

ANTI-CORRUPTION POLICY

Version	2.0
Short description	Anti-Corruption Policy
Relevant to	Council, Officers, Staff and Students
Approved by	University Council
Responsible officer	Vice-Chancellor
Responsible office	Office of the Vice-Chancellor
Date introduced	June, 2014
Related University documents	University Charter, Statutes and relevant policies
Related legislation	Ethics and Anti-Corruption Commission Act, (revised 2012), Anti-Corruption and Economic Crimes Act, (revised 2012), Public Officers Ethics Act, 2003 (revised 2010), Public Procurement and Asset Disposal Act, 2005 (revised 2015), Public Finance Management Act, 2012 (revised 2013), Universities Act, 2012 (revised 2014), The Employment Act, 2007, The Witness Protection Act, 2006 (revised 2012), Public Audit Act, Leadership and Integrity Act, 2012 Cap 182 (revised 2014).
Key words	Ethics, Anti-Corruption

December, 2021

APPROVAL

The University of Eldoret having been awarded its Charter on 11th February 2013 has set on a growth path guided by its vision of being “A Premier University that nurtures global leaders and innovators”. As part of laying its foundation, the University developed its Statutes in November 2013 followed by its first strategic plan which was rolled out in the year, 2014. The second Strategic Plan (2019-2024) is now in place.

The process of recruiting its top managers was completed in March 2014. The University then embarked on the process of developing its policies which will guide decisions of the different organs of the University in order to achieve rational outcomes geared towards the growth of the University. During the 2017/2018 Financial Year, the University carried out a Corruption Risk Assessment to identify possible corruption risks in the various functional areas of its operations. The revision to this Anti-Corruption Policy is therefore informed by the need to align it with the revised Corruption Risk Assessment and the revised Corruption Risk Mitigation Plan.

My special thanks go to all those who put in their time, effort and skills to develop this Policy.

By virtue of the authority vested in me as the Chairman of Council of the University of Eldoret and in reference to the approval granted by Council on 9th December, 2021, I hereby sign this Anti-Corruption Policy this 9th Day of December, 2021.



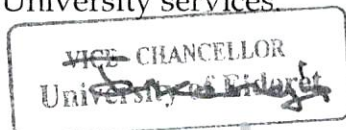
Dr. Ismail Buro Hassan
CHAIRMAN OF COUNCIL



FOREWORD

University of Eldoret aims to pursue an overall strategy that leverages on the strength of its geographical footprint in Uasin Gishu County and its 'power of place' in the North Rift Kenya. Integrity will be the driving force that directs university activities to enable it fulfil its vision of being "A premier University that nurtures global leaders and innovators." The University also recognizes the centrality of corruption prevention in achieving her mission of providing quality education, training, research, and consultancy in science, agriculture and technology to meet the needs and aspirations of a dynamic society. To achieve her mission, it is imperative that the University adopts a planned and structured approach in corruption risk assessment and mitigation strategies. This will be achieved in line with the corporate social responsibility requirements that are geared towards fulfilling global SDGs, the Constitution of Kenya 2010 and Vision 2030 among other development strategies.

In order to safeguard the institution from any corrupt practices that may occur, the University has developed the Anti-Corruption Policy which contains clear guidelines on corruption prevention measures to help staff, students and the general public on how to handle any corrupt cases whenever they occur. Thus, there is need to strictly adhere to the government anti-corruption policies and procedures such as Kenya National Anti-Corruption and Economic Crimes Act (CAP 65, Laws of Kenya 2003), the Public Officers Ethics Act (2003) and the Code of Conduct and Ethics for Public Universities' legal notice No 170/2003, among others. The University has attempted to identify all its corruption prone areas and developed a corruption risk mitigation plan. The plan highlights the role of the University Management, staff, students and other stakeholders in combating corruption in the institution. It is hoped that this guide will be useful in preventing corruption in all facets of the University services.



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Vice-Chancellor

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LIST OF ABBREVIATIONS & ACRONYMS

CAT	Continuous Assessment Test
CDF	Constituency Development Fund
CEO	Chief Executive Officer
CPC	Corruption Prevention Committee
CRA	Corruption Risk Assessment
CRMP	Corruption Risk Mitigation Plan
DVC, A & F	Deputy Vice Chancellor, Administration and Finance
DVC, ASA	Deputy Vice Chancellor, Academics and Students' Affairs
DVC, PRE	Deputy Vice Chancellor, Planning, Research and Extension
EACC	Ethics and Anti-Corruption Commission
HELB	Higher Education Loans Board
ICT	Information Communication & Technology
KUCCPS	Kenya Universities and Colleges Central Placement Service
LPO	Local Purchase Order
ODEL	Open, Distance and e-learning
PSSP	Privately Sponsored Students Programme
UoE	University of Eldoret
VC	Vice-Chancellor

EXECUTIVE SUMMARY

This is the 2nd version of the University of Eldoret Anti-Corruption Policy since it became a fully-fledged Public University in 2013. This policy has been developed in cognizance of the Constitution of Kenya, 2010, the Universities Act No. 42 of 2012, the National Ethics and Anti-Corruption Policy, 2020 amongst other legal and institutional instruments. The University envisages becoming 'A premier University that nurtures global leaders and innovators' by providing a corruption-free environment.

During the 2017/2018 Financial Year, the University carried out a Corruption Risk Assessment (CRA) to identify the possible corruption risks in the various functional areas of its operations. Out of the risks identified, the University developed a Corruption Risk Mitigation Plan (CRMP) that stipulates strategies the University will use to mitigate the risks. The University has continued to review the CRA annually to identify emerging risks and therefore come up with mitigation measures.

As a result, the UoE Anti-Corruption Policy was reviewed to align it with the reviews in the CRA and the CRMP. Hence, the policy presents an overview of the University, the policy statement, the legislative and administrative requirements, the definition of corruption, roles and responsibilities of management, staff, and other stakeholders in the fight against corruption, the structures that help in the fight against corruption, the composition of the Corruption Prevention Committee (CPC), how to report corruption internally and externally, handling of corruption cases, protection of whistleblowers, disciplinary measures for handling corruption cases, the functional areas and possible corruption risks and the organizational structure in the fight against corruption.



OVERVIEW OF THE UNIVERSITY

Background

The University of Eldoret (UoE) is located 10 km from Eldoret town along the Eldoret-Ziwa -Kitale road. The large track of agricultural land makes it ideal for the realization of its mandate as a University of Science, Agriculture and Technological innovations. UoE was founded in 1946 by the white settlers as a Large-Scale Farmers Training Centre. In 1984, it was converted to a teachers' training college and renamed Moi Teachers' Training College to offer a Diploma in Education. Due to the double intake crisis, the College was taken over by Moi University in 1990 as a Campus and renamed Chepkoilel Campus offering life, basic and applied science programs. In August 2010, through Legal Notice No. 125 of 13 August 2010 the Campus was upgraded into a University College with the name Chepkoilel University College, a Constituent College of Moi University. Upon the award of Charter by the President of the Republic of Kenya on 11th February 2013, the University College was renamed University of Eldoret and has since established a Town Campus in Eldoret Town, housed in the MUSCO building and a Liaison Office in Nairobi housed on the 12th Floor of Pension Towers.

Since the acquisition of the Charter, the University has graduated 21,369 students and the student population currently stands at 18,425. The University has been developing market-driven courses as it strives to be the University of choice. The number of staff has since grown by 66% and the number of Schools increased from seven (7) to nine (9). These include the Schools of Science, Engineering, Agriculture and Biotechnology, Natural Resource Management, Education, Business and Management Sciences, Economics, Environmental Studies and Human Resource Development. The University also has eight Directorates that support service delivery. These are the Directorates of Information & Communication Technology, Strategic Planning and Performance Contracting, Resource Mobilization, Industrial Linkages, Partnerships and

Collaborations, Research & Innovation, Quality Assurance, and the Board of Postgraduate Studies.

The University is endowed with modern facilities that support quality learning, research, and outreach programs. These include a well-equipped library, lecture halls and theatres, laboratories, workshops, a fully mechanized dairy unit, and agricultural land. To enhance security, the University has installed several security features which include a perimeter fence, modern gates, floodlights, and surveillance cameras (CCTV). In September 2015, the University was granted ISO 9001:2015 certification by the Kenya Bureau of Standards.

To keep abreast with what is going on in the Higher Education sector regionally and internationally, to network with Universities in Africa and outside the region and to maintain education standards that are comparable internationally, the University of Eldoret is an affiliate member of the Association of African Universities (AAU) and the Inter-University Council for East Africa (IUCEA). The University is also affiliated to the Regional Universities Forum for Capacity Building in Agriculture (RUFORUM) and the Federation of Kenya Employers (FKE).

Institutional Values

Vision

A premier University that nurtures global leaders and innovators.

Mission

To provide quality education, training, research and consultancy in Science, Agriculture and Technology to meet the needs and aspirations of a dynamic society.

Core Values

At University of Eldoret, we are committed to:

- i. Integrity
- ii. Innovativeness
- iii. Customer satisfaction
- iv. Competitiveness
- v. Equity

- vi. Responsiveness
- vii. Inclusivity

Mandate

According to University of Eldoret Charter of 2013, UoE is mandated to:

- i. Provide directly or in collaboration with other institutions of higher learning, facilities for quality training, research and innovation in agriculture, engineering, technology, enterprise development, health sciences, social sciences and other applied sciences, and integration of teaching, research and effective application of knowledge and skills to the life, work and welfare of citizens of Kenya;
- ii. Promote technological innovation as well as discovery, preservation, transmission and enhancement of knowledge and to stimulate the intellectual life in the economic, social, cultural, scientific, and technological development;
- iii. Play an effective role in the development of science, technology, engineering, agriculture and natural resource management in conjunction with the industry and to provide extension services so as to contribute to the social and economic development of Kenya;
- iv. Develop market driven programmes of study including those that culminate with degrees, diplomas and certificates.

Core Functions of the University

- i. **Teaching and Learning:** The University offers adequate, innovative, relevant and market driven academic programs, at undergraduate and postgraduate levels, with in-built quality control systems. Furthermore, the University provides an enabling academic environment for staff and students.



- ii. **Research:** As part of its mandate to generate, preserve and disseminate knowledge, the University has created a conducive environment to undertake quality research that is relevant and transformative.
- iii. **Consultancy:** The University has integrated consultancy within its core functions.
- iv. **Outreach and Extension:** The University has integrated outreach and extension within its core functions.
- v. **Community Service:** The University participates in community programs and activities as part of its Corporate Social Responsibility.

1.0 POLICY STATEMENT

Corruption is a serious scourge that has eaten into the fabric of the Kenyan Society and may occur in any public institution. The University Anti-Corruption Policy is aimed at improving institutional productivity, efficiency and good governance.

The roles of management, staff, students and other stakeholders in preventing corruption or unethical behavior/practices are clearly spelt out and based on the Code of Conduct and Ethics for Public Universities (Legal Notice No.170, Law of Kenya). All areas of operation within the University that may be prone to corruption have been spelt out (Section 6.0) and guidelines and handling procedures given in order to assist stakeholders in preventing unethical behavior. The University, therefore, expects all its stakeholders to strive to eliminate all avenues of corruption in order to make University of Eldoret a corruption free institution.

Any crime or corrupt practices identified will be dealt with firmly using this policy together with the other anti-corruption policies or procedures of the government including, the Anti-Corruption and Economic Crimes Act (ACECA 2003), the Public Officers Ethics Act (POEA, 2003) and the Code of Conduct and Ethics for Public Universities (Legal Notice No. 170).

2.0 LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

The following documents are the main legal instruments and institutional policies used as references when developing this policy and for its implementation:

2.1 Legal Instruments

- i. The Constitution of Kenya, 2010
- ii. Universities Act No. 42 of 2012
- iii. Leadership and Integrity Act, 2012, Cap 182
- iv. The National Ethics and Anti-Corruption Policy, 2020
- v. Bribery Act revised 2016

- vi. Public Procurement Regulations, 2020
- vii. Anti-corruption and Economic Crimes Act, 2003 (revised 2012)
- viii. Public Officers Ethics Act, 2003
- ix. Public Procurement and Disposal Act, 2005 and Public Procurement and Asset Disposal Act, 2015.
- x. Public Financial Management Act, 2012
- xi. Public Audit Act, 2003 revised 2015
- xii. University of Eldoret Charter and University of Eldoret Statutes, 2013
- xiii. The Code of Conduct and Ethics for Public University (Legal Notice No. 170)
- xiv. The Employment Act, 2007
- xv. The Witness Protection Act 2006

2.2 Institutional Instruments

- i. University of Eldoret Quality Manuals and Procedures, 2015
- ii. University of Eldoret Service Charter
- iii. University of Eldoret Strategic Plan 2019 - 2024
- iv. Performance Contracting Guidelines
- v. Terms of Service and Collective Bargaining Agreements
- vi. Annual Budget and Establishment
- vii. University of Eldoret Financial Regulations
- viii. University of Eldoret Financial Manual
- ix. University of Eldoret Accounting Manual
- x. University of Eldoret Research Policy
- xi. University of Eldoret Intellectual Property Policy
- xii. University of Eldoret Examination Rules and Regulations
- xiii. University of Eldoret Part-Time Teaching Policy
- xiv. University of Eldoret Scheme of Service
- xv. University of Eldoret Internal Audit Manual
- xvi. University of Eldoret Rules and Regulations Governing the Conduct of Students

- xvii. University of Eldoret Gender Policy
- xviii. University of Eldoret Senate Rules (Admissions, Curriculum Developments, Examination Rules and Regulations)
- xix. University of Eldoret Wardens Manual
- xx. University of Eldoret Library Rules and Regulations
- xxi. University of Eldoret Sexual Harassment and Discrimination Policy
- xxii. University of Eldoret ICT Policy
- xxiii. University of Eldoret Acceptable Use Policy
- xxiv. University of Eldoret E-Waste Policy
- xxv. Security Policy
- xxvi. Transport Policy

3.0 SCOPE/APPLICABILITY

This Policy applies to Members of University of Eldoret Council, all Officers, Staff and Students.

4.0 DEFINITION OF CORRUPTION

This policy operates within the framework of corruption as defined in the Kenya Anti-Corruption Plan and the Anti-Corruption and Economic Crimes Act of 2003 as follows:

- i. Abuse of position or office, for personal gain or for the advantage of another person;
- ii. Bribery, theft, embezzlement and fraud;
- iii. Evasion of payment of Government revenues, taxes, rates, fees and other dues;
- iv. Practicing of nepotism, clannism;
- v. Practicing discrimination on the basis of religion, gender or disability;
- vi. Inversion and distortion of social values including soliciting for and giving sexual and other favours;
- vii. Negligence of professional ethics; and
- viii. Breach of trust;
- ix. In addition to this, failure to report corruption

5.0 ROLES AND RESPONSIBILITIES

5.1 Role of Management

The University Management is responsible for:

- i. Corruption prevention and detection,
- ii. Setting ethical standards,
- iii. Setting up corruption prevention committees,
- iv. Providing guidance and support to staff.

5.2 Role of University Staff and other Stakeholders

- i. Prompt reporting of incidences or suspected cases of corruption,
- ii. Identifying areas which are prone to corruption.

5.3 Role of Supervisors

- i. Receiving, forwarding, and acting on reported cases,
- ii. Clearly explaining to the person making the disclosure what will happen to the information received,
- iii. Taking reasonable steps to ensure that the person who has made the disclosure is not victimized,
- iv. Assuming the responsibility for designing, implementing system improvements, and to ensure non-recurrence if the disclosure relates to their area of control.

6.0 FUNCTIONAL AREAS AND CORRUPTION PRONE PRACTICES

The following is a list of some of the main functional areas where corruption may occur:

6.1 Management

- i. Security
- ii. Procurement planning and management
- iii. Internal Audit
- iv. Public Relations
- v. Information Communication & Technology (ICT)

6.2 Academic

- i. Admissions
- ii. Teaching
- iii. Examinations
- iv. Graduation
- v. Students Records Management
- vi. Students' Association
- vii. Staff Unions
- viii. Library

6.3 Administrative

- i. Recruitment and Training
- ii. Staff Development
- iii. Medical services
- iv. Leave
- v. Records management
- vi. Financial management systems and procedures
- vii. Catering and hostels
- viii. Central services
- ix. Management of University property
- x. Transport and Garage
- xi. Housing
- xii. Retirement
- xiii. Legal matters
- xiv. Farm

6.4 Research and Extension

- i. Management of research funds and activities
- ii. Outreach services
- iii. Income generating units

6.5 Planning and Development Division

- i. Infrastructural development and refurbishment
- ii. Establishment and recurrent expenditures

*The possible functional areas are contained in appendix I and corruption risk assessment areas are given in appendix II.

7.0 STRUCTURES TO FIGHT CORRUPTION

The University has put in place the following structures to prevent corruption:

- i. University Corruption Prevention Committee
- ii. Campus Corruption Prevention Committee
- iii. Integrity Assurance Committee

The structures are responsible for:

- i. Regular vetting of staff
- ii. Regular monitoring of University functional areas
- iii. Monitoring systems/controls as per ISO 9001:2015 procedures
- iv. Supervisory checks and controls within the University
- v. Staff integrity and mentorship
- vi. Institutionalization of efficiency, transparency and accountability of transactions
- vii. Regular updates and monitoring of University assets
- viii. Monitoring of declaration of conflict of interest

8.0 COMPOSITION OF THE CORRUPTION PREVENTION COMMITTEE

The following is the composition of the Corruption Prevention Committee:

Vice -Chancellor	-	Chairperson
Deputy Vice Chancellor, Academic and Students Affairs	-	Member
Deputy Vice Chancellor, Administration and Finance	-	Member
Deputy Vice Chancellor, Planning, Research and Extension-	-	Member
Registrar, Planning	-	Member
Registrar, Administration	-	Member

Registrar, Academics	-	Member
Finance Officer	-	Member
Two Senate Representatives	-	Member
Director, Quality Assurance	-	Member
Director, ICT	-	Member
Human Resource Officer	-	Member
Representative (Audit)	-	Member
Senior Legal Officer	-	Member
Senior Procurement Officer	-	Member
Chair, Integrity Assurance Officer	-	Secretary

9.0 MANDATE AND OPERATIONS OF THE CORRUPTION PREVENTION COMMITTEE

The role and functions of the corruption prevention Committee within the institution will be as follows:

- i. Setting priorities in the prevention of corruption within the University.
- ii. Planning and coordinating corruption prevention strategies.
- iii. Integrating all corruption prevention initiatives in the University.
- iv. Receiving and reviewing reports on corruption prevention initiatives and recommending appropriate action.
- v. Receiving and taking action on corruption reports made by staff and other stakeholders.
- vi. Documenting concrete measures taken and any referrals to other agencies such as EACC.
- vii. Monitoring and evaluating the impact of corruption prevention initiatives.

10.0 INTERNAL AUDIT REVIEWS

Internal Audit reviews play a crucial role in the prevention and detection of corruption. It also provides mechanisms for supervision, control and review of all operational systems within the University. In addition, it plays a major role in assessing the nature and extent of any fraud and corruption risks.

The university will carry out, on a quarterly basis, internal reviews in all its operational areas with emphasis on the corruption risk areas appearing in the appendices.

11.0 HOW TO REPORT CORRUPTION INTERNALLY AND EXTERNALLY

The University ensures that there are provisions made to allow for disclosure of all corrupt practices within the University by providing avenues for reporting such vices. Some of the avenues may include and are not limited to:

- i. Placing corruption reporting boxes at strategic points within the University.
- ii. Creation of hotline numbers that people can use.
- iii. Reporting directly to the C.E.O.
- iv. Creating an interactive page on the University website where claimants can log on and send claims.
- v. Students and members of staff are encouraged to report to their immediate superior all conducts they consider unethical, or criminal to facilitate appropriate action by the relevant agents.

Such reports shall:

- i. Be made in writing; where a report is made verbally, the receiving officer will put it in writing after which the giver of the report shall confirm the contents of the written report and sign it.
- ii. Be treated with total confidentiality by the reporter and the receiver of the report.
- iii. Be verified for authenticity.
- iv. Be forwarded to the Vice-Chancellor.

The reporter is entitled to feedback on action taken on the matter reported within 4 weeks of reporting, and if no action is taken the informant may report the same to EACC.

12.0 HANDLING OF CORRUPTION CASES

Any cases suspected for corruption and reported to the Corruption Prevention Committee shall be referred for further investigation.

Upon the completion of the investigation, the committee will consider the report and determine whether or not to carry out further investigations through verbal and /or written submissions.

The committee will then make decisions to:

- i. Refer the matter to the Staff Disciplinary Committee or
- ii. Refer the matter to the Ethics and Anti-Corruption Commission or
- iii. Refer the matter to the police or all the above.

13.0 PROTECTION OF WHISTLE BLOWERS

In accordance with the Witness Protection Act, 2006 (revised 2012) the University undertakes to protect the identity of persons making corruption disclosures and to ensure that information that might identify the person making the disclosures is protected. If there is need to disclose the information, this shall first be discussed with the person.

14.0 DISCIPLINARY MEASURES

Any breach of the provisions of this Policy by any member of staff shall be dealt with in accordance with the provisions of the University disciplinary procedures, the Anti-Corruption and Economic Crimes Act 2003 (revised 2012), the Public Officer Ethics Act 2003 (revised 2010) and The Code of Conduct and Ethics for public Universities, Legal Notice N0.170/2003.

15.0 TRAINING

The University commits itself to sensitize and train all staff on matters of ethics and integrity and in future may formulate and integrate the courses into the University teaching curricula for all students.

16.0 MANAGEMENT/IMPLEMENTATION AUTHORITY

The policy and implementation of this policy is vested upon the office of the Vice Chancellor, on behalf of Council.

17.0 REVIEW

This Policy shall be reviewed in intervals of five (5) years or as need arises to ensure its continued application and relevance.

18.0 EFFECTIVE DATE

This policy shall take effect from the date of approval by the University Council.



APPENDIX I: FUNCTIONAL AREAS AND POSSIBLE RISKS

Management Organs

Decision Making

- Delayed decision making
- Biased decision making
- Selective implementation of decisions
- Resource allocation
- Forgeries
- Diversion of resources
- Discrimination in resource allocation
- Misappropriation of resources
- Favoritism in allocation of resources

Administrative

- Unethical staff conduct
- Non adherence to public officer's ethics
- Pilferage
- Reporting to work late and leaving early
- Reporting to work drunk

Student Admissions

- Irregular Interschool/departmental transfers
- Delay in processing of admission letters
- Irregular PSSP Admissions
- Biased application of admission criteria
- Use of fake results slip
- Non remittance of application fees
- Delay in processing of admission letters
- Delay in issuance of admission letters
- Irregular mature entry admissions
- Use of fake/forged result slips

- Non-adherence to admissions criteria and incorrect placement into the year of study
- Irregular transfers from PSSP to mature entry admission
- Unethical practices in admissions
- Irregular post graduate admissions
- Favoritism in admission, especially in cases where chances are limited
- None adherence to senate criteria on post graduate admissions

Curriculum

- Use of outdated teaching content/delay in curriculum review
- Inadequate coverage of curriculum
- Delay in provision of course outline
- Non adherence to 20% rule
- Delay in releasing of teaching and examination timetables
- Delay in student reporting
- Delay in commencement of lectures
- Incomplete fee payment
- Failure in use of nominal rolls
- Irregular appointment of part-time lecturers and external examiners
- Irregular payments
- Poor service delivery

Examinations

- Failure to give Continuous Assessment Tests(CATs)
- Non-marked CATs
- Issuance of artificial marks
- Non adherence to the rule of two CATs per course
- Missing CAT marks
- Marked CAT scripts not returned to students
- Irregular setting and moderating of examinations
- Delay in setting and failure to moderate examinations

- Inadequate coverage of topics and curriculum
- Recycling of examination year after year
- Setting different examinations for different campuses but same courses
- Leakage of examination
- Failure to set examinations
- Failure to moderate examinations
- Irregular delivery of examinations
- Irregular processing of examinations
- Irregular handling of examinations
- Irregular use of office resources
- Conflict of interest



APPENDIX II: CORRUPTION RISK AREAS

FUNCTIONAL AREA	ACTIVITY	CORRUPTION RISK
Academic	Issuance of examination	<ul style="list-style-type: none"> • Lack of full payment of fees • Use of fake examination cards
	Invigilation of examinations	<ul style="list-style-type: none"> • Non-adherence to examination rules • Irregular issuance of booklets
	Teaching	<ul style="list-style-type: none"> • Failure to give adequate contact hours • Replacing contact teaching modes with handouts • Failing to cover the subject matter in the course outline
	Processing of Results	<ul style="list-style-type: none"> • Issuance of undeserved marks • Altering of marks • Unethical issuance of transcripts and certificates • Changing names on certificates and transcripts • Presentation of incomplete set of examination scripts to the external examiners

	Graduation	<ul style="list-style-type: none"> • Fee balance problem • Incomplete courses as required • Pending disciplinary cases • Loss of graduation gowns • Failure to pay convocation fee
	Registration and admissions	<ul style="list-style-type: none"> • Use of fake certificates • Compromised admissions • Irregular interschool transfers • Use of fake bank slips
	Use of ICT facilities	<ul style="list-style-type: none"> • Misuse of access rights • Misuse and vandalism of ICT equipment and software • Network vulnerability • Sale of institutional software • Use of open source/pirated software
ODeL	Online teaching and learning	<ul style="list-style-type: none"> • Failure to give adequate contact hours • Replacing contact teaching modes with handouts • Failing to cover the subject matter in the course outline • Failure to attend classes
	Online examinations	<ul style="list-style-type: none"> • Non-adherence to examination rules and regulations

Library Services	Issue and return of books	<ul style="list-style-type: none"> • Irregular issuance of books at the library • Mutilation of books, records and documents • Delay in re-calling of issued books • Non-payment of overdue books • Downloading online resources and using for non-academic reasons • Misuse of online library access rights
Students Affairs	Games and Sports	<ul style="list-style-type: none"> • Irregular issuance of sports equipment • Irregular selection of participants • Misuse of sports equipment • Raising false financial claims
	Accommodation	<ul style="list-style-type: none"> • Irregular allocation of rooms • Abetting non-ethical practices (cohabiting, "piracy", sub-letting of rooms) • Carrying out illegal businesses in hostels • Non-adherence to "10-10" rule
Warden ship	Policy	<ul style="list-style-type: none"> • Non-adherence to the Wardens Policy guidelines
Student welfare		<ul style="list-style-type: none"> • By-passing chain of command • Irregular student elections

		<ul style="list-style-type: none"> • Unethical entertainment • Irregular allocation of business premises • Irregular consideration in the work study programme
Development	Infrastructural development and refurbishment	<ul style="list-style-type: none"> • Pilferage of building materials • Over employment of labourers • Delayed completion of projects • Irregular receiving of building materials • Poor workmanship
Research	Management of research funds	<ul style="list-style-type: none"> • Irregular disbursement of research funds • Failure to monitor use of research funds • Delay in disbursement of research funds • Lack of transparency while allocating research funds
Recruitment	Job Advertised	<ul style="list-style-type: none"> • Job specification tailored to favour certain individuals • Elimination of suitable candidates to favor weaker ones
	Short listing of persons	<ul style="list-style-type: none"> • Short listing of persons that do not meet the requirements • Biased composition of the shortlisting Committee

	Interviews	<ul style="list-style-type: none"> • Biased composition of the appointments committee • Lack of score cards for interviews • Deliberate delays of interview invitation notices and in other instances withholding of the invitation • Lobbying for specific candidates among panel members
	Hiring of staff	<ul style="list-style-type: none"> • Hiring of staff without regard to the establishment • Hiring of casuals when there is no actual need for them
Deployment	Transfer and placements	<ul style="list-style-type: none"> • Favourism of certain staff during placement and/or transfers
Staff Development	Promotion	<ul style="list-style-type: none"> • Uncoordinated promotion of staff • Promotion of unqualified staff
	Training	<ul style="list-style-type: none"> • Biased nomination of staff for training and/or sponsorship
Medical	Referrals	<ul style="list-style-type: none"> • Biased and corrupt referrals of staff for medical treatment
	Medical Claims	<ul style="list-style-type: none"> • Raising false medical claims • Approval of false medical claims

	Dependants' lists	<ul style="list-style-type: none"> • Collaboration with staff to include non <i>bonafide</i> persons in lists of dependants
Leave	Leave of absence/Sabbatical leave	<ul style="list-style-type: none"> • Favoritism during approval of leave
	Leave approval and computation	<ul style="list-style-type: none"> • Deliberate miscalculation of balance of Leave days
Records	Records	<ul style="list-style-type: none"> • Mishandling and mismanagement of records • Tempering with records in personal files
Catering and Hostels	Room allocation	<ul style="list-style-type: none"> • Asking for bribes from students to secure them rooms • Selling of rooms for personal gain
	Procurement of foodstuff	<ul style="list-style-type: none"> • Single sourcing of food items
	Loss of revenue	<ul style="list-style-type: none"> • Under payment of served food • Serving food that has not been paid for • Theft of food items cooked and uncooked
University Property	Management of university property	<ul style="list-style-type: none"> • Misuse of stationery, office equipment • Poor time management • Misuse/theft of sanitary and cleansing materials • Use of University property for personal gain

		<ul style="list-style-type: none"> • Lack of respect for information/intellectual property • Use of University information for personal gain
Transport and Garage	Fuel	<ul style="list-style-type: none"> • Siphoning of university fuel • Misuse of fuel cards • Overstating the cost of fuel
	University Vehicles	<ul style="list-style-type: none"> • Use of University vehicles for personal gain • Single sourcing and theft of spare parts
Waivers	Approval of Fee Waivers	<ul style="list-style-type: none"> • Collaboration with staff to approve fee waiver for non bona fide persons
Retirement	Retention of Service	<ul style="list-style-type: none"> • Discrimination in selection of staff to be retained upon retirement
Housing	House allocation	<ul style="list-style-type: none"> • Unfair/discriminative allocation of University houses/space
Legal Office	Payment of legal fees	<ul style="list-style-type: none"> • Collusion with external lawyers or parties to defraud the university e.g. in legal fee
	Handling of legal matters	<ul style="list-style-type: none"> • Compromising of cases
Finance	Part-time payments	<ul style="list-style-type: none"> • Raising irregular financial claims • Approving irregular financial claims

	Payroll Management	<ul style="list-style-type: none"> • Using wrong rates of payments, making dummy payments • Payments made to retired and terminated staff • Irregular stoppage of deductions • Delayed remittances
Cash Office	Cash handling	<ul style="list-style-type: none"> • Fictitious payments • Double payments • Unauthorized cheque/cash payments • Missing documents to support payments
	Handling students fee payment	<ul style="list-style-type: none"> • Understating of student' s fees • Irregular accounting of HELB loans, CDF and other bursaries • Fictitious and/or incomplete posting of student's records • Use of fake statements and receipts
	Revenue Management	<ul style="list-style-type: none"> • Use of fake receipt books • Irregular collection of debts • Unauthorized use of revenue
	Expenditure	<ul style="list-style-type: none"> • Inflated invoices and quotations • Issuance of invoices for unsupplied goods and services

	Budgetary control	<ul style="list-style-type: none"> • Vote misallocation, non-commitment of • payments, wrong postings
	Bank	<ul style="list-style-type: none"> • Erroneous payments, double payments, frauds through bank accounts
	Financial accounts	<ul style="list-style-type: none"> • Creative accounting, unreconciled accounts
	Examination	<ul style="list-style-type: none"> • Lack of objectivity in checking fee • payments and passing of irregular payments
	Imprest	<ul style="list-style-type: none"> • Using imprest for wrong purposes • Staff taking imprest while having other unaccounted imprests • Irregular actions on processing of imprests, such as deliberate delays
	Fuel/Calling cards	<ul style="list-style-type: none"> • Erroneous issuance of calling cards and • fuel cards
	Medical refund payments	<ul style="list-style-type: none"> • Claims made on basis of fake receipts and/or fake signatures used for claims • Inflated invoices by referral doctors
Procurement	Ordering and stocking	<ul style="list-style-type: none"> • Stocking obsolete/expired items • Lack of regular inventory/stocktaking
	Specifications	<ul style="list-style-type: none"> • Giving vague and bias specifications.

	Methods of procurement	<ul style="list-style-type: none"> • Limited competition • Inflated quotations • Lobbying by suppliers
	Receiving and issuance	<ul style="list-style-type: none"> • Receiving items of wrong specifications, under delivering • Irregular release of goods
	Storage	<ul style="list-style-type: none"> • Poor storage, pilferage and discrepancy in issuing items • Loss of accounting documents • Unauthorized removal of documents/assets
	Disposal	<ul style="list-style-type: none"> • Irregular identification and valuation of assets • Delayed disposal
Internal Audit	Internal Audit	<ul style="list-style-type: none"> • Selective auditing of specified areas • Selective reporting
Security	Investigation process	<ul style="list-style-type: none"> • Poor follow up of reported cases, especially stolen materials/equipment • Doctoring of investigation reports to suit the culprit • Delayed investigations
Farm	Revenue collection	<ul style="list-style-type: none"> • Uncoordinated revenue collection • Uncoordinated labour/productivity • Conflict of interest
Income generating units	Revenue generation	<ul style="list-style-type: none"> • Mismanagement of funds • Fraudulent processes • Pilferage of materials

NB: Other risks not specifically mentioned in this appendix shall be included.

**APPENDIX III: ORGANIZATIONAL STRUCTURE OF THE
CORRUPTION PREVENTION COMMITTEE**

