MOI UNIVERSITY
(ISO 9001:2015 CERTIFIED INSTITUTION)

Corruption Risk Assessment Report & Mitigation Plan

19th August 2019

Zero draft

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1.0 FOREWORD

Moi University is a public institution which was established in 1984 (Moi University Act, 1984) as a University of Science and Technology, having started initially with 83 students that were transferred from the University of Nairobi. As at end of June 2019, there were over 35,000 students served by about 3,000 staff in the University. Given the large number of staff and students there is need to strictly adhere to the government anti-corruption policies and procedures as per the Constitution of Kenya 2010, Anti-Corruption and Economic Crimes Act (CAP 65), the Public Officers Ethics Act (2003) and the Code of Conduct and Ethics for Public Universities legal notice No 170 among others.

In order to safeguard the institution from any corrupt practices that may occur, the University has undertaken corruption risk assessment and developed the corruption Mitigation Plan, to help staff, students and the general public on how to mitigate any corrupt cases before they occur. The corruption mitigation plan highlights the role of the University Management in networking and mobilizing resources needed to combat corruption in the institution. It is hoped that this guide will be useful in preventing corruption in all facets of the University services.

Prof. Isaac S. Kosgey, Ph.D.
VICE - CHANCELLOR

DEFINITIONS OF TERMS

Corruption refers to dishonest activity in which a Council Member, Management, Staff, Student and Stakeholder of Moi University acts contrary to the interest of the university and abuses his/her position of trust in order to achieve some gain or advantage for him or herself or for another person or entity (as provided for in Kenya Anti-Corruption and Economic Crimes Act of 2003).

Corruption prevention refers to any mechanism that aims to detect and mitigate corruption before it takes place.

Department refers to both administrative and academic department.

Ethics refers to generally accepted behaviors that are considered right in the university

Heads of division/ sections refers to any person who has staff reporting to him/her in their day to day activities of the University. It may include Dean, Registrar, and Deputy Registrar, Senior Assistant Registrar, Assistant Registrar, Head of Department, Head of section/unit or any person performing duties of the above listed officers.

Integrity refers to doing the right thing all the time.

Policy refers to The Revised Moi University Anti-Corruption & Whistle Blowers Protection Policy, 2019

The University refers to Moi University.

Whistle blower refers to any person reporting corruption practices to the authorities referred to in this Policy.

LIST OF ACRONYMS

CCPC	Campus/College Corruption Prevention Committee
CPC	Corruption Prevention Committee
DCPC	Directorate Corruption Prevention Committee
EACC	Ethics and Anti-Corruption Commission
EIAO	Ethics and Integrity Assurance Officers
EIO	Ethics and Integrity Officer
IC	Integrity Committee
MUCPC	Moi University Corruption Prevention Committee
MUIC	Moi University Integrity Committee
SCPC	School Corruption Prevention Committee
SIC	School Integrity Committee

PREFACE

Moi University is a public institution which was established in 1984 (Moi University Act, 1984) as a University of Science and Technology, having started initially with 83 students that were transferred from the University of Nairobi. As at June 2017, Moi University had over 53,000 students and by over 3,000 staff. There is need for efficiency and effectiveness in service delivery and comply with laid down legal framework in daily operations.

The review of the Anti-Corruption Policy marks a new beginning in safeguarding the institution from any corrupt practices that may occur; the policy contains clear guidelines on corruption, detection and prevention measures. The policy shall apply to both internal and external stakeholders of Moi University.

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 wherever they occur. Further to this, the *Anti-Corruption Policy* is expected to safeguard and protect persons witnessing corruption and unethical practices who would otherwise not report the incidences for fear of repercussions on themselves or their job.

The University has undertaken corruption risk assessment and developed a corruption mitigation plan. The plan highlights the role of the University Management in networking and mobilizing resources needed to combat corruption in the institution.

It is hoped that this policy will be useful in creating an anti-corruption culture in all facets of the University services.

Prof. Isaac S. Kosgey, Ph.D.
<u>VICE – CHANCELLOR</u>

1.0 Introduction

Moi University recognizes that an important aspect of accountability is to have a mechanism to enable all individuals to voice their concerns internally in a responsible and effective manner when they discover information which they believe shows serious malpractice. To this end, this policy demonstrates the university's commitment to recognize and take action in respect of any malpractices, illegal acts or omissions by its employees and other stakeholders.

It is the responsibility of all staff to ensure that if they become aware that actions of other staff members or stakeholders might compromise this objective, they will be expected to report the matter in safe knowledge that it will be treated seriously and sensitively.

Noting that the Witness Protection (Amendment) Act 2010 was enacted by the Parliament of Kenya to protect whistleblowers, it is important to develop a whistle blowing policy and procedures to protect staff who acting in good faith by disclosing information concerning the activities of university or those of any of its customers, or relevant employee's which might be considered as fraudulent or corrupt practice.

In developing this policy Moi University Council and Management shall ensure that the policy is in tandem with the Witness Protection (Amendment) Act 2010.

This policy and procedures shall support and assist staff in bringing genuine concerns to the attention of appropriate people within the university who can initiate an investigation into matters raised.

Where this policy is in conflict with an Act enacted by the Parliament of Kenya, then the Act will take precedence over this policy.

And if a complainant requires further protection beyond this policy, the provision of the Witness Protection (Amendment) Act 2010 shall apply.

The aim of this policy is to entrench anti-corruption measures at Moi University. The policy therefore defines Moi University's position in combating corruption and in promotion of ethics and integrity and outlines intervention measures that shall be put in place to prevent and detect corruption and unethical conduct.

1.1 Mandate

The University derives its mandate from the Universities Act no. 42 of 2012, which granted Moi University a charter in 2013. The functions and core mandate as spelt out in part ii of the charter.

1.2 Philosophy of Moi University

Putting Knowledge to Work is our guiding philosophy. At Moi University the discovery, dissemination, and application of knowledge are synergistically balanced. We are driven by the process of involvement in world affairs; in the needs of individuals and their communities, businesses, industries, and governments; in the nurturing of inquisitive minds; in the transfer of ideas from the campus to the marketplace; and involvement in societal problems in our country and beyond. The creation of new knowledge that will benefit society is at the heart of our mission as a university. The distinction between basic and applied research has become more blurred as the processes of discovery, scientific inquiry and scholarship inform all aspects of the educational enterprise at Moi University**.**

1.3 Vision

To be the University of Choice in nurturing innovation and talent in science, technology and socio-cultural development.

1.4 Mission

To preserve, create, and disseminate knowledge, conserve and develop scientific, technological and cultural heritage through quality teaching and research; to create, a conducive work and learning environment; and to work with stakeholders for the betterment of society.

1.5 Core Values

i. Intellectual freedom, excellence and the truth.
ii. Teamwork, networking and a culture of peace.
iii. Transparency and accountability.
iv. Professionalism and Social justice.
v. Self-respect institutional loyalty and patriotism.
vi. Continual improvement of services, competitiveness and relevance.

1.6 Scope and Applicability

This policy applies to Council, Management, Senate, all staff and students of Moi University as well as stakeholders who include and not limited to contractors, suppliers, and members of the public.

The purpose of the policy is to:

i. Support our core values of transparency and accountability, professionalism and social justice.
ii. Establish internal mechanism that encourages whistleblowing.
iii. Integrate culture of anti-corruption and take appropriate measures against violators of good governance.
iv. To ensure staff, students and stakeholders raise concerns without fear of suffering retribution.

2.0 Policy Statement

Corruption is a serious problem that has eaten into the fabric of the Kenya Society and may occur in any public institution. Moi University shall undertake to cultivate the culture of anti-corruption in all its activities in delivering on its mandate and shall create conducive environment for whistleblowers to support the anti-corruption efforts.

2.1 Principles of the Policy

This policy is guided by five key principles;

i. Fairness and equity
ii. Public trust
iii. Awareness.
iv. Efficiency Integrity and honesty

3.0 Legal Framework of this Policy

This policy is anchored on the Constitution of Kenya 2010 and its applicable laws on Ethics and Anti-corruption which include following;

3.1 Legal Instruments

i. The Constitution of Kenya, 2010,
ii. The Anti-Corruption and Economic Crimes Act, 2003,
iii. The Public Officers Ethics Act, 2003,
iv. The Public Procurement and asset Disposal Act, 2015,
v. The Public Procurement & Disposal Regulations (2006),
vi. The Public Private Partnership Act, 2013,
vii. The Government Financial Management Act, 2004,
viii. The Public Audit Act,2015,
ix. The Leadership and Integrity Act No. 19 of 2012,
x. The Universities Act No. 42, 2013,
xi. The Code of Conduct and Ethics for Public Universities(Legal Notice No.170),
xii. The Employment Act, 2007,
xiii. The Witness Protection Act 2006,
xiv. Public Finance Management Act, 2012,
xv. Access to Information Act ,2016,
xvi. Bribery Act ,2015,
xvii. Ethics and Anti-Corruption Commission Act,2011,
xviii. Proceeds of Crime And Anti-Money Laundering Act,2009,
xix. Public service (Values and Principles) Act, **2015**,
xx. Data Protection Act, 2019
xxi. Mwongozo Code of Governance for State Corporations, 2015.

3.2 Institutional Instruments

All policies of Moi University in existence at the time this policy takes effect shall also apply. This shall include and not limited to:

i. Moi University Charter, 2013.
ii. Moi University statues, 2013.
iii. Moi University Quality Manual and Procedures, 2018
iv. Moi University Service Charter.
v. Moi University Strategic Plan 2010-2015 Revised, 2009
vi. Performance Contracting Guidelines.
vii. Terms of Service and Collective Bargaining Agreements.
viii. Annual Budget and Establishment.
ix. Moi University Accounting Manual

x. Moi University Financial Procedures
xi. Moi University Financial Manual
xii. Moi University Research Policy
xiii. Moi University Intellectual Property Policy
xiv. Moi University Examination Rules and Regulations
xv. Moi University Part-Time Teaching Policy
xvi. Moi University Scheme of Service.
xvii. Moi University Internal Audit Manual
xviii. Moi University Rules and Regulations Governing the conduct of students
xix. Moi University Gender Policy
xx. Moi University Senate Rules (Admissions, Curriculum Developments, Examination Rules and Regulations, Etc.)
xxi. Moi University Wardens Manual
xxii. Moi University Library Rules and Regulations
xxiii. Sexual Harassment and Discrimination Policy
xxiv. Moi University Recruitment Policy
xxv. Moi University Training Policy.
xxvi. Moi University Teaching and promotion of Academic staff
xxvii. The Moi University Code of Conduct for Staff

4.0 Corruption Prone and Risk Areas in the University

4.1 Definition of Corruption

This policy operates within the framework of corruption as defined in the Kenya Integrity 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, tribalism, clanism;
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;
viii. Breach of trust
ix. Conflict of interest
x. Failure to declare conflict of interest or any gift that is by law required to be declared
xi. Withholding information that could act as evident to any act of corruption

xii. Any other offence under the Kenyan and International laws involving dishonesty.

4.2 Corruption Risk Areas & Practices in the University

4.2.1 Broad risk Areas

All functional areas in the university are potential corruption risk areas. These in broad term include but not limited to;

1. Core mandate i.e. teaching, research and community engagements.
2. Payroll management, Human Resources and Administration Areas.
3. Information communication technology.
4. Finance and
5. Procurement.

4.2.2 Specific Functional Areas and Corruption Prone Practices

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

4.2.3 *The Council*

Decision making but not limited to the following:

1. Administration of property and funds of the University
2. Reception and disbursement of gifts , grants and other monies of the university
3. Appointment and promotion of staff
4. Students and staff discipline
5. Welfare of students and staff.

4.2.4 Vice-Chancellor's Office

i. Security
ii. Internal Audit
iii. Public Relations
iv. I.C.T
v. Procurement Planning and Management

4.2.5 Academic, Research and Extension

i. Admissions
ii. Teaching, attachments and field courses.
iii. Examinations.
iv. Graduation.
v. Student Records Management.
vi. Management of research funds and activities.
vii. Collaborations and partnerships.
viii. Consultancy, outreach services/Community engagement

4.2.6 Administrative, Planning and Development

i. Recruitment and Training
ii. Staff Development

iii. Medical services
iv. Leave
v. Records management
vi. Central services
vii. Management of University property
viii. Transport and Garage
ix. Staff Housing
x. Retirement
xi. Legal matters
xii. Quality management systems and performance compliance
xiii. Infrastructural Development and refurbishment.
xiv. Project Management

4.2.7 Students Affairs

i. Student Welfare.
ii. Catering and hostels.
iii. Student organizations- elections and management.
iv. Students' organization funds and facilities.
v. Students disciplinary.
vi. Student finances-caution money

4.2.8 Finance

i. Financial management systems and procedures
ii. Capital and Recurrent Expenditures
iii. Fee payment.
iv. Income generating units

NOTE: The possible risks and corrupt practices in the outlined functional areas are contained in Appendix 1.

6.1 Role of University Chancellor

The Chancellor shall make a visitation on anti-corruption.

6.2 Role of the Council

The University Council shall be responsible for:

i. Approving and reviewing university wide policies and procedures.
ii. Providing leadership and direction in the fight against corruption.
iii. Ensuring compliance to the Kenyan constitution and other relevant laws.
iv. Establishing Committees of Council for proper decision making.
v. Allocating resources for the operation of the University.

6.3 Role of the Moi University Council Audit Committee

The University Council shall be responsible for:

i. Providing leadership and direction in the fight against corruption.
ii. Ensuring compliance to the Kenyan constitution and other relevant laws.
iii. Monitoring use of resources for the operation of the University.
iv. Oversight of financial reporting and related internal controls
v. Review of disciplinary decisions against staff.
vi. Oversight of the internal audit /auditor.

6.4 Role of Vice-Chancellor and Management Board

The Vice- Chancellor and University Management board shall be responsible for:

i. Ensuring compliance with the Kenyan constitution and other relevant laws.
ii. Putting in place mechanism and strategies to create an anti-corruption culture in the university through detection and prevention of corrupt practices in all forms.
iii. Establishing the relevant university corruption prevention and integrity committees.
iv. Providing guidance and support to staff in fighting corrupt practices
v. Communicate to all stakeholders the position of university in prevention of corruption and unethical conduct.
vi. Facilitating training and sensitization activities to all stakeholders.
vii. Putting in place monitoring systems/controls as per approved quality management standards and procedures of the university and CUE.
viii. Institutionalizing efficiency, transparency and accountability in all transactions of the university and its stakeholders
ix. Institutionalize declaration of conflict of interest.
x. The Vice-Chancellor shall chair Moi University Corruption Prevention Committee (MUCPC).

6.5 Role of Internal Audit

The Internal Audit shall be responsible for:

i. Ensuring compliance with the Kenyan constitution and other relevant laws

ii. Assurance that all financial procedures have been adhered to.

iii. Assessment of compliance to policies, procedures and guidelines issued by the Council from time to time.

iv. Recommending to the council development or review of relevant policy to curb, detect or prevent corruption.

v. Oversight the finance and other units of the university on compliance to statutory requirements.

6.6 Role of Principals, Deans, Directors, and Management Boards;

The Principals, Deans, Directors Schools/College Management Boards shall be responsible for:

i. Ensuring compliance with the Kenyan constitution and other relevant laws.

ii. Putting in place mechanism and strategies to create anti-corruption culture in the university through detection and prevention of corrupt practices in all forms.

iii. Establishing and chairing the relevant corruption prevention and integrity committees.

iv. Nominate and recommend to the vice chancellor for appointment members suitable and qualify for membership to the relevant Integrity Committees.

v. Providing guidance and support to staff in fighting corrupt practices

vi. Communicate to all stakeholders the position of university in prevention of corruption and unethical conduct.

vii. Facilitating training and sensitization activities to all stakeholders.

viii. Putting in place monitoring systems/controls as per approved quality management standards and procedures of the university and CUE.

ix. Institutionalizing efficiency, transparency and accountability in all transactions of the university and its stakeholders

6.7 Role of University Senate

The University Senate is in charge of all academic matters and shall be responsible for academic integrity through:

i. Adherence to the Constitution of Kenya and relevant laws.

ii. Participating in training and sensitizations on anti-corruption organized by the University, statutory bodies or other stakeholders.

iii. Putting in place mechanisms/standing committees to handle corruption cases relating to academic matters
iv. Promptly discharging reported incidences of suspected cases on corrupt practices relating to academic affairs
v. Cultivating an anti-corruption culture by ensuring that each stakeholder is duty bound to perform to the best possible standards of due care and in accordance with their respective professional codes of conduct.

6.8 Role of University Staff and Students

All members of staff and students have the following roles:

i. To adhere to the Constitution of Kenya and the rule of law.
i. To participate in training and sensitizations on anti-corruption organized by the university or statutory bodies.
ii. To promptly report incidences or suspected cases of corruption.
iii. To achieve the best possible standards of care and to act in accordance with the university code of conduct and ethics.
iv. Participate in development and review of relevant policies**.**
v. Sensitize other stakeholders on the best practice in prevention and decrement of corruption.

6.9 Roles of Heads and Chairs of Departments (HODs and CODs*)*

The Heads and Chairs of Departments shall be responsible for;

i. Receiving acting and forwarding reported cases on corruption.
ii. Explaining to the whistle blowers the actions that will be taken.
iii. Ensuring that the person who has made the disclosure is protected.
iv. Designing, implementing system improvements.
v. Ensuring non-recurrence of corruption within their area of control.

6.10 Roles of Ethics and Anti-Corruption Commission.

The Commission shall have its roles as defined by relevant acts of parliament which may be enacted, amended or repealed from time to time. These roles shall include but not limited to:

i. Enforcement of all Anti-Corruption Laws.
ii. Conducting systems audits
iii. Spearheading awareness and trainings
iv. Assisting the university in vetting potential staff

6.11 Roles of other Statutory Bodies

Other statutory bodies including; Inspectorate of State Corporations, Office of the Auditor General and Commission for University Education shall have roles as per their legal mandate and existing relevant laws of Kenya.

6.12 Roles of External Stakeholders

The Stakeholders includes suppliers, service providers, parents, guardians ,collaborating institutions & partnerships ,international bodies, members of general public and their role is to;

i. Report any act of corruption they witness to relevant internal or external statutory body.
ii. Participate in development and review of relevant policies
iii. Sensitize other stakeholders on the best practice in prevention and decrement of corruption.
iv. Partner with Moi university to cultivate an anti-corruption culture

7.0 Systems, Structures & Mechanisms to Fight Corruption

The University shall establish the following systems, structures, processes & mechanisms to prevent corruption.

This shall include but not limited to:

i. Moi University Council Audit Committee,
ii. Internal Audit Unit,
iii. University Corruption Prevention Committee.
iv. Campuses/Schools/Directorate Corruption Prevention Committees.
v. University Integrity Committees.
vi. School/Campus/ Directorates Integrity Committees
vii. Ethics & Integrity Assurance Officers

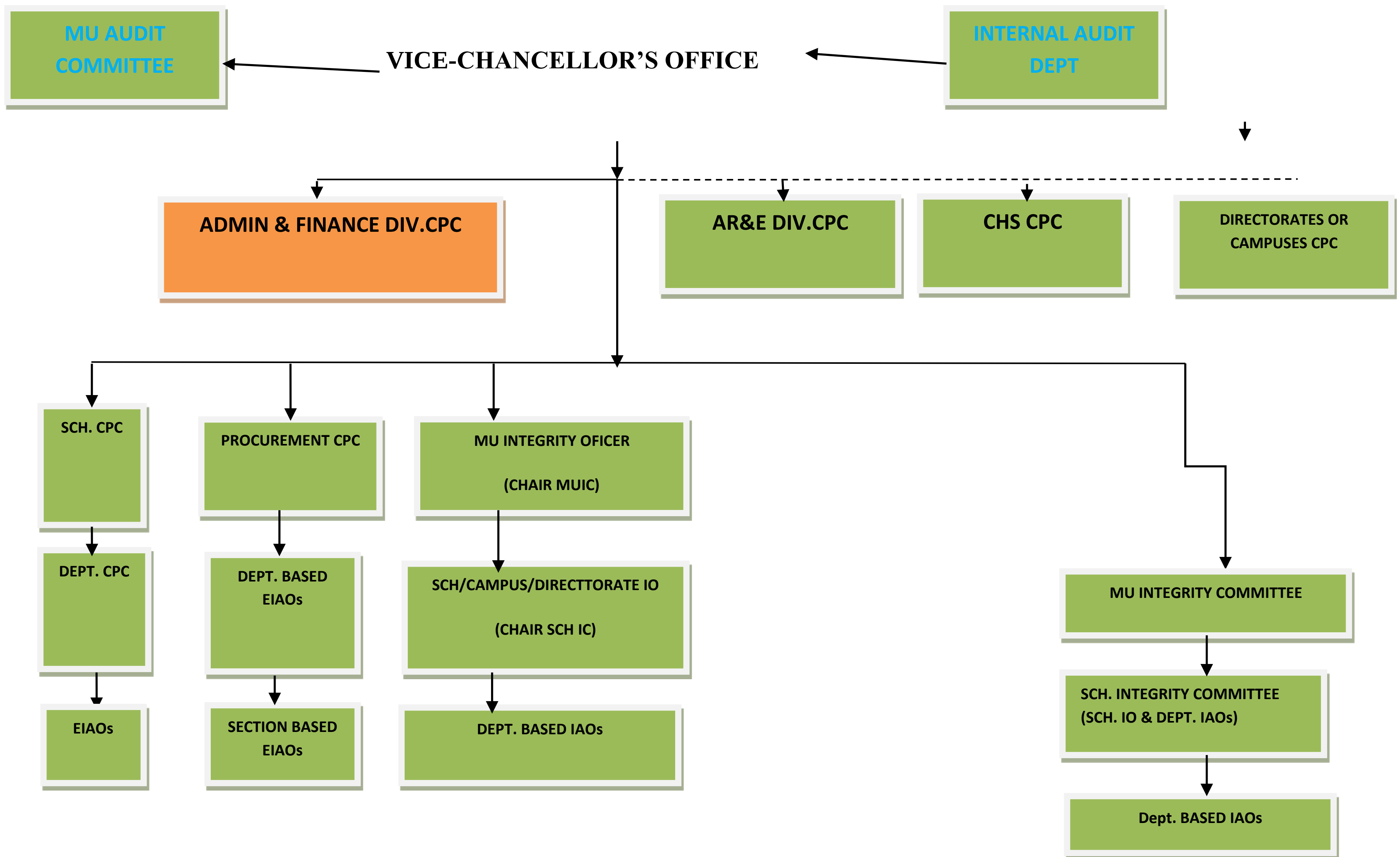

Fig. 3 Anti-Corruption Systems and Mechanisms

7.1 Corruption Prevention Committee

Moi University shall establish Corruption Prevention Committee composed and cascaded the Corruption Prevention Committees to Schools, Directorates, Campuses, and Institutes.
In composing corruption prevention committees the University ensures that members are appointed in accordance with existing appointment criteria and in compliance with laws of Kenya.

7.2 Moi University Corruption Prevention Committees Composition

The composition of the Moi University Corruption Prevention Committee will be as Follows:

i.	Vice-Chancellor	-	Chairman
ii.	Deputy Vice-Chancellor Finance	-	Member
iii.	Deputy Vice-Chancellor (A, P&D)	-	Member
iv.	Deputy Vice-Chancellor (A, R&E)	-	Member
v.	Deputy Vice Chancellor (SA)	-	Member
vi.	College Principal	-	Member
vii.	Deans of Schools	-	Member
viii.	Dean of Students	-	Member
ix.	Directors Of Campuses, Institutes And Directorates	-	Members
x.	Chief Legal Officer	-	Member
xi.	Chief Internal Auditor	-	Member
xii.	Senior Procurement Officer	-	Member
xiii.	UASU representative, Chapter Secretary	-	Member
xiv.	KUSU, Chapter Secretary	-	Member
xv.	KUDHEIHA Shop steward	-	Member
xvi.	MUSO Secretary General	-	Member
xvii.	Ethics and Integrity Officer	-	Secretary

7.3 School/Campus/Directorate/College CPCs

The Schools/Campus/Directorates/College Corruption Prevention Committees shall be headed by Dean, Directors, Head of Department or Registrars as the case may be and shall be issued with an appointment letter by the Vice-Chancellor. Each School/Departmental Committee shall have seven members.

Integrity Officers based at schools who shall be secretary to the SCPC shall be nominated by the Deans/Directors and appointed by the Vice-Chancellor. All secretaries to the committee shall be members of Integrity Committee.

The composition of the SCPC/DCPC/CCPC will be as follows:

i.	Dean/Director/Registrar	Chairman
ii.	Heads of Departments/Sections	Members
iii.	2 Other Staff from School	Members
iv.	School Ethics and Integrity Officer	Secretary

7.4 Mandate and Operations of the Corruption Prevention Committee

The role and functions of the corruption prevention Committee within the institution are 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, students and other stakeholders.
vi. Documenting concrete measures taken and any referrals to other agencies such as Ethics Anti-Corruption Commission (EACC).
vii. Spearheading anti-corruption campaigns within their jurisdiction.
viii. Monitoring and evaluating the impact of corruption prevention initiatives.
ix. Preparing and submitting quarterly progress reports to the management and the Performance contract Steering Committee.

7.5 Ethics and Integrity Committees

Moi University shall establish two levels of Integrity Committees; University wide and School Integrity Committees. The Moi University Integrity Committee shall be chaired by University Integrity Officer. The School /Campus and directorates
EIAOs shall be members.

The conglomerates of department Ethics and Integrity Assurance Officers shall form School/Campus/Directorates Integrity Committees while School/Campus/Directorates Integrity shall form the Moi University Integrity Committee.

7.6 Roles of Ethics and Integrity Committees

i. To mainstream anti-corruption strategies and initiatives measures in the University with a view of building an anti-corruption culture.
ii. To constantly monitor university operations and procedures so as to prevent instances of unethical behavior among staff, students and other stakeholders.
iii. To deliberate on anti-corruption and other ethics and integrity issues on monthly basis at school level and quarterly basis at university level.
iv. To submit regular progress reports to the relevant organs in the university and external agencies as required by law.

7.7 Ethics and Integrity Officers

The University shall establish a university wide Integrity Office and school level Integrity Office as per existing scheme of service. The offices shall be headed by the University Integrity Officer and School Integrity Officer respectively.

7.8 Roles of Ethics and Integrity Officer.

The Ethics and Integrity Officer shall be appointed by the Vice-Chancellor and shall be secretary to MUCPC.

His/her roles shall include

i. To prepare all documents and papers required for the relevant CPC meetings
ii. To prepare and circulate minutes of the relevant CPC as appropriate
iii. To keep and coordinate the diary of CPC operations
iv. To coordinate preparation of the anti-corruption policy, corruption risk assessment and management plan, code of ethics and conduct, change management plans and other initiatives
v. To prepare and submit reports to the relevant University CPCs
vi. The University Integrity Officer shall chair MUIC while school integrity officer shall chair SIC.
vii. To perform any other relevant duties assigned by the CPC

7.9 Ethics and Integrity Assurance Officers (EIAOs)

The officers shall be appointed by the HODs/CODs at the departmental level as per the Scheme of Service.

7.10 Roles of EIAO s;

Shall support the Ethics and Integrity Office and the CPCs by;

i. Conducting a CRA and developing and implementing a Corruption PP at departmental level
ii. Implement university codes of conduct and ethics, service charters and other governance instruments at departmental level.
iii. Implementation of anti-corruption education and awareness programmers
iv. Monitor, evaluate and participate in the review of the anti-corruption policy.
v. Receive and document cases on corruption allegations.

8.0 Procedure for Reporting Corruption Cases

8.1 Avenues for Reporting

8.1.1 The University shall make provisions to allow for disclosure of all corrupt practices within the University by providing avenues for reporting such vices.

8.1.2 The reporting avenues include but not limited to:

i. Corruption reporting boxes at strategic points within the University.
ii. Integrity office on Hotline numbers (0777-220225,0775-129999)
iii. An interactive page on the University website (www.mu.ac.ke.)
iv. The Council email : *council@mu.ac.ke*
v. Office of the Vice-Chancellor: *vcmoi2009@gmail.com*
vi. Integrity Office Email: integrity @mu.ac.ke
vii. Office of Deans of schools and Dean of students.
viii. Office of Directorates.
ix. Chairs and Heads of Departments office.
x. Directly to the EACC:
   a. Website *www.eacc.go.ke/report corruption,*
   b. *Tel: (020) 2717318;2720722;2100312/3*
   c. *Mobile: 0729888881/2/3; 0736996600/33*
   d. *Fax: (020)2717473*
   e. *Email address: eacc@integrity.go.ke*

8.2 Guidelines for Corruption Reporting

8.2.1 All reports on corruption allegations shall be:

i. Made in writing. Where a report is made verbally, the receiving officer will put it in writing after which the giver of the report where applicable shall confirm the contents of the written report and sign it.
ii. Treated with confidentiality by the reporter and the receiver of the report.
iii. Verified for authenticity by respective relevant investigating organs.
iv. Forwarded to the Vice-Chancellor for further action.

8.2.2 Any party that reports instances of corruption is entitled to acknowledgement within three days and feedback on action taken on the matter reported within 21 working days of reporting. Where no action is taken within reasonable time, the informant may report the same to EACC.

8.2.3 However, if one is still not satisfied after using the procedures and getting a final written response, one is entitled to channel one's concern to other relevant agencies, which may include:

a) The Office of the Auditor General
b) A relevant professional or regulatory body
c) Efficiency Monitoring Unit
d) Ethics and Anti-Corruption Commission
e) Directorate of Criminal Investigation

f) Witness Protection Agency
g) The Ombudsman Office/Commission on Administrative Justice

8.2.4 Any persons being the first recipients of reports shall have a duty to;-

i. Treat concerns in a confidential manner.
ii. Carry out preliminary investigations to establish the veracity of the case
iii. Forward the case to the relevant university anti-corruption organ.

8.3. Handling of Corruption Cases

8.3.1 Any cases of suspected corruption reported to the University shall be referred to the relevant organ for further investigation.

8.3.2 Investigating organ shall submit a report to MUCPC for deliberations

8.3.3 Upon receipt of the report the MUCPC shall consider the report and determine the next course of action.

8.3.4 The Committee will then make a decision to:

i. Refer the matter to the Staff or students Disciplinary Committee
ii. Refer the matter to other School Corruption Prevention Sub-Committee
iii. Refer the matter to the EACC.
iv. Refer the matter to the Kenya Police
v. Refer the matter to any other relevant Authority.

8.3.5 Internal sanctions for those found culpable shall be in accordance with disciplinary actions as per relevant policies.

9.0 Whistle Blowing Procedure

9.1 Introduction

9.1.1 Whistleblower in the context of this policy refers to any person who witnesses or has any information or documents pertaining corrupt practice and reports using the channels outlined in this policy.

9.1.2 In accordance with the Witness Protection Act, 2006 the University undertakes protect the identity of persons making corruption disclosures and to ensure that information that might identify the person making the disclosures is protected.

9.2 Procedure for Handling of Whistle Blowers

9.2.1 A person wishing to disclose information concerning corruption under witness protection act shall notify relevant university authorities. If there is need to disclose the information this shall first be discussed with the person.

9.2.2 No action may be taken against informers for their assistance so long as the informer believes the information to be true.

9.2.3 The identity of an informer shall be handled in accordance with the procedure of the witness protection act

9.2.4 Such informers shall be enrolled to Witness Protection Programme under the terms and conditions existing at the time of enrollment.

9.2.5 The officer receiving the request for protection shall notify the Vice-Chancellor of the same within three working days.

9.2.6 The Vice-Chancellor shall take necessary steps and measures to ensure the whistle blower is protected.

10.0 Anonymity and Confidentiality

10.1 All matters raised by concerned employees will be treated with utmost confidentiality.

10.2 All correspondence entered into the whistle blowing process will be absolutely confidential whether a person making the disclosure wishes to remain anonymous or not.

10.3. The substance of an investigation including the identities of the parties to it will remain confidential and may only be disclosed with the consent of the complainant.

11.0 Anonymous Allegations

11.1. All complaints must contain as much information as possible to allow for proper assessment.

11.2. Anonymous allegations will be considered based on the following factors;

i. Seriousness of the issue raised

ii. The credibility of the concern

iii. The likelihood of confirming the allegation from attributable source

iv. To the extent possible, any complaint should be factual rather than speculative or conclusory.

11.3 This policy encourages staff to put their contact/information to their allegations whenever possible.

12.0 Untrue Allegations

12.1 Disciplinary action shall be taken against employees who makes allegations frivolously, maliciously or for personal gain.

13.0 Internal Audit Reviews

13.1 The University will carry out on a quarterly basis internal audit reviews in all its operational areas.

13.2 All periodic reports on various aspects of university operations shall be reported to relevant organs of the University.

13.4 whereas there may be nil report a communication in the relevant and prescribed format shall be filled.

13.5 Internal Auditor or a person designated to perform such function shall notify the Management the findings of the audit together with actionable recommendations

13.6 The management shall provide feedback to relevant stakeholders and the Council within 21days of discussion.

14.0 Disciplinary Measures

14.1 Any breach of the provisions of this Policy by any member of staff, students and other stakeholders shall be dealt with in accordance with the provisions of the University Disciplinary Procedures and other relevant laws of Kenya.

15.0 Sensitization & Training

15.1 The University commits itself to sensitization and training of staff on matters of ethics and integrity which includes;

a. Awareness through continuous sensitization and training of staff, students and other stakeholders.
b. Structures such as corruption prevention committees, integrity committees and other fora.
c. Processes including various procedures, applicable standards for best practices and quality compliance standards adopted from time to time.
d. Any other strategy that will be provided for by the MUCPC from time to time.

16.0 Management Implementation & Monitoring Authority

16.1 The Vice-Chancellor shall be responsible for the implementation & Continuous monitoring of this Policy.

17.0 Monitoring and Review of the Policy

17.1 This policy shall be monitored continuously and necessary amendments made.

17.2 It will be subjected to major review after every five years but piecemeal reviews shall be done as need arises.

18.0 Dissemination

18.1 It is responsibility of head of Divisions, Deans, Directors, Heads of Departments and Sections to disseminate the provisions of this policy to all intended clientele.

19.0 Execution

19.1 This Policy shall come in force upon approval by the University Council.

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Prof. Isaac S. Kosgey, Ph.D.
VICE – CHANCELLOR

Table 10.1 :CORRUPTION RISK ASSESSMENT REPORT

FUNCTIONAL AREAS		CORRUPTION RISKS
THE COUNCIL		
	Decision making	• Discrimination towards stakeholders • Biased decision making relating to: Administration of property and funds of the university Reception & disbursement of gifts, grants and other monies. Appointment and promotion of staff Students and staff discipline Welfare of students and staff
VICE CHANCELLOR'S OFFICE		
Procurement	Procurement planning	• Stocking obsolete / expired goods. • Skewed procurement planning • Lack of regular inventory/stock taking
	Specification	• Accepting items not meeting owners specification
	Procurement methods	• Wrong procurement method to limit competition • Inflated quotations • Lobbying for suppliers • Collusion with suppliers
	Receiving and issuing	• Irregular release of goods • Receiving items with wrong specification, lower quality and details not matching LPO issued.
	Storage	• Poor storage, pilferage, discrepancy in issuing items • Loss of accounting documents • Unauthorized removal of documents/ assets
	Disposal	• Failure to use disposal plan. • Identification & undervaluation of assets • Delayed disposal
Internal audit	Audit functions	• Lack of audit plan. • Selective auditing of specified areas & selective reporting • Non-objective auditing
Security	Security services and staff	• Poor follow up of reported cases, especially stolen materials/equipment. • Biased investigation /compromised investigation • Theft by servants i.e. security guards
Public Relations	Wrong negative publicity	• Negative and wrong information to the public.
ACADEMICS, RESEARCH AND EXTENSION		
Student Admissions	Kenya Universities and	• Irregular inter-university/interschool transfers. • Delay in processing of admission letters.

	Colleges Central Placement Service (KUCCPS) Admissions	• Biased Inter University/Interschool/Interdepartmental transfers.
	PSSP Admissions	• Biased application of admission criteria. • Fake or forged results slips. • Non remittance of application fees • Delay in processing of admission letters • Delayed issuance of admissions letters
	Postgraduate Admissions	• Favoritism in admission, especially in cases where chances are limited. • None adherence to senate criteria on post graduate admissions.
Teaching	Curriculum	• Use of Outdated teaching content/delay in curriculum review. • Inadequate coverage of the topics and curriculum. • Delay in provision of course outline.
	Adherence to 20% Rule	• Delay in releasing of time table. • Delay in student reporting. • Delay in commencement of lectures. • Non-adherence to students class attendance requirements.
	Fee Payment	• Misuse of nominal rolls.
	Part-Time Lecturers	• Irregular hiring of part-time lecturers. • Irregular payments. • Poor service delivery. • Noncompliance of per-time teaching policy. • Delay of recruitment letter of contract.
Examination	Continuous Assessment Tests (CATs)	• Non-marked CATs. • Issuance of fictisous marks. • Non adherence to the rule of two CATs per course. • Missing CAT marks. • Marked CAT scripts not returned to students.
	Setting and moderating of examinations	• Delay in setting and lack of moderating examinations. • Recycling of examination year after year. • Setting different examinations for different campuses but same courses.
	Leakage of examination	Unethical handling of examination during: • Setting of examination, • Moderation of examination,

		• Delivery of examination,
		• Processing of examination,
		    ✓ *Receiving*
		    ✓ *Typing*
		    ✓ *Photocopying*
		    ✓ *Collating*
		• Conflict of interest.

	Issuance of examination cards	• Nonpayment of full payment of fees. • Use of fake examination cards. • Irregular issuance of examination cards.
	Invigilation of examination	• Non-adherence to set examination rules. • Irregular issuance of examination booklets.
	Processing of Results	• Issuance of undeserved marks. • Altering of marks. • Unethical issuance of transcripts and certificates. • Changing of names. • Presentation of complete set of examination scripts to the external examiners.
	Graduation	• Allowing students to graduate with fee balance problem. • Allowing student to graduate without completion of courses required. • Pending disciplinary cases. • Clearing a student who has not returned a graduation gowns. • Loss of graduation gowns/ delayed return of the gowns. • Non recovery of fee for lost/non returned gown.
Student Records	Student Records Management	• Altering of students records/hacking.
Research and outreach services	Management of research funds and activities.	• Misuse of funds by researchers. • Diversion of research funds by finance departments
	Collaborations and partnerships.	• Entering into non-beneficial/costly collaborations
	Consultancy, outreach services/Community engagement	• Biased engagements. • Nonpayment of consultancy fees to persons undertaking the consultancy. • Infringement on intellectual property rights.
Library Services	Issuing and return of books	• Irregular issuing of books at the library. • Mutilation of books, records and documents. • Delay in re-calling of issued books.

		• Non-payment of overdue books.
STUDENT AFFAIRS		
	Games and sports	• Irregular issuing of sports equipment. • Biased selection of participants. • Misuse of sports equipment. • False claims.
	accommodation	• Irregular/biased allocation of rooms. • Abetting non-ethical practices (cohabiting, “piracy”, sub-letting of rooms). • Carrying out illegal business in hostels. • Non -adherence to “10 - 10” rule.
	Wardenship	• Non observance of the Wardens Policy guidelines.
	Student welfare	• By-passing chain of command. • Rigging of Student elections. • Misappropriation of Entertainment fund. • Irregular/biased allocation of business premises. • Irregular/biased allocation of Work study programme.
	Student organizations-elections and management	• Misappropriation of funds. • Political interference in running of organizations. • Misuse of university property.
	Students disciplinary.	• Biased disciplinary process. • Compromise of disciplining staff by culprits. • Loss of evidences. • Delayed process.
	Student finances-caution money	• Pocketing of students caution money by school accountants.
ADMININISTRATION, PLANNING & DEVELOPMENT		
Human resource	Staff conduct and ethics	• Non adherence to public officers’ ethics. • Pilferage. • Reporting to work late and leaving early.
Development	Infrastructural development and refurbishment	• Pilferage of building materials. • Over employment of laborers. • Delayed completion of projects. • Receiving of poor quality /quantity building material. • Poor workmanship.
Research	Research Funds	• Irregular disbursement of research funds. • Lack of monitoring.

		• Delay in disbursement of the research funds. • Lack of transparency while allocating the research funds.
Recruitment	Job Advertisement	• Job Specification tailored to favour certain individuals. • Elimination of suitable candidates to favor weaker ones.
	Short listing	• Short listing persons that do not meet the requirements. • Biased composition of the shortlisting committee.
	Interviews	• 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	• Hiring of staff without regard to the establishment. • Hiring of casuals when there is no actual need for them.
Deployment	Transfer and placements.	• Favourism of certain staff during placements.
Staff Development	Promotion	• Uncoordinated promotion of staff • Promotion of unqualified staff.
	Training	• Biased nomination of staff for training and sponsorships
Medical	Referrals	• Biased and corrupt referrals of staff for medical treatment
	Medical claims	• Approval of false claims
	Dependants lists	• Collaboration with staff to include non bonafide person in lists of dependants
Leave	Leave of absence /Sabbatical leave	• Favoritism of staff on approval of this leave
	Leave approval and computation.	• Deliberate miscalculation of balance of leave days
Records	Records	• Mishandling and mismanagement of records. • Tempering with records in personal files.
Security	Investigation process.	• Doctoring of investigation reports to suit the culprit.
Catering and Hostels	Room allocation	• Asking for bribes for students to secure them rooms. • Selling of rooms for personal gain. • Interfering of the on line room allocation
	Procurement of food stuff	• Single sourcing of food items.
	Loss of revenue.	• 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	• Misuse of Stationary • Office equipment • Misuse of time • Misuse Sanitary and Cleansing Materials • Misuse of University property for personal gain. • Misuse of information/ intellectual property • Use of University information for personal gain.
Transport and Garage	Fuel	• Siphoning of University fuel. • Misuse of fuel cards • Overstating the coast of fuel
	University Vehicles	• Use of University vehicles for personal use • Single sourcing and theft of spear parts.
Waivers	Approval of Fee Waivers	• Collaboration with staff to approve fee waiver for non bonafide person
Retirement	Retention of service	• Discrimination in selection of staff to be retained upon retirement.
Housing	House allocation	• Unfair/discriminative allocation of University houses
Legal Office	Payment of legal fees	• Collusion with external lawyers or parties to defraud the University e.g. in legal fee
	Handling of legal matters	• Compromising of cases
Projects	Project Management	• Collusion with contractors to offer substandard work. • Non adherence to project work plan. •
FINANCE		
Finance	Part-timers payments	• Fake claims – claim as per timetable even when courses are not taught.
	Payroll	• Wrong rate of payments, dummy payments. • Payments made to retired and terminated staff. • Irregular stoppage deductions. • Delayed remittance.
	Cash office	• Fictitious payments. • Double payments. • Unauthorized cheque/ cash payments. • Missing documents to support payments

	Students Finance	• Understating of students fees. • Dishonest information on HELB loans, CDF and other Bursaries. • Fictitious and/or incomplete posting of students records. • Use of fake fee statement and receipts.
	Revenue	• Use of fake receipt books. • Failure to collection of debts. • Unauthorized use of revenue.
	Expenditure	• Inflated invoices and quotations, • Invoices for unsupplied goods & services, LPOs.
	Budgetary Control	• Vote misallocation, non-commitment of payments, wrong postings.
	Bank Reconciliation	• Erroneous payments, double payments, Frauds through bank accounts.
	Final accounts	• Creative accounts, Un-reconciled accounts.
	Examination	• Lack of objectivity in checking the payments and passing of irregular payments.
	Imprest	• Imprest use for wrong purposes. Staff taking imprest while having other unaccounted imprests. • Irregular actions on processing of imprests, such as deliberate delays.
	Fuel / Calling cards	• Misuse of Calling cards and Fuel cards.
	Medical Refund payments	• Claims made on basis of fake receipts and/or signatures used for claims. • Inflated invoices by referral doctors.
	Financial management systems and procedures	• Non adherence to Financial Management Systems and Procedures.
	Income generating units	• Pocketing /non declaring of revenue by unit staff.

11.1. Core Mandate

Functional Areas	Risk	Prevention Strategies	Time Frame	Responsibility	Budget
		ACADEMICS			
Admissions	• Skewed Admission of students through interschool transfer	Monitoring Use of KUCCPS Criteria To ensure correct placement of transferred students to various degree programs.	Aug 2021	• Deans of Schools • DVC(A,R&E) • Deputy Registrar (Admissions)	20,000
	Compromise of Admission staff to admit unqualified students Delay in issuance of provisional admission letter	Programme co-ordinator to verify all documents presented before admission Develop a checklist of all requisite application documents for admission	Aug 2021	• DVC(A,R&E) • Deputy Registrar (Admissions) • Deans of Schools •	20,000
Post graduate admissions	• Irregular admission of students where chances are limited • Non adherence to senate criteria on postgraduate admissions	Deans should ensure adherence to all senate rules and regulations PAO (Quality Assurance) to monitor and ensure candidates are competitively selected	Aug 2021	• DVC(A,R&E) • Deputy Registrar (Admissions) • Deans of Schools	20,000
	▪ Curriculum Review	Regular review of the curricular after a full academic circle to prevent use of outdated curricular.	Aug 2021	▪ Deputy Vice Chancellor (Academic Research and Extension). ▪ Deputy Registrar (Admissions) ▪ Deans of Schools ▪	3,000,000

Curriculum	• Coverage of the curriculum.	Close supervision and monitoring by Heads of Department to ensure teaching of full content, provision of course outlines and punctually in attendance of lectures by lecturers and students. Strict adherence to regular student-lecture evaluation form at the end of every course. In-house/in-service Schools to conduct regular workshops for curriculum/ content delivery.	Aug 2021	• Chief Academic Officer • Deans • Heads of Departments • Deputy Registrar (Admissions) • Deans of Schools	120,000
	Implementing unaccredited curriculum • Using outdated curriculum	Ensuring that all curricula are senate approved before implementation Ensuring that all curricula are accredited by Commission for University Education before implementation Ensure curriculum are	Aug 2021	•	200,000
Lectures	Teaching Time-Table.	Release of the timetable a month before the start of a semester as per Senate Rules.	Aug 2021	• DVC(A,R&E)	20,000

	Commencement of lectures	Ensure prompt commencement of lectures as per Senate Guidelines. Monitor adherence to 20% rule and nominal roll. Disciplinary of Sanctions to offenders.	Aug 2021	• DVC(A,P&D) • Deans of Schools and Deputy Registrar Admissions, • Deputy Registrar Academic (Quality Assurance). •	20,000
Part-time Lecturers	Hiring process.	Ensure adherence to Senate approved part-time teaching policy.	Aug 2021	• DVC(A,R&E) • Registrar (Planning). • HODs, Deans	20,000
	Payment of Claims.	Ensure no faulty claims.	Aug 2021	• DVC A,R &E • Finance Officer •	20,000
	Course Delivery Performance.	Use students evaluation reports on part-time Lecturers.	Aug 2021	• .DVC(A,R&E) • Deans of Schools	100,00
	Poor coverage of course and/or modules None attendance of classes	Timely course allocation Use of diverse teaching approaches Course evaluation reports Use of class attendance register	Aug 2021	•	20,000
Setting and Moderating Examinations (Departmental / School Levels)	Coverage of the Curriculum	Ensure Examinations Questions (Final and CATS) cover the entire syllabus.	Aug 2021	. DVC(A,R&E) Heads of Department	20,000
	Recycling of past Paper Examination Questions	Ensure different examinations are set for different sittings	Aug 2021	"Heads of Department Deans of Schools	20,000
	Setting different examinations for different	Use of sanctions against the lecturers and the	Aug 2021	• DVC (A,R&E) • Heads of Department	20,000

	campuses but same courses.	staff involved should there be examinations leakage.			
	Leakage at Departmental or school levels.	Conduct awareness workshops on Public Officer's Code of Ethics to those handling exams. Vetting of Officers who handle examinations.	Aug 2021	• Heads of Departments • Deans of Schools • Deputy Registrar (Examinations) • DVC(A,R&E)	20,000
	Sitting examination when not authorized Forged examination card Poor quality of set questions	At least 80% class attendance Full Fee payment Internal and external moderation of Examinations	Aug 2021	•	20,000
Administering Examinations	Continuous Assessment Tests (C.A.Ts)	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	Aug 2021	• Heads of Departments • Deans of Schools • PAO (Examinations) • Chief Academic Officer DVC(A,R&E)	20,000
	Conflict of Interest.	Unauthorized persons should not handle / deliver examinations	Aug 2021	• Heads of Departments • Deans of Schools • PAO (Examinations) • Chief Academic Officer • All members of staff	20,000
	Issuance of examination cards	Ensure that only bona-fide students are issued with Exam Cards.	Aug 2021	• School administrators. • School Accountants.	20,000

Invigilation of examination	Exam Rules	Adherence to set examination rules Ensure that all invigilators.	Aug 2021	• Heads of Departments. • Deans of Schools. • Dean of schools	20,000
	Booklets	Use of different colours. for examination booklet	Aug 2021	"	20,000
	Invigilators	use of adequate invigilators and security personnel in examination rooms	Aug 2021	"	20,000
	Exam Environment.		Aug 2021	• Principal Administrative Officer (Central Services).	20,000
	Inadequate number of invigilators in the examination room	Ensuring a minimum of two invigilators in the examination room	Aug 2021	•	20,000
Processing of Results	Marking of Papers.	Moderation of Ensure lecturers have enough time to mark and not too many papers.	Aug 2021	• DVC(ARE) Officer • Dean of schools • Head of Departments	20,000
	Late processing of results Incomplete marks	Ensuring that results submitted one month after the end of semester examination Ensuring that the results are externalized each Academic year	Aug 2021	•	20,000
			Aug 2021	•	20,000
	Mark Sheets.	Sensitization of staff on the Code of Conduct and Ethics for Public Universities.	Aug 2021	"DVC(ARE) • Deans Heads of Departments	20,000
	Ethical Behavior of Lecturers and	Vetting of Staff. Use of	Aug	• "Deans Heads of Departments	20,000

	Staff Handling Exams. Presentation of complete set of examination scripts to the external examiners	Disciplinary Sanctions.	2021		
	Nonpayment of requisite fee Non completion of degree course	Attachment of payment receipt/bank slip Approved results by the School board	Aug 2021	•	20,000
Library Services	Irregular issuing of books at the library Mutilation of books, records and documents Delay in re-calling of issued books Non-payment of overdue books	Vetting access to non bonafide users Introduction of library fee to non bonafide users Enhanced supervision installation of surveillance cameras Revising the penalty charge Advanced software for records management	Aug 2021	• University Librarian • Campus librarians • Security personnel • University Librarian • Campus librarians • Security personnel •	60,000
11.2 Procurement and Financial Management					
Student Affairs	Fee balance	Reconciliation of accounts to block graduation by students before completion of fees.	Aug 2021	• DVC(SA) • School Accountants • Finance Officer •	20,000
	Completion of courses required	Proper checking to ensure students who graduate has finished all courses.	Aug 2021	• DVC(AR&E) • Deans • Head of Departments	20,000
	Disciplinary cases	Speedy Disposal of Students	Aug	• DVC(A,R&E) • Dean of Students	20,000

		Disciplinary Cases.	2021	• Legal Officer • Chief Security officer • Registrar Academic	
	• Issuance and return of graduation gowns	Keep Inventory of Graduation Gowns.	Aug 2021	• DVC(AR&E) • Dean of Schools.	20,000
	• Procurement of Gowns	Follow provisions of the Public Procurement and Disposal Act in Purchasing of Gowns.	Aug 2021	• DVC(A,R &E) • Senior Procurement Officer.	20,000
	Games and sports.	Irregular issuing of sports equipment Selection of participants Misuse of sports equipment false claims	Aug 2021	• DVC(SA) • Games and sports co-coordinator • Dean of Students Finance officer	20,000
	Accommodation	Allocation of rooms abetting non-ethical practices (cohabiting, “piracy”, sub-letting of rooms) Carrying out illegal business in hostels non -adherence to “10 - 10” rule	Aug 2021	• DVC(SA) • • Dean of students • Wardens • Finance Officer Catering and hostels manager	20,000
	Wardenship	non observance of the Wardens policy guidelines	Aug 2021	• Deputy Vice Chancellor (SA) • Wardens • Dean of Students)	20,000
	Student welfare	by-passing chain of command Student elections Entertainment Allocation of business premises Work study programme	Aug 2021	• DVC(SA) • Dean of students	20,000
Research Funds	Disbursement of research funds	Provision of guidelines for disbursement of	Aug 2021	• Deputy Vice Chancellor (Academic, Research and Extension).	20,000

		funds		• DVC(Finance)	
	Research activities	Adherence to the Moi University Research policy	Aug 2021	• DVC(Finance) Deputy Registrar Research	20,000
11.3 Payroll Management					
Management decision making	Discrimination towards stakeholders Delayed decision making Biased decision making	Adherence to mitigation plan regulations and guidelines	Aug 2021	• Vice Chancellor • Deputy vice chancellors • Registrar • Principals • Campus Directors • Deans • Heads of sections/departments	20,000
	Resource allocation	Diversion of resources Misappropriation of resources Favoritism in allocation of resources	Aug 2021	• Vice Chancellor • Deputy vice chancellors • Registrar • Principals • Campus Directors • Deans • Heads of sections	20,000
Staff Conduct and Ethics	Non adherence to public officers ethics pilferage Reporting to work late and leaving early/Absenteeism	Strict monitoring Enforcing disciplinary measures Impromptu spot checks In-house training Introduction of work attendance sheet Monthly reports to registrars	Aug 2021	• DVC(A,P&D) • Deans of schools • Heads of departments/sections	20,000
Recruitment	Job Specification	Implementation of Scheme of Service Adherence to Scheme of service	Aug 2021	• DVC (A,P&D •) Finance Officer • Deans of Schools • Head of Departments	20,000
	Short listing	Develop Recruitment mitigation plan guidelines for shortlisting	Aug 2021	DVC(A,P&D) • Finance Officer • Deans of Schools • Registrar(A,P&D) • Deputy Registrar Recruitment)	20,000

				Head of Department/section	
	Interview Notifications	Use mobile, e-mail and post office.	Aug 2021	• DVC(A,P&D) • DVC(AP&D) • Deputy Registrars • Finance Officer • Deans of schools • Head of Department	20,000
	Interview Process	Use of Score Proper constitution and rotation of interview panel as per statutes.	Aug 2021	DVC(A,P&D) • Finance Officer • Deans Head of Department	20,000
	Employment of staff	Adhere to the approved establishment during hiring.	Aug 2021	• DVC(A,P&D) • Finance Officer • Deans • Head of Department	20,000
	Hiring of Casuals	Needs assessment to be conducted before hiring casuals. Maintain a policy of non-discrimination with all applicants for employment.	Aug 2021	DVC(A,P&D) • Registrar (A&D) • Finance Officer • Deans of School • Deputy Registrar Central Services Head of Department	20,000
Deployment	Placement and Transfers	Adherence to placement guidelines(as per the recruitment policy)	Aug 2021	• DVC(A,P&D) • Deputy • Registrar Personnel • Deans and HODs	20,000
Staff Development	Promotion	Adherence to Scheme of Service	Aug 2021	• DVC(AP&D) • Registrars Personnel Deputy Registrar Recruitment	20,000
	Nomination and sponsorships.	Adherence to Guidelines for selection and nomination process.	Aug 2021	• DVC(A,P&D) • Deputy Registrar Training • Finance Officer • DR training • Dr Planning • Deans and HOD	20,000
	Training	Adherence to the training policy.	Aug 2021	• Deputy Registrar Training • Finance Officer • DR training • Dr Planning	20,000

				• Deans and HOD DVC(A,P&D) •	
Medical	Referrals Approval of Medical claims Approval of dependants lists	Review the current medical Scheme to address approvals, payments and dependants' lists.	Aug 2021	• DVC(A,P&D) • DR, personnel • Chief Medical Officer • Finance Officer	20,000
Leave	Leave of absence Sabbatical leave Leave approval and computation	Adherence to the Terms of Service, CBA's and Employment Act, 2007. Follow the laid down procedures for leave applications and computation	Aug 2021	• DVC (AP&D). • Dr Personnel • • Head of Sections	20,000
Records	Records handling and management	Develop policy for records management and Adherence to ISO 9001:2015 Standards Automation of all records vetting and administering of oath of secrecy to staff handling records Introduction of work attendance sheet	Aug 2021	• DVC(A,P&D) • ICT Director • DR Personnel • Senior Legal Officer	20,000
Security	Investigation process Loopholes in reports	Recruitment of competent security staff Training Adherence to Code of conduct and Ethics	Aug 2021	• DVC(A,P&D) • Dr Personnel • DR, Training • Chief security Officer	20,000
Financial Claims	Approvals	Rigorous examination process Support documents should always be attached to all	Aug 2021	• DVC(Finance) • Finance Officer	20,000

		approved claims			
Hostels	Room allocation	Automation to avoid double room allocation. Regular Supervision.	Aug 2021	• DVC(SA) • Catering & Hostels Manager • FO • ICT Director	20,000
Catering	Procurement of food stuff Loss of revenue at sales and serving points	Procurement functions to be undertaken by Procurement unit Enhance supervision to ensure service is given against correct receipt Deployment of qualified staff to this area	Aug 2021	DVC(Finance) • Procurement Officer • Catering & Hostels Manager Finance Officer	20,000
Management of University Property	Stationary Office equipment Time spent on duty. Sanitary and Cleansing Materials	Strict accountability and supervision of staff.	Aug 2021	• Vice Chancellor. • All Heads of Departments	20,000
Transport	Fuel Use of University vehicles for personal use	Use fuel cards for all University vehicles Enhanced Supervision Fit tracking devices on the vehicles	Aug 2021	• DVC(AP&D) • Transport &Garage Manager • Internal Audit • Finance Officer • Chief Security Officer • Senior Purchasing Officer	200,000
	Purchase of Spare Parts and Service of Vehicles.	Adherence to Code of Conduct and Ethics Adherence to the purchasing regulations	Aug 2021	• DVC(AP&D) • Transport &Garage Manager • Internal Audit • Finance Officer • Chief Security Officer Senior Purchasing Officer	20,000
Waivers	Approval of Fee Waivers	adherence to the fee waiver policy ensure proper accountability when signing of list of	Aug 2021	• VC • DVC(AP&D) • DVC(F) • Deans/Hosts	20,000

		dependants			
Retirement	Retention on service after attainment of retirement age. Payment of salary /allowances to retirees	Ensure that selection of those to be retained is done openly and fairly. Conduct Need Assessment before retention Introduction of work attendance sheet	Aug 2021	• DVC(A,P&D) • DR, Personnel • VC • Deans of Schools • Heads of Departments • DR, Personnel	20,000
Staff Housing	House allocation approvals.	Adhere to the criteria for allocation of University houses	Aug 2021	DVC(A,P&D) Housing Allocation Secretariat Chairman Housing and Allocation Committee	20,000
Legal Office	Collusion with external lawyers or parties to defraud the University e.g. in Legal Fee.	Use of the Advocates remuneration order	Aug 2021	• Chief legal Officer • Senior Legal Officer • Senior Internal Auditor	20,000
	Compromising of cases	Implementation of the Code of conduct and Ethics for Public Universities.	Aug 2021	DVC-Finance Finance Officer Chief Medical)	20,000
Medical Claims (By Staff)	Receipts presented by staff for drugs purchased. Signatures or approvals	Strict and regular supervision by CMO and Accountant in charge of personal claims on cumulative claims and checking the receipts against drug price lists. Receipts to itemize drugs and services rendered Stocking of adequate drugs in the university clinics Develop medical	Aug 2021	▪ DVC(Finance ▪ Finance Officer ▪ Chief Medical Officer	20,000

		policy			
Medical Claims (Appointed Doctors and Hospitals)	Invoices by Appointed Doctors and Hospitals.	Verification of all invoices submitted by appointed Doctors and Hospitals. ▪	Aug 2021	▪ DVC (F). ▪ Deans ▪ Finance Officer	20,000
Part-Time Payments	Claims	Lecturer & students attendance registers to be introduced and be used when paying Adherence to Part- Time policy Introduction of work attendance sheet	Aug 2021	▪ DVC (F). ▪ Deans ▪ Finance Officer	20,000
Payroll	Payments of salaries /allowances no non-qualified or retired/ghost workers	Limit payroll access to few people through passwords Payroll payments to be checked before releasing the salaries Monthly additions of payments to staff Adhere to government circulars, terms of service , Unions CBAs Introduction of work attendance sheet	Aug 2021	▪ Finance Officer ▪ Finance Officer	20,000
Cash office	Payments Use of funds	List of payments to be approved and used to draw cheque / pay cash Adhere to Financial regulations and	Aug 2021	▪ DVC(Finance) ▪ . Students Finance Finance Officer	20,000

		manuals			
Students Finance	HELB Loans, CDF and Bursaries. Posting of records Clearance of students Fees collection	Electronic fees collection to be reinforced. Officers issuing exam cards should access FIMS Independent check on students' fee records before postings to the students accounts. Exam cards to be electronically generated and students clearance Strict Supervision of fee collection.	Aug 2021	▪ Dean of Schools, ▪ Senior Accountant ▪ Finance Officer. ▪ Finance Officer ▪ Deans of Schools	20,000
Revenue	Receipt books Debt collection Use of revenue Storage of accountable documents	Manual receipts to be phased out within a year. Revenue collection to be decentralized. Adherence to Financial regulations & Manuals.	Aug 2021	▪ Finance Officer.	20,000
Expenditure	Invoices and quotations Expenditure Records Management Payments	Verification of documents Proper filing of documents using serial numbers Safe custody of documents under lock and key Automation Secure moderators	Aug 2021	▪ DVC(Finance) ▪ Finance Officer	20,000
Budgetary Control	Preparation of budget Commitment of vote book Posting	verification of commitment balances Adherence to Financial	Aug 2021	▪ Finance Officer.	20,000

		regulations & Manuals Automation			
Bank Reconciliation	Payments Receipts	Daily checking of entries in the bank statements reconciliation Adherence to Financial regulations & accounting standards	Aug 2021	▪ Senior Accountant ▪ Finance Officer	20,000
Final accounts	Creative accounts Reconciliation	Independent check by Internal audit and Examination Adherence to Financial regulations & GAAPs Automation	Aug 2021	▪ DVC(Finance) Senior Accountant ▪ Finance Officer	20,000
Examination	Checking of payments and approvals	Post audit to be done at regular intervals rotation of staff approved reference documents – working file	Aug 2021	▪ DVC(Finance) ▪ ▪ Internal Audit Finance Officer	20,000
Imprests	Use of Imprests Payments	Imprest to be authorized by authority to incur expenditure holders. Automation and Adherence to Imprest policy. Adherence to service charter Adherence to ISO requirements Adherence to Financial regulations & accounting manuals Provision of specimen signatures of	Aug 2021	▪ DVC(Finance) ▪ Finance Officer.	20,000

		authority to incur expenditure holders Maintain relevant approved reference documents			
Fuel / Calling cards	Use of Fuel cards Issuance of calling cards	Adhere to approved list of running vehicles to issue calling cards to approved list of staff Independent random check Automation	Aug 2021	▪ DVC(Finance) ▪ Finance Officer ▪ Transport Manager	20,000
Inventory	Inventory and Stock control	Rationalized procurement plan Provision of specimen signatures of AIE holders Automation Maintenance of stocks re order levels Adherence to PPDAR and procurement and manual Automation	Aug 2021	▪ DVC(F) ▪ Senior Procurement Officer ▪ Finance Officer	20,000
Specifications	▪ Preparation of specifications for items to be purchased.	Specifications to be based on functionality / performance. Adherence to statutory standards Adherence to PPDAR and procurement and manual	Aug 2021	▪ DVC(Finance) ▪ Senior Procurement Officer	20,000
Methods of Procurement	Tenders Request for quotations Expression of	Use open tenders / prequalification of suppliers / contractors	Aug 2021	▪ DVC(Finance) ▪ Senior Procurement Officer	20,000

	interest Low value procurement Direct Procurement	Adherence to PPDA and regulation procurement and manual			
Receiving of Procured Goods / Services.	Delivery of goods Receipt of goods	An all-inclusive inspection & acceptance committee Adherence to PPDA and regulation procurement and manual Automation	Aug 2021	▪ DVC(F) ▪ Tender processing committee ▪ Director, ICT	20,000
Storage of Goods.	Requisitions ▪ Issuance of items	Proper storage & records specimen signatures of AIE holders	Aug 2021	▪ DVC(Finance) ▪ Senior Procurement Officer.	20,000
Disposal of Goods	Identification & Valuation of assets	Adhere to Disposal Act and Regulation Continuous assessment of stock and assets Proper valuation Automation Adherence to PPDA and Regulations Adherence to the procurement manual	Aug 2021	▪ DVC(Finance) ▪ Senior Procurement Officer ▪ Director, ICT ▪ Head of Departments	20,000
Prequalification of suppliers / contractors	Advertisement Evaluation	Adherence to PPDA and regulation procurement manual	Aug 2021	▪ DVC(Finance) ▪ Senior Procurement Officer ▪	20,000
	Auditing Report	Adhere to the approved annual work plan	Aug 2021	▪ Vice Chancellor ▪ Chief Internal Auditor	20,000

Infrastructural development & refurbishment	Requisition of materials. Employment of casual laborers. Timely completion of projects Receiving of building material Workmanship Planning and variations	provision of adequate security at the site to prevent pilferage of building materials adherence to code of conduct and Ethics for Public Universities Strict adherence to the labour budget. adherence to set timeframe ensure adequate supervisors Adequate planning for development projects Use of professional Supervisor Rationalization of casual labors requirement.	Aug 2019	▪ DVC(A,P&D) ▪ University Architect ▪ Security Officer ▪ Senior Procurement Officer	20,000

MOI UNIVERSITY CORRUPTION RISK MITIGATION PLAN (2018/2019)					
Functional Areas	**Risk**	**Prevention Strategies**	**Time Frame**	**Responsibility**	**Budget**
11.4 Information Communication Technology					
1. Moi University Hostel Management System	**Manipulation of MUHMIS with malicious intentions**. E.g. blocking some students from booking rooms, reverting some students from rooms already booked. Bribery & Favoritism during room booking.	• Declare all vacant rooms/bed spaces in good time.	Aug 2021	• ICT Director • Dean of Students • DVC Student affairs	530,000
		• Keep all rooms in a good condition.	Aug 2021		
		• Review of systems especially in house developed systems.	Aug 2021		
		• Audit trails.	Aug 2021		
2. Finance Management Information System	**Fraud in (FMIS) systems** e.g. Bribery, Abuse of trust through sharing of passwords, Manipulation of financial records by unauthorized persons.	• Audit trails	Aug 2021	• ICT Director • Finance officer • DVC Finance	• 233,000
		• Control of access rights of staff.	Aug 2021		
		• Full automation & Integration of FMIS system with other existing systems.	Aug 2021		
3. Exam Processing System	**Abuse of Exam processing system.** E.g. Bribery, Favourism, Abuse of trust through sharing of passwords.	• Full automation of exam process.	Aug 2021	• ICT Director • Registrar Administration • DVC Administration, Planning & Development	250,000
		• Implement & strengthen the exam policy	Aug 2021		
		• Strict adherence to examination almanac	Aug 2021		
		• Carry out regular system audit	Aug 2021		

4. Human resource management information systems	**Mismanagement of staff/students information records.** E.g. Manipulation of staff information without permission. Leaking confidential information of (staff mails) to the public.	• Automation and integration of staff records	Aug 2021	• ICT Director • Registrar Administration • DVC • Administration, Planning & Development	20,000
		• Train/Sensitize staff who handle	Aug 2021		
		• sensitive information (oath of secrecy)	Aug 2021		
		• Proper handling of records (register, tracking files)	Aug 2021		
5. Procurement of ICT resources	**5. Lapse in Procurement of ICT resources** E.g. Overpricing of ICT hardware /software resources. Procuring of substandard ICT hardware &software. Lack of clear guidelines on the total ownership cost of software leading to over/under budgeting.	• Develop clear guidelines on procurement process of ICT resources.	Aug 2021	• Procurement Officer • ICT Director	56,000
		• Involving stakeholders in the development process of the software.	Aug 2021		
		• Automation of procurement process.	Aug 2021		
		• Carry out regular system audit	Aug 2021		
6. Managing of ICT Resources	**Misuse of ICT Resources** E.g. Propagating viruses with intention of corrupting the IT system, Hacking IT systems to explore	• Installing of firewalls (Both software & hardware)	Aug 2021	• ICT Director	360,000
		• Installing network monitoring tools	Aug 2021		
		• Use of bandwidth optimization	Aug 2021		

	vulnerabilities of the systems which can inconvenience the legitimate users of the system.	tool			
		• Training/ Sensitization of staff	Aug 2021		
		• Carry out regular system audit	Aug 2021		
7. Moi University Web Portal (Student information)	• **Manipulation of students information** e.g. Bribing to manipulate students marks and issuing exam cards irregularly, Abuse of trust through sharing of passwords,	• The University to own and host the system • Full automation of all systems in the university (ERP)	Aug 2021	• ICT Director • Registrar Academics • DVC Academics, Research and Extension	582,000
		• Establish an MIS section in ICT to handle all systems centrally.	Aug 2021		
		• Sufficient training of the system end users	Aug 2021		
		• Carry out regular system audit	Aug 2021		
		• Review of systems especially in house developed systems.	Aug 2021		

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SIGNATORIES OF THIS CORRUPTION RISK MITIGATION PLAN

Chairperson of the Corruption Prevention/Integrity Committee

Signed:………………………Date:………………………………..

Secretary of the Corruption Prevention/ Integrity Committee

Signed:…………………………… Date:………………………