

**MOI UNIVERSITY
(ISO 9001:2015 CERTIFIED INSTITUTION)**

**Bribery and Corruption Risk Report & Mitigation Plan
30th September, 2022**

TABLE 1.1 :BRIBERY AND CORRUPTION RISK ASSESSMENT REPORT 2022-2023

FUNCTIONAL AREAS		CORRUPTION RISKS
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 AFFAIRS		
Student Admissions	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 • 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Teaching	Curriculum	• Use of Outdated teaching content/delay in curriculum review.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.
		•
Examination	Continuous Assessment Tests (CATs)	• Non-marked CATs. • Issuance of fictitious 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, ✓ <i>Receiving</i> ✓ <i>Typing</i> ✓ <i>Photocopying</i> ✓ <i>Collating</i> • 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	Management of research funds and	• Misuse of funds by researchers.

services	activities.	• 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.
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.
	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.
	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 favor 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.	• Favoritism 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
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.
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.
Retirement	Retention of service	Discrimination in selection of staff to be retained upon retirement.
FINANCE		
Finance	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.
	Financial management systems and procedures	• Non adherence to Financial Management Systems and Procedures.
	Income generating units	• Pocketing /non declaring of revenue by unit staff.

MOI UNIVESRITY BRIBERY AND CORRUPTION RISKS MITIGATION PLAN 2022/2023

I .ACADEMICS, RESEARCH, EXTENSION AND STUDENT AFFAIRS

Identified Risk	Prevention Strategy	Mitigation Actions/Activities	Responsibility	Resource Requirements	Implementation Timeframe
1. Admission of students A. Bribery risks Bribing way into admission where chances are limited.	Adherence to all senate rules and regulations.	Sensitization and publicizing reporting channels. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Dec 2022
Admission of students B. Corruption risks Irregular admission of students where chances are limited Non adherence to senate criteria on postgraduate admissions	Adherence to all senate rules and regulations.	Scrutinizing all applications. Sensitization of staff. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Dec 2022
2. Curriculum A. Bribery risks Bribing of instructors	Regular review of the curricular after a full academic circle.	Regular sensitizations of staff Course evaluation at the end of semester Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Finances	May 2023
Curriculum B. Corruption risks	Regular review of the curricular after a full academic circle.	Regular sensitizations of staff Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	Human Resources	• Jun 2023

1. Use of outdated Curriculum			Registrar ARE&SA		
2. Coverage of the curriculum.	Strict adherence to regular student-lecture evaluation form at the end of every semester.	Use of attendance registers Course evaluation at the end of semesters. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Director quality assurance Registrar ARE&SA	Computers Human Resources Finances	Jun 2023
3. Lectures A. Bribery risks Bribery in course allocation	Release of the timetable a month before the start of a semester as per Senate Rules.	Use of attendance registers Course evaluation at the end of se Operationalization of Corruption Prevention Committees.	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Jun 2023
B. Corruption risks Late Commencement of lectures	Ensure prompt commencement of lectures as per Senate Guidelines. Monitor adherence to 20% rule and nominal roll.	Use of attendance registers Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Jun 2023

4. Examinations A. Bribery Risks Sitting examination when not authorized	At least 80% class attendance Full Fee payment Internal and external moderation of Examinations	Sensitizations. Automation of examination setting and processing Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Jun 2023
Examinations B. Corruption risks 1. Conflict of Interest.	Unauthorized persons should not handle / deliver examinations	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Computers Human Resources Finances	Jun 2023
2. Issuance of examination cards	Ensure that only bona-fide students are issued with Exam Cards.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023
5. Invigilation of examination A. Bribery risks 1. Bribing exam managers to allow noncompliance to Exam Rules	Adherence to set examination rules Ensure that all invigilators.	Sensitizations Disciplining culprits Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023
B. Corruption Risks 1. None adherence to code of conduct.	Adherence to set examination rules Ensure that all invigilators	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023

2. Invigilators	use of adequate invigilators and security personnel in examination rooms	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023
3. Inadequate number of invigilators in the examination room	Ensuring a minimum of two invigilators in the examination room	Sensitization Operationalization of Corruption Prevention Committees s	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023
6. Processing of Results A. Bribery Risks Soliciting of bribers in processing of results Marks issued for favors e.g. monetary exchange	Ensuring that results submitted one month after the end of semester examination Ensuring that the results are externalized each Academic year	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023
Processing of Results B. Corruption Risks Delay in processing results	Automation of processes	Sensitizations Maintaining reporting channels Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	• Computers • Human Resources • Finances	Jun 2023

7. Student Affairs A. Bribery Risks Fraud in revenue collection	Reconciliation of accounts to block graduation by students before completion of fees.	Sensitizations Disciplining of culprits Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Human Resources	Jun 2023
Student Affairs B. Corruption Risks 1. Forgery in fees receivables documents/receipts	Reconciliation of accounts to block graduation by students before completion of fees.	Sensitizations Speedy Disposal of Students Disciplinary Cases. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar ARE&SA	Human Resources	Jun 2023
2. Irregular room allocation	Automation to avoid double room allocation. Regular Supervision.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	Human Resources	Jun 2023

II ADMINISTRATION, PLANNING AND STRATEGY DIVISIONS					
7. Staff Conduct and Ethics A. Bribery Risks Pilferage of university property and goods	Strict monitoring and Enforcing disciplinary measures.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	- Computers - Human Resources - Finances	Jun 2023
Staff Conduct and Ethics B. Corruption Risks Reporting to work late and leaving early/Absenteeism	Strict monitoring and Enforcing disciplinary measures.	Sensitizations Maintaining work sign in and out sheets •Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	- Computers - Human Resources - Finances	Jun 2023
8. Recruitment A. Bribery Risks Canvassing in recruitment and payment of bribes to be recruited	- Adherence to Human Resource Manual. - Operationalization of Corruption Prevention Committees	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	- Computers - Human Resources - Finances	Jun 2023

Recruitment B. Corruption Risks Using forged or untrue credentials to secure employment	• Adherence to Human Resource Manual. • Operationalization of Corruption Prevention Committees	Sensitizations Operationalization of Corruption Prevention Committees. Due diligence to all recruits to ascertain true facts.	Chairs and Heads of Departments Registrar Human Resources	• Computers • Human Resources • Finances	Jun 2023
9. Job Specification A. Bribery Risks Bribery by candidates to allow favorable/skewed job specification	Implementation of Scheme of Service Adherence to Scheme of service Adherence to human resource manual	Sensitizations Operationalization of Corruption Prevention Committees. Widespread announcement of jobs.	Chairs and Heads of Departments Registrar Human Resources	• Computers • Human Resources • Finances	Jun 2023
Job Specification B. Corruption Risks Biased job specification	Implementation of Scheme of Service Adherence to Scheme of service	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	• Computers • Human Resources • Finances	Jun 2023

10. Interview Notifications A. Bribery Risks None contacting interviewees at the right and appropriate time	Use mobile, e-mail and post office.	Sensitizations All notifications be done on the same day and include short message notification. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments Registrar Human Resources	- Computers - Human Resources - Finances	Jun 2023
Interview Notifications B. Corruption Risks Delay in notifying shortlisted candidates.	Use mobile, e-mail and post office.	Sensitizations All notifications be done on the same day and include short message notification. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
11. Promotion A. Bribery Risks Biased promotions through bribing staff.	Adherence to Scheme of Service.	Sensitizations Shortlisting and publishing the qualified staff in strategic notice boards and website. Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023

Promotion B. Corruption Risks Non promotion of qualified staff.	Adherence to Scheme of Service	Sensitizations Undertaking Internal and external periodic audits Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
12. Nomination and sponsorships. A. Bribery risks Soliciting bribes to be nominated for sponsorship.	Adherence to Guidelines for selection and nomination process.	Sensitizations Publicizing all sponsorships and successful list of candidates Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Nomination and sponsorships. B. Corruption Risks Biased nomination	Adherence to Guidelines for selection and nomination process.	Sensitizations Publicizing all sponsorships and successful list of candidates Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
13. Training A. Bribery Risks Nominating staff based on monetary benefits they give.	Adherence to the training needs assessment.	Sensitizations Publicizing all successful list of candidates Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023

Training B. Corruption Risks Nomination of staff based on nepotism and other favoritism methods.	Adherence to the training needs assessment.	Sensitizations Publicizing all successful list of candidates Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
14. Payroll A. Bribery Risks 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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
Payroll B. Corruption Risks 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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023

15. Cash office A. Bribery Risks Payments to wrong recipients and kickbacks to staff processing payments.	List of payments to be approved and used to draw cheque / pay cash Adhere to Financial regulations and manuals	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Cash office B. Corruption Risks Mis-use of funds	List of payments to be approved and used to draw cheque / pay cash Adhere to Financial regulations and manuals	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
16. Revenue A. Bribery Risks Bribery to under invoice/ reduce revenue being received	Manual receipts to be phased out within a year. Revenue collection to be decentralized. Adherence to Financial regulations & Manuals.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Revenue B. Corruption Risks Under Invoice/ reduce revenue being received	Manual receipts to be phased out within a year. Revenue collection to be decentralized. Adherence to Financial regulations & Manuals.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023

17. Expenditure A. Bribery Risks Expenditure on unbudgeted votes	Verification of documents Proper filing of documents using serial numbers Safe custody of documents under lock and key Automation Secure moderators. Accounting of imprests and surcharging were imprests holders fail to account in time.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
Expenditure B. Corruption Risks Fake Invoices and exaggerated quotations	Verification of documents Proper filing of documents using serial numbers Safe custody of documents under lock and key Automation Secure moderators. Accounting of imprests and surcharging were imprests holders fail to account in time.	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
18. Documents Examination A. Bribery risks Use of fake documents to support spending.	Post audit to be done at regular intervals	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023

Documents Examination B. Corruption Risks Use of forged documents to support spending on Imprest.	Post audit to be done at regular intervals rotation of staff approved reference documents – working file	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
19. Inventory A. Bribery Risks Untrue Inventory and Stock control to initiate re-ordering.	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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Inventory B. Corruption Risks 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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023

20. Methods of Procurement Tenders A. Bribery risks Bribery by suppliers to staff on the following methods of procurement: Request for quotations Expression of interest Low value procurement Direct Procurement	Use open tenders / prequalification of suppliers / contractors Adherence to PPDA and regulation procurement and manual	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Methods of Procurement Tenders B. Corruption Risks Un-professional conduct in procurement of tenders	Use open tenders / prequalification of suppliers / contractors Adherence to PPDA and regulation procurement and manual	Sensitizations Operationalization of Corruption Prevention Committees Tender committees' operationalization.	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
24. Receiving of Procured Goods / Service A. Bribery Risks. Bribery in receiving of goods whose specifications or quantities don't tally to what was ordered.	An all-inclusive inspection & acceptance committee Adherence to PPDA and regulation procurement manual. Automation	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023
Receiving of Procured Goods / Service B. Corruption Risks Receiving of goods whose specifications or quantities don't tally to what was ordered.	An all-inclusive inspection & acceptance committee Adherence to PPDA and regulation procurement manual. Automation	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	• Computers • Human Resources • Finances	Jun 2023

25. Disposal of Goods A. Bribery Risks Bribery by potential buyers to officers involved in 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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
Disposal of Goods B. Corruption Risks Biased Identification & Valuation of assets staff by involved	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	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
26. Prequalification of suppliers / contractors A. Bribery Risks Bribery in Payment of suppliers	Adopt a first supply first pay policy	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023
Prequalification of suppliers / contractors B. Corruption Risks Favoritism in payment of pending bills	Adopt a first supply first pay policy	Sensitizations Operationalization of Corruption Prevention Committees	Chairs and Heads of Departments	- Computers - Human Resources - Finances	Jun 2023

III CROSS CUTTING INFORMATION COMMUNICATION TECHNOLOGY					
Identified Risk	Prevention Strategies	Mitigation Actions/Activities	Responsibility	Resource Requirements	Implementation Timeframe
A. Bribery Risks					
28. 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.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	• ICT Director • Dean of Students • DVC(ARE& SA)	• Human Resources • Computers. • Software • Finances	March 2023
	• Keep all rooms in a good condition.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Review of systems especially in house developed systems.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Conducting Audit trails.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
29. Finance Management Information System	Conducting Audit trails	Training/ Sensitization of staff Operationalization of	• ICT Director • Finance officer	• Human Resources	March 2023

Fraud in (FMIS) systems e.g. Bribery, Abuse of trust through sharing of passwords, Manipulation of financial records by unauthorized persons.		Corruption Prevention Committees		- Computers. - Software - Finances	
	Control of access rights of staff.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	Automation & Integration of FMIS system with other existing systems.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
B. Corruption Risks					
30. Exam Processing System Abuse of Exam processing system. E.g. Bribery, Favoritism, Abuse of trust through sharing of passwords.	Full automation of exam process.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	- ICT Director - Registrar Administration - DVC(AP&S)	- Human Resources - Computers. - Software - Finances	June 2023
	Implement & strengthen the exam policy	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	Strict adherence to examination almanac	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			

	• Carry out regular system audit	Training/ Sensitization of staff Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
31. 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	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	• ICT Director • Registrar Administration • DVC (AP&S)	• Human Resources • Computers. • Software • Finances	May 2023
	• Train/Sensitize staff who handle	Training/ Sensitization of staff Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Sensitive information (oath of secrecy)	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Proper handling of records (register, tracking files)	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			

32. Procurement of ICT resources 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.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	• Procurement Officer • ICT Director	• Human Resources • Computers. • Software • Finances	March 2023
	• Involving stakeholders in the development process of the software.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Automation of procurement process.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Carry out regular system audit	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
33. Managing of ICT Resources Misuse of ICT Resources E.g. Propagating viruses with intention of corrupting the IT system, Hacking IT systems to explore vulnerabilities of the systems which can inconvenience the legitimate users of the system.	• Installing of firewalls (Both software & hardware)	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	• ICT Director	• Human Resources • Computers. • Software • Finances	March 2023
	• Installing network monitoring tools	Training/ Sensitization of staff Operationalization of Corruption Prevention			

		Committees			
	• Use of bandwidth optimization tool	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Training/ Sensitization of staff	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Carry out regular system audit	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			March 2023
34. 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	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees	• ICT Director • Registrar • Academics • DVC(ARE& SA)	• Human Resources • Computers. • Software • Finances	March 2023
	• Full automation of all systems in the university (ERP)				
	• Establish an MIS section in ICT to handle all systems centrally.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			

	• Sufficient training of the system end users	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Carry out regular system audit	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			
	• Review of systems especially in house developed systems.	Training/ Sensitization of staff Operationalization of Corruption Prevention Committees			May 2023

Chairperson of the Corruption Prevention/Integrity Committee Signed:.....Date:.....

Secretary of the Corruption Prevention/ Integrity Committee Signed:..... Date:.....