

CORRUPTION RISK ASSESSMENT OF THE EDUCATION SECTOR IN RWANDA

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Corruption Risk Assessment of the Education Sector in Rwanda

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Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of May 2024. Nevertheless, Transparency International cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

Acknowledgements

Many thanks to the Transparency International Secretariat and the Transparency International chapters in the Democratic Republic of Congo, Ghana, Madagascar, Rwanda and Zimbabwe whose work on the risks of and linkages between corruption and discrimination in service delivery has inspired this manual. This report has been created as part of Transparency International's Inclusive Service Delivery Africa (ISDA) project. Generous support for this publication was provided by: Global Affairs Canada.



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LIST OF ACRONYMS

ALAC	Advocacy and Legal Advice Centre
CRA	Corruption Risk Assessment
ESSP	Education Sector Strategic Plan
FGD	Focus group discussion
IPRC	Integrated polytechnics regional centres
ISDA	Inclusive Service Delivery in Africa
HEC	Higher Learning Education Council
KII	Key Informant Interview
LGBTI	Lesbian, gay, bisexual, transgender and intersex
MIFOTRA	Ministry of Labour
MINEDUC	Ministry of Education
NESA	National Examination and School Inspection Authority
REB	Rwanda Education Board
RP	Rwanda Polytechnic
SDG	Sustainable Development Goal
TVET	Technical and Vocational Education Training
UHC	Universal Healthcare Coverage
12 YBEP	12 Year Basic Education Programme

EXECUTIVE SUMMARY

This corruption risk assessment aims to evaluate the corruption risk in the education sector in Rwanda, as well as to examine how corruption may prevent women, girls, and other vulnerable groups from accessing education services. Utilizing literature and primary data from focus group discussions, five areas with sixteen decision points that are typically susceptible to corruption were selected to assess whether there is a risk of corruption.

Those areas of focus are:

1. Food supply in public primary and secondary schools
2. Internship allocation, supervision and grading for public TVET and tertiary students
3. Students' grading in public secondary schools and tertiary institutions
4. Teacher recruitment and transfer in public primary and secondary schools
5. Student placement in public secondary school

This assessment employed a participatory approach, integrating key informant interviews, focus groups, and observational techniques to examine corruption risks within the education sector. Engaging stakeholders, discussions explored the diverse dimensions of corruption in education, including its forms, likelihood, impact, risks, and mitigation strategies. This comprehensive methodology yielded valuable insights into the nature of corruption within education, guiding the development of recommendations tailored to address identified challenges and vulnerabilities.

Findings from both service users (Category 1) and public officials (Category 2) shed light on the corruption landscape within Rwanda's education sector. Among service users, the top decision points with the highest likelihood for corruption occurrence include sextortion in internship allocation, corrupt practices in teacher recruitment, and withholding approvals for internships until bribes are paid. These findings were mirrored by public officials, who identified similar high-risk decision points, including the withholding of approvals for internships, corrupt practices in teacher recruitment, and corruption in the school feeding program.

Moreover, the impact of corruption on education outcomes was highlighted through identified decision points such as sextortion's impact on job allocations, negative repercussions of facilitation payments, hindrance of teacher recruitment, and the negative impact on the school feeding program. These findings underscore the urgent need for targeted interventions to enhance transparency, accountability, and integrity within Rwanda's education sector, ensuring equitable access to quality educational services for all.

Furthermore, the assessment revealed that corruption risks primarily stem from loopholes in existing systems. The study identified key drivers of corruption within the education sector, including unpredictable inflation, gender dynamics influencing corrupt behaviour, and societal norms perpetuating corrupt practices. Addressing these underlying drivers and strengthening anti-corruption measures are essential steps toward safeguarding the integrity of Rwanda's education system and promoting equal access to education for all citizens.

TEN KEY POLICY RECOMMENDATIONS

1

Transparent Procurement Processes: Corruption undermines the quality of school feeding programs for primary and secondary schools. MINEDUC and MINALOC should strengthen oversight and establish transparent criteria for food procurement.

2

Transparent Mechanisms for Internship Allocation: Discriminative internship allocation undermines the quality of teacher training and professional development. HEC and MINEDUC should ensure non-discriminative allocation and promote digital platforms for internship applications and selections, reducing human discretion.

3

Anti-Corruption Measures and Integrity Training: Corruption in grading practices compromises academic integrity in Secondary Schools and Tertiary Institutions. NESA and HEC should implement integrity trainings for academic staff and students, with sustained efforts and effective sanctioning.

4

Merit-Based Teacher Recruitment: Bribery and favouritism in teacher recruitment hinders education quality in Secondary and Primary Schools. REB and MINEDUC should ensure fair recruitment processes.

5

Transparent Student Admissions: Corruption in student admissions perpetuates inequalities in secondary schools. REB and MINEDUC should establish clear admission criteria and ensure transparency in the selection process.

6

Strengthened Anti-Corruption Legal Frameworks: Weak enforcement perpetuates corrupt practices. RGB and Office of the Ombudsman should strengthen legal frameworks and enforcement mechanisms to combat corruption in education.

7

Citizen Engagement in Education Governance: Limited oversight allows corruption to thrive. Ministry of Education, CSOs, and Community-Based Organizations should enhance citizen engagement in education governance to monitor and report corrupt practices.

8

Anti-Corruption Education Programs: Lack of awareness sustains corruption. MINEDUC, Ministry of Justice, and CSOs should invest in anti-corruption education programs to raise awareness of its detrimental effects.

9

Institutional Capacities for Corruption Prevention: Inadequate capacities hinder corruption detection. RIB, Office of the Auditor General, and MINEDUC should strengthen institutional capacities for effective corruption prevention and detection.

10

International Collaboration in Anti-Corruption Efforts: Transnational collaboration is essential in combating corruption. Ministry of Foreign Affairs and International Cooperation, along with regional and international anti-corruption bodies, should foster cooperation and best practice sharing.

INTRODUCTION

TI Rwanda is implementing the “Inclusive Service Delivery Africa (ISDA)” project to improve access to education and healthcare services for women, girls, and other groups at risk of discrimination in Rwanda by addressing corruption-related barriers.

A. THE ISDA PROJECT

TI Rwanda is a chapter of Transparency International (TI), a global movement working in over 100 countries to end the injustice of corruption. TI is implementing a four-year regional project in five African countries, namely the Democratic Republic of Congo (DRC), Ghana, Madagascar, Rwanda, and Zimbabwe, aimed at improving access to education and healthcare services for women, girls and other groups at risk of discrimination. The TI Secretariat is managing the project in partnership with national chapters in the five countries, with technical expertise and stakeholder engagement support from Transparency International’s Global Health Programme and Transparency International’s national chapter in Canada. This work is supported by Global Affairs Canada (GAC).

The project responds to a core development challenge linked to the impact of corruption and impunity on access to education and healthcare services for groups at risk of discrimination, particularly women and girls in Africa. Corruption undermines the quality and quantity of public services, fuels inequalities in access to basic services and reduces the resources available for women and groups at risk of discrimination who are more reliant on public services, resulting in heightened poverty for those most marginalised.

Overall, the project seeks to achieve the following by 2026:

- More effective action taken by public institutions to close gender-related corruption loopholes and address vulnerabilities in the education and health sectors relative to women, girls, and other groups at risk of discrimination.
- Increased engagement of citizens, particularly women, girls, and other groups at risk of discrimination, to demand accountability from duty-bearers in the delivery of education and healthcare services.
- Increased recognition among national, regional, and international stakeholders of the need to mainstream gender-informed anti-corruption measures into the delivery of education and health services and concrete ways by which these can be met.

B. CORRUPTION RISK ASSESSMENT

A corruption risk assessment is a diagnostic tool which seeks to identify weaknesses within a system which may present opportunities for corruption to occur (TI 2011). Several different corruption risk assessment methodologies have been developed. Most corruption risk assessments take an institutional approach. They aim to identify the institutional processes and practices that are vulnerable to corruption, as well as to identify weaknesses in rules and regulations in the institution, sector and/or process under analysis (TI 2011). They can be applied at all levels from government institutions to donor support programmes and down to sectoral programmes (TI 2011).

The corruption risk assessment method is used under the ISDA project aims to assess existing policies in the health and education sectors for corruption vulnerabilities and loopholes and ascertain where specific gaps/loopholes are that impact women, girls and groups at risk of discrimination. It aims to accomplish this by identifying where, how and why corruption occurs at specific decision points within operational processes, and to identify mitigation strategies to close these loopholes.

C. AREAS OF FOCUS

Background on Rwandan education sector

Education is a fundamental human right, compulsory and free in public schools as per Article 20 of the Constitution of the Republic of Rwanda of 2003, revised in 2015. Basic education in Rwanda is composed of Pre-primary, Primary, and Secondary education levels. In addition to these three levels, there is non-formal education, or adult basic education. In the last 15 years ago, Rwanda noticed an impressive growth in primary enrolment as a result of ongoing policy development and new strategies such as school construction, teacher recruitment, capitation grants, teaching and learning materials, promotion of girls' education, increased parent involvement and government encouragement towards private sector investment.

Moreover, considerable progress has been observed in terms of the increased number of schools, particularly as universal primary education is considered the foundation for further development of secondary education (MINEDUC, 2019).

The right to education means both the right to access and receive education of high quality (UNICEF-Rwanda, 2022). Despite numerous meanings of quality education (Unterhalter, 2019) in the Rwandan context quality of education means that “every child accesses an equipped school with the skills, knowledge, attitudes and values responsive to the Rwanda’s aspirations

in socio-economic development as well as to personal further educational development” (World Bank, 2011).

In order to concretize the above definition of quality education, the Ministry of Education in Rwanda has adopted quality standards for all primary, secondary and higher education institutions. Reforms in the education sector in Rwanda have specific institutional arrangements with the aim of promoting the quality of education in each education cluster. Under the overall coordination of the Ministry of Education, the basic education sub-sector (Pre-primary, Primary, and Secondary education) has moved under the institutional regulation of the Rwanda Education Board (REB) and National Examination and School Inspection Authority (NESA).

The Technical and Vocational Education Training (TVET) was separated from general education and moved under the Rwanda TVET Board. Furthermore, the basic education at district level is coordinated by education directorate the higher learning institutions are coordinated and regulated by the Higher Learning Education Council (HEC), while Rwanda Polytechnic (RP) supports Integrated polytechnics regional centres (IPRC).

Within the education policy in Rwanda, special consideration goes to enabling compulsory and free basic education for all and the education sector has significantly invested in expanding access to basic education from nine to twelve years. At the beginning of the implementation of the basic education program for all in 2003, the policy developed by provided for nine years of basic education. In 2012, this program was expanded to 12 years of basic education as part of the changes to the education curriculum through MINEDUC (Anzeze, 2022)

Higher education (or tertiary education) is an important component of the education system in Rwanda. and is recognised by MINEDUC as a factor that can contribute to the poverty reduction and promote sustainable development and growth (MINEDUC, 2008). The tertiary education system in Rwanda is designed with intention to promoted inclusion. Women and men expect equal access and equally treatment (all receive student financing from the government once they fulfil requirements despite the limited budget to fund a significant number of students). Additionally, people with disabilities are considered in higher education initiatives. The undergraduate level is the main form of tertiary education and is provided by three (3) public and twenty-seven (27) private higher learning institutions (HEC, 2023).

Higher education in Rwanda faces challenges, including the limited number of qualified and skilled teaching staff and insufficient provision of teaching materials. To overcome such challenges, the Government of Rwanda has welcomed private investors in education sector and public –private partnerships in order to promote the higher education sector. The Government of Rwanda, through the HEC, is very keen on promoting quality of education

where clear policies and guidelines for qualification are established and are being implemented and enforced. These include for example:

- National student admission policy
- Academic appointment and promotion procedures
- Code of practice examination
- National equality and diversity policy for higher education
- Model student complaints procedures, etc.

All these efforts are expected to allow Rwanda's universities to significantly improve the quality of the academic experience for their students, in order to secure a globally competitive, innovative, and creative workforce for the country's future development (Rebecca Schendel, 2013).

Additionally, the implementation of education in short and long-term aspirations in Rwanda is being supported by the Education Sector Strategic Plan (ESSP) (2018/19–2023/24), the Girls Education Policy (2008), the Special Needs Education Policy (2008), the National Early Childhood Development Policy Strategic Plan of MIGEPROF (2016 to 2021), the Language Education Policy, the ICT in Education Policy (2014), the Quality Standards in Education (2008), the Nine-Year Basic Education Strategy (2008), the Strategic Plan for Technical Education (2008-2012) and the Science, Technology and Innovation policy (2020), among others.

Regarding the legal framework, Articles 50, 118, 119 and 120 in the Law n° 010/2021 of 16/02/2021 determining the organization of education in Rwanda underlines the promotion of inclusive education and learning processes that are convenient for people with disabilities. Additionally, the law no 02/2011/OL of 27 July 2011 governs the organization of education in Rwanda, the law no 23/2012 of 15 June 2012 governs the organization and functioning of the nurseries, primary and secondary education, and the regional commitments made as part of Rwanda's membership of the East African Community (EAC). These all shed more light on the willingness and commitment of the government to promote access to quality education for all.

Nevertheless, access to quality education in Rwanda is impeded by persistent corruption in the education sector. Utilising the Advocacy and Legal Advice Centre (ALAC) database¹, a literature review and based on inputs from key informants and focus group discussion participants, TI Rwanda identified five priority areas of focus to study under the corruption risk assessment in the education sector. Include each priority areas of focus were is prone to specific corruption risks as indicated by determined based on the information from the literature and/or the data from the Advocacy and Legal Advice Centre (ALAC) database. The

¹ The ALAC data is made up of the information reported by victims of corruption through TI- Rwanda's online platform.

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Priority area of focus 1: Supply of Food items in primary and secondary schools

Corruption in public procurement processes has been highlighted by many studies. For example, Hamish A. et al. (2018) indicate that forms of corruption occur in the public sector especially in local government and include: kickbacks, extortion, embezzlement, nepotism, favouritism, conflict of interest, and bureaucratic corruption. As public schools also rely on public procurement, they may not escape such corrupt practices. For example, there was a case in the United States in which a school chef was convicted for taking bribes to supply their school with inferior quality food (New York Times, 2023).

The National Comprehensive School Feeding Policy (2019) guides and regulates the management of food supplies and the school feeding programme in Rwandan schools. The policy envisions all school children in Rwanda will be better able to achieve their full development potential through a sustainable school feeding programme that provides adequate and nutritious meals at school. Additionally, the Rwanda School Feeding Operational Guidelines Summary (undated) clearly highlights the procedures that should be followed in the procurement and management of food supplies at schools. However, there is a reported lack of enforcement of the Guidelines.

A study conducted by Transparency International Rwanda on behalf of the Office of the Ombudsman in 2023 revealed that the level of corruption in public tendering is high. In Rwanda, some bidders pay bribes to tender committee members over an extended period and some people also engaged in bid rigging to win tenders through clandestine agreements in advance (AAC, 2018). There are also risks of diverting the funds allocated to the school feeding programme by head teachers and staff (Corruption watch, 2013).

These facts indicate that corruption and irregularities take various ways in the school feeding programme (Corruption Watch, 2013). The high risk of corruption and inefficient procedures in school feeding programs can lead to the lack of observance of legal or institutional procedures. Procurement in non-budgetary Agencies such as schools may lead to mismanagement of public funds if there are no controls in place to prevent the malpractice. Thus, there is a need of mitigation measures in order to promote a transparent procurement process in food supply.

Priority area of focus 2: Internship allocation for TVET and tertiary level students

Under the Rwandan tertiary sector, students in certain programmes have the opportunity to do internships. With the development of the Education Sector Strategic Plan (2018/19 – 2023/24), the Government of Rwanda took an initiative aiming to provide those who graduate

from Rwandan teacher education colleges with the knowledge, skills, attitudes and competencies required to drive continued social and economic transformation in the country and be competitive on the global market.

In this regard, Strategic Priority 2 of the ESSP provides for strengthened continuous professional development and management of teachers across all levels of education in Rwanda. One such measure is the provision of internship opportunities for teacher trainees. However, gaps and challenges reportedly remain around the lack of mechanisms for ensuring non-discriminative allocation of trainees into schools for them to do their internship.

Furthermore, tertiary institutions themselves also have internal policies that regulate and guide the implementation of internships and school practice. For example, the University of Kigali's Internship and Teaching Practice Policy pursues, among other things, to ensure a well-structured and coordinated internship programme, effectiveness and efficiency in management and implementation of the internship programme, and provide a framework for monitoring, evaluation and reporting for the improvement of the programme. Nevertheless, students have been complaining about alleged corruption and poor implementation of the internship system (Dyomfana, 2021).

Furthermore, TVET schools in Rwanda are perceived to be prone to corrupt practices according to a report by Transparency International Rwanda (2021). According to the report, the most frequent reasons for demanding bribe in TVET schools were: to get materials to be used for casual works outside the school (30%); to get admission (20%); to get a recommendation for an internship (20%); to get improved academic records (20%); to get an internship from private institutions (10%), other reasons including instances where girls students were also victims of sexual corruption while interacting with managers of private companies seeking for an internship.

Priority area of focus 3: Students' grading in secondary schools and tertiary institutions

According to the Global Corruption Report on Education (TI, 2013), corruption in higher education may come in forms such as plagiarism, cheating, unauthorised use of others' work, paying for assignments claimed as one's own, the falsification of data and the misrepresentation of records and fraudulent publishing.

In Rwanda, student academic grading in secondary schools and tertiary institutions can be affected by corruption, including forms of gender-based corruption practices. The RBI 2023 report indicated that among the top five institutions coming in the second category of those with relatively highest likelihood include Secondary school (8.6%) and Primary school (7.4%). In Rwanda, secondary schools are mostly affected by sextortion in the students' grading as revealed by 36% of respondents (Transparency International Rwanda, 2022). This was also

confirmed by participants in FGDs with students from secondary schools (see testimony below).

“My classmate in secondary was exploited by our teacher because the latter helped her in examinations. Some days before sitting for the examinations, the teacher used to give her a copy of the very exam and I helped her to revise and memorize the answers. I was not aware that they were friends but one day she called the teacher using my phone and she forgot to delete the call details. At the end of the day, the teacher impregnated her.” (FGDs, one of secondary schools’ student)”.

In similar vein, a report by Transparency International Rwanda (2018) on gender-based corruption in public workplaces highlights the nature and magnitude of gender-based corruption in the higher institutions of learning. According to the report, the level of gender-based corruption in higher education stood at 42.6%, the second-highest after that of the private sector, which stood at 57.3%. The report emphasizes that sexual harassment, exploitation and the use of sex as a form of payment are the main gendered form of corruption.

Additionally, female students are asked for sexual favours in exchange for marks and they are often subjected to gender-based corruption when writing their dissertations. Some supervisors, according to the report, delay students’ work in order to be able to meet with female students face-to-face; so they can demand sex, leading to reportedly many incidents of sextortion.

In Rwanda, other forms of corruption in the high learning institutions exist. According to Transparency International Rwanda’s Report (RBI, 2017),, bribe occurrences in universities is among the highest form of corruption in the country. The RBI 2017 revealed that bribery in Rwandan universities mainly occurs in cases where student pay a bribe for their grades or in recruiting personnel.

Priority area of focus 4: Recruitment of teachers in secondary and primary schools

Bribery may be present in recruitment processes of teachers in Rwanda in order for a teacher to secure a job in a particular school of preference. Rwanda Today (2021) reported that teachers have been asked to pay for their admissions to favourable schools at the expense of those who could not afford to pay the bribes. A local media source additionally highlights that in some districts, there were fixed amounts of money one had to pay to get a job in some schools. According to New Times, in 2021 an official at Rwanda Education Board (REB) was arrested by the Rwanda Investigation Bureau over soliciting a bribe in an ongoing process of recruitment and admission of teachers in public schools. The media source indicated that one of the applicants who paid bribe in order to be considered in the admission was also arrested.

The 2021 Rwanda Bribery Index found that there is a seven percent likelihood that teachers will pay a bribe to secure a job in secondary schools.

In this study, during the interviews held with teachers, it was revealed that the prevalence of corruption in the admission of teachers is alarmingly high, significantly compromising the quality of education. According to one of the teachers interviewed, only the wives of affluent individuals, high-ranking officials, or those who have paid bribes are the ones selected to teach in schools located in the city. Others are sent to rural areas.

Priority area of focus 5: Student admissions in secondary schools

Students' admission in Rwanda is susceptible to be affected by bribes especially during the management of student's placement appeals. According to the ministerial instructions n0001/MINEDUC/26/07/2022 governing national examinations, student's placement concerns only successful candidates of primary examination(P6) and Ordinary Level National Examination(S3). All student placement's appeals are channelled through the candidates' school where he/she registered for national examination. The headteacher collects all received appeals, conduct thorough analysis of each case and then submits all appeals within valid justification to NESAC through an online appeal system.

NESAC reserves the right to reject any appeal if after analysis, it is realised that a strong case has not been established and communicated to claimant school within 30 calendar days counting from the day of the receipt of appeal. If no case the rechecking and remarking shall be done by the appointed team in the presence of the claimant student on the site, only the headteacher of a school who lodged the appeal on behalf of the student must be present to represent his/her student.

In this study, it was revealed that appointed team by NESAC were reported to demand bribe to students in collusion with headteachers while managing students' appeals at the facility level (see testimony from a head teacher in Kayanza District in the section of heat map of School's staff and local leaders below).

According to the 2021 Rwanda Bribery Index, the likelihood of students and/or their parents paying bribes to go to favourable schools is eight percent This happens especially when a student is allocated a school which is very far away from their home or they do not like the school for some reason. When they try to seek change of school to one they prefer, the students and their parents may be asked to pay a bribe. This issue has kept some children from lower socioeconomic quintiles out of schools. Thus, some students, mainly those from poor families cannot access education just because of corrupt practices.

RESEARCH DESIGN

A. METHODOLOGY

A descriptive research methodology was used to conduct this study because it is appropriate for corruption risk assessment. The descriptive research aims at accurately and systematically describing a population, situation or phenomenon. A descriptive research design can use a wide variety of research methods to investigate one or more variables (McCombes, 2019).

This particular study uses qualitative methods to collect and analyse data. This methodology was proposed because it enables respondents to extensively and clearly describe the circumstances and processes that are in play that enable corruption risks in the context of education service delivery. This section describes the proposed methodology for this corruption risk assessment and, more specifically, it outlines methods, scope, targeted respondents, how they were selected, the data collection and analysis process.

METHODS

The purpose of this study was to assess corruption risks in the process of accessing basic education in Rwanda. Qualitative methods (literature review, key informant interviews and Focus group discussions) were used to collect data on identified risk factors.

The assessment sought to identify the likelihood and the impact of corruption within institutions, which may present opportunities for corruption to occur. The data on this assessment was collected through FGDs with administrative staff from public schools, teachers, local leaders, parents and suppliers whose experience and perception on how corruption can adversely affect access to education was sought in order to inform the risk scoring =. Reference was also made to the guide of the United Nations Global Compact for corruption risk assessment (UN Global Compact Office, 2013), processes (risk factors) on which likelihood, impact and risks have to be assessed.

- **The literature review:** Included existing education policies, the legal framework, government's reports and different research works related to the service delivery in education sector. An emphasis was put on reviewing the extent to which anti-corruption commitments are enforced in key educational instruments in Rwanda.
- **Key Informant Interviews (KIIs):** Key informant interviews involve interviewing people who have particularly informed perspectives on an aspect of the program being evaluated (MacFarlan No Date). In this study, KIIs involved key stakeholders who, in one way or the other, were connected with service delivery in education including both

service users and service providers.. For example, information was collected from school leaders, education officers at sector and district levels and officials from REB, NESA and MINEDUC at the central level. The interviews focussed on various aspects of corruption in the education sector such as forms, likelihood, impact, risks and curbing strategies. The selection of key stakeholders and experts in the field helped gain a deeper understanding of the nature of corruption in the selected areas of focus.

- **Focus Group Discussions (FGDs):** Focus groups combine elements of both interviewing and participant observation. The focus group session is, indeed, an interview (Patton, 1990) not a discussion group, problem-solving session, or decision-making group. At the same time, focus groups capitalize on group dynamics. The hallmark of focus groups is the explicit use of the group interaction to generate data and insights that would be unlikely to emerge without the interaction found in a group. The technique inherently allows observation of group dynamics, discussion, and firsthand insights into the respondents' behaviours, attitudes, language, etc.

Focus groups are a gathering of 8 to 12 people who share some characteristics relevant to the study (US National Science Foundation). FGDs were used to collect information from various stakeholders in basic education (parents, suppliers, teachers, head teachers, schools 'administrative and local government staff)., including on their experience and perception on the likelihood and impact of corruption risks. The FGDs were convened in a way so that each group could freely express their views and tell their experiences. A FGDs checklist was developed with open and probing questions to enable participants discuss specific topics in detail.

B. SAMPLING PROCESS

According to Transparency International (2018), *"A Risk assessment does not seek to measure the perception, existence or extent of corruption, rather, the aim is to identify weakness within a system which may present opportunities for corruption to occur"*. The sampling process in this study involved an exclusively qualitative method and has targeted only groups of people who were knowledgeable about the education sector and more likely to be able to identify such weaknesses.

Purposive sampling was used to select the participants in FGDs and generally samples were kept small in size. Separate FGDs were held with service users and service providers who were selected based on their expertise about the area of priority to be discussed. Service users including parents, interns and suppliers of food, while service providers included local leaders dealing with education at district and sector level and implementers of basic education programs (teachers, head teachers, administrative staff such as directors of education, social

affairs, and executive secretaries). This research was carried out in five purposively-selected five districts of Rwanda. And one

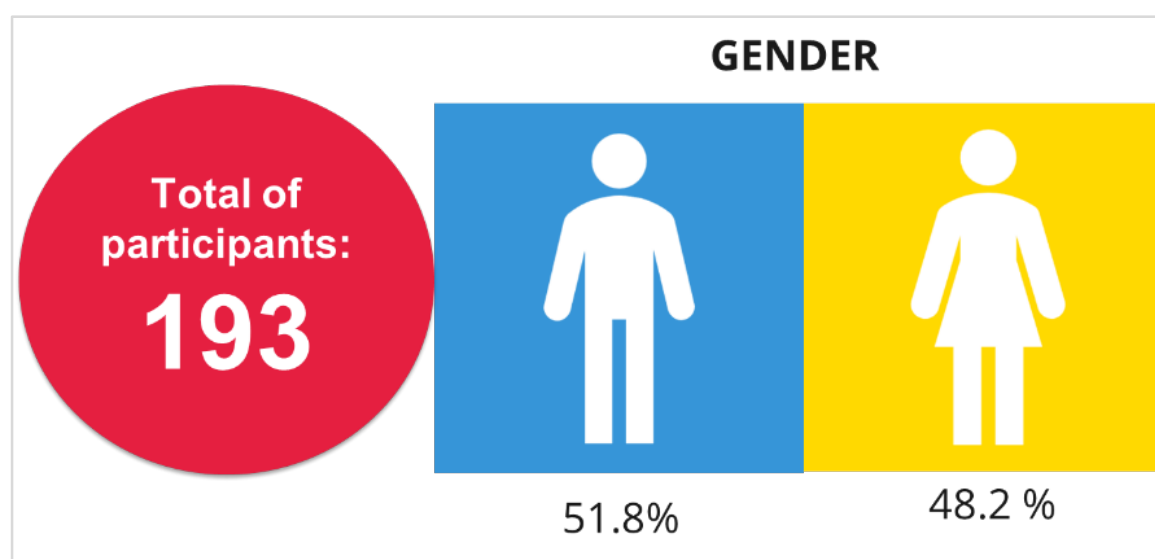
The desired sample was to have 240 participants in FGDs which were conducted in 3 administrative entities (sectors) and one secondary school per sector in all the 5 districts. However, only 193 were able to participate in the assessment, that is almost 80% of the initial sample size. The table below illustrates the category of participants in FGDs.

TABLE 1: CATEGORY OF PARTICIPANTS IN FGDS IN THE SELECTED DISTRICTS

PRIORITY AREA	TARGETED RESPONDENTS
Supply of Food Items in public primary and secondary schools	<ul style="list-style-type: none"> ▪ Food suppliers in primary and secondary schools ▪ School teachers and administrative personnel
Internship allocation, supervision and grading for public TVET and tertiary school's students	<ul style="list-style-type: none"> ▪ Interns from TVET and tertiary schools ▪ TVET/ Tertiary schools' teachers and administrative personnel
Students grading in public secondary and tertiary schools	<ul style="list-style-type: none"> ▪ Students in public secondary and tertiary schools ▪ School teachers and administrative personnel in secondary and tertiary schools
Recruitment and transfer of teachers in public secondary and primary schools	<ul style="list-style-type: none"> ▪ School teachers and administrative personnel from secondary and primary schools ▪ School managers from secondary and primary schools
Student placement in public secondary schools	<ul style="list-style-type: none"> ▪ Students from public secondary schools ▪ Teachers and administrative staff from secondary schools ▪ School managers from secondary schools

The disaggregation of the FGDs by gender is shown in the figure below.

Figure 1: DISTRIBUTION OF PARTICIPANTS IN FGDS BY GENDER



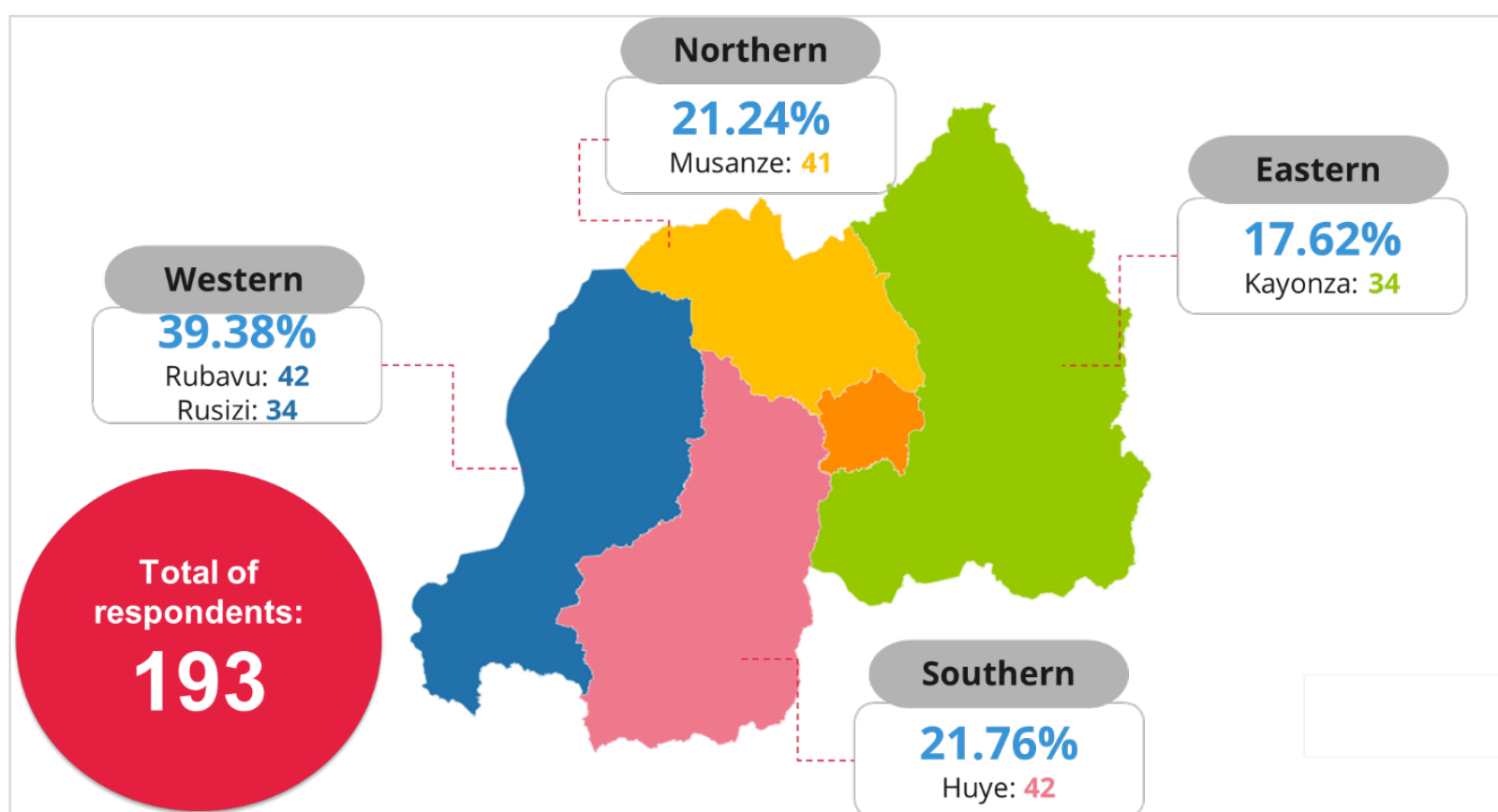
The age distribution of the study sample reveals a mixed representation of young respondents (students, interns) and adults (parents, teachers, managers and administrative staff) who participated in the assessment as shown in the table below.

TABLE 2: DISTRIBUTION OF PARTICIPANTS IN FGDS BY AGE

AGE	MEN	WOMEN	FREQUENCY	PERCENT
20-25	10	10	20	10.4
25-30	11	12	23	11.9
30-35	10	11	21	10.9
35-40	13	15	28	14.5
40-45	10	8	18	9.3
45-50	11	6	17	8.8
50-55	14	14	28	14.5
55-60	12	9	21	10.9
60+	9	8	17	8.8
TOTAL	100	93	193	100

The FGDs were held in five districts in Rwanda: Musanze in Northern Province, Rubavu and Rusizi in Western Province, Huye in Southern Province and Kayonza in Eastern Province. These were selected because sub-offices have been established by TI-RW in each of these districts since since 2009 who were able to support the field research. The figure below presents the distribution of respondents who participated in FGDs by district.

FIGURE 2: DISTRIBUTION OF RESPONDENTS BY DISTRICT



The purposive sampling technique was also used to select Key Informants who were presumed to be well-informed about the education sector in Rwanda and the five priority

areas. At the district level, KII were conducted with head teachers, District Education Officers and those in charge of social affairs at the local administrative entity), At least three Key Informants were selected in each of the five districts, meaning 15 people in total were interviewed.

At the national level, Key Informant Interviews, were also conducted with policymakers, regulators, practitioners and business people who are members of Public Sector Federation (PSF). The table below indicates key areas and institutions as well as the number of people who participated in KIIs at the national level.

TABLE 3: RESPONDENTS FOR KEY INFORMANT INTERVIEWS AT NATIONAL LEVEL

INSTITUTION	NUMBER OF KEY INFORMANTS
MINISTRY OF EDUCATION	2
NESA	2
REB	2
RTB	2
HEC	2
RPPA	1
OFFICE OF OMBUDSPERSON	1
OFFICE OF AUDITOR GENERAL	1
PSF	1
TOTAL	14

C. INCLUSION OF WOMEN, GIRLS AND GROUPS AT RISK OF DISCRIMINATION

Corruption tends to affect people differently due to a range of factors including gender, context, race, socioeconomic status, power relations and vulnerability. In many instances, corruption affects women more adversely than men and vulnerable groups are more susceptible to corruption (UNODC, 2020). Transparency International and Equal Rights Trust (2021) studied corruption affecting groups at risk of discrimination on grounds of sex and gender, LGBTQI+ status, race and ethnic background, religious belief and faith, membership of Indigenous communities and age.

They found that:

- Discrimination renders disadvantaged groups more vulnerable to corruption.
- Corruption can take forms such as sextortion that are intrinsically discriminatory.
- Discrimination results in the effects of corruption being unequally experienced across society.
- Discrimination raises barriers to prevent victims of corruption from seeking justice, while corruption can inhibit efforts to investigate and overcome discrimination.

In line with the priorities of the ISDA project, this assessment aims to particularly identify how corruption risks in the education sector affect women, girls and vulnerable groups. For this reason, there were separate FGDs convened for girls, teen mothers, PWDs, and parents from low-income households. Additionally, as mentioned before, the purposive sampling enabled researchers to achieve almost gender parity in the FGD study sample.

D. DESCRIPTION OF DATA ANALYSIS PROCESS

The analysis undertaken in this study took the form of the corruption risk assessment. The implemented methodology involved the following steps:² Key operational processes and decision points were identified for each area of focus.

- A decision point is the point at which relevant actors need to make the necessary decision to drive a process forward.
- Based on research findings and available data, corruption risks occurring at the decision points were mapped out. These corruption risks involve an abuse of public power for private gain that leads to a deviation of the decision. This deviation means that the service delivery process is not upheld as it should be.
- Considering the various corruption risks identified for the decision point, a risk score was calculated for each decision point. The risk score was calculated as a combination of two scores: the likelihood and impact of the corruption risk(s) occurring. These scores were measured on a 1-5 scale (where 1 represents very low and 5 represents very high). To determine the likelihood and impact scores, the scoring process was carried out through the FGDs. Participants, including service users and providers, were asked to give their provide scores as individuals based on their own personal perception or experience of corruption at the decision point. After this, average scores for each FGD were computed; the risk score was determined by the average scores across all FGDs.
- The decision points were then placed on a risk heat map which illustrates where risks within processes are higher and lower, and therefore where prioritized action is needed.
- Mitigation strategies were designed to eliminate or reduce the corruption risks identified for the decision points. Data collected in particular from KIIs helped identify mitigation strategies.
- A plan for implementing as well as monitoring the implementation of the mitigation strategies was developed.

² The corruption risk assessment methodology implemented by the ISDA project is informed by a conceptual framework document titled "Managing Risks to Corruption in the Health Sector", which is in the ownership of the United Nations Development Programme (UNDP). As of the time of publication, this document is still under development and is not yet published. UNDP has given permission to the ISDA project team to use the document.

E. LIMITATIONS OF RESEARCH DESIGN

- **Sensitivity of the research topic:** Research on corruption is highly sensitive especially when it comes to sharing personal experience and perception of corruption practices. For instance, there is a risk of social desirability bias from some respondents. To mitigate this risk, the research team sought an informed consent (verbal) from the respondents, which made participation fully voluntary and the confidentiality/anonymity to all respondents and participants was granted.
- **Identifying key risk factors:** The main limitation that this study faced is linked to the identification of dimensions/risk factors / indicators that affect women and girls trying to access education services. According to Transparency International³, although women tend to condemn corrupt behaviour more than men, they report corruption less often than men. As a result, it can be argued that there may be some other forms of corruption affecting women, girls and other groups at risk of discrimination in the education sector that are not yet uncovered because they are not reported due to social and/or cultural norms or due to issues related to the privacy and inadequate protection of whistle-blowers. To address this limitation in this study, in-depth interviews were separately conducted, in addition to FGDs, especially with those respondents who showed that they have information but were concerned about publicly sharing it with the researchers.
- **Perception-based questions:** The data for the corruption assessment was in part provided by responses to perception-based questions. While perceptions of corruption risks on an aggregate level can be a useful indicator, they are not without error and should not be treated as corresponding entirely to the situation on the ground. For example, respondents may on occasion have given their perception on the likelihood and impact of risks within an area of the health services they were not familiar with or display bias towards.
- **Coverage:** Another limitation was the limited geographical scope of the study. In order to minimize the impact of the small coverage, which could lead to missing some national level insights into corruption in the education sector, specific interviews were conducted with key informants from national institutions leading policies and regulating education or those working closely with the education sector.

FINDINGS

RESULTS

This assessment analysed 5 priority areas and identified 16 decision points. It emerged from FGDs held with Category 1 respondents (service users) that the top four decision points with the highest likelihood for corruption to occur in the education sector in Rwanda are:

- The risk that schools' managers and supervisors in TVET and Tertiary schools commit sextortion against female students who are seeking internship and approvals as well as grades for their internship (Likelihood Score: 4.3 out of 5)
- Recruitment of teachers and administrative staff in secondary and primary schools can be hindered by corrupt practices such as favouritism, nepotism, bribes, and criteria bypass (4.2 out of 5)
- Required approvals for internship are withheld, unless bribes for allocating students' internship from TVET and tertiary schools are paid (4.1 out of 5)

The risk that corrupt National Examination and School Inspection Authority (NESA) personnel allow student admission in schools of their choice in return for bribes from parents (4.1 out of 5). The service user respondents three decisions points have registered the highest impact they have on the overall education outcomes in Rwanda.

- Interns from TVET/tertiary schools provide facilitation payments to their supervisors in a bid to secure approvals and high grades (4.5 out of 5)
- Sextortion affecting job allocations and transfers of female administrative staff and teachers leads to harmful impacts on victims (4.4 out of 5)
- Job allocations, transfers of administrative staff and teachers can be hindered by corrupt practices such as favoritism, nepotism, bribes, and criteria bypass (4.3 out of 5)

The assessment conducted with Category 2 respondents (local government and schools' staff and teachers) also revealed a similar trend in terms of the scoring of the likelihood and impact of the risk of corruption occurring in the education sector in Rwanda which gives the findings potentially more validity. Concerning the likelihood, public officials identified 6 decision points with the highest scores as follows:

- Required approvals are withheld unless bribes for allocating students' internship from TVET and tertiary schools are paid (4.7 out of 5)
- Recruitment of teachers and administrative staff in Secondary and primary schools can be hindered by corrupt practices such as favoritism, nepotism, bribes, and criteria bypass (4.7 out of 5)

- Corrupt National Examination and School Inspection Authority (NESA) personnel allow student admission in schools of their choice in return for bribes from parents (4.4 out of 5)
- Food suppliers pay bribes to school administrators so that they are not required to meet the stipulated quantities and quality, resulting in the production of fewer items, higher unit cost, and/or low quality (4.4 out of 5)
- Recruitment of female teachers and female administrative staff in secondary and primary schools can be hindered by sextortion (4.3 out of 5)
- Teaching staff and examiners from public secondary and tertiary schools demand bribes to reveal examination questions and illegally provide high grades (4.2 out of 5)

Likewise, findings from category 2 who participated in the assessment indicated that corruption at the following decision points had highest impact on the education delivery chain in Rwanda.

- Suppliers pay bribe to school administrators so that they are not required to meet the stipulated quantities and quality, resulting in the production of fewer items, higher unit cost, and/or low quality (4.3 out of 5)
- Schools' managers and supervisors in TVET and Tertiary schools are susceptible of committing sextortion against female students who are seeking internship and approvals as well as grades for their internship (4.2 out of 5)
- Recruitment of teachers and administrative staff in secondary and primary schools can be hindered by corrupt practices such as favoritism, nepotism, bribes, and criteria bypass (4.2 out of 5)
- Corrupt school managers in public secondary schools allow student admission in schools of their choice in return for bribes from parents (4.1 out of 5)
- Diversion of schools' food supplies for unauthorized uses deprives the intended recipients and creates opportunities for illegal gains (4 out of 5)

Most of these corruption risks result from loopholes, including the generally low level of the education sector official's commitment to fighting corruption. This study has therefore examined the drivers of corruption within the education sector in Rwanda. From the FGDs at the national level, it emerged that among the key drivers of corruption in education in Rwanda include:

- Unpredictable Inflation that induces individuals to resort to corrupt practices
- Gender as a determinant role on whether or not an individual engages in corrupt behaviour
- Social norms and pressures that play a role in corrupt practices

IDENTIFICATION OF PROCESSES AND DECISION POINTS

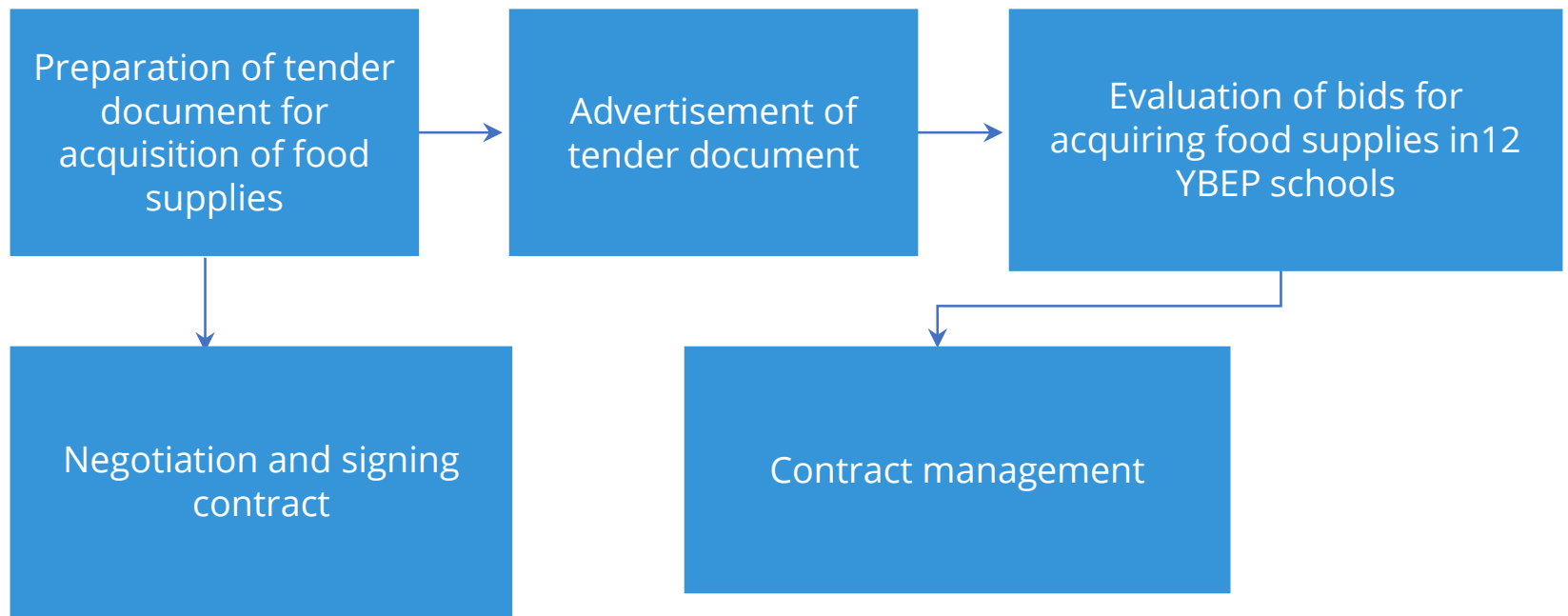
Table 6 sets out the processes studied under the CRA (these processes are the same as the areas of focus). In addition to the explanation of selected processes and how they have been identified, the key actors involved in each process have been mentioned as well.

TABLE 4: IDENTIFIED PROCESSES AND INVOLVED KEY ACTORS

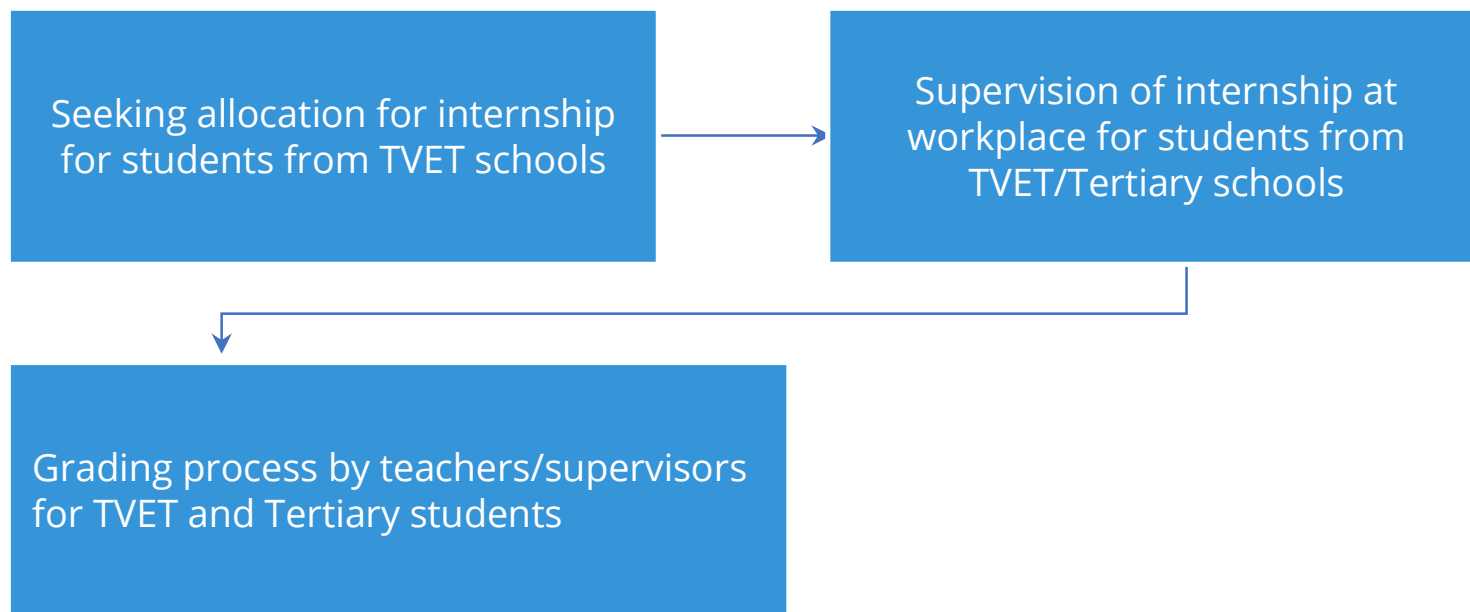
CODE	PROCESS	KEY ACTORS IN THE PROCESS	HOW THE PROCESS WAS IDENTIFIED
1	Food supply in public primary and secondary schools	Head teacher, bursar, tender committee and supplier	Data: TI-RW reports, ALAC database, The National Comprehensive School Feeding Policy (2019) , Report on corruption in private sector by the Office of the Ombudsman(2023)
2	Internship allocation, supervision and grading for public TVET and tertiary students	School management, teachers, and companies/organisations offering internships	Data: TI-RW reports, ALAC database
3	Students' grading in public secondary schools and tertiary institutions	NESA, Teachers, university administrative and teaching staff, students	Data: TI-RW reports and ALAC database
4	Teacher recruitment and transfer in public primary and secondary schools	NESA, local government staff, School leaders (head teachers are involved in by-passing the rules and procedures established by NESA	Data: TI-RW reports and ALAC database
5	Student placement in public secondary schools	NESA, District education officers, students	Data : TI-RW reports and ALAC database

The diagrams below display decision points under each priority area and are presented in progressive order.

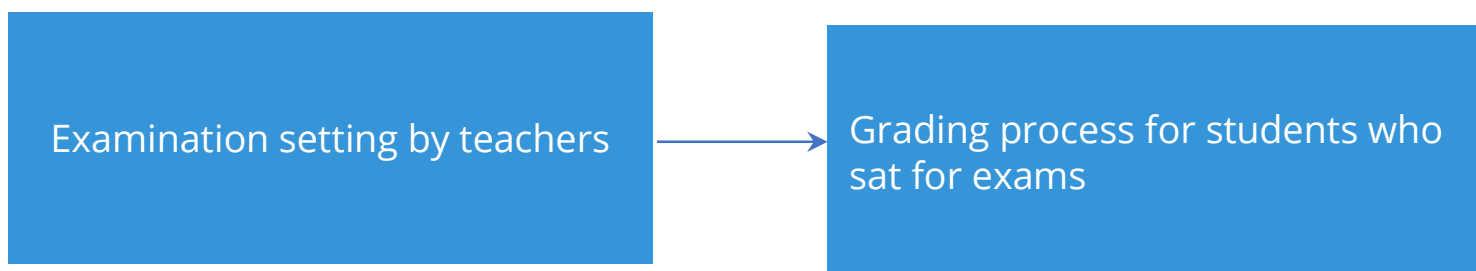
Priority area 1: Supply of Food Items in public primary and secondary schools



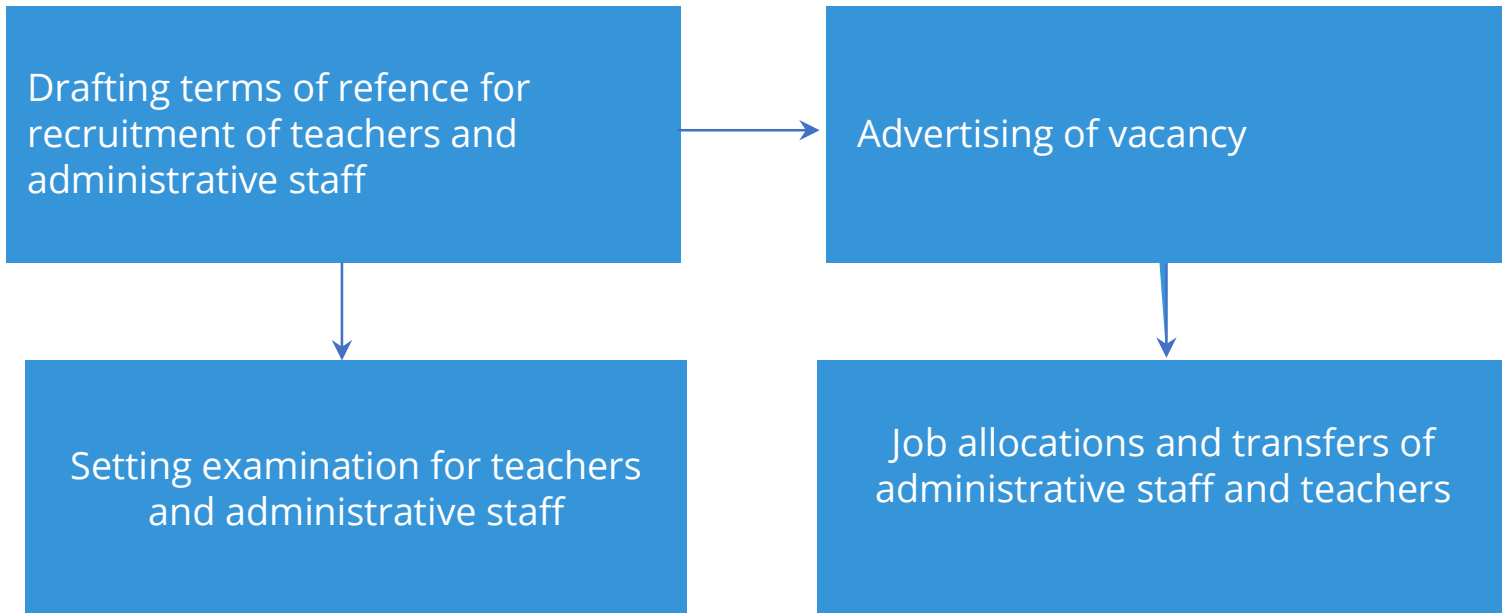
Priority area 2: Internship allocation, supervision and grading for public TVET and tertiary school's students



Priority area 3: Students grading in public secondary and tertiary schools



Priority area 4: Recruitment and transfer of teachers in public secondary and primary schools



Priority area 5: Student placement in public secondary schools

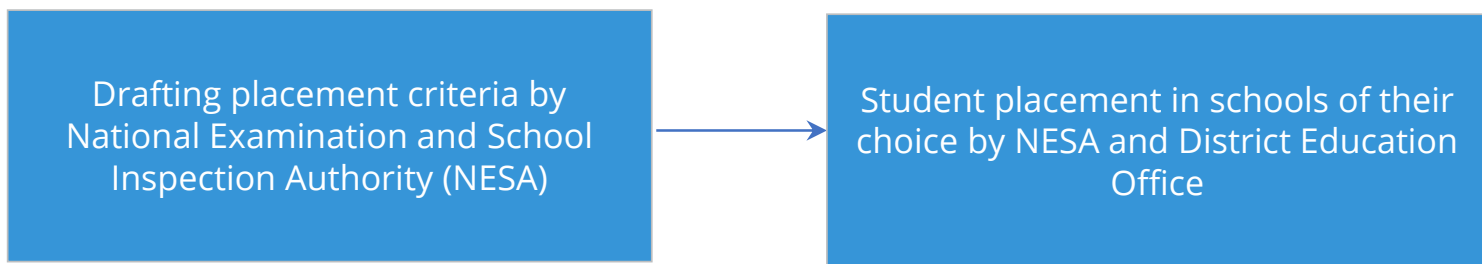


TABLE 5: DECISION POINTS AND POTENTIAL DEVIATED DECISIONS

CODE	DECISION POINT	POTENTIAL DEVIATED DECISIONS/CORRUPTION RISKS	HOW THE DECISION POINT AND DEVIATED DECISION POINTS WERE IDENTIFIED
1.1.	Preparation of tender document for acquisition of food supplies, Advertisement of tender document	<ul style="list-style-type: none"> • Information on procurement opportunities to supply foods in schools is limited to favoured firms/suppliers • Suppliers pay a bribe to tender committee members to tailor technical specifications, evaluation criteria that fit their companies. in order to exclude other bidders. • Procurement officers set evaluation criteria based on their favoured bidders. For example, if they know that the favoured bidder has only two references to prove past experience, in the tender document they will require only two certificates. The same practice is applied for credit line. This often happens in public boarding schools. • School head teacher and chairperson of parents committee leak information (criteria, budget) related to the tender with their favoured bidders. 	The decision point and deviated decision points were identified through literature review and during different focus group discussions and KIIs conducted with food suppliers.
1.2.	Evaluation of bids for acquiring food supplies in 12 YBEP schools, negotiation and signing contract	<ul style="list-style-type: none"> • Suppliers influence school administration actors before contracts are awarded to eliminate other competitors • Collusion between bidders occurs in such a way that new competitors cannot get the contract in schools. For example, a bidder or a group of bidders who keep winning tenders for a long period despite the existence of other qualified bidders. • There is a conflict of interest in procurement in schools. Some head teachers and other schools' staff create companies in the names of other persons and they are the ones who win tenders 	The decision points and deviated decision points were identified by participants in different focus group discussions, and KIIs conducted with food suppliers.

		<ul style="list-style-type: none"> • Women and girls are vulnerable to sextortion committed by schools managers while bidding for food supply 	
1.3.	Contract management	<ul style="list-style-type: none"> • Some suppliers pay bribes to the school managers in order to bypass requirements agreed in the contract. For example, suppliers pay a bribe to school administrators so that they are not required to meet the stipulated quantities and quality, resulting in delivering sub-standard and sub-quantity goods and services. • Diversion of school's food supplies for unauthorized uses affects intended recipients and creates opportunities for illegal gains, For example, in Rwanda, staff from Integrated polytechnic regional college of Kigali were arrested due to the teaching materials and consumables that were stolen. • Overpricing of invoices and pocketing the extra fees 	FGDs and KIIs with suppliers, TI-RW, report (2021), TI-RW report (2023)
2.1	Seeking allocation for internship for students from TVET schools	<ul style="list-style-type: none"> • Required approvals are withheld, until bribes are paid for allocating internships from TVET institutions • In TVET schools some students pay bribes to get an internship approval from company managers, female students are particularly victims of sexual corruption to get approval for internship 	Testimonies from the assessment of gender - based corruption (TI-RW, 2022), FGDs, KIIs
2.2	Supervision of internship at workplace for students from TVET/Tertiary schools	<ul style="list-style-type: none"> • Interns from TVET/Tertiary institutions provide facilitation payments (bribes) to their supervisors in a bid to secure approvals and high grades • Female students are vulnerable to sextortion committed by their teachers' supervisors in order to secure approval for the internship 	Testimonies from the assessment of gender -based corruption (TI-RW, 2022), FGDs, KIIs
2.3	Evaluation process by teachers/supervisors for TVET and	<ul style="list-style-type: none"> • Female students are vulnerable to sextortion committed by their teachers/supervisors in order to get higher grades 	<ul style="list-style-type: none"> • (Newtimes, 2019) • (TI-RW, 2020) • FGDs

	Tertiary students	<ul style="list-style-type: none"> Lecturers request students to pay bribes in order to get higher grades during the internship supervision 	
3.1	Examination setting by teachers	<ul style="list-style-type: none"> Teaching staff and examiners from public secondary and Tertiary institutions demand bribes or students offer bribes to reveal examination questions Some students testified that they experienced leakages of exams by some teachers because of sextortion. They said that sextortion is the form of corruption most experienced in the examination process rather than bribery. This means students may be provided with the examination question papers in advance or are given the answers before or during the examination itself. 	Testimonies from the assessment of gender-based corruption (TI-RW, 2022), FGDs
3.2	Grading process for students who sat for exams	<ul style="list-style-type: none"> Some female students confirmed that they experienced sextortion in exchange for better grades during the examination process 	Testimonies from the assessment of gender-based corruption (TI-RW, 2022), FGDs, KIIs
4.1	Drafting terms of reference for recruitment of teachers and administrative staff, Advertising of vacancy	<ul style="list-style-type: none"> Terms of reference are drafted in such a way to benefit a favoured candidate 	FGDs, KIIs
4.2	Setting examination for teachers and administrative staff	<ul style="list-style-type: none"> Examinations are drafted in such a way to benefit a favoured candidate Examinations are leaked to a favoured candidate, including in response to a bribe 	FGDs and KIIs
4.3	Job allocations and transfers of administrative	<ul style="list-style-type: none"> The recruitment of female teachers and female administrative staff in primary and secondary schools can be affected by sextortion. Some female teachers said that sometimes they experienced 	(U4, 2019), FGDs (TI-RW, 2018) (Farooq & Kai, 2017), KIIs

	e staff and teachers	<p>sextortion with some district officials for hiring or transfer purposes.</p> <ul style="list-style-type: none"> • The placement of teachers and other school staff in rural schools tend to be affected mostly by nepotism and favouritism. • 	
5.1	Drafting admission criteria by National Examination and School Inspection Authority (NESA)	<ul style="list-style-type: none"> • Admission criteria are drafted in such a way to benefit a favoured candidate • 	FGDs, KIIs
5.2	Student admission in schools of their choice by NESA and District Education Office	<ul style="list-style-type: none"> • Bribes related to admissions are solicited or offered, as reported by students and parents in the Rwanda Bribery Index 2021 • Corrupt National Examination and School Inspection Authority (NESA) personnel or school managers allow student admission in schools of their choice in return for bribes from parents. • 	(TI-RW, 2021), FGDs, KIIs

RISK MAPPING

This section reports on risk scores for all sixteen (16) decision points for the 5 selected priority areas. The results of risk scores are discussed in two categories. The first category (d.1) reports on risk scores by service users and suppliers of food in schools while the second category (d.2) reports on risk scores by teaching and administrative staff and local leaders in all the five districts involved in this assessment.

RISK SCORE BY SERVICE SEEKERS AND FOOD SUPPLIERS

Corruption likelihood, impact and risk scores by service seekers

Table 6: Risk Score – Supply of Food to public primary and secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
1.1	Preparation of tender document for acquisition of food supplies, Advertisement of tender document	3.9	3.5	3.7
1.2	Evaluation of bids for acquiring food supplies in 12 YBEP schools, Negotiation and signing contract	3.5	4.4	4
1.3	Contract management	4.0	3.6	3.8

Figure 3: Risk heat map – Supply of Food to public primary and secondary schools

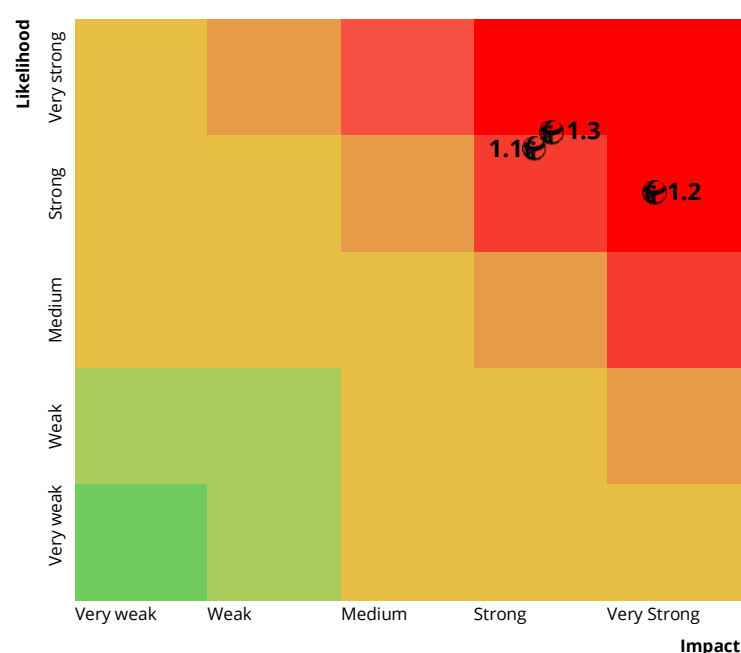


Table 7: Risk Score – Internship allocation, supervision and grading for public TVET and tertiary students

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
2.1	Seeking allocation for internship for students from TVET schools	4.1	3.8	4
2.2	Supervision of internship at workplace for students from TVET/Tertiary schools	3.6	4.5	4
2.3	Grading process by teachers/supervisors for TVET and Tertiary students	4.3	4.0	4.2

Figure 4: Risk heat map – Internship allocation, supervision and grading for public TVET and tertiary students

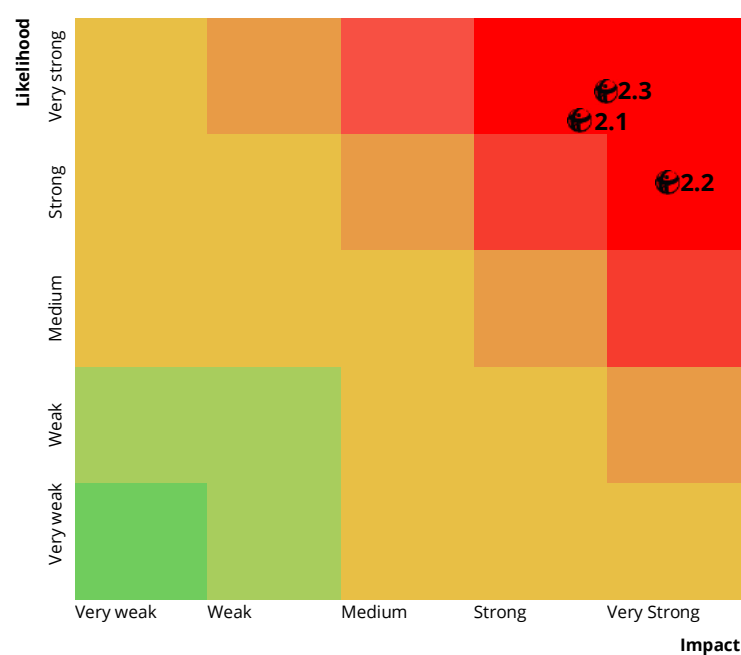


Table 8: Risk Score – Students’ grading in public secondary schools and tertiary institutions

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
3.1	Examination setting by teachers	3.5	4	3.8
3.2	Grading process for students who sat exams	4	3.2	3.6

Figure 5: Risk heat map – Students’ grading in public secondary schools and tertiary institutions

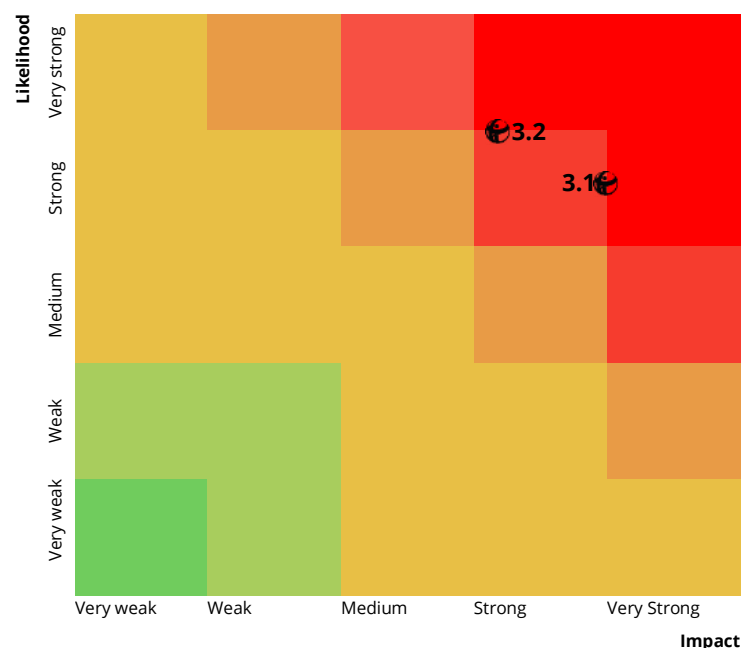


Table 9: Risk Score – Teacher recruitment and transfer in public primary and secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
4.1	Drafting terms of reference for recruitment of teachers and administrative staff, Advertising of vacancy	1	2	1.5
4.2	Setting examination for teachers and administrative staff	1	2	1.5
4.3	Job allocations and transfers of administrative staff and teachers	3.9	3.6	3.8

Figure 6: Risk heat map – Teacher recruitment and transfer in public primary and secondary schools

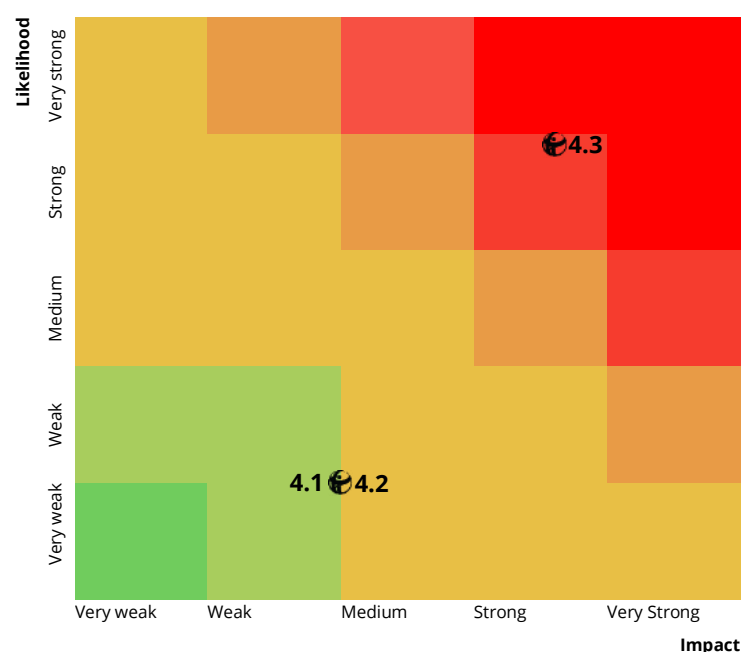
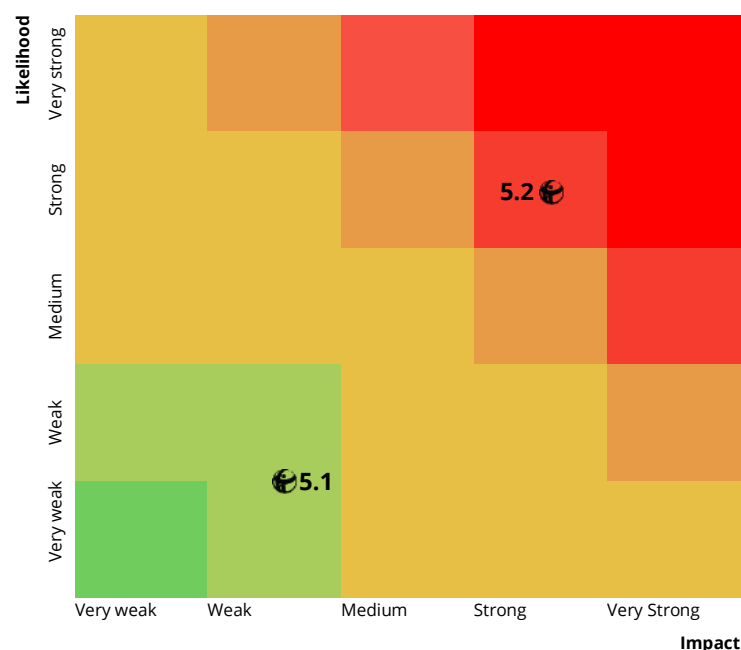


Table 10: Risk Score – Student admission in public secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
5.1	Drafting admission criteria by National Examination and School Inspection Authority (NESA)	1	1.6	1.3
5.2	Student admission in schools of their choice by NESA and District Education Office	3.4	3.6	3.5

Figure 7: Risk heat map – Student admission in public secondary schools



Decision points with highest corruption risk score in the education sector in Rwanda

- **Contract management in food supply in 12 YBE schools**

Ratings of Suppliers of food taking part in the study indicated that corruption risks are high in this process. As the figures show, all decision points have risk scores above 3.5 out of 5. These findings are also consistent with experiences of corruption shared by participants in focus group discussions, where they expressed how they face corruption in this process. Below are testimonies of participants in FGDs that show corruption encountered while seeking these services.

“Most of the time, after supplying foodstuff, we (suppliers) are demanded to pay bribes to school administrators so that they can speed up payment. We give them what they need because in some cases we need money back to pay loans in banks. When you refuse to pay bribes and report to the sector level, schools make sure you never win a tender again. It happened to me and I never won tenders in the seven schools that I reported. After paying me, my dossiers are automatically eliminated when I dare to compete for tenders in those schools.

There are also other schools that do not pay me but instead pay other suppliers who came later and no explanation for why they do not pay me". **A supplier in Rubavu District.**

This was echoed by another victim of corruption who testified:

"I won a tender to supply foods to a school, I was told to increase the price in my invoice and give the balance to the manager of the school" **Female participant in a FGD with suppliers, Musanze District)**

- **Evaluation of bids for acquiring food supplies in 12 YBEP schools, Negotiation and signing contract:**

Most public tenders are implemented by private business operators. Numerous research findings have revealed that the payment of bribes can influence who gets the government contract, the terms and condition of the contract and terms of subcontracts for the implementation of project. In this study, risk of corruption during the negotiation and signing of the contract was found to be rather high (3.9 out of 5) as testified by participants in the FGDs:

"There is always a mafia (conspiracy) in procurement in schools. This is because some head teachers and other school officials have created companies in the names of other persons (beneficial ownership), and they are the ones who win tenders. This mostly affects schools under a "Nine Year Basic Education Program." **A teacher at a "Nine Year Basic Education Program" School in Gicumbi District:**

- **Supervision of internship at workplace for students from TVET/Tertiary schools**

Internships are beneficial for students because they help develop their professional aptitude, strengthen personal character, and provide a greater door to opportunity. By investing in internships, students are equipped with the broadest spectrum of opportunities when seeking and applying for a job after college. However, it emerged from the FGDs conducted with some TVET graduates that for them it is very difficult to get internships from school managers due to corrupt behaviors, or also to complete the internship due to the corrupt behavior of supervisors, including sextortion, as documented in the following testimonies.

"There are female interns who are victims of gender-based corruption. I personally know a young girl who was interning in a hospital, but after two weeks, the director began harassing her and pressuring her to engage in sexual intercourse. When she refused, he immediately dismissed her, and I encountered her mother attempting to assist her in securing an internship in another institution". **A woman in Musanze District**

"During my internship in secondary school, my supervisor, who was also the boss, made inappropriate advances towards me. He expressed his affection and offered me privileges that

weren't extended to other colleagues. On one Saturday, when everyone else was off, he summoned me to the office and asked for a sexual encounter, promising favourable evaluations in return. I declined, but upon returning to work on Monday, he began mistreating me, assigning challenging tasks that made it difficult to complete my internship. When I sought another internship opportunity, a leader at the new company also propositioned me for sex, and I refused once again". **A student from a polytechnic college.**

- **Recruitment and transfer of teachers in public secondary and primary schools**

The recruitment and transfer of teaching staff and administrative staff in Secondary and primary schools are vulnerable to corruption in the form of favoritism, nepotism, bribes, and criteria bypass with an average risk score of 3.8 out of 5. During focus group discussions, participants also revealed how they encounter corruption in this process.

"The prevalence of corruption in the admission of teachers is alarmingly high, significantly compromising the quality of education. Virtually all teachers live in fear of potential reassignment to other schools, even if they have not requested it. Recently, NESA assigned a teacher to our school; however, after just two weeks, the district notified him that he had to relocate to another school far from the city. Frankly speaking, here in our district, only the wives of affluent individuals, high-ranking officials, or those who have paid bribes are the ones selected to teach in schools located in the city. Others are sent to rural areas". **A teacher at a "Nine Year Basic Education Program School in Gicumbi District.**

- **Students grading in public secondary and tertiary schools**

In this assessment, respondents identified bribery and sextortion as common forms of corruption in this process.. During focus group discussions, participants revealed some experiences of corruption that they often encounter in services related to grading.

"I know a young orphan lady who is very intelligent in class but one of her teachers made her repeat a year after denying to have sexual intercourse with him. The cases of gender-based corruption are increasing in schools. Because I knew that case where the lady repeated, when my daughter reported to me that one of her teachers wanted to induce her in sex in exchange with marks, I decided to take her to another school in Musanze where I have to pay RWF 155,000 per trimester while I used to pay only 89,000 in the old school in Nyanza. I did this because my daughter told me that the teacher had already started harassing her". **A parent of a gender-based corruption victim in Kamonyi,**

- **Student admission in public secondary schools**

Student admission in schools in Rwanda is relatively prone to corruption as revealed by some participants in focus group discussions where students are exposed to corrupt behaviors such as sextortion and bribery (see testimony below).

“I got impregnated when I was in third year of secondary school (the year in which I was supposed to sit for an ordinary level national exams). After giving birth, my family took me back to school but a headmaster denied saying that he does not admit grownup mothers. I moved to another nearby school the headmaster instructed me to first have sexual intercourse with him for me to be admitted. I accepted because there was no other option. I graduated last year, thanks to Caritas Rwanda for supporting me to get school fees and other basic needs”. **A teen/young mother in Gicumbi District**

“I wanted my child to be admitted in a school for students with disabilities but all my efforts failed because I was demanded to pay bribe of 80,000 FRW to get an admission. When I tried to negotiate, the one who was supposed to help me said the minimum could be 70,000 FRW and get a sponsor to pay school fees for my child. I did not pay that amount because I am poor, and as a result, my child missed that opportunity”. **A parent of a student with disability in KAYONZA District**

“Due to scarcity of schools specialized in teaching students with disabilities, the level of corruption is very high if you need a school admission to get a support. My neighbor who is very poor told me that her child was not able to get admitted in a school because the registrar demanded her to pay 50,000 FRW. If she got admission, her child would be sponsored and study for free but her child is home now because the mother did not pay bribe due to poverty”. **A participant in the FGD with parents of students with Disability in KAYONZA District**

These testimonies indicate that corruption during the admissions process may disproportionately affect and impact vulnerable groups by severely limiting their access to education.

RISK SCORE BY SERVICE PROVIDERS (CATEGORY 2)

This section reports on how respondents from Category 2 in public schools perceived the corruption risks for the priority areas.

CORRUPTION LIKELIHOOD, IMPACT AND RISK SCORES BY SCHOOL'S STAFF AND LOCAL LEADERS (Category 2 respondents)

Table 11: Risk Score – Supply of Food and education materials in public primary and secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
1.1	Preparation of tender document for acquisition of food supplies, Advertisement of tender document	3.8	3.2	3.5
1.2	Evaluation of bids for acquiring food supplies in 12 YBEP schools, Negotiation and signing contract	3.6	3.8	3.7
1.3	Contract management	4.4	4.3	4.3

Figure 8: Risk heat map – Supply of Food and education materials in public primary and secondary schools

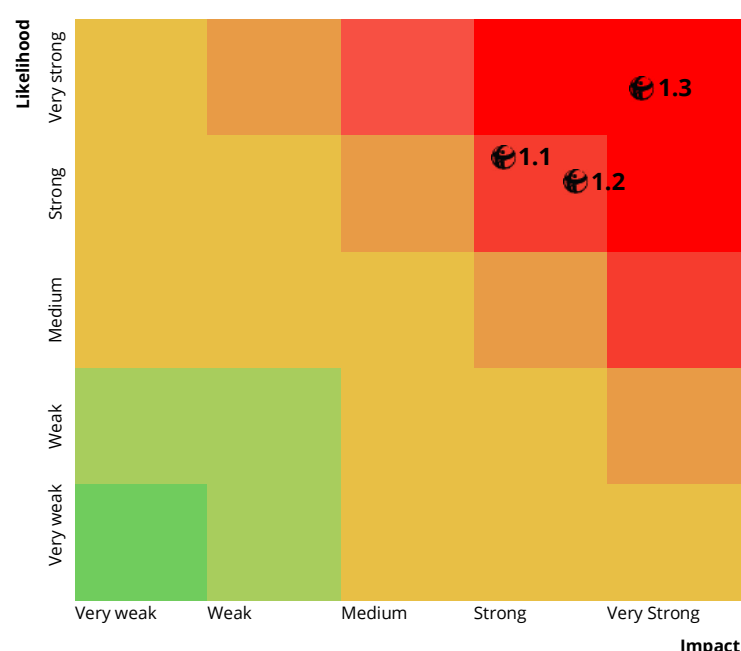


Table 12: Risk Score – Internship allocation, supervision and grading for students in public TVET and tertiary institutions

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
2.1	Seeking allocation for internship for students from TVET schools	4.7	3.9	4.3
2.2	Supervision of internship at workplace for students from TVET/Tertiary schools	3.7	4.0	3.9
2.3	Grading process by teachers/supervisors for TVET and Tertiary students	3.4	4.2	3.8

Figure 9: Risk heat map – Internship allocation, supervision and grading for students in public TVET and tertiary institutions

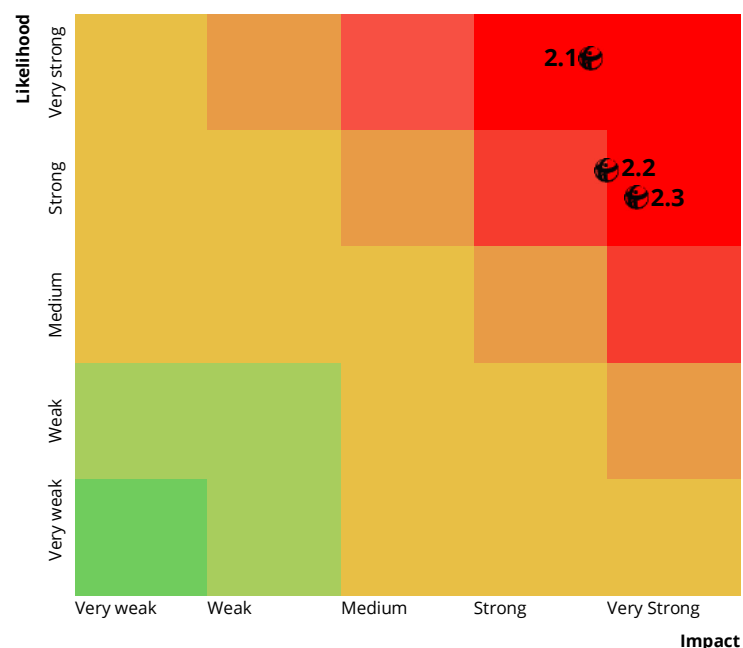


Table 13: Risk Score – Students grading in public secondary schools and tertiary institutions

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
3.1	Examination setting by teachers	4.2	4	4.1
3.2	Grading process for students who sat for exams	4	3.2	3.6

Figure 10: Risk heat map – Students’ grading in public secondary schools and tertiary institutions

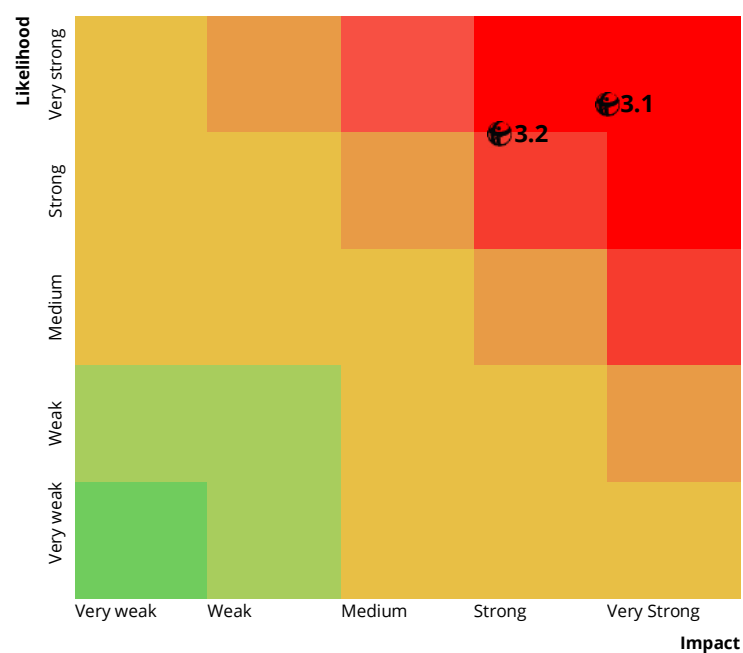


Table 14: Risk Score – Teacher recruitment and transfer in public primary and secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
4.1	Drafting terms of reference for recruitment of teachers and administrative staff, Advertising of vacancy	1.6	2.2	1.9
4.2	Setting examination for teachers and administrative staff	1.6	2.2	1.9
4.3	Job allocations and transfers of administrative staff and teachers	4.3	3.4	3.9

Figure 11: Risk heat map – Teacher recruitment and transfer in public primary and secondary schools

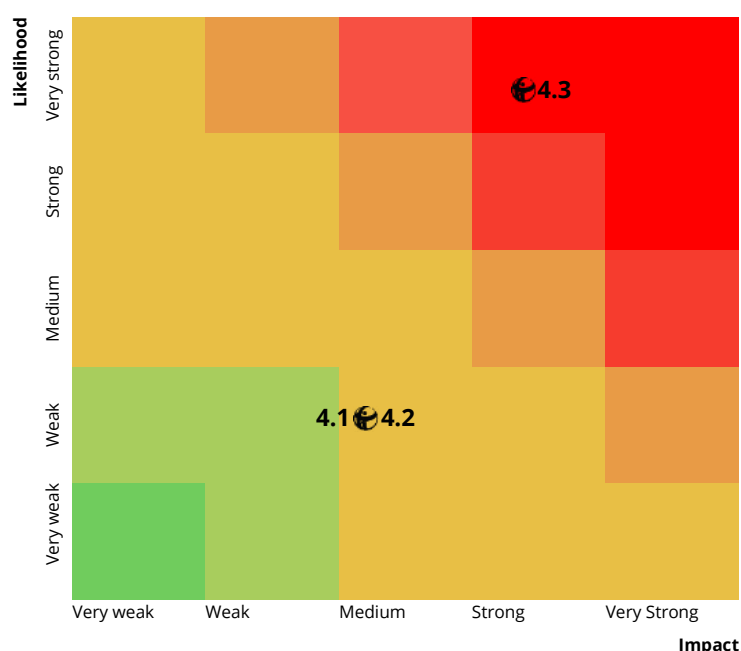
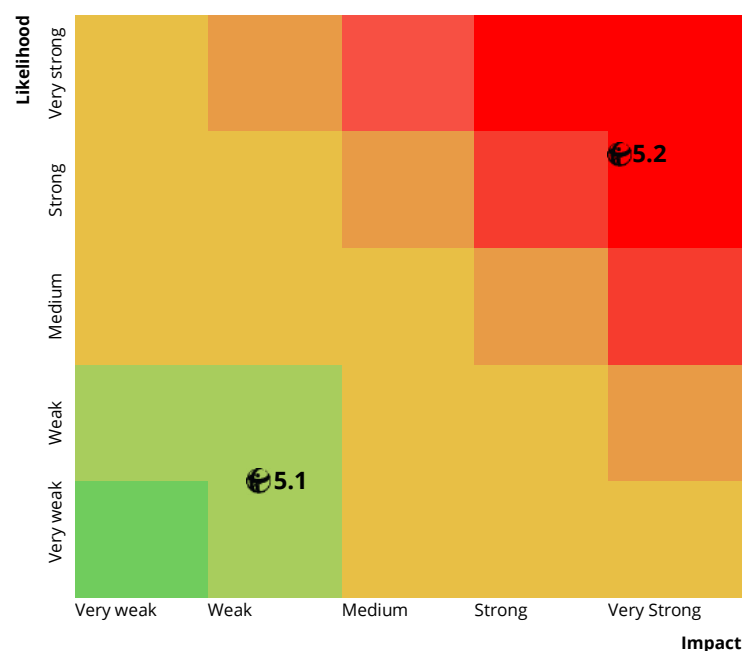


Table 15: Risk Score – Student admission in public secondary schools

Code	Decision Point	Average Likelihood Score	Average Impact Score	Average Risk Score
5.1	Drafting admission criteria by National Examination and School Inspection Authority (NESA).	1	1.4	1.2
5.2	Student admission in schools of their choice by NESA and District Education Office	3.8	4.1	4

Figure 12: Risk heat map – Student admission in public secondary schools



School's staff and local leaders believe that there is high risk of corruption in the following decision points.

The ratings of school staff and local leaders indicate that services susceptible to the risk of corruption (with risk scores above 3.6/5) include recruitment of teachers and administrative staff, allocation of students to internships, and food suppliers who bribe school administrators so they are not required to meet the stipulated quantities and quality of supplies.

- **Supply of Food Items in public primary and secondary schools**

The risk scores allocated by respondents are indicative of a high level of corruption risk in the supply of food items in public primary and secondary schools. The figures indicate that all decision points have risk scores of more than 2.4 out of 5, with 4 out of 5 being the highest.

Below are some cases of corruption mentioned by school staff during discussions conducted in June 2023.

*There is corruption in all steps of procurement in schools especially in school feeding programs and procurement of schools' materials and consumables. Sometimes head teachers or members of the procurement committee reveal crucial tender information to some bidders and oblige them to surrender at least 25% of their profit to those who help them win tenders. There are also many cases where real costs of materials are increased in a bid to have a remainder collected from suppliers. As a signatory, I was once obliged to sign that the ball cost Frw 50,000 while I knew the supplier only had to receive half of it and he had to provide an invoice of Frw 50,000. **A female teacher in Musanze District.***

- **Internship allocation, supervision, and grading for public TVET and tertiary school students**

With a risk score of 4.3 out of 5, respondents indicated that the allocation of internships. A TVET school principal was interviewed in this study alluded to TVET staff soliciting bribes from students He said:

“We do not tolerate cases of corruption. We recently dismissed two lecturers accused of corruption in changing students' grades. One of those lecturers' voices had been recorded while requesting bribes. But we were surprised to hear that he went to court and the Judge said that we had no rights to collect evidence by recording him”. **A TVET principal**

- **Recruitment and transfer of teachers in public secondary and primary schools**

The recruitment of teachers and administrative staff in schools can be hampered by corruption in the form of favoritism, nepotism, bribery, and criterion bypass, as demonstrated by service providers and clients. The above-mentioned corruption forms also affect the services related to job allocations and transfers of administrative staff and teachers 25. Corruption in the form of sextortion affects the practices of job allocation and transfers of teachers and administrative staff when it comes to female staff,. In the focus group discussions, participants shared their experiences of corruption incidents especially in the forms of bribery and sextortion in services related to human resources.

The level of corruption in the admission of teachers is very high and this really affects quality of education because almost all teachers are fearful that they may be relocated to other schools even if they have not requested for that. Recently, NESAsent a teacher to our school but after two weeks the district informed him that he had to go to another school far from the city. Sincerely speaking, here in our district, only wives of rich people, high officials or those who paid bribes are the ones who are sent to teach in schools located in the city. Others are sent far in the countryside. In addition, there is corruption in requesting for relocation from one school to another). Teachers who request to go to a school located in the city are charged about 400,000Frw. Normally, nowadays relocation is authorized through an online platform introduced by NESAs. However, the district and headmasters dodge the system and hide that they have teachers' posts that needed to be filled. At the end of the day, after closing the system due to relocation deadline, they explain they have pending posts which allow to do this out of the system. **A teacher at a “Nine Year Basic Education Program” School in Gicumbi District**

Despite the implementation of a digital system for teachers' recruitment and transfers, some Mayors and other district officials continue to compromise the established process and system. Additionally, there are religion-based schools that establish criteria requiring staff to adhere

to a specific religion, hindering NESAs from ensuring fair recruitment. At times, NESAs accommodate the preferences of these schools. **A NESAs Staff member**

- **Students grading in public secondary and tertiary schools**

Activities related to student grading in public secondary and tertiary schools are vulnerable to corruption risks. Respondents also have indicated that female students who are vulnerable to sextortion in exchange for favors in exams. Participants in focus group discussions also revealed some cases of corruption in the delivery of the above-mentioned services.

*There are cases of sextortion where teachers give marks to students in exchange for marks. This almost happens for students who get evening or weekend coaching. Instead of teaching them, some teachers have sexual relations with students and give them marks in normal classes. **A female teacher in Musanze District***

- **Student admission in public secondary schools**

The ratings from service providers and clients, indicate that the admission procedures in public secondary schools are vulnerable to corruption. Cor. During focus group discussions, participants also shared experiences of corruption related to admission in public secondary schools

*As a teacher, I can testify that there are so many cases where students or their parents are demanded to pay bribes to get admissions in certain schools or get combinations of courses they wish to study in advanced level. For example, the fact that we have so few Teacher Training Colleges (TTC) while the government has provided school fees subsidies for students enrolled in TTC, students are demanded to pay bribes to get admitted. Only students who do not pay bribes are those selected by REB/NESA after the National exam. But of course, headmasters unofficially reserve some places to bring in other students. **A teacher at a "Nine Year Basic Education Program" School in Gicumbi District***

*'Since the authority for students' placement was transferred to the National Examination and School Inspection Authority (NESAs) and Rwanda Basic Education Board (REB), the opportunities for corruption have decreased. However, the number of claimants has increased due to many students being placed in schools far away from their homes, thereby escalating corruption in the process of filing claims. After passing national examinations, it's surprising that some students in Kayonza District (Eastern Province) are sent to study in Rubavu District (Western Province)! When these students or their parents file claims with NESAs, on certain occasions, the latter sends inspectors to districts to meet with claimants. At this juncture, some parents resort to paying bribes to NESAs staff or employing other corrupt means to secure the schools they desire'. **A head teacher in Kayonza District***

Table 16: The Rating of the likelihood and impact of corruption risk by Category 1 and 2 respondents

Code	Areas of focus	Decision points	Category1 respondents			Category2 respondents		
			Likelihood score (1-5)	Impact score (1-5)	Risk Score (1-5)	Likelihood score (1-5)	Impact Score (1-5)	Risk Score (1-5)
1	Supply of Food to public primary and secondary schools	Preparation of tender document for acquisition of food supplies, Advertisement of tender document	3.9	3.5	3.7	3.8	3.2	3.5
		Evaluation of bids for acquiring food supplies in 12 YBEP schools, Negotiation, and signing of contract	3.5	4.4	4	3.6	3.8	3.7
		Contract management	4	3.6	3.8	4.4	4.3	4.4
2	Internship allocation, supervision, and grading for public TVET and tertiary students	Seeking allocation for internship for students from TVET schools	4.1	3.8	4	4.7	3.9	4.3
		Supervision of internships at the workplace for students from TVET/Tertiary schools	3.6	4.5	4	3.7	4	3.9
		Grading process by teachers/supervisors for TVET and Tertiary students	4.3	4	4.2	3.4	4.2	3.8
3	Students' grading in public secondary schools and tertiary institutions	Examination setting by teachers	3.5	4	3.8	4.2	4	4.1
		Grading process for students who sat for exams	4	3.2	3.6	4	3.2	3.6
4	Teacher recruitment and transfer in public primary and secondary schools	Drafting terms of reference for recruitment of teachers and administrative staff, Advertising of vacancy	1	2	1.5	1.6	2.2	1.9
		Setting examinations for teachers and administrative staff	1	2	1.5	1.6	2.2	1.9
		Job allocations and transfers of administrative staff and teachers	3.9	3.6	3.8	4.3	3.4	3.9
5	Student placement in public secondary schools	Drafting placement criteria by the National Examination and School Inspection Authority (NESA).	1	1.6	1.3	1	1.4	1.2
		Student placement in schools of their choice by NESA and District Education Office	3.4	3.6	3.5	3.8	4.1	4

These figures indicate that there is a significant risk of corruption in the sector of education. This is demonstrated by the fact that most of the decision points specified in this assessment (10 out of 13) have a risk score of more than 3 out of 5. Based on how the sets of respondents rate the corruption risk at various decision points, it is clear that they assessed corruption risk differently. In the opinions of category 2 respondents, some of the decision points show a higher corruption risk than others. These include the following;

- Contract management,
- Allocation for internships for students from TVET schools,
- Examination setting by teachers
- Student admission in schools of their choice by NESAs and District Education Offices.

As the statistics show, these decision points have risk scores of more than 15 out of 25. Ratings made by service seekers and suppliers of food also indicate that certain decision points have a higher risk of corruption than others. Based on the ratings, the following decision points have risk scores of more than 3 out of 5.

- Evaluation of bids for acquiring food supplies in 12 YBEP schools, negotiation, and signing of contract
- Allocation for internships for students from TVET schools
- Supervision of internships at the workplace for students from TVET/Tertiary schools
- Grading process by teachers/supervisors for TVET and Tertiary students

As per the views of all respondents (service providers and users), some decision points are less likely to be corrupted than others. Those decision points with low risk scores are the following;

- Drafting terms of reference for recruitment of teachers and administrative staff, Advertising vacancy
- Setting examinations for teachers and administrative staff
- Drafting admission criteria by the National Examination and School Inspection Authority (NESAs).

Based on how the two sets of respondents testify about corruption risk at various decision points, it is interesting to observe that both categories had similar scores of risks of corruption for most of the decision points assessed. This suggests that both service providers and users have a level of common understanding of where corruption risks lie.

Drivers of corruption

- **Unpredictable inflation drives individuals to resort to corrupt practices**

Some participants in the KIIs expressed their view that unpredictable inflation in Rwanda is actors within the education sector to corrupt practices: for example, there are reports that some teachers neglect students who are not part of their evening coaching class which they consider as source of income that can add up on their low wages. This proves true as inflation affects negatively the purchasing power of individuals and groups by lowering the real wage level. According to Tosun (2002), individuals and groups must fulfil their needs although their purchasing power decreases. This might result in corruptions as individuals and groups can look for illegal methods.

- **Social norms and pressures that play a role in corrupt practices**

Social networks may be constructed on the basis of specific criteria of group affiliation such as gender, ethnicity, professional acquaintances, religion and so on. For example, any information about a job market is not given to just anyone, nor is it available from everyone but rather to the people who live in the neighbourhood, those who attend one's church or school or those with whom someone has worked in the past. It is only natural that when there are jobs to be had, people who know about them will tell the people who are close to them, those with whom they identify, and those who at some point can reciprocate the favour. In terms of the kind of social pressures that can in corrupt practices, discussions held with national level representatives who participated in this study, showed that there are religion-based schools who set criteria that they need only staff who belong to their religion which seems to be unfair recruitment procedure and hence being perceived that in these schools' jobs are provided on the basis of favouritism.

- **The absence of a legal framework in primary and secondary schools for managing contracts makes the education sector vulnerable to discretionary decision making and corruption**

In Rwanda, the political environment is conducive to reliable public financial management in general and public procurement process in particular whereby the Government has undergone several reforms through the enactment of a number of successive laws and putting in place regulations that help the translation of the laws into usable procurement tools such as e-procurement. Despite the existence of the different legal and institutional instruments, there are still looming problems in the way tendering process is carried out in public institutions. In some public agencies such as schools, there are weak internal controls, compliance, and risk management systems which facilitate unethical behaviour. Such behaviour may include unidentified or unmanaged conflicts of interest, frequent gifts and hospitality, failure to perform third party audits and lack of documentation of contracts and

transactions. For example, during the FGDs conducted with teachers in one of the Nine Year Basic Education school, it was urged that there was always a *mafia*-like arrangement in procurement in schools where some head teachers and other school officials have created companies in the names of other persons and they are the ones who win tenders all the time. In these schools e-procurement system has not yet been introduced to prevent loopholes in the procurement process.

The public procurement in Rwanda is designed in such way each public tender has to respect key principles to ensure that transparency and accountability as well as value for money are achieved when spending national budget (article 6 of the law n°62/2018 of 25/08/2018). However, with regard to organizational arrangement and separation of powers in public procurement, some bidders and practitioners have suggested that Rwanda Public Procurement Authority should not combine powers of inspection of malpractices, faults and powers of suspending or approving the suspension or debarment of bidders from participating in public procurement as this combination of powers may result in forms of corruption.

On the side of operations, all public procuring entities are generally required to process all procurement activities in e-procurement to increase the transparency and accountability as it is requested by the article 4 of the law N°62/2018 of 25/08/2018. Despite the use of technology, bidders and practitioners in public procurement urge that the e-procurement system needs to be more upgraded to manage the entire process of procurement such as bid evaluation, contract management and e-payment because these are steps that are perceived with high corruption.

RISK MITIGATION STRATEGIES

RISK MITIGATION STRATEGIES

THE ORDER OF RISK MITIGATION STRATEGIES ACC. TO PRIORITISATION	DECISION POINT	RISK SCORE (Category 1)	RISK SCORE (Category 2)	MITIGATION STRATEGY	HOW THE MITIGATION STRATEGY WAS IDENTIFIED
4.1.1	Recruitment of teachers and administrative staff in Secondary and primary schools can be affected by corrupt practices such as favouritism, nepotism, bribes, and criteria bypass	3.8	3.9	<ul style="list-style-type: none"> ▪ To increase the awareness on rules and procedures of the recruitment of teachers and administrative staff to prevent corruption in jobs allocation of the latter ▪ Introduce safe and gender-sensitive reporting mechanisms into recruitment processes and inform all candidates about them. 	The identification of this strategy was based on the fact that when staffing and transfer procedures are not known, staff will be tempted to pay bribes
1.1.3	Suppliers pay bribe to school administrators so that they overlook certain requirements such as quantities and quality, resulting in the production of fewer items, higher unit costs, and/or low quality	3.8	4.3	<ul style="list-style-type: none"> ▪ To promote e-public procurement in all public schools ▪ Establishing supply verification committees in schools including, parents' representatives. 	This strategy will reduce the power of school managers and procurement committees to monopolise the procurement process.
2.1.1	Required approvals for allocating internship to students from TVET and Tertiary institutions are withheld until bribes are paid	4	4.3	<ul style="list-style-type: none"> ▪ The internship process should be handled online where possible in order to ensure transparency and accountability. ▪ Establish students internship committees composed of multiple stakeholders ▪ Establish confidential and gender sensitive reporting mechanisms to mitigate sextortion. 	<ul style="list-style-type: none"> • It is easier to monitor online than offline processes. ▪ When a decision is to be taken by one person the risk of corruption is high because there might be abuse of powers, bureaucracy, bribes.
1.1.2	Suppliers influence school administration before contracts are awarded to eliminate other competitors	4	3.7	<ul style="list-style-type: none"> ▪ To establish tender committees that include representatives of students and parents and ensure that they 	This strategy helps avoid collusion of school staff.

				observe all procurement steps	
5.1.1	Corrupt National Examination and School Inspection Authority (NESA) personnel allow student admission in schools of their choice in return for unofficial payments from parents.	3.5	4	<ul style="list-style-type: none"> ▪ Increase transparency in the student admission procedures by involving teachers, parents and students in the appeal committee at school level to challenge the corrupt behaviour in the student's placement allocation 	NESA personnel are likely to conspire with headteachers and demand bribe to students
4.1.4	Job allocation and transfer of female administrative staff and female teachers can be affected by sextortion	3.8	3.9	<ul style="list-style-type: none"> ▪ To establish clear criteria and procedures of job allocation and transfer. ▪ Establish confidential and gender sensitive reporting mechanisms to mitigate sextortion. ▪ To establish job allocation and transfer committees ▪ Digitize job allocation and transfer through online recruitment systems. 	These strategies will minimise decision making by one person and will make the monitoring of service providers easier as everything will be done online.

MONITORING AND EVALUATION

In order to monitor and evaluate the effectiveness of proposed mitigation strategies under this assessment, the types of mitigation strategies, methods to be used as well as timeline are presented in the table below.

Given that the use of any particular mitigation strategy is done in several steps, the monitoring timeline has considered the time it takes for the process of having any strategy to be operational. Generally, the monitoring periodicity was set to be a year (on an annual basis). Concerning the evaluation of the impact of proposed mitigation strategies, mixed techniques will be used to evaluate the effectiveness of the strategies and the extent to which they have been responsive to reducing corruption risks in corresponding areas of focus.

MITIGATION STRATEGY	TIMELINE	EVALUATION METHODS
<ul style="list-style-type: none"> ▪ To increase the awareness on rules and procedures of the recruitment of teachers and administrative staff to prevent corruption in jobs allocation of the latter ▪ Introduce safe and gender-sensitive reporting mechanisms into recruitment processes and inform all candidates about them. 	October 2024, October 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ Promoting e-public procurement in public schools ▪ Establishing procurement and supply verification committees in schools, including parents' representatives. 	March 2024, July 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ Internship process should be handled online where possible in order to easily monitor the process and promote transparency and accountability. ▪ Setting up student internship committees to avoid power monopoly that may increase corruptions risks. 	October 2024, March 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ Establishing tender committees that include representative of students and parents so that they can be part of all procurement steps 	October 2024, October 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ Increase transparency in the student admission procedures by involving teachers, parents and students in the appeal committee at school level to challenge the corrupt behaviour in the student's placement allocation 	October 2024, October 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ Establishing clear job allocation and transfer procedures ▪ Establishing job allocation and transfer committees ▪ Implement job allocation and transfer through the e-recruitment system. 	October 2024, October 2025	<ul style="list-style-type: none"> ▪ Social Audits
<ul style="list-style-type: none"> ▪ In addition to including parents' representatives in tender committees, the number of female members should be increased so that they can be part of the whole procurement process. 	October 2024, October 2025	<ul style="list-style-type: none"> ▪ Social Audits

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ANNEX

ANNEX I: Corruption risk Assessment in education: Data collection tool

AREAS	RISKS	LIKELIHOOD (1-5): CHANCES THAT THE RISK WILL TAKE PLACE 1=LOW RISK, 5=HIGH RISK	IMPACT (1-5): EXPECTED EFFECT ON THE FORESEEN RESULT, 1=LOW IMPACT, 5=HIGH IMPACT	RISK SCORE	MITIGATION STRATEGIES	RESPONSIBLE ENTITY
Drivers of corruption (External factors)	Unpredictable Inflation that induces individuals to resort to corrupt practices					
	Gender can play a determinant role on whether or not an individual engages in corrupt behaviour					
	Social norms and pressures that play a role in corrupt practices					
	Political Environment that allows for considerable monopoly power					

	The absence of a legal framework for managing contracts makes the sector vulnerable to discretionary decision making and corruption					
Control factors of corruption (Institutional or Internal factors)	Lack of well-defined procedures and regulations provides opportunities for corruption					
	Lack of, if not inadequate enforcement of the professional code of conduct for school personnel (eg. Administrative staff and teachers) provide opportunities for engaging in corrupt practices					
	Lack of (or limited) participation of teaching staff, students, parents and other representatives of Civil Society					

	in the school management can weaken the accountability and lead to corruption					
Priority area 1: Supply of Food Items in public primary and secondary schools	Information on procurement opportunities to supply foods items in schools is limited to favored firms					
	Suppliers influence school administration before contracts is awarded to eliminate other competitors					
	Suppliers pay bribe to school administrators so that they are not required to meet the stipulated quantities and quality, resulting in the production of fewer items, higher unit cost, and/or low quality					
	Diversion of school's food supplies to unauthorized uses deprives					

	the intended recipients and creates opportunities for illegal gains					
	Schools' managers and supervisors in TVET and Tertiary schools are susceptible of committing sextortion against female students who are seeking internship and approvals as well as grades for their internship					
Priority area 2: Internship allocation, supervision and grading for public TVET and tertiary school's students	Schools' managers and supervisors in TVET and Tertiary schools are susceptible of committing sextortion against female students who are seeking internship and approvals as well as grades for their internship					
	Interns from TVET/Tertiary schools are predisposed to provide facilitation payments					

	(Bribes) to their supervisors in a bid to secure approvals and high grades					
	Schools' managers and supervisors in TVET and Tertiary schools are susceptible of committing sextortion against female students who are seeking internship and approvals as well as grades for their internship					
Priority area 3: Students grading in public secondary and tertiary schools	Teaching staff and examiners from public secondary and Tertiary schools demand bribes to reveal students examination questions and illegally provide high grades					
	Schools' managers and supervisors in TVET and Tertiary schools are susceptible of committing sextortion against female students who					

	are seeking internship and approvals as well as grades for their internship					
Priority area 4: Recruitment and transfer of teachers in public secondary and primary schools	Recruitment of teachers and administrative staff in Secondary and primary schools can be hindered by corrupt practices such as favoritism, nepotism, bribes, and criteria bypass					
	Job allocations, transfers of administrative staff and teachers can be hindered by corrupt practices such as favoritism, nepotism, bribes, and criteria bypass					
	Recruitment of female teachers and female administrative staff in Secondary and primary schools can be hindered by sexual corruption					

	Job allocations, transfers of female administrative staff and female teachers can be hindered by sexual corruption					
Priority area 5: Student placement in public secondary schools	Corrupt National Examination and School Inspection Authority (NESA) personnel allow student placement in schools of their choice in return for unofficial payments from parents.					
	Corrupt school managers in public secondary schools allow student placement in schools of their choice in return for unofficial payments from parents					





SAY NO

An illustration showing a hand in a grey sleeve on the left holding up a green banknote with yellow spots. A hand in a blue sleeve on the right is receiving the banknote. The word 'NO' is written in large, red, textured letters behind the hands.

TO CORRUPTION



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