



**Glorious United For  
Rural Development**

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# GURD RWANDA ANTI FRAUD POLICY

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GLORIOUS UNITED FOR RURAL DEVELOPMENT  
[www.gurd.org](http://www.gurd.org)  
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## 1. Purpose

The purpose of this Anti-Fraud Policy is to establish a framework for preventing, detecting, and addressing fraud within GURD Rwanda. This policy reflects the organization's commitment to maintaining the highest standards of integrity, accountability, and transparency, particularly in its mission to empower teen mothers through education and vocational training.

## Mission, Vision, and Values of GURD Rwanda

### a) Mission

*We aim to support girls and women by empowering them with knowledge and skills in sexual reproductive health, equipping them to navigate life's challenges, and providing counseling and socio-economic opportunities. We also focus on gender-based violence prevention and response (SGBV) as well as improving girls' educational outcomes. Through these initiatives, we hope to help young people achieve their full potential and create a brighter future for themselves and their communities.*

### b) Vision

*"Attaining sustainable and transformative change for young people in rural communities."*

### c) Our Values

- **Commitment**
- **Diversity and Inclusion**
- **Collaboration**
- **Collective Care**
- **Creativity and Innovation**

## 2. Scope

This policy applies to all employees, volunteers, board members, contractors, beneficiaries, and any other individuals or entities associated with GURD Rwanda. It encompasses all activities, operations, and transactions carried out by or on behalf of the organization.

## 3. Definition of Fraud

Fraud is defined as any intentional act or omission designed to deceive others, resulting in financial or personal gain for the perpetrator or loss to the organization. Examples of fraud include, but are not limited to:

- Misappropriation of funds or assets
- Falsification of records or documents
- Unauthorized use of organizational resources
- Procurement fraud (e.g., kickbacks, collusion)
- Misrepresentation of financial or operational information
- Bribery or corruption

## 4. Policy Statement

GURD Rwanda has a zero-tolerance approach to fraud. All instances of suspected or actual fraud will be thoroughly investigated and may result in disciplinary action, including termination of employment, legal action, or reporting to law enforcement authorities.

## 5. Roles and Responsibilities

The roles and responsibilities under this Anti-Fraud Policy are as follows;

### 1. Leadership

Leadership including the top managers, supervisors and all other staff in charge representing GURD-Rwanda are responsible for setting the tone for ethical behavior across the organization and fostering a culture of integrity. They ensure that adequate resources and systems are in place to prevent and detect fraud effectively.

### 2. Employees and Volunteers

Employees and volunteers are required to comply with the Anti-Fraud Policy and report any suspicions or evidence of fraudulent activities. They are also responsible for safeguarding organizational assets and adhering to established internal controls.

### 3. Internal Audit and Compliance Team

This team is tasked with conducting regular risk assessments and audits to identify potential fraud risks. They are also responsible for investigating reported cases of fraud and recommending corrective actions to address any issues.

### 4. Beneficiaries and External Partners

Beneficiaries and external partners are expected to act in good faith and comply with the organization's policies. They must report any irregularities or concerns they observe to the organization.

## 6. Prevention Measures

- **Internal Controls:** Implement robust systems for financial management, procurement, and record-keeping.
- **Training and Awareness:** Conduct regular training for staff, volunteers, and beneficiaries on fraud risks and ethical practices.
- **Whistleblowing Mechanism:** Establish confidential channels for reporting fraud
- **Due Diligence:** Conduct background checks on employees, contractors, and partners.

## 7. Reporting Fraud

All suspected cases of fraud must be reported immediately to the Executive Director or a designated Compliance Officer. Reports can also be submitted anonymously through the whistleblowing mechanism. The organization ensures that all reports will be treated with confidentiality and investigated promptly.

## 8. Investigation and Response

- **Initial Assessment:** Upon receiving a report, the Compliance Officer will conduct a preliminary assessment to determine its validity.

- **Formal Investigation:** If warranted, a detailed investigation will be initiated by the Internal Audit Team or an external expert.
- **Corrective Actions:** Based on findings, appropriate measures will be taken, which may include:
  - i. Recovery of misappropriated funds or assets
  - ii. Disciplinary actions against perpetrators
  - iii. Process improvements to prevent recurrence

## 9. Protection Against policy violation (Retaliation)

GURD Rwanda is committed to protecting whistleblowers who report fraud in good faith. Retaliation or harassment against individuals who report fraud will not be tolerated and may result in disciplinary action.

## 10. Monitoring and Review of the Anti-Fraud Policy

**The effectiveness of the Anti-Fraud Policy is ensured through a structured process of regular monitoring and periodic review. The following steps outline this process:**

1. **Annual Policy Review**  
The Anti-Fraud Policy is reviewed on an annual basis to ensure it remains effective and relevant. The review process evaluates the adequacy of existing measures in addressing evolving fraud risks, organizational changes, or regulatory requirements.
2. **Stakeholder Engagement**  
Feedback from employees, volunteers, beneficiaries, and external partners is collected during the review process. This ensures the policy addresses practical challenges and aligns with the experiences and insights of those implementing or affected by it.
3. **Fraud Incident Analysis**  
The outcomes of past investigations into fraud cases are analyzed to identify trends, vulnerabilities, and areas for improvement. Lessons learned are used to refine the policy and strengthen preventive measures.
4. **Performance Metrics**  
Key performance indicators (KPIs) are established to monitor the policy's implementation. These may include the number of fraud reports received, the resolution time for investigations, and the effectiveness of corrective actions.
5. **Communication of Updates**  
Following the review, any updates or changes to the policy are communicated to all relevant stakeholders, ensuring they are informed of their responsibilities under the revised framework.
6. **Audit and Oversight**  
Internal audits are conducted regularly to assess compliance with the policy and the robustness of fraud prevention measures. External audits may also be commissioned to provide an independent evaluation of the organization's anti-fraud controls.
7. **Continuous Improvement**  
Monitoring efforts focus on identifying areas where the policy can evolve to better meet the

organization's needs. The process ensures a proactive approach to fraud risk management, adapting to both internal and external changes.

GURD Rwanda ensures the Anti-Fraud Policy remains a living document, responsive to emerging challenges and supportive of the organization's commitment to integrity and accountability.

**Approved by:**

**TUYISHIME Fidèle**

**Legal Representative**

**NTAKIYIMANA Elie**

**Secretary**

**UMUHIRE Maria Gloriose**

**Deputy Legal Representative**



## Annex

### Staff/ volunteer Acknowledgment form

**Purpose:**

This declaration form is a mandatory acknowledgment by all employees, volunteers, and other stakeholders of GURD Rwanda. By signing this document, individuals confirm their understanding, acceptance, and compliance with the Anti-Fraud Policy. This form will be stored as an official record of the organization's commitment to maintaining integrity, transparency, and accountability in its operations.

**Acknowledgment of the Anti-Fraud Policy**

I, the undersigned, hereby confirm that I have:

1. Read and understood GURD Rwanda's Anti-Fraud Policy.
2. Committed to upholding the principles outlined in the policy.
3. Agreed to report any suspicions or incidents of fraudulent activities in compliance with the established procedures.
4. Acknowledged that failure to adhere to this policy may result in disciplinary action, legal proceedings, or other corrective measures as deemed necessary by GURD Rwanda.

I understand the importance of this policy in ensuring the organization's accountability and in safeguarding its mission to empower Participants and vulnerable groups throughout all our supporting areas.

**Full Name:** \_\_\_\_\_

**Position/Role:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Approval**

This document has been reviewed and approved by GURD Rwanda's leadership. It reflects the organization's commitment to the highest standards of governance and operational integrity.

**Approved by:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Date of Approval:** \_\_\_\_\_