.....	3
6. Establishment of anti-fraud committee.....	4
7. Fraud reporting channel.....	4
8. Investigation of suspected fraud.....	5
8. Policy implementation and monitoring strategies.....	6
9. Amendments and Waivers of the Policy.....	9

RSSB ANTI-FRAUD POLICY

April, 2018

Table of contents

1. Introduction.....	2
2. Definition of fraud.....	2
3. Policy objective.....	3
4. Scope of the policy.....	3
5. Responsibilities	3
6. Establishment of anti-fraud committee.....	4
7. Fraud reporting channel.....	4
8. Investigation of suspected fraud	5
8. Policy implementation and monitoring strategies	6
9. Amendments and Waivers of the Policy.....	9

- RSSB code of conduct and relevant human resource policies;
- RSSB Process and procedures manual;
- RSSB Enterprise Risk Management policy and procedures manual;
- Other relevant laws and policy documents.

This policy document shall be reviewed every 3 years or otherwise in case of material change in RSSB's operations

2. Definition of fraud

Fraud is defined as "false representation or concealment of material fact or any other illegal act committed intentionally to cause wrongful gain to self or other, and wrongful loss to others".

In RSSB, fraud includes but is not limited to:

- Inappropriate personal use of RSSB's funds or properties;
- Unlawful act done by RSSB employees, stakeholders or third party in registration and contribution collection processes;
- Practices done by RSSB beneficiaries or third party to get the unlawful benefits;
- Bribery done by service providers, consultants, contractors and stakeholders;

1. Introduction

In the course of implementation of its mandate, Rwanda Social Security Board (RSSB) has the responsibility of safeguarding its allocated resources against fraud, by ensuring that revenues and properties are managed in accordance with legislations.

Any act of fraud in RSSB consumes resources necessary to fulfill its mandate, damages its reputation and affects personnel effectiveness, motivation and morale.

This has compelled the RSSB to formulate an anti-fraud policy that will promote organizational behavior and spell out types of fraud and measures to be taken to curb fraudulent practices.

This document is intended to provide guidance in fighting against fraud and should be read in conjunction with:

- RSSB code of conduct and relevant human resource policies;
- RSSB Process and procedures manual;
- RSSB Enterprise Risk Management policy and procedures manual;
- Other relevant laws and policy documents.

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- Bribery done by service providers, consultants, contractors and stakeholders;

- Non-compliance to the existing contracts by medical partners, service providers, consultants, contractors and other stakeholders;
- Manipulation of IT system with aim to cause loss to the institution;

3. Policy objective

The overall objective of this policy is to prevent fraud in RSSB. The specific objectives are to:

- Build RSSB internal capacity to counter fraud practices;
- Establish fraud prevention mechanism in RSSB;
- Detect fraud cases planned by prospective offenders;
- Establish proper fraud investigation system;
- Provide appropriate sanctions measures to the offenders;

4. Scope of the policy

RSSB has zero tolerance to fraud and corruption. This policy applies to RSSB staff members, contractors, suppliers, beneficiaries and any other stakeholders.

This policy applies to all activities and operations of RSSB including but not limited to registration of members, social security contribution collection, social security benefits payment, investment projects and corporate governance processes.

5. Responsibilities

5.1 Senior Management Team (SMT)

Managers must be aware of fraud practices committed in RSSB, be alert for any indication of fraud or improper activity and maintain controls to avoid such occurrences.

To control occurrence of fraud practices, managers are required to build internal capacity of RSSB staff to counter fraud, establish fraud prevention measures and detection mechanisms of prospective fraud, establish proper fraud investigation system, work with key institutions to fight fraud, and provide the appropriate sanction measures.

5.2 All Staff

Employees have the responsibility of carrying out their work in such a way as to prevent fraud from occurring in the workplace. Employees must also be alert for occurrence of fraud, be aware that unusual transactions or behavior could be an indication of fraud, and report potential cases of fraud.

5.3 Anti-fraud committee

RSSB anti-fraud committee should take an active role in prevention and deterrence of fraud, as well as an effective ethics and compliance program. The anti-fraud committee should constantly advise RSSB management to ensure that the institution has appropriate anti-fraud programs and controls in place to identify potential fraud and ensuring that investigations are undertaken if fraud is detected. The anti-fraud committee should ensure that appropriate action is taken against known perpetrators of fraud.

6. Establishment of anti-fraud committee

The RSSB management commits to establish an independent anti-fraud committee with main responsibility of evaluating and providing advice to the management on deterring, detecting, recording and reporting fraud cases.

The committee shall be made up by 5 persons including the Chairperson, vice chairperson, secretary, and 2 members. Terms of reference of the committee shall be formulated by the management.

In the course of investigation, all activities shall be kept as confidential and private as possible and shall always be carried out with integrity. Investigators are bound by professional secrecy as per the penal code. However, confidential information may be shared only for investigation purposes.

7. Fraud reporting channel

RSSB staff members who have allegation related to the fraud practices are required to report the perceived allegation straight to the anti-fraud committee through an email created for fraud reporting.

Employees who suspect fraud should not do any of the following:

- Contact the suspected individual(s) directly in an effort to determine facts, demand, explanations or restitution;
- Discuss the issue with anyone within RSSB other than the authorities listed above;
- Discuss the issue with anyone outside of RSSB, except as required by law.

If the circumstances are such that reporting a suspicion as above is not appropriate, the issue may be reported as provided in the Whistleblower policy.

8. Investigation of suspected fraud

All suspected fraud should be given utmost attention. Upon receipt, RSSB will assess the case and if it determines that there is sufficient ground, it will conduct an investigation. In addition, RSSB may undertake proactive investigation in high risk areas that are susceptible to fraud.

RSSB may also coordinate with other fraud investigation institutions to ensure effective investigation of fraud involving external parties for whom RSSB does not have authority to investigate.

8. Policy implementation and monitoring strategies

Strategic objectives	Policy orientations	Policy actions	Responsibilities
Build RSSB internal capacity to counter fraud practices	Synchronize available human resources to fight against fraud practices;	Establish the anti-fraud committee;	SMT
		Involve RSSB staff in fraud control in their respective areas of operation;	RSSB Management
		To employ permanent Medical advisor specifically for occupational hazards;	RSSB top managers
	Build staff capacity in anti-fraud practices	Develop an anti-fraud training manual and update it regularly;	Risk management Unit
		Develop anti-fraud training plan and implement it;	Risk management Unit
		Provide relevant staff with investigation and reporting courses;	Corporates services division
	Review administrative measures to staff who facilitate/commit fraud	Devise administrative measures to correct staff involved in fraud;	Corporate services division
		Devise measures for partners who oppress RSSB staff on the basis of counter-fraud activities;	Medical, CBHI and legal services
		The clause related to fair collaboration between RSSB and medical partners according to the implementation of the contract in order to protect interest of RSSB regarding fraud acts.	
	Close monitoring of RSSB partners	Organize and carry out regular visits to RSSB health partners;	Medical advisors, RSSB inspectors;
Establish fraud prevention mechanism in RSSB	Develop internal control system	Incorporate anti-fraud clauses in all RSSB contracts to be signed with partners and suppliers;	Legal and Corporate services
		Revisit and update written instructions for verification of medical prescriptions and bills	Medical and CBHI departments
		Revisit acquisition, use and disposal of asset guidelines	Corporates services

Detect prospective fraud cases	Develop a public fraud awareness program Develop appropriate IT tools Benchmarking RSSB services	Revisit payment procedures and requirements to counter possible fraud practices;	Finance department
		Carry out anti-fraud campaign on a regular basis	Risk management, PR, Education and communication Unit
		Create interface of RSSB, LODA, NIDA and CRVS databases;	SMT, IT
		Improve pension database by including family information for active employees;	Contribution division, IT
		Ensure efficient automation of Medical and CBHI validation processes;	Medical department, IT
		Benchmark medical cost of various service providers;	Planning and research division
Establish proper fraud investigation system	Deployment of RSSB anti-fraud staff in all critical point of services Establishment of efficient whistle-blowers system	Benchmark RSSB anti-fraud practices with other key social security institutions;	Planning and research division
		Develop standards of staffing Medical Access Facilitators (MAF) at medical facilities;	Medical service department;
		Devise appropriate mechanisms to monitor fraud practices where RSSB is not represented by medical access staff;	Medical services and CBHI departments
		Develop whistleblower protection mechanism;	Planning & Research division
		Establish motivational incentives to whistleblowers.	Corporate services division
		Ensure filing of relevant evidences against any changes done in the system;	IT
	All changes done in RSSB Database are double checked	Any change done in RSSB database be approved by the competent authority;	IT
		Put in place investigation committee;	SMT
		Carry out investigation on suspected fraud and draft report	Investigation committee

9. Amendments and Waivers of the Policy

No waiver of any provisions of this Policy shall be effective unless approved by the Board of Directors. If required, such waiver shall be in accordance with applicable laws and/or the rules and regulations of the Board of Directors.

- i. Approved by the Board of Directors;
- ii. If required, such waiver shall be in accordance with applicable laws and/or the rules and regulations of the Board of Directors.

Any amendments to this Policy shall be promptly described in writing and shall be subject to applicable laws and/or the rules and regulations of the Board of Directors.

This anti-fraud policy was adopted on 27/10/2018

GATEA S. Jonathan
Director General

Partner with key institutions to fight fraud	Work with key institutions to set standards for fraud control	Work with Rwanda Law Reform Commission (RLRC) and MINIJUST to include social security related fraud in penal code;	SMT, Legal unit
Provide the appropriate sanction measures	Ensure that sanction measures discourage prospective offenders	<p>RSSB shall create a special investigation unit with main mission of dealing with fraud acts committed in social security areas, MoU with National police may be signed to facilitate that kind of partnership.</p> <p>Train RSSB staff on new medical protocols to facilitate verification;</p> <p>Amend the existing laws to ensure appropriate sanction measures of fraudsters.</p>	SMT, Legal Unit
Ensure the policy implementation	Monitor policy implementation	<p>Ensure policy actions are included in RSSB action plan</p> <p>Follow up the progress of anti-fraud policy implementation</p> <p>Review anti-fraud policy regularly;</p>	<p>Planning and Research division</p> <p>SMT, Legal Unit, user departments</p>

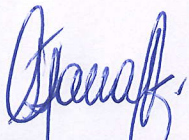
9. Amendments and Waivers of the Policy

No waiver of any provisions of this Policy for the benefit of a director or an executive officer shall be effective unless

- i. Approved by the Board of Directors or, if permitted, a committee thereof, and
- ii. If required, such waiver is promptly disclosed to the RSSB's Management in accordance with applicable laws and/or the rules and regulations.

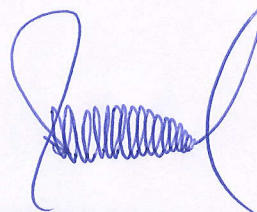
Any amendments to this Policy must be approved by the Board of Directors, if applicable must be promptly disclosed to the RSSB's stakeholders in accordance with applicable laws and/or the rules and regulations.

This anti-fraud policy was adopted by the Board of Directors and became effective as of 29/06/2018



GATERA S. Jonathan

Director General



TURAHIRWA Ephraim

Chairman Board of Directors