

UNIVERSITY OF HEALTH AND ALLIED SCIENCES



# **FRAUD IDENTIFICATION, MITIGATION AND PREVENTION POLICY**

October 22, 2021

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## **1.0 Introduction**

The University of Health and Allied Sciences (UHAS/The University) is a public university with good corporate governance practices. The University hereby expects the highest standards of conduct from members and staff within its community. In particular, it has a duty to protect public assets by ensuring that management and other practices accord with the standards of probity expected of public sector bodies. It must also ensure that the resources available to it are used only in furtherance of the University's establishment instruction as an educational body. This Fraud Identification, Mitigation and Prevention Policy (The Policy) outlines the best practices of the University in developing a culture of high ethical standards in the administration of public funds.

## **2.0 Objectives of the Policy**

The objectives of this policy are to:

- a) Create awareness and conscientise members of the University community on the offence and effect of corruption on the University and society
- b) Set the necessary guidelines to help prevent fraud, corruption, and financial irregularities at all levels within the University community
- c) Address the issue of early detection and sanctions against conducts of fraud, corruption, and financial irregularities.
- d) Outline the processes for investigating allegations and reports of incidents of fraud, corruption, and financial irregularities.

## **3.0 Statement of Policy**

The University, as a public entity, detests fraud, corruption and financial malfeasance and does not tolerate such conducts from its staff and members during the performance of their duties in furtherance of the University's mandate. To this extent, this Policy directs staff and members of the University to exhibit the highest degree of professionalism, diligence and due process in the performance of their duties.

Whenever any matter arises which involves, or has the potential to involve, irregularities or fraud concerning cash, documents, stores or other assets of the University, or any other suspected irregularity in the conduct of the business of the University, the concerned party shall notify the Director of Human Resources who shall take the necessary steps to initiate an investigation. The Director of Internal Audit shall assist in all anti-fraud and corruption related activities. Action will be taken in accordance with the University's Fraud Identification, Mitigation and Prevention Policy.

## **4.0 Principles of Applicable Conduct**

Employees are expected to observe the following principles of applicable conduct in all financial and related transactions:

- a) Conflict of Interest: Decisions must be taken solely in terms of the University's interests. Personal relationships, friendships, family links or personal advantage must not influence decisions. Similarly, members or staff of the University must not place themselves under any financial or other obligation or benefit to outside individuals or organizations, which might influence them in the performance of their duties. As much as possible, staff and members of the University must avoid conflict of interest situations in accordance with the Statutes of the University, including full disclosure of the conflict-of-interest situation and the person proscribed from benefiting from the conflict-of-

interest situation. Any conflict-of-interest in these respects must be declared to the relevant Dean or Director or equivalent officer. Where the conflict of interest is apparent, an individual with such an interest shall withdraw from the decision-making process.

- b) Value for money: This must always be a prime criterion for any transaction in the University. This does not mean, of course, that a product or service should be purchased only in reference to price; other factors including, for example, quality and fitness for purpose, are relevant considerations. The Public Procurement Act, 2003 (Act 933) as amended, and relevant enactments, shall be in reference regarding all procurement activities.
- c) Asset protection: All employees and members of the University have the responsibility to protect the assets and integrity of the University, and are expected to take all reasonable steps to safeguard and protect the physical assets and other properties of the University (including cash and equipment). The University's equipment and facilities are not to be used for personal benefit but in accordance with the existing policies, procedures and practices.
- d) Financial procedures: Employees must comply at all times with the University's Financial Procedures and other equivalent enactments. In particular, Deans and Directors and others responsible for financial management must ensure that there is a proper separation of duties (an integral element of financial control), and that employees who play key roles in purchasing and other financial transactions understand and comply with the Financial Procedures.

## **5.0 Scope and Application**

- a) This policy applies to all members and staff of the UHAS community.
- b) The policy also applies to all persons who serve the University in any capacity.
- c) The policy also applies to all third parties who deal with the University in one way or another but are not members or staff of the University.

## **6.0 Implementation and Compliance Institutions**

The main institutions for the implementation and compliance of this policy are:

- a) The University Council
- b) The Vice Chancellor
- c) The Anti-Corruption Committee

## **7.0 The University Council**

The University Council shall have the overall responsibility for ensuring that the University complies with the Policy. This includes ensuring that:

- a) The Policy is reflected in all other policies and contracts of the University.
- b) The Policy takes into account other University documents such as the University Statutes, Strategic Plan, Financial Regulation, Student Handbook, Conditions of Service, Code of Conduct, and other policies and regulations.
- c) The Policy shall be made available to members and staff during orientation programmes.

## **8.0 The Vice Chancellor**

- a) Appoint members to constitute the Anti-Corruption Committee established under this policy
- b) Receive reports of findings and recommendations of the Anti-Corruption Committee for necessary action

## **9.0 Anti-Corruption Committee**

### **9.1 Membership**

- a) The Vice Chancellor shall appoint the Chairperson and members of the Committee.
- b) The Chairperson shall be a person with relevant experience in corruption related matters and principles.
- c) The Chairperson shall be instrumental in convening meetings, initiating enquiry processes, and ensuring the integrity of all proceedings relating to investigation of grievances.
- d) The Committee shall be composed of five members: a Chairperson and four other members shall be appointed in accordance with Schedule II of the Policy.
- e) Competent external individuals from other relevant institutions may be invited to serve on the Committee as ex-officio members, or to act as expert advisers.

### **9.2 Responsibilities of the Anti-Corruption Committee**

The Committee shall address corruption issues relating to the University community by:

- a) Planning and implementing education and training programmes on Corruption.
- b) Widely disseminating this policy to the University's community;
- c) Providing educational materials to promote compliance with the policy and familiarity with internal reporting procedures
- d) Training University personnel on the Policy.
- e) Conducting investigative hearings into specific complaints of corruption.
- f) Sending reports on investigations to the Vice Chancellor.

### **9.3 Term of Office**

Members of the Committee shall serve for a term of two years, after which they may be appointed to serve a further two-year term only.

## **10.0 Reporting Suspected Financial Misconduct**

Reporting suspected financial misconduct could be hindered by fear of victimization, particularly if the alleged offender is the complainant's superior or close colleague.

Nonetheless, the University is committed to taking all reasonable measures to protect the integrity of its business and other activities and it therefore must be given the opportunity to investigate any suspected instance of financial misconduct. It might be that an allegation proves to be unfounded but it is in everybody's interests, and in the interest of the University as a whole, that all allegations are investigated and properly resolved. For the avoidance of doubt, the University affirms that, unless he or she is acting maliciously, anyone raising concerns about suspected financial misconduct is acting responsibly and properly.

Against this background, every employee or member has a role to play in protecting the integrity of the University's business and other activities, and all employees must regard themselves as under obligation, and indeed instruction, to report any suspected financial misconduct. 'Financial misconduct' in this context should be taken to cover 'fraud, corruption, theft, dishonesty or deceit by an employee, whether at the expense of the University, other employees, students or any other body or organization', as well as actions or inactions which fall below the standards of probity expected in public life.

- a) If you suspect that financial misconduct is taking place, or has taken place, you should report your suspicions immediately to an appropriate University officer. Ideally, this should be the Director of Human Resources.
- b) All allegations will be taken seriously and investigated carefully in accordance with the procedure set out in this Policy.
- c) Where an employee reports suspected financial misconduct, the University will take every possible step to protect him/her from any form of victimization. The University does, however, have a duty to protect its employees from malicious complaints, and employees should be aware, therefore, that disciplinary action might be taken against anyone found to have acted maliciously in bringing forward an unfounded allegation.
- d) To help protect an employee from any form of victimization, the University will take all reasonable steps to ensure that the identity of the complainant is kept secret (except insofar as disclosure of the identity may be necessary for the purposes of carrying out a full and proper investigation or for the purposes of taking appropriate action against a person who is found to have committed some form of financial misconduct).
- e) Concealing information by not reporting threats of fraud, corruption and financial irregularities that come to the knowledge or should reasonably come to the knowledge of employees in the course of their normal duties, would also be appropriately sanctioned.

## **11.0 Investigating Allegations of Financial Misconduct (Fraud Response Plan) – Initial Investigation**

All allegations of financial misconduct will be investigated and resolved in accordance with the procedure summarized below:

- a) On receipt of a complaint from a member of staff, or a student, or any person other than a staff or student, the Director of Human Resources or his nominee will meet the complainant to establish the basis of concern. The Deans and Directors will be informed, as will the Vice Chancellor, the University's Internal Auditors, and the Chairman of the Audit Committee. Until the facts have been determined, all those involved will be required to exercise discretion.
- b) After establishing the basis for concern, the Director of Human Resources or his nominee will review the allegations and establish the apparent position.
  - i. If the Director of Human Resources establishes that there is no irregularity in respect of an allegation of corrupt practice, he will submit a report first to the Vice Chancellor and thereafter to the Audit Committee. Unless the Audit Committee or the Internal Auditors demur from the conclusions reached by the Director of Finance, the case will be regarded as closed (except to the extent that the Audit Committee

- determines that some refinement of financial control procedures is needed).
- ii. If, however, the Director of Finance reaches the conclusion that there appear to be grounds for believing that financial misconduct has taken place, he will refer the matter to the University's internal auditors, the Vice Chancellor and/or the Police for further investigation. The Audit Committee, and the relevant Dean or Director will be informed when a case is referred for investigation on this basis.
- c) Any investigation will be carried out in accordance with the principles of natural justice, and with due regard to the rights of all individuals involved in the case. The University will take all reasonable measures to ensure that an investigation is concluded as quickly as possible.
  - d) When the allegation is of a serious nature, a member of staff who is accused of financial misconduct may be suspended pending investigations, in accordance with the University's disciplinary procedures.
  - e) On completion of an investigation, a formal report will be submitted to the Director of Finance, the Vice Chancellor, the Audit Committee and others at the discretion of the Vice Chancellor. The Audit Committee will review the report and the actions taken to resolve the issue and may request further actions or require a further report to satisfy itself that the matter has been fully resolved.
  - f) Action shall be taken, under the University's disciplinary procedures, against any member of staff found liable of financial misconduct. Any such person may also be subject to criminal proceedings, as well as civil legal action, for the recovery of any moneys misappropriated from the University.
  - g) When an allegation of financial misconduct is upheld, the Audit Committee will ensure that financial control procedures are improved as necessary to reduce the likelihood of recurrence.
  - h) Should any officer responsible for this procedure be implicated in any way in an allegation of financial misconduct, he or she will not take part in the procedure; the role will be undertaken by an appropriate alternate (normally the officer's immediate superior).

## **12.0 Fraud and Financial Irregularity**

The meaning of fraud and financial irregularity as provided in this Policy shall take its meaning from the Criminal and Other Offences Act, 1960 (Act 29); the Corrupt Practices (Prevention) Act, 1964 (Act 230); Public Procurement Act as amended; Financial Management Act; and related enactments on these subject matters. To this extent, any inconsistency in respect of meaning of fraud and financial irregularity as provided in this Policy, the meaning as provided in national legislation shall take precedence.

Without prejudice to the meaning of fraud and financial irregularity as provided in relevant legislation, in this Policy fraud and financial irregularity means, "Any action deliberately designed to cause loss to the University or to obtain any unauthorised benefit, whether this is received personally or by others." Fraud, Corruption and Financial Irregularities include:

- a) Stealing means a person who dishonestly appropriates a thing of which he is not the owner with the intention to deprive the owner of the thing its use and benefits.

- b) Dishonest Appropriation refers to an appropriation of a thing made with an intent to defraud or if it is made by a person without claim of right, and with a knowledge or belief that the appropriation is without the consent of some person for whom he is trustee or who is owner of the thing, as the case may be, or that the appropriation would, if known to any such person, be without his consent.
- c) Fraudulent Breach of Trust means dishonest appropriation of a thing the ownership of which invested in a person as a trustee for or on behalf of any other person.
- d) Defrauding by False Pretenses means a representation of the existence of a state of facts made by a person, either with the knowledge that such representation is false or without the belief that it is true, and made with intent to defraud.
- e) Dishonest Receiving means dishonest receipt of a property which a person knows to have been obtained or appropriated by any crime but the person receives, buys, or in any manner assists in the disposal of such property otherwise than with a purpose to restore it to the owner.
- f) Robbery means the use of force or causing of harm to any person for the purpose of stealing a thing from that person, or use of any threat or criminal assault against any person with intent thereby to prevent or overcome the resistance of that person or any other person to the stealing of the thing.
- g) Forgery involves the forging or altering of any document whatsoever, with intent to defraud or injure any person, or with intent to evade the requirements of the law, or with intent to commit or to facilitate the commission of any crime.
- h) Extortion refers to the act by which a person, under authority of his office, demands or obtains from any person, whether for himself or any other person, any money or valuable consideration which he knows that he is not lawfully authorized to demand or obtain, or does so at a time at which he knows that he is not lawfully authorized to demand or obtain the same, for the purpose of extortion; and is guilty of Corruption.
- i) Money Laundering: A person who knows or ought to have known that property is or forms part of the proceeds of unlawful activity, and the person
  - i. converts, conceals, disguises or transfers the property;
  - ii. conceals or disguises the unlawful origin, disposition, movement or ownership of rights with respect to the property; or
  - iii. acquires, uses, or takes possession of the property
- j) that person is engaging in Money Laundering and is guilty of Corruption.
- k) Aiding and Abetment: A person who knowingly, whether directly or indirectly, instigates, commands, counsels, procures, solicits, or in any manner purposely aids, facilitates, encourages, or promotes, by his act or otherwise for the purpose of aiding, facilitating, encouraging, or promoting the commission of a corrupt act by any other person engages in abetment and is also guilty of Corruption.
- l) Embezzlement and Misappropriation: A person who without lawful justification takes or withholds assets or funds belonging to the University, for the purpose of appropriating same for his personal use, which assets or funds are in the control of or have been entrusted to such person, either to be held or to be

used for a specific purpose, engages in embezzlement and misappropriation and is guilty of Corruption.

m) Corrupt Practices in Procurement

- i. A person who engages in corrupt practices under section 93 of the Public Procurement Act, 2003 (Act 663) as amended by the Public Procurement (Amendment) Act, 2016 (Act 914) is guilty of corruption under this policy.
- ii. For the purpose of this policy, corrupt practice shall be any act of corruption engaged in at any stage of a procurement procedure.
- iii. A person who commits acts mentioned in (a) and (b) above for the purpose of gaining a personal benefit or reward is guilty of Corruption.

These prohibitions under this Policy are applicable to members of staff, members of Council, co-opted members of committees, suppliers, partners, subsidiaries, associates, and any other individuals or organisations that have dealings with the University.

All members of staff, students, or members of Council suspecting fraud or financial irregularity in the University should report such fraud as soon as possible to the Director of Finance or the Registrar. If any suspected fraud or financial irregularity relates personally to the Director of Finance, then the matter should be referred to the Registrar. If the suspected fraud or financial irregularity relates personally to the Registrar, then the matter should be referred to the Vice Chancellor, and if it relates to the Vice Chancellor, then the matter should be reported to Chairman of Council.

A Fraud Response Plan (Section 18.0) sets out the process that will be followed to investigate the suspicion and the circumstances in which notifications will be made to the Audit Committee and Council.

### **13.0 Hospitality and Gifts**

Sections 240 to 245 of the Criminal Offences Act, 1960 (Act 29) and the Corrupt Practices (Prevention) Act, 1964 (Act 230) indicate that it is an offence for employees to accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. The guiding principles to be followed by all employees therefore, must be:

- a) The conduct of individuals should not create suspicion of any conflict between their official duties and their private interests;
- b) The actions of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal, or to their colleagues, that they have been or may have been influenced by a benefit to show favour or disfavour to any person or organisation.

Thus, employees should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work, as that could increase the employee's risk of corruption by being influenced in making a business decision as a consequence of accepting such hospitality.

The frequency and scale of hospitality accepted should not be significantly greater than the University would be likely to provide in return. When it is not easy to decide between what is and what is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from the relevant Dean, Director, or the Director of Finance.

Employees in receipt of such gifts or hospitality are obliged to promptly notify the Director of Finance or other designated officer.

For the protection of those involved, the Director of Finance or other designated officer will maintain a register of gifts and hospitality received.

## **14.0 Disclosure and Registration of Interests**

Conflict of interest and the procedure to address same shall have the meaning as provided in the Statutes of the University of Health and Allied Sciences and the University of Health and Allied Sciences Act, 2011 (Act 828). To that extent and without prejudice, conflict of interest is a situation that may occur, which has the potential to undermine the impartiality of a person, or where there is the possibility of a conflict between the individual's self-interest and their professional or public interest.

All members of staff must disclose any potential or actual conflict of interest that may impinge on their impartiality in any matter relevant to their duties, to their Deans and Directors or other appropriate authority, in accordance with the University's Staff Code of Conduct, and Policy on Registration and Declaration of Interests.

Members of Council are similarly required to disclose any potential or actual conflict of interest in accordance with the Statutes of the University and Act 828 and other relevant procedures of the University.

In all cases, personal interests must be declared at any meeting where the matter is to be discussed, whether or not that interest has already been declared and recorded. Such declarations will be recorded in the minutes of any relevant meeting. The individual should not participate in or seek to influence any decision relating to the matter concerned.

It is also a requirement of the University that members of Council, all senior members, staff with significant financial authority and staff with access to privileged information, disclose relevant personal interests in the Register of Personal Interests. This includes:

- a) All directorships registered under the Companies Act, whether or not they are remunerated employment, office, profession or other activity apart from employment by the University.
  - i. other relevant interests, for example: clients or business relationships which they know to have a direct connection with the University and its associated companies or which might affect their business
  - ii. any significant shareholdings in organisations which they know to have business with the University or its associated companies
  - iii. un-remunerated posts, honorary positions and other connections which may give rise to a conflict of interest or of trust, as set out in the Statutes of the University
- b) It is also a requirement to record relevant interests, where they are both known and material, held by members of their immediate family, that is to say a spouse, partner, parents, children and siblings, in accordance with the Statutes of the University.

No person shall be a signatory to any University contract on behalf of the University where he or she also has a relevant interest in the activities of the other party as described in the Policy on Registration and Declaration of Interests.

## **15.0 Formal Reporting/Complaint Mechanism**

### **15.1 Duty to Report**

All members of the University Community or persons who operate within the University, as well as third parties, have a duty to report all acts of corruption by members of the University or on the part of third parties in their relations with the University or any member of the University.

Any member of the University Community who believes that he or she has been a victim of corruption; or has information that another person is engaging in acts of corruption in violation of this Policy, has a duty to report the matter and utilize the procedures described under this Policy for redress.

The complainant shall not be reprimanded, retaliated against, or discriminated against in any way for initiating an inquiry or complaint in good faith.

A person may make a report where that person has information or reasonable cause to believe that a breach of this Policy, the University of Health and Allied Sciences Financial Regulations and Governance Policy, 2020; Section 92 of the Public Procurement Act, 2003 (Act 933) as amended; or any other law pertaining to corruption, has occurred in a way that:

- a) There is or there is likely to be waste, loss, misappropriation or mismanagement of the University's resources, assets or income due to acts of corruption;
- b) A person is exploiting his/her position to gain advantage or an unfair benefit or that a person is engaging in corruption as defined in this Policy.

### **15.2 Procedure**

1. A report shall be made in writing to the Anti-Corruption Committee through any of its members or the secretariat by using the Complaint Form (Schedule I).
2. The report shall contain as far as practicable
  - a) the full name, address or Department of the complainant;
  - b) the nature of the act of corruption in respect of which the report is being made, with particulars or details;
  - c) the person alleged to have committed the act of corruption;
  - d) the time and place where the alleged act of corruption took place;
  - e) the full name, address and description of a witness to the commission of the act of corruption (if any);
  - f) any available evidence
  - g) whether the complainant is directly or indirectly connected to the person against whom a complaint has been lodged.

### **15.3 Protection of Complainant**

- a) The Anti-Corruption Committee upon receipt of a complaint shall take all necessary measures to ensure that the complainant is protected from abuse, victimization or discrimination if the complainant is likely to face such abuse, victimization or discrimination.
- b) The Committee shall report any complaint of abuse, victimization or discrimination to the Vice-Chancellor and make recommendations.

### **15.4 Presumption of Innocence**

A person against whom a complaint is lodged shall be presumed innocent of that allegation unless and until there is a final finding of fact establishing liability of the person by the Committee or a stipulated admission to the charge by that person.

### **15.5 Right to Representation**

A complainant or a respondent in a corruption matter has the right of representation at proceedings of the Anti-Corruption Committee by a lawyer of his/her choice.

### **16.6 Investigations**

All complaints or reports of allegation of corruption shall be investigated by the Committee. Where, upon investigation of a complaint, the Committee finds a breach of the policy but the breach constitutes an offence under any enactment, and the matter is already being investigated or prosecuted by the police, Office of the Attorney-General and Minister for Justice or any other public authority, the Committee may recommend that the relevant disciplinary Committee stay proceedings of the matter until a determination is made by a court of competent jurisdiction or by the particular authority.

Where a person is found guilty of any form of corruption by a court of competent jurisdiction, it shall form prima facie evidence of misconduct on which basis the matter may be referred to the relevant Disciplinary Committee for disciplinary procedures to be undertaken under the University Statutes.

The above notwithstanding, each case shall be considered on its own merit. The Committee shall submit a report on the investigations, together with its recommendations, to the Vice Chancellor.

### **17.0 Disciplinary Procedure and Sanctions**

Where a person is alleged to have breached the Fraud Identification, Mitigation and Prevention Policy or committed an offence under the policy, the person shall be referred to the appropriate Disciplinary Committee for disciplinary proceedings, and the appropriate sanctions applied when found culpable.

Notwithstanding section 22.0 above, where the act of corruption falls under both this Policy and a national enactment, nothing precludes the University from reporting the matter to the appropriate authority for prosecution as well as referring the person to the appropriate disciplinary committee.

Where the matter involves a third party, or a member of the University who is neither a Senior Member, Staff nor Junior Member:

- a) A report may be made to the appropriate authority for prosecution, or
- b) The person may be invited to appear before the Committee for investigation of the matter. The Committee shall make appropriate recommendations to the Vice Chancellor, which may include banning of the person from any dealings with the University.

A member of the university who is found liable by the appropriate Disciplinary Committee shall be sanctioned appropriately in accordance with existing regulations or legislation.

### **18.0 Duty to Co-operate**

Employees and students must cooperate with the University's investigations into corruption accusations which are conducted by the Anti-Corruption Committee. Refusal to cooperate with an investigation, or impeding an investigation, may result in disciplinary action.

## **19.0 Malicious or False Accusations**

The University recognizes that malicious or false accusations could have a serious impact on the reputation and integrity of individuals. As such, malicious or false accusations will be treated very seriously.

Anyone who is found to have made deliberately malicious or false accusations against another person shall be subject to disciplinary action under the appropriate University procedure for discipline.

## **20.0. Promotion of Anti-Corruption Policy**

### **Dissemination of information on Fraud Identification, Mitigation and Prevention Policy**

This Policy shall be published and disseminated to all members of the University community. It shall be displayed at conspicuous places in all schools, departments, institutes, centres, lecture halls, directorates, units, offices and other public spaces as far as possible. It shall also be made available to newly recruited staff of the University and newly admitted students.

It shall be brought to the attention of third parties: contractors, suppliers, consultants, and all persons who deal with the University in any capacity.

It shall be the duty of all persons belonging to the University community to read the Policy and comply with it.

## **21.0 Assurance of Effective Implementation of this Policy**

1. The Anti-Corruption Committee shall have the responsibility to provide the Council with reasonable assurance that this Policy is being pursued effectively.
2. The Committee will provide quarterly reports to the Council on their activities.
3. The report will contain the number of fraud or whistleblowing incidents dealt with, even if nil, the culprits involved, conclusion of the investigations, and recommendations.
4. The Vice Chancellor, in his/her half yearly report to Council shall also address the effective implementation of this policy.
5. The Anti-Corruption Committee shall recommend to Council, any referral of incidents of fraud or financial irregularities to the appropriate state institutions for further prosecutions.

## **22.0 Training and Capacity Development**

All members of the Anti-Corruption Committee will receive appropriate training about corruption and how to apply this Policy, as well as disciplinary and grievance procedures in order to discharge their duties in an efficient and sensitive manner.

## **23.0 Review of Policy**

This Policy will be reviewed as and when necessary.

## **24.0 References**

Financial Policies and Procedures Manual of the University of Health and Allied Sciences.

University of Ghana Anti-Corruption Policy, 2020 (Number 947, Volume 58, Number 13)

Criminal and Other Offences Act, 1960 (Act 29)

Corrupt Practices (Prevention) Act, 1964 (Act 230)

Public Procurement Act, 2003 (Act 933) as amended

Public Financial Management Act, 2016 (Act 921)

Whistleblower Act, 2006 (Act 720)

UHAS Strategic Plan

## 25.0 Schedules

### Schedule I: Complaint Form

Name of Complainant: .....

Address of Complainant: .....

.....

Person Complained of/Respondent:

.....

Location of Respondent: .....

.....

Details of Act of Corruption being reported (with particulars):

.....

.....

.....

.....

.....

Name and address of Witness (if any): .....

.....

Date: .....

Signature: .....

Name of Committee Member receiving the complaint:

.....

Office/Address of Committee Member receiving the complaint:

.....

**Schedule II: Composition of Anti-Corruption Committee**

1. A Chairperson who may be a lawyer with not less than 10 years at the Bar
2. Two (2) senior members of the University, who are persons of high moral integrity one of whom is a woman
3. One (1) representative from the Commission on Human Rights and Administrative Justice (CHRAJ)
4. One (1) representative from the Ghana Anti-Corruption Coalition

**Schedule III: Register/Record of Gifts**

1. Name of the person/entity donating the gift
2. Purpose of the gift
3. Name of the recipient
4. Detailed description of the gift
5. Value of the gift
6. Date of submission of the gift to Director of Finance
7. Other necessary information