



SOUTH EASTERN KENYA UNIVERSITY

ANTI-CORRUPTION POLICY

Vision

To be a globally competitive center of excellence in teaching, research and innovation and service.

Mission

To provide quality education through teaching, research, extension, innovation and entrepreneurship with emphasis on dryland agriculture, natural resources and environmental management

Core Values

Professionalism

Innovation

Integrity

Freedom of Thought

Teamwork

Respect for and conservation of the environment

Philosophy

Transforming lives through teaching, research, innovation and community service

ABBREVIATION AND ACRONYMS

CATs: Continuous Assessment Tests

EACC: Ethics and Anti-Corruption Commission

IOU: I Owe You

IT: Information Technology

ICT: Information and Communication Technology

SLAs: Service Level Agreements

DEFINITION OF TERMS

Corruption- An offence under any of the provisions of the Anti-Corruption and Economic Crimes Act, 2003; Bribery: Fraud; Embezzlement or misappropriation of public funds; Abuse of office; Breach of trust; or an offence involving dishonesty in connection with any tax, rate or impost levied under any Act; or under any written law relating to the elections or appointment of persons to public office.

Discrimination – discrimination directly or indirectly against any person on any ground, including race, sex, pregnancy, marital status, health status, ethnic or social origin, colour, age, disability, religion, conscience, belief, culture, dress, language or birth as envisaged under Article 27 of the Constitution of Kenya, 2010.

Plagiarism – presenting someone else’s work or ideas as your own, with or without their consent, by incorporating it into your work without full acknowledgment and includes all published and unpublished material, whether in manuscript, printed or electronic form.

Conflict of interest – a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person’s self-interest and professional interest or public interest, financially or otherwise.

FOREWORD BY THE UNIVERSITY COUNCIL CHAIRMAN

The first step to be taken by any organization aiming to develop an effective anti-corruption plan is to develop and implement an anti-corruption policy that promotes zero-tolerance to corruption. The university council is committed to ensuring that SEKU becomes a corrupt free zone. Compliance with the Constitution of Kenya, 2010, the Anti-Corruption and Economic Crimes Act No. 3 of 2003, the Universities Act No. 42 of 2012, Universities (Amendment) Act and all other prevailing and relevant legislations shall be fundamental if SEKU is to eradicate corruption within its systems. This policy is crucial towards inculcating a culture that maintains zero tolerance to corruption.

I urge that all members of the University familiarize themselves with this policy and work together to ensure that the provisions of this policy are implemented to the latter. I also wish to emphasise that it is only through concerted effort that SEKU shall be able to become a corrupt free zone.

Dr. Reuben Chirchir
Chairman of Council

PREFACE BY VICE CHANCELLOR

Corruption is recognized as a vice that is harmful to both private and public institutions all over the world. Corruption can lead to low productivity, loss of institution resources, low staff morale, tarnished institutional image as well as flight of the qualified staff among others. Consequently, South Eastern Kenya University (SEKU) acknowledges that corruption can occur in the University and this anti-corruption policy is a vital document to enhance transparent and effective service delivery. The University is committed to developing a culture that maintains zero tolerance to corruption in all its functional areas.

I urge all the members of the university to work together in order to realize the overall objective of ensuring that SEKU becomes a Corrupt free zone.

Prof. Geoffrey M. Muluvi Ph.D

Vice-Chancellor

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PART I: POLICY STATEMENT

The University Council, Management Board, staff, students and stakeholders are committed to nurturing a culture of integrity and work ethics in all the functional areas of the University, in order to promote good governance and attainment of zero-tolerance to corruption. In this regard, an anti-corruption committee has been put in place to ensure full implementation of this policy on behalf of, and in consultation with, the University council. In addition, the committee is tasked to create awareness and sensitize the entire University community on the importance of fighting corruption in all its faces. The benefits of having a corruption free institution include continued development, increased confidence of both local and international partners, improved social behavior and moral standards and effective, responsible and efficient staff due to increased morale, which would make it a source of pride and joy for all stakeholders associated with SEKU.

PART II: LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

SEKU is a public institution governed by the legal instruments and policies that are applicable to all public institutions. These include the Constitution of Kenya 2010, Proceeds of Crime and Anti-Money Laundering Act 2014, Public Finance Management Act 2012, Anti-Corruption and Economic Crimes Act 2003, Fair Administration Act 2015, Public Officers Ethics Act 2003, Leadership and Integrity Act 2012, and the Public Procurement and Disposals Act 2005.

The University has a strategic plan and performance contract to guide its operations besides this anti-corruption policy document. Moreover, it has developed a code of conduct and ethics in line with the leadership and Integrity Act as well as a comprehensive corruption risk analysis and corruption prevention plan to assist in the fight against corruption.

PART III: SCOPE AND APPLICATION

This Anti-Corruption Policy shall apply to the University Management Board, staff, students and external Stakeholders.

PART IV: CORRUPTION RISK AREAS

The following are corrupt practices under the respective functional areas;

1. ACADEMIC AND RESEARCH

(a) Teaching

- (i) Inadequate course coverage, a case where the lecturer does not utilise full lecture hours to deliver the expected course content while engaging in private activities.
- (ii) Improper dress code, which tends to corrupt morals of others.
- (iii) Lack of class command as a result of poor lecturer- student relationships emanating from favoritism, nepotism, and gender based relations.
- (iv) Favoritism and nepotism in hiring of part time lecturers.
- (v) Discrimination in allocation of part-time programmes and biased payment of part-time teaching claims.
- (vi) Chronic absenteeism of the academic staff pretending to be engaged in other official activities.

(b) Examination

- (i) Unfair and biased marking and grading of student examinations, CATs, projects and assignments.
- (ii) Examination cheating including leakage based on favoritism, nepotism, gender based relations and other immoral activities.
- (iii) Falsification of examination records through inducements by students, relatives and friends.
- (iv) Improper handling of examinations and their records leading to loss of examination integrity.
- (v) Failure to administer examination in order to blackmail the University administration.

(c) Research

- (i) Failure to disclose research and consultancy funds to the University.
- (ii) Falsification of scientific publication in order to gain promotion.
- (iii) Falsification of research claims.

(iv) Inappropriate assessment and unnecessary delays in the supervision of students involved in research.

(v) Plagiarism of research work.

(d) Admissions

(i) Admission of unqualified students to various University programs as a result of bribery, inducement or other corrupt considerations.

(ii) Falsification of academic certificates for the purposes of admission to the desired University program.

(e) Library

(i) Theft of library materials.

(ii) Infringement of copy rights through photocopying text materials.

(iii) Deliberate damage of library assets.

(iv) Concealment and holding of library resource materials to benefit some preferred library users while denying others access to those materials.

2. GAMES AND SPORTS

(a) Unfair recruitment practices, associated with favoritism, nepotism or gender, that disadvantage qualified sportspersons.

(b) Failure to honor monetary compensation due to players and athletes leading to low morale.

(c) Theft and malicious damage of sports equipment resulting institutional losses.

(d) Discriminatory reporting of games by the media that weakens the participants' commitment.

(e) Absenteeism during the camp training leading to unfair monetary compensation and loss of public resources.

(f) Deliberate falsification of training records to gain institutional funds unjustly.

(g) Using illegitimate students during tournaments

3. PROCUREMENT

(a) Identification of requirements

- (i) Overestimation of quantities of goods/services and works.
- (ii) Failure to assess accurately the needs leading to emergency procurement methods such as single sourcing and direct procurement.
- (iii) Conflict of interest in coming up with the requirements.
- (iv) Failure to provide proper specifications leading to rejection of goods or services.
- (v) Economically unjustified procurement.

(b) Procurement planning

- (i) Failure to carry out market survey.
- (ii) Lack of procurement plans.
- (iii) Unexplained delay in preparing procurement plans.
- (iv) Failure to adhere to procurement plans.
- (v) Splitting of contracts for similar goods, works or services in order to circumvent the procurement threshold limit.

(c) Identification of Potential Suppliers and Sourcing

- (i) Restricted advertising or insufficient notice thereby limiting competition.
- (ii) Opening bids before submission deadlines.
- (iii) Not opening bids in public.
- (iv) Failure to record bid documents at the time of opening.
- (v) Failure to write minutes during bid opening.
- (vi) Failure to provide secure storage of and unrestricted access to bids received.

(d) Contract Award

- (i) Accepting suppliers/contracts terms.
- (ii) Failure to maintain proper minutes of the Evaluation Committee's proceedings.
- (iii) Poor records management, incomplete records and missing significant number of document.
- (iv) Placing orders for completely different goods from the same supplier Evaluation committee rejecting the evaluation recommendation without giving valid reasons.

- (v) Evaluation committee doing actual evaluation of bids after rejecting the evaluation committee's recommendations without giving reasons.
- (vi) Hurried signing of contracts before the expiry of window period for suppliers/contractors who may wish to contest award/appeal.
- (vii) Failure to notify simultaneously all bidders of the bid outcome.
- (viii) Placing orders for same good to different suppliers
- (ix) Placing orders above tendered prices and quantities.

(e) Contract implementation

- (i) Agreeing to receive lower quantity or quality or type other than what was ordered and claim to be paid for full delivery.
- (ii) Falsification of quality standards, documentation and certificate of performance.
- (iii) Paying for goods not physically received by the University.
- (iv) Failure of inspection and acceptance committee to prepare reports.
- (v) Goods delivered at close of day to compromise verification of quality and quantity.
- (vi) Inducement of stores staff by compelling suppliers to reject goods from their business rivals.
- (vii) Delay in acceptance of goods thereby inconveniencing suppliers.
- (viii) Diversion of goods for personal use or resale.
- (ix) Unjustified variations.
- (x) Failure to sign contract documents.
- (xi) Variations not approved by the procurement committee.

(f) Payments

- (i) Unsecured advance payment.
- (ii) Payment before delivery.
- (iii) Payment for goods/services/works not received.
- (iv) Selective payment of suppliers.
- (v) Deliberate loss of payment records and documents resulting in double payments.
- (vi) Settlement of false/non-existent claims.

4. STORES MANAGEMENT

(a) Stock Policy

- i) Failure to maintain stock management policy on: Items to be stocked, Stock levels, Re order/economic order levels, Inventory control.

(b) Stock Records

- (i) Failure to hold stock records securely.
- (ii) Unrestricted access to computer used to store stock data.
- (iii) No Current stock balances of all items.
- (iv) Falsification of stock records/stock verification reports and stock taking manipulation.

(c) Control and supervision

- (i) Lack of segregation of duties.
- (ii) Poor description of duties.
- (iii) Absence of handing/taking over notes.
- (iv) Failure to rotate staff.

5. ICT

(a) Information Security

- (i) Internal and external manipulation of data.
- (ii) Leakage of confidential information.
- (iii) Viruses or malicious code that may be used to manipulate IT systems in the back ground.
- (iv) Sharing of passwords resulting in abuse of trust.
- (v) Gaining unauthorised access to ICT systems.

(b) Development and Acquisition of IT Software and Hardware

- (i) Overpricing of hardware and software on procurement.

- (ii) Development of substandard ICT systems.
- (iii) Lack of clear guidelines on Total Ownership Cost of software developed resulting to expenditure beyond the budgeted cost.
- (iv) Poorly done SLA on software or hardware procured, leading to exaggerated maintenance cost to procuring entities.
- (v) Acquiring of obsolete hardware and software.
- (vi) Colluding with vendors to install pirated software.

(c) Human Capital

- (i) Lack of segregation of duties in running of key systems.
- (ii) Not undertaking proper background checks leading to the recruitment of staff with history of perpetrating IT corruption.
- (iii) Lack of rotation of staffs making it difficult to detect acts of e-corruption.
- (iv) Poor communication between human resource and IT department when employees change roles or leave employment leading to dormant user accounts that may be used to perpetrate corruption.
- (v) Lack of clear job description of staff in ICT department leading to ICT staff handling conflicting roles.

(d) Business Continuity Planning

- (i) Lack of or inadequate back up procedure which may result in recovery failure of data especially where there has been an act of corruption thus concealing the vice.
- (ii) Lack of a documented disaster recovery and business continuity plan that may result in sabotage, forcing the University to use manual systems that are prone to corruption.

6. FINANCE

(a) Budgeting

- (i) Lack of budgets leading to uncontrolled expenditure.
- (ii) Failure to align the budgets with the strategic plan.
- (iii) Poor prioritisation of projects.

- (iv) Non-compliance to budgets.
- (v) Unjustifiable supplementary budgets.

(b) Revenue Collection

- (i) Understatement of revenue receipt.
- (ii) Non-surrender of revenue collected.
- (iii) Under billing/charging of revenue due from clients.
- (iv) Irregular spending of revenue at source before banking intact.
- (v) Introduction of fake receipts.
- (vi) Falsification of receipting, including manipulation of carbon copies.
- (vii) Substituting fake cheques for cash.
- (viii) Issue of IOU.
- (ix) Collusion with debtor to underpay accounts receivables.
- (x) Irregular write off of debts.
- (xi) Failure to prepare up-to-date bank reconciliation statements to conceal corruption
- (xii) Irregular/discretionary of bills.
- (xiii) Use of fake banking slips to account for cash.

(c) Management of Expenditure

- (i) Irregular payment for non-existent/undelivered goods and services.
- (ii) Irregular advance payments for goods and services.
- (iii) Supporting payments with fake receipts, invoices and other documents
- (iv) Payment for unauthorised expenditures.
- (v) No-surrender or falsification of surrender of imprests
- (vi) Delays in payments with a view to extorting bribes.

(d) Management of Investments

- (i) Investing in financial institutions and instruments not approved by Treasury and other relevant authorities.
- (ii) Discretion in making non optimal investment decisions.
- (iii) Buying assets in names of individual officers or companies associated with officers.
- (iv) Investing institutional funds in personal accounts.
- (v) Misappropriation of interest earned from investment by failing to disclose.

(e) Accounting and Reporting

- (i) Incomplete record keeping.
- (ii) Falsification of financial records.
- (iii) Malicious destruction of financial records.
- (iv) Failure/delay in preparation of financial records such as bank reconciliation statement.
- (v) Non-compliance with relevant accounting standards.
- (vi) Intentional non-disclosure of items in the accounts.
- (vii) Failure to maintain various accounting documents such as counterfoil receipt book, registers, cheques, and asset registers.
- (viii) Untimely reports.
- (ix) Creative accounting and reporting.
- (x) Failure to implement recommendations by oversight authorities.

7. INTERNAL AUDIT FUNCTION

- (a) Concealment of evidence.
- (b) Biased reporting.
- (c) Clearance of imprests without proper accounting documents.
- (d) Non-execution of audit assignments.
- (e) Lack of independent audit function.

8. CATERING

(a) Purchase and Storage of Food Stuffs

- (i) Poor procurement planning leading to wastage.
- (ii) Receiving and accepting sub-standard items.
- (iii) Receiving less than ordered in collusion with suppliers.
- (iv) Diversion of food items for personal use.
- (v) Malicious rejection of supplied items for bribes.

(b) Sale of Foodstuff

- (i) Improper pricing or billing of foodstuff.
- (ii) Poor internal controls e.g. issue of receipts, daily reports etc.
- (iii) Poor foodstuff apportionment and rationing e.g. food portions.
- (iv) Lack of qualified staff to control systems, such as cash registers operators
- (v) Collusion by staff to sell food without issuance of receipts to defraud the University.

9. HUMAN RESOURCE

(a) Selection and Recruitment

- (i) Tailor-made advertisements.
- (ii) “Direct” appointments. (Employment of staff without following the set appointment procedures).
- (iii) Unofficial headhunts.
- (iv) Wrong job criteria.
- (v) Failure to advertise.
- (vi) Misplacement of application documents.
- (vii) Inadequate analysis of applications.
- (viii) Short listing bias due to vested interests of the panellists.
- (ix) Favouritism in selection of candidates for appointments.
- (x) Employment of fraudulent candidates.
- (xi) Haphazard deployments and placements.

(b) Promotions

- (i) Biased appraisals.
- (ii) Acting appointments not based on merit and performance.
- (iii) Meriting staff not being promoted.
- (iv) Staff members not being considered for higher positions when they fall vacant.

(c) Training

- (i) Unfair nomination for training.
- (ii) Unplanned Trainings.

- (iii) Lack of training policy.

(d) Rewards and Punishment

- (i) Non-performers being rewarded.
- (ii) Punishment of staff based on personal interests.
- (iii) Job evaluations and appraisals not being used for rewards.

(e) Work Environment

- (i) Discrimination on account of gender, sex, grade, health, and other corrupt considerations.
- (ii) Leakage of confidential information about/to staff members.
- (iii) Skewed decisions due to family and personal relations where one is in direct supervision of another in close relationship.

(f) Retirement

- (i) Failure to issue retirement notice to staff due to inducement.
- (ii) Unjustified retirement on public interest.

(g) Administration

- (i) Conflict of Interest.
- (ii) Misuse and abuse of office.
- (iii) Nepotism.
- (iv) Skewed decisions due to family and personal relations where one is in direct supervision of another in close relationship.
- (v) Failure to declare gifts and benefits.
- (vi) Misuse of property and staff.
- (vii) Favouritism.
- (viii) Cronyism.

11. Transport

- a) Misuse and lack of control of motor vehicles.
- b) Fuel siphoning.

- c) Theft of tyres, tubes and other spares.
- d) Fake maintenance costs.
- e) Favouritism in prequalification of garages and awards of tenders.
- f) Failure to adhere to safety measures.
- g) Unfair award of transport requisition.
- h) Biased assignment of vehicles to drivers.
- i) Biased assignment of trips that attract allowances.

12. Medical

- a) Theft of drugs.
- b) Misuse of University medical equipment.
- c) Use of medical scheme to treat uncovered patients e.g. brothers girlfriends.
- d) Misuse of sick leave.
- e) Impersonation of patients.
- f) Failure to keep records.

13. Records Management

- a) Loss of documents.
- b) Leakages of information.
- c) Peddling information to competition for personal gain.
- d) Misdirection of documents.
- e) Delay of delivery of letters.
- f) Malicious destruction of documents.
- g) Lack of traceability of documents.
- h) Retrieval problems due to lack of storage area.
- i) Non-classification of documents.
- j) Failure to document actions.
- k) Poor titling of files.
- l) Recycling of file cover leading to lack of authenticity.
- m) Deployment of non-qualified staff to manage records.

- n) Sharing offices with officers not handling records.
- o) Lack of control in opening and closing files.
- p) Physical mishandling of files.
- q) Falsification or distortion of information content.

14. Security

- a) Lack of control of human and vehicle traffic within the University.
- b) Lack of proper identification for staff, students and visitors.
- c) Lack of access control in sensitive areas.
- d) Theft by servant.
- e) Drug peddling and abuse within the University.

15. Accommodation

- a) Bribery in assignment of rooms.
- b) Favouritism/cronyism in assignment of rooms.
- c) Vandalism.
- d) Theft by servants/students.
- e) Misuse of utilities.
- f) Illegal hosting of friends.
- g) Illegal subletting.
- h) Commercial activities within the hostels.
- i) Conflict of interest.

16. Estates and Maintenance

- a) Misuse of construction materials.
- b) Under delivery of construction materials.
- c) Overestimation of project costs.
- d) Use of substandard materials.
- e) Diversion of project funds.
- f) Overuse of manual labour.
- g) Overreliance on outsourced artisans.

- h) Lack of maintenance schedules.
- i) Delay in completion of projects leading to extra costs.
- j) Unplanned alterations to approved projects.
- k) Fictitious repairs.

17. Elections

- a) Bribery during voting and counting of votes.
- b) Favoritism in nomination of candidates.
- c) Vandalism of election materials.
- d) Theft of election materials.
- e) Misuse of election materials.
- f) Illegal hosting of non-registered voters.
- g) Conflict of interest in selection of returning/election officers

PART V: STRUCTURES TO FIGHT CORRUPTION

1. Vice-Chancellor and Management Board

The Management board headed by the Vice-Chancellor is responsible for all the University operations including detection and prevention of corruption and ensures appropriate internal control systems are put in place. It also has the responsibility of notifying relevant external agencies about allegations of corrupt practices identified in the University.

2. Corruption Prevention Committee

The Corruption Prevention Committee shall create awareness among the University Community on corrupt practices, prevention and response strategies. It shall advice and supports the top management on matters relating to corruption detection, investigation and prevention.

3. Senior Management

Deans, directors, heads of departments and managers constitute senior management team, which is expected to play a leading role in detection and prevention of corruption. It is critical in the implementation of strategies that combat corrupt activities within their respective areas of jurisdiction. The senior management shall conduct initial enquiries regarding complaints of corruption and assist with further investigation if called upon to do so. They shall ensure that there are mechanisms in their areas to assist with:

- a) Assessment of corruption behavior inherent in their areas
- b) Creation of staff awareness on ethical principles subscribed to by the University.
- c) Training of staff on corruption detection and prevention.
- d) Promotion of appropriate attitude towards compliance with laws, rules and regulations that combat corrupt practices.
- e) Prompt response to all allegations of corrupt acts.

4. University Staff and Stakeholders

The staff members and other stakeholders need to understand and comply with controls, policies and procedures put in place to prevent and combat corruption. Therefore, if anyone becomes aware of corrupt activity, there is a duty under legislation to report immediately following corruption reporting procedures. Furthermore, everyone is expected to assist with enquires and investigations pertaining to corrupt activities. Where items are at risk, everyone is required to report to the immediate authority in order to minimize the threat of corruption. While it remains the responsibility of everyone to ensure corruption is prevented in their own arrears, the University's internal audit is a useful resource of advice on appropriate corruption controls.

5. Corruption Risk Management

The University aims to integrate a corruption risk management strategy into its culture of management. Practices and procedures designed to minimise the occurrence of corrupt activities include;

- 1) Clear reporting systems.
- 2) Regular monitoring of activities.
- 3) Random data checks.
- 4) Delegation of duties.
- 5) Adequate supervision.
- 6) Safe record keeping.
- 7) Proper documentation.
- 8) Regular and comprehensive appraisal of corruption risks once every three years.

6. Corruption Awareness

The University aims to provide all stakeholders with general awareness of corruption and response if detected or suspected. In this regard, the University institutes courses, seminars and presentations on the topics of ethics, corruption detection and prevention and induction on obligatory programs. Mechanisms to inform everyone about corruption detection and prevention strategy in the University have been put in place. The following are strategies to be used to create awareness on corruption:

- a) Distribution of the University Policy document on corruption detection and prevention strategy as part of their employment contract.
- b) Educating new staff during induction.
- c) Mounting regular updates on the strategies to combat corruption.
- d) Making available the University Anti-Corruption Policy in its website.
- e) Making anti-corruption issues an agenda in all the management meetings.
- f) Occasionally, conveying key anti-corruption issues via screen savers.
- g) Informing all stakeholders about investigations and disciplinary actions taken against anyone involved in corrupt activities.

7. Corruption Detection

Although everyone in the University can be involved in corruption, there are some areas where it is most likely to occur. Corrupt activities in these areas may be captured through but not limited to;

- a) Monitoring high risk jobs and areas.

- b) Scrutinizing breaches of internal controls.
- c) Monthly verification of management records such as telephone usage bills.
- d) Targeting alterations in transaction records and missing documentation.
- e) Falsified or altered authorisation or inadequate documentary support.
- f) Departmental reviews or internal audits.
- g) Changes in behavior patterns or lifestyles by employees or staff members.

8. Review of Internal Control Strategies

Incidences of corruption are usually associated with weak internal control systems. Therefore, reports and recommendations regarding weakness in the control system should be regularly reviewed. Weaknesses that are identified in the anti-corruption strategy during investigation into corrupt activities should be referred to the corruption prevention committee for improvement or revision of the strategies.

PART VI: COMPOSITION OF THE CORRUPTION PREVENTION COMMITTEE

There shall be a Corruption Prevention/Integrity Committee, whose members shall be determined by the University Management Board in line with Government Policies. The Committee shall oversee the implementation of this Policy.

1. Mandate and operations of the corruption prevention/ integrity committees

The mandate and operations of the corruption prevention/ integrity committees are:

- a) Setting priorities in the prevention of corruption within the University.
- b) Planning and coordinating corruption prevention strategies.
- c) Integrating all corruption prevention initiatives in the University.
- d) Receiving and reviewing reports on corruption prevention initiatives and recommending appropriate action.
- e) Receiving and taking action on corruption reports made by staff and other stakeholders.
- f) Documenting referrals to other agencies and making available evidence of concrete measures taken on corruption cases.
- g) Spearheading anti-corruption campaigns within the University.

- h) Monitoring and evaluating the impact of corruption prevention initiatives.
- i) Preparing and submitting quarterly progress reports to the Performance Contract Steering Committee.

2. Internal audit reviews

Internal Audit plays a critical role in the prevention of corruption in any institution. It provides an institutionalized mechanism for supervision, control and regular review of operating systems within a university. It also plays an important role in assessing the nature and extent of any corruption risk. For this reason, the university management will make full use of its internal audit function in its fight against corruption.

PART VII: REPORTING OF CORRUPTION INTERNALLY AND EXTERNALLY

1. Internal Reporting of Suspected Corruption

An employee who suspects any form of corruption is required to discuss it with the immediate supervisor and such suspicions will be treated confidentially and investigated. If the employee does not wish to report to the immediate supervisor, the suspicion can be reported directly to supervisor's superiors or to the University corruption prevention committee or the Vice-Chancellor.

2. Anonymous Reporting

Staff members are encouraged not to make anonymous complaints in order to facilitate collection of further evidence, where necessary. However, in situations where an individual does not want to reveal identity, corruption reporting can be done anonymously. If there is sufficient evidence to justify investigation of anonymous report, the investigation will be conducted based on the following:

- a) Seriousness of the issue at hand.
- b) Credibility of the complaint.
- c) Evidence provided during reporting.
- d) Prospects for external investigation.
- e) Fairness to the person being investigated.

3. Reporting to Police and Ethics and Anti-Corruption Commission

In the event that the University preliminary investigation indicates that a criminal offence may have been committed by an individual, the case shall be referred to the Police or EACC with the following minimum details:

- a) A summary of the allegations(s).
- b) A list of suspected offender(s) (where known).
- c) A chronological account of the facts giving rise to the allegation(s).
- d) A list incorporating details of witnesses or potential witnesses.
- e) Copies of relevant documents.
- f) Copies of all records of interviews, statements, depositions or affidavits obtained up to that point and in particular any written statement made by the subject of the investigation.

PART VIII: HANDLING OF CORRUPTION CASES

Once a corruption case is reported, the Corruption Prevention Committee shall conduct a thorough investigation. Depending on the scope of the case, the University Management shall determine who will handle the investigation. Corruption cases deliberated upon and supported by cogent evidence or reasonable suspicion that a corruption offence has occurred or is about to occur should be reported to EACC or other law enforcement agencies for further action.

PART IX: PROTECTION OF WHISTLEBLOWERS

The staff and other stakeholders who make corruption disclosures shall be guaranteed protection in accordance with existing national laws. A person who takes detrimental action against another person because of the former having made a corruption disclosure risks disciplinary action by the University. The staff who receives corruption disclosure has a responsibility to ensure that information that might identify the person making the disclosure is not known except in cases where;

1. The informant consents in writing for the release of such information.
2. The information is deemed to be necessary for investigating the case.
3. It is essential according to the principles of natural justice that the information be disclosed to the person that the disclosure concerns.

It may be necessary to identify the person making the corruption disclosure if proceedings are commenced before a tribunal, court or an investigative committee. However, such identification should first be discussed with the informant. It should be noted that protection of the informant is not guaranteed if the corruption reporting is made:

1. Frivolously or maliciously.
2. To question the merits of the University policy.
3. Is made in an attempt to avoid disciplinary action.

PART X: DISCIPLINARY MEASURES

1. Administrative Measures

Where there is no criminal prosecution, the University will apply appropriate administrative or disciplinary penalties against individuals involved in corruption.

2. Recovery of the Proceeds of Corruption

The University shall take necessary legal action to recover losses determined to have resulted from corruption. This will apply where the likely benefits of such recovery will exceed the funds and resources invested in the recovery process. However, this will not preclude any decision to take recovery action on the losses involved as well as disciplinary measures.

PART XI: TRAINING

The University Management commits itself to the sensitization and training of all staff on matters of ethics and integrity in order to reduce chances of corrupt practices.

PART XII: IMPLEMENTATION

The Vice-Chancellor shall play a leading role in the implementation of the Anti-Corruption Policy, while the Corruption Prevention Committee shall ensure that all matters pertaining to corruption are promptly addressed and necessary action taken.

PART XIII: REVIEW

The Anti-Corruption Policy is subject to review from time to time, whenever necessary.