

MBEYA UNIVERSITY OF SCIENCE AND TECHNOLOGY



FRAUD RISK MANAGEMENT POLICY

AUGUST 2024

FOREWORD

Mbeya University of Science and Technology (MUST) has an obligation to implement the Fraud Risk Management Guidelines 2023, the National Anti-Corruption Strategic Plan III (NACSAP III 2017-2022) and Strategic Objective B of the MUST CSP 2022/23 - 2026/27 which deals with the Nation Anti-Corruption Agenda. The Fraud Risk Management Policy provides a framework for ensuring a fraud free service delivery at MUST.

In this regard, MUST seeks to contribute to the nation by creating a generation of graduates and other stakeholders who are against fraud practices. It aims at ensuring that those who work, partner and study at the University are aware that fraud is unacceptable. In order to achieve the aspiration, adequate measures must be in place through review, formulation and implementation of appropriate Policy. Consequently, the production of the University's quality and competitive products will greatly imply quality training and committed teamwork in implementing among others the Fraud Risk Management that best fits the clients' needs and satisfactions from services delivered by MUST.

All MUST staff and the community at large are obliged to effectively implement this Policy in order to maintain integrity, transparency, fairness, justice and equity, respect for the Rule of Law towards quality training, research and consultancy services to our esteemed clients. Henceforth, MUST Management will not tolerate any form of fraud.

Prof. Aloys Mvuma

Vice Chancellor

August 2024

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LIST OF ABBREVIATIONS AND ACRONYMS

CAG	Controller and Auditor General
CIA	Chief Internal Auditor
COSO	Committee for Sponsoring Organizations of the Treadway Commission
ERM	Enterprise Risk Management
FRC	Fraud Risk Champion
FRO	Fraud Risk Officer
IAG	Internal Auditor General
ISO	The International Organization for Standardization
NACSAP	National Anti-Corruption Strategy and Action Plan
PCCB	Prevention and Combating of Corruption Bureau
PSE	Public Sector Entities

DEFINITION OF KEY TERMS AND CONCEPTS

Accounting Officer	Appointed officer by name and in writing by the Paymaster-General in respect of each expenditure vote, who controls and is accountable for the expenditure of money applied to that vote by an Appropriation Act and for all revenues and other public moneys received, held or disposed of, by or on account of the department or service for which the vote provides.
Corruption	The use of power, money or favors by people in position of authority or contacts in their network for illegitimate private gain.
Control	Any action taken by management, the governing board, and other parties to manage risk and increase the likelihood that established objectives and goals will be achieved.
Fraud	Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.
Fraud detection	Procedures to discover fraud during or after its occurrence
Fraud deterrence	The process of eliminating factors that may cause fraud to occur
Fraud prevention	Strategies that are designed to proactively reduce or eliminate fraud committed against an organization
Fraud response	Plans and activities that take place after a fraud has been detected

Fraud Risk Assessment	A dynamic and iterative process for identifying, analyzing and evaluating fraud risks relevant to the PSEs.
Fraud risk	It is a possibility of any unexpected loss, be it financial, reputational, or material, due to fraudulent activity by an internal or external intentional act or omission designed to deceive others to achieve a gain.
Fraud Risk Impact	The degree of loss or damage that would result from an occurrence of the fraud risk event.
Fraud Risk Likelihood	A chance of fraud happening, whether defined, measured or determined objectively or subjectively, qualitatively, or quantitatively, and described using general terms or mathematically.
Fraud Risk Appetite	The amount of risk that an organization is prepared to accept (tolerate) or be exposed to at any point in time.
Fraud Risk Management Framework	Set of components that provide the foundations and organizational arrangements for designing, implementing, monitoring, reviewing, and continually improving fraud risk management throughout the organization.
Fraud Risk Management Coordinator	A person appointed to coordinate issues of Fraud Risk Management in the PSEs.
Fraud Risk Management	A process that provides a framework to identify, analyze, evaluate, and treat fraud risks.
Fraud Risk Owner	The Senior Official responsible for the area that the fraud risk will impact on most or that has been assigned the responsibility for the fraud risk by his/her Accounting Officer.

Fraud Risk Register	A composite, prioritized, list of the identified and evaluated fraud risks outlining their likelihood and potential impact, and includes an action plan or proposed mitigating measures to manage or contain a fraud risk to acceptable Levels.
Fraud Investigation	A search or gathering of evidence relating to a specific fraud allegation(s) to determine the facts relating to the matter and to assist in deciding what, if any, action shall be taken in relation to the matter(s).
Fraud Risk Tolerance	An organization or stakeholder's readiness to bear the fraud risk after the fraud risk has been treated, to achieve the organizations or stakeholder's objectives.
Public Sector Entity	All Tanzanian Public Sector Institutions: Ministries, Departments, Agencies, Parastatal Organizations, Public Corporations, Regulatory Authorities, Government Business Entities, Regional Secretariats and Local Government Authorities that are required to or expected to implement sound risk management systems.
Risk	The effect of uncertainty on objectives.
Tone at the top	An organization's general ethical climate and/or atmosphere, as established by its Council, audit committee, and senior management. Having a strong tone at the top is believed by business ethics experts to help prevent fraud and other unethical practices.

CHAPTER ONE

BACKGROUND INFORMATION OF THE UNIVERSITY

1.1 Introduction

The history of Mbeya University of Science and Technology (MUST) dates back to 1986 when Mbeya Technical College (MTC) was established by the Government of Tanzania for the purpose of training Full Technicians at Certificate Level (FTC) under the Russia - Tanzania Training Support. The College existed up to mid-2005 offering programmes in the fields of Architecture, Electrical Engineering, Civil Engineering and Mechanical Engineering. In July 2005, MTC was transformed into a multi-disciplinary Mbeya Institute of Science and Technology (MIST) through the National Council for Technical Education (Mbeya Institute of Science and Technology) Establishment Order, 2004.

The transformation was a Government move towards strengthening the College to become a fully-fledged University. Mbeya Institute of Science and Technology registered a number of achievements including restructuring of FTC programmes to Ordinary Diploma programmes and introduction of Undergraduate Degree programmes which eventually lead to expansion of students' enrolment. Following these achievements, on 29th March 2012 after being issued with a Provisional Licence by Tanzania Commission for Universities (TCU), the Institute was transformed to a fully-fledged University namely Mbeya University of Science and Technology (MUST). The University was granted Mbeya University of Science and Technology Charter, 2013 on 20th August 2013.

MUST is endeavouring to lead in science and technology, become a centre of excellence for academics, research and consultancy and puts itself in a position where research results are meant for improving livelihood in the society. In order to develop professional skills in science, engineering and technology in related fields, MUST has to go hand in hand with fraud risk management policy.

1.2 MUST Vision

The Vision of Mbeya University of Science and Technology is to become the leading centre of excellence for knowledge, skills and applied education in science and technology.

1.3 MUST Mission

The Mission of Mbeya University of Science and Technology is to develop academically, technologically and socially competent students, staff and other stakeholders who will be responsive to the broader needs and challenges of the society specified by:

- (a) Facilitating appropriate tuition, practical training and support according to the needs of students and other customers;
- (b) Encouraging staff commitment to quality education and services including research, consultancy and innovation;
- (c) Fostering lifelong learning, honesty and responsibility;
- (d) Promoting an environment conducive to human development; and
- (e) Promoting effective entrepreneurship and usage of appropriate technology that meet national and international needs and standards through skills and practical oriented training, research and consultancy.

1.4 Situational Analysis

Fraud risk management is a holistic and proactive fraud mitigation approach that is embedded within an organization. A successful strategy requires robust internal controls plus investment in anti-fraud technology for the current and future fraud landscape. According to Policy for Developing and Implementing Fraud Risk Management Framework in the Public Sector Entities (2023), organizations lose an estimated 5 percent of their revenues to fraud. Industry professionals know that fraud cannot be ignored and will not disappear on its own. To combat the rising risks, organizations need to address fraud strategically and benefit from taking a

proactive approach rather than a reactive one. This is where an effective fraud risk management strategy plays a crucial role.

Currently, the Controller and Auditor General Report (2023) for the financial year 2020/21 showed an increased risk of fraud including theft of assets, misappropriation of public funds and corruption in Public Sector Entities (PSEs). Similarly, the Prevention and Combating of Corruption Bureau (PCCB) Report (2020) indicates increased risks of fraud in police force (17.9%), health sector (17.9%), courts of law (11.9) and revenue management (6.1%). As a result, Government of Tanzania (2023) revised guidelines for developing and implementing Fraud risk management framework in the PSEs.

However, there has been changes in the way PSE operates including embedment of technology in service delivery, changes in international standards with regard to fraud risks and the issues related to risk of fraud observed in CAG report. The revised and updated Guidelines for Developing and Implementing Fraud Risk Management Frameworks in PSE, 2023 are expected to complement on the already designed and implemented Enterprise Risk Management (ERM) systems in PSEs, and National Anti-Corruption Action Plan (NACAP).

MUST has revised its Anti-Corruption Policy to incorporate changes so as to comply with the National Anti-Corruption Policy. However, the Fraud Risk Management Policy is not in place. Thus, establishing the Fraud Risk Management Policy will compliment efforts in fighting against corruption practices at MUST.

1.5 Justification for Fraud Risk Management Policy

Worldwide, numerous higher learning institutions suggest an internal perception of a reduced vulnerability to fraud and reluctance to publicise cases internally or externally for fear of reputational damage. The present Policy will create spill overs to clients and University at large on segregation of duties, academic consultancy, mandated fraud, examinations fraud and

philanthropic income. It is therefore inevitable for the Fraud Risk Management Policy to be in place.

CHAPTER TWO

INFORMATION ON FRAUD RISK MANAGEMENT POLICY

2.1 Introduction

This part presents the Vision, Mission, Goal, Objectives, Philosophy and Scope of Policy on Fraud Risk Management.

2.2 Policy Vision

To be a free University from a fraud triangle (through prevention, detection and responding to fraud) of interrelated elements of motive, opportunity and rationalization for fraud to occur.

2.3 Policy Mission

To develop means for fraud prevention, detection and responding to fraud.

2.4 Policy Goal

The goal of the Fraud Risk Management Policy is to enhance zero occupational frauds from asset misappropriation, fraudulent financial statements and corruption at the University and the Country at large.

2.5 Policy Objective

2.5.1 Main Objective

The main objective of this document is to guide on prevention, detection and responding to fraud.

2.5.2 Specific Objectives

- (a) Coordinate efforts of implementing appropriate fraud risk procedures and systems.
- (b) Co-ordinate and monitor the implementation of fraud risk management initiatives within MUST.

- (c) Work with fraud risk owners to ensure that the fraud risk management processes are implemented in accordance with agreed fraud risk management strategy.
- (d) Collate and review all fraud risk registers for consistency and completeness.
- (e) Provide advice and tools to staff and management on fraud risk management issues within the organization, including facilitating workshops in fraud risk identification.
- (f) Promote understanding of and support for fraud risk management including delivery of fraud risk management training.
- (g) Oversee and update organization-wide fraud risk profiles, with input from fraud risk owners.
- (h) Ensure that relevant fraud risk information is reported and escalated or cascaded, as the case may be, in a timely manner that supports organizational requirements.

2.6 Philosophy of Fraud Risk Management Policy

The fraud risk management philosophy accepts fraud triangle of interrelated elements, occupational frauds and others which are relevant to MUST in implementing its core activities.

2.7 Scope of Fraud Risk Management Policy

The scope of the Policy is focused primarily on providing generic guidance on commitment and approach to managing fraud risks to both staff and clients. The Policy apply to MUST across all levels of organizational structure, activities, processes in line with applicable MUST Policies and Guidelines.

CHAPTER THREE

POLICY ISSUES, STATEMENT AND STRATEGIES

3.1 Introduction

This chapter presents policy issues, statements and strategies. Its purpose is to introduce the subject matters to work on, state what requires to adhere to, its objectives and values of the issue. It articulates what to accomplish in each policy statement and the target to address the issue.

3.2 Policy Issue: Commitment to Fraud Risk Management

The University recognizes that fraud has been and continues to be an increasing risk in all organizational levels. As such it poses challenges to all Colleges, Directorates, Departments and Units with regard to its prevention and detection of pre-planned, intermediate and slippery-slope fraudsters.

3.2.1 Policy Statement

MUST shall supplement the internal controls environment by helping to prevent, detect and deter fraud.

3.2.2 Policy Strategy

In this regard, MUST shall:

- (a) Improve efficiency to meet commitments and/or University objectives and performance targets as well as increased stakeholders' confidence;
- (b) Institute (i.e., develop, adopt and implement) a sound and effective fraud control across organizational levels; and
- (c) Take an active role in providing and setting broad guidance and support on the development and implementation of fraud risk management practices across the University.

3.3 Policy Issue: Adoption of Fraud Risk Management Standards

Fraud risk management builds on internal control and ERM models. In this Policy therefore, the fraud risk management shall be in accordance with the Committee of Sponsoring Organisation (COSO) 2013.

3.3.1 Policy Statement

MUST shall adopt risk assessment process that complies with International Organisation for Standardisation (ISO) 31000:2018.

3.3.2 Policy strategy

In this regard, MUST shall:

- (a) Developing and implementing Institutional Risk Management Framework; and
- (b) Follow the same steps and sequence as those of ERM in implementing the fraud risk management framework.

3.4 Policy Issue: Implementation Requirements

The University has developed and intends to implement a Fraud Risk Management Policy.

3.4.1 Policy Statement

MUST shall establish process for monitoring, reviewing, and enhancing fraud risk management and governance systems.

3.4.2 Policy Strategy

In this regard, MUST is required to ensure that:

- (a) Personnel throughout the University are aware of Fraud Risk Management Policy including the type of fraud and misconduct that may occur;
- (b) Policies, culture, and structure that facilitate how the University will identify, record and monitor fraud risks, including procedures for reporting fraud risks information to the oversight organs;
- (c) Fraud risk management process is in line with international standards for risk management under ISO 31000;
- (d) Fraud risk management process is part and parcel of the overall ERM within the the organization; and
- (e) Fraud risk register is used to record, rate, monitor and report fraud risks.

3.5 Policy Issue: Implementation Responsibilities

The implementation responsibility of this policy is placed to the University accounting officer, Principals, Directors and Heads of Department and Units.

3.5.1 Policy Statement

MUST shall ensure that all responsible officers customize the specific roles and responsibilities so that they align to their organizations' structure.

3.5.2 Policy Strategy

In this regard, MUST shall:

- (a) Set high level of commitment to Fraud Risk Management;
- (b) Establish Fraud Risk Governance Roles and Responsibilities;
- (c) Document the Fraud Risk Management Program; and
- (d) Communicate the Fraud Risk Management Framework.

3.6 Policy Issue: Assess the Risk of Fraud

Fraud risk assessment is a process aimed at proactively identifying and addressing University vulnerability to internal and external fraud. It is an ongoing and continuous process.

3.6.1 Policy Statement

The University shall ensure that it complies with the requirement of risk assessment provided under Risk Management Framework.

3.6.2 Policy Strategy

In this regard, MUST shall:

- (a) Involve appropriate levels of management;
- (b) Form a cross-departmental Fraud Risk Assessment Team; and
- (c) Decide on criteria for measuring and tolerance of Fraud Risk.

3.7 Policy Issue: Fraud Deterrence and Preventive Measures

The fraud deterrence includes the actions involved in eliminating factors that may cause fraud. Fraud prevention involves having arrangements in place that reduce the risk of fraud occurring. Both involve a number of

factors and/or actors which include an ethical organizational culture, a strong awareness of fraud among employees, suppliers and clients and an effective internal control framework.

3.7.1 Policy Statement

MUST shall establish fraud prevention strategies as the first line of defence that provide the most cost-effective method of controlling fraud within the University.

3.7.2 Policy Strategy

In this regard, MUST shall:

- (a) Have a strong and committed senior management team; and
- (b) Operationalize an ethical organizational culture.

3.8 Policy Issue: Fraud Detection Measures

University's effective detective controls in place and visible is one of the strongest deterrents to fraudulent behaviour. Although detective controls may provide evidence that fraud is occurring or has occurred, they are not intended to prevent fraud.

3.8.1 Policy Statement

MUST shall employ procedures that uncover fraud as soon as possible after it has occurred in the event that the University's preventing systems fail.

3.8.2 Policy Strategy

In this regard, MUST shall:

- (a) Establish passive detection measures, including:
 - (i) Effective internal controls;
 - (ii) Mechanisms to report fraud allegations;
 - (iii) Tip-off or hotline facilities; and
 - (iv) Whistle blowing and University interest disclosures.

- (b) Strengthen active detection measures, including:
 - (i) Monitoring and review activities to detect internal fraud;

- (ii) Analysis of management accounting reports;
- (iii) Hot spot analysis;
- (iv) Data mining- post transactional review;
- (v) Monitoring and review activities to detect external fraud;
- (vi) Detecting fraud by external service providers;
- (vii) Partnering with other institutions; and
- (viii) Utilizing the role of internal audit.

3.9 Policy Issue: Fraud Response Procedures

Fraud response refers to a plan of action put in place when a suspected fraud is discovered or reported.

3.9.1 Policy Statement

MUST shall plan the responsibilities for action.

3.9.2 Policy strategy

In this regard, MUST shall:

- (a) Take action when a fraud is reported;
- (b) Conduct formal internal investigation;
- (c) Involve the Police and PCCB;
- (d) Secure information and assets;
- (e) Deal with the media;
- (f) Institute disciplinary procedures;
- (g) Document the results of an investigation;
- (h) Report the results of an investigation; and
- (i) Review of internal controls after a fraud.

CHAPTER FOUR

POLICY COMMUNICATION AND IMPLEMENTATION

4.1 Introduction

This chapter presents organizational structure of the University and responsibilities of different offices and obligations of stakeholders in the implementation of the Policy.

4.2 Organizational Structure

The purpose of the administrative structure is to define and delegate responsibilities, to establish relationships for enabling people to work and ensure effective systems and mechanisms for communications. The Fraud Risk Management Policy is under the office of the Vice Chancellor whose administrative structure is shown in Figure 1.

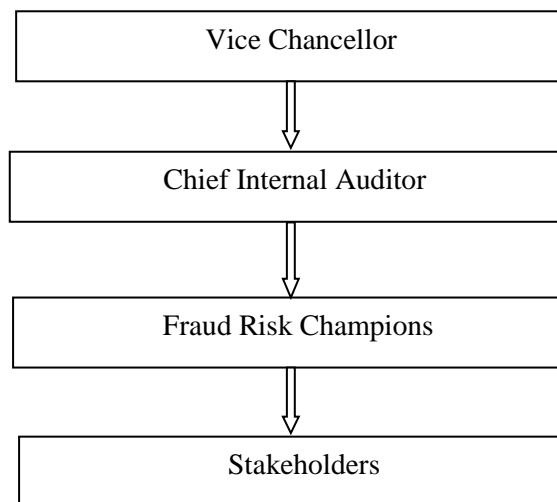


Figure 1: Administrative Structure of Fraud Risk Management

4.3 The Roles of the Vice Chancellor

The Accounting Officer is accountable for the overall governance of the fraud risk management practice in the organization. The officer shall oversee the development and implementation of fraud risk management frameworks that align to the University's operations, structure and context.

Specifically, the Vice Chancellor is responsible to:

- (a) Set an appropriate tone by supporting the adoption and implementation of effective fraud risk management;
- (b) Design, implementation, and enhancement of fraud risk management framework;
- (c) Delegate responsibilities for fraud risk management to fraud risk management and internal formations so that it aligns to the existing University structure, processes, culture and context;
- (d) Ensure appropriate action in respect of the recommendations of audit committee, internal audit, and external audit with regard to issues of fraud risk management; and
- (e) Provide assurance to relevant stakeholders that key fraud risks are properly identified, assessed and mitigated.

4.4 The Roles of the Chief Internal Auditor

In most organizations, the Chief Internal Auditor has an advisory role and reports to the Accounting Officer. In relation to fraud risk management, the Chief Internal Auditor shall therefore be responsible for:

- (a) Play active role in the oversight of the fraud risk assessment;
- (b) Familiarize itself with fraud risk management process and approach of the organization;
- (c) Catalyze risk management by enquiring from management risk assessments and treatment reports;
- (d) Ask to see the departmental/ institutional level fraud risk registers periodically;
- (e) Evaluate the effectiveness of the fraud risk management activities in ensuring that key fraud risks facing the University are being managed appropriately;
- (f) Consider fraud risks when developing annual audit plan and spend time to evaluate the design and operation of anti-fraud controls and audit the adequacy of fraud risk management process;
- (g) Provide active support and involvement in the fraud risk management process.

- (h) Review all matters related to fraud risk and risk management, through fraud risk management reports, on the manner they are being managed through use of internal and external audit reports;
- (i) Ensure appropriate internal audit work is undertaken with regards to fraud risks, by ensuring that internal audit plans are risk-based and focus on the most significant risk areas (ERM and fraud);
- (j) Provide regular feedback to the Accounting Officer/ the Council on the adequacy and effectiveness of fraud risk management in the University, including recommendations for improvement; and
- (k) Provide assurance to the Council and management that existing controls are appropriate given the fraud risk tolerance established by the Council.

4.5 The Roles of Fraud Risk Champions

The role of the Fraud Risk Champions (FRC) is to assist the Accounting Officer to fulfill her fraud risk management roles. The Fraud Risk Champions has the responsibility to:

- (a) Coordinate efforts for developing and implementing appropriate fraud risk management guidelines, policies, procedures and systems;
- (b) Co-ordinate and monitor the implementation of fraud risk management initiatives within the University;
- (c) Work with fraud risk owners to ensure that the fraud risk management processes are implemented in accordance with agreed fraud risk management guidelines, policy and strategy;
- (d) Collate and review all fraud risk registers for consistency and completeness;
- (e) Provide advice and tools to staff, management, the Executive and Council on fraud risk management issues within the University, including facilitating workshops in fraud risk identification;
- (f) Promote understanding of and support for fraud risk management including delivery of fraud risk management training;

- (g) Oversee and update University-wide fraud risk profiles, with input from fraud risk owners;
- (h) Ensure that relevant fraud risk information is reported and escalated or cascaded, as the case may be, in a timely manner that supports University requirements;
- (i) Prepare quarterly fraud risk management implementation reports of fraud risk treatment action plans and to submit them to the Fraud Risk Coordinator; and
- (j) Attend internal audit meetings where fraud risk management issues are discussed.

4.6 The Roles of Stakeholders (Staff and Students)

It is the responsibility of all personnel, stakeholders and contractors to apply the fraud risk management process to their respective roles. They shall be responsible to:

- (a) Understand fraud and awareness of red flags;
- (b) Read and understand policies/guidelines and procedures on frauds;
- (c) Participate in the process of creating a strong control environment;
- (d) Identify fraud risks and reporting these to the relevant risk owner(s);
- (e) Report suspicions or incidences of fraud and corruption; and
- (f) Co-operate with investigators.

CHAPTER FIVE

MONITORING AND EVALUATION

5.1 Introduction

This chapter presents monitoring of the Fraud Risk Management Policy, tools for Monitoring and evaluation, periodic evaluation of the policy and evaluation report.

5.2 Monitoring

Monitoring is a continuous process to assess progress and constrict on the process of implementation of the Policy. Evaluation is to assess the achieved results against expected ones. The process of evaluation observes what have happened and how activities have been implemented in relation to ethical matters.

The University shall develop ongoing monitoring and measurements to evaluate, remedy and continuously improve the University's fraud detection techniques. If deficiencies are found, management shall ensure that improvements and corrections are made as soon as possible. Management shall institute a follow up plan to verify that corrective or remedial actions have been taken. Measurable criteria for monitoring shall include:

- (a) Number of known fraud schemes committed against the University;
- (b) Number of statuses of fraud allegations received by the University that required investigation;
- (c) Number of fraud investigations resolved;
- (d) Number of employees who have/have not signed the ethics statements;
- (e) Number of employees who have/have not completed ethics training sponsored by the organization;
- (f) Number of whistle-blower allegations received via the organization's hotline;
- (g) Number of allegations that have been raised by other means;
- (h) Number of messages supporting ethical behavior delivered to employees by executives;

- (i) Number of service providers who have/have not signed University's ethical behavior requirements;
- (j) Number of customers who have signed the organization's ethical behavior requirements; and
- (k) Number of fraud audits performed by internal auditors.

5.3 Tools for Monitoring and evaluation

Some tools for monitoring and evaluation (M&E) can be chosen among others in the following list as deemed necessary:

- (i) **Case study:** A detailed descriptive narrative of individuals, departments, colleges, events, program, or time periods. They are particularly useful in evaluating situations and exploring qualitative impact related to ethical matters.
- (ii) **Checklist:** A list of items used for validating or inspecting that procedures/steps have been followed, or the presence of examined behaviours that influence unethical matters;
- (iii) **Closed-ended (structured) interview:** A technique for interviewing that uses carefully organized questions that only allow a limited range of answers, such as "Yes/No," or expressed by a rating/number on a scale. Replies can easily be numerically coded for statistical analysis;
- (iv) **Community interviews/meeting:** A form of public meeting open to all community members. Interaction is between the participants and the interviewer, who presides over the meeting and asks questions following a prepared interview guide;
- (v) **Direct observation:** A record of what observers see and hear at a specified site, using a detailed observation form. Observation may be of physical surroundings, activities, or processes in service delivery;
- (vi) **Focus group discussion:** Focused discussion with a small group of participants to record attitudes, perceptions, and beliefs pertinent to the issues being examined in ethical matters;

- (vii) **Key informant interview:** An interview with a person having special information on corruption practices. These interviews are generally conducted in an open-ended or semi-structured fashion;
- (viii) **Mini-survey:** Data collected from limited participants, usually selected using non-probability sampling techniques. Structured questionnaires with a limited number of closed-ended questions are used to generate quantitative data that can be collected and analysed quickly;
- (ix) **Most Significant Change:** A participatory monitoring technique based on stories about important or significant changes on ethical practices, rather than indicators. They give a rich picture of the impact of development work and provide the basis for dialogue over key objectives and the value of development programs;
- (x) **Open-ended interview:** A technique for questioning that allows the interviewer to probe and follow up topics of interest in depth (rather than just “yes/no” questions);
- (xi) **Participant observation:** A technique that requires the researcher to spend considerable time with the group being studied (days) and to interact with them as a participant. This method gathers insights that might otherwise be overlooked, but is time-consuming;
- (xii) **Participatory Rapid Appraisal:** This uses community engagement techniques to understand community views on a particular issue. It is usually done quickly and intensively – over a given period. Methods include interviews, focus groups, and community mapping;
- (xiii) **Questionnaire:** A data collection instrument containing a set of questions organized in a systematic way, as well as a set of instructions to the enumerator/interviewer about how to ask the questions (typically used in a survey);

- (xiv) **Rapid appraisal (or assessment):** A quick cost-effective technique to gather data systematically for decision making, using qualitative and quantitative methods, such as observations and sample surveys. This technique shares many of the characteristics of participatory appraisal (such as triangulation and multidisciplinary teams) and recognizes that indigenous knowledge is a critical consideration for decision-making in ethical issues; and
- (xv) **Self-administered survey:** Written surveys completed by the respondent, either in a group setting or in a separate location. Respondents must be literate; for example, it can be used to survey teacher opinions.

5.4 Periodic Evaluation of the Policy

This part describes a M&E framework for fraud risk management activities. Monitoring of the fraud risk management framework, fraud risk management process and control is an essential facet to enable continuous improvement at two levels, University and fraud risk owners.

5.4.1 University Level

The University shall ensure monitoring and evaluation of fraud risk management activities by:

- (a) Designing and implementing a fraud risk management program;
- (b) Maintaining adequate documentation of design of anti-fraud programs and controls;
- (c) Enforcing Code of Ethics;
- (d) Preparation and submission of quarterly fraud risk management implementation reports;
- (e) Semi-Annual review and updating of the fraud risk register; and
- (f) Periodic review and updating of the fraud risk management framework.

5.4.2 Fraud Risk Champions

- (a) Implement and document a fraud risk assessment process;

- (b) Evaluate design and operating effectiveness of anti-fraud programs and controls;
- (c) Report to the Accounting Officer (through Fraud Risk Coordinator) on effectiveness of the fraud risk management program;
- (d) Educating the staff on areas of potential compliance violations;
- (e) Provide information about the fraud risk when it is requested.
- (f) Prepare quarterly fraud risk management implementation reports of fraud risk treatment action plans and to submit them to the Fraud Risk Coordinator;
- (g) Review fraud risk registers and related controls; and
- (h) Maintain fraud risk register and other documents/ reports relating to risk management within their respective departments or directorates in a systematic manner.

5.5 Amendment and Review of the Policy

The MUST Policy on Fraud Risk Management may not be exhaustive and an end in itself since technology is so dynamic. Therefore, this document shall be reviewed after three (3) years of being under operation or as deemed necessary.

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APPROVAL

At its 43rd Meeting held on 6th day of September 2024, the COUNCIL of Mbeya University of Science and Technology RECEIVED, DISCUSSED and APPROVED the Fraud Risk Management Policy.

Hon. Zakia Hamdani Meghji

CHAIRPERSON

Adv. Lugano Mwakilasa

SECRETARY