



*University of Choice*

## **CORRUPTION PREVENTION POLICY**

<b>Version</b>	1.0
<b>Short description</b>	Corruption Prevention Policy
<b>Relevant to</b>	Council, Officers, Staff and Students
<b>Approved by</b>	University Council
<b>Responsible officer</b>	Vice-Chancellor
<b>Responsible office</b>	Office of the Vice-Chancellor
<b>Date introduced</b>	April, 2016
<b>Related University documents</b>	University Charter, Statutes and relevant policies
<b>Related legislation</b>	Ethics and Anti-Corruption Commission Act, revised 2012, Anti-Corruption and Economic Crimes Act, revised 2012, Public Officers Ethics Act, 2003, Public Procurement and Disposal Act, 2005, Public Finance Management Act, 2012, Public Audit Act, 2003, Universities Act, 2012, The Employment Act, 2007, The Witness Protection Act, 2006, Leadership and Integrity Act, Cap 182
<b>Key words</b>	Ethics, Anti-Corruption

**April, 2016**

## **APPROVAL**

The Masinde Muliro University of Science and Technology having been awarded its Charter on 2012 has set on a growth path guided by its vision of “being a Premier University that is globally visible in knowledge generation and technological innovation”. As part of laying its foundation, the University developed its Statutes in November 2013 followed by its first strategic plan which has been reviewed will be rolled out later this year, 2016.

The process of recruiting its top managers was completed in 2004. The University has now embarked on the process of developing its policies which will guide decisions of the different organs of the University in order to achieve rational outcomes geared towards the growth of the University. This Corruption Prevention Policy is just one of the many policies that the University is rolling out.

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

By virtue of the authority vested in me as the Chairman of Council of the Masinde Muliro University and in reference to the approval granted by Council in its meeting of 28<sup>th</sup> June, 2019, I hereby sign this Anti-Corruption Policy this 28<sup>th</sup> day of June, 2019.

**Dr. Jeremy Bundi, PhD**

**CHAIRMAN OF COUNCIL**

## ACRONYMS

<b>C.A.T:</b>	Continuous Assessment Tests
<b>C.E.O:</b>	Chief Executive Officer
<b>CDF:</b>	Constituency Development Fund
<b>CPC:</b>	Corruption Prevention Committee
<b>EACC:</b>	Ethics and Anti-Corruption Commission
<b>HELB:</b>	Higher Education Loans Board
<b>KUCCPS:</b>	Kenya Universities and Colleges Central Placement Service
<b>LPO:</b>	Local Purchase Order
<b>PSSP:</b>	Privately Sponsored Students Programme
<b>MMUST:</b>	Masinde Muliro University of Science and Technology

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## **FOREWORD**

Masinde Muliro University of Science and Technology (MMUST) was established through an Act of Parliament on 30<sup>th</sup> December, 2006 as the seventh public University in Kenya. The university is the successor of Western University College of Science and Technology (WUCST), which in turn succeeded the defunct Western College of Arts and Applied Sciences (WECO).

The University is located along the Kakamega-Webuye road, one kilometre from the central business district (CBD) of Kakamega town. The main campus stands on about 140 acre plot with an annex situated in the town centre.

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

**Professor Joseph Bosire, PhD**  
**Ag. Vice-Chancellor**

## **OVERVIEW OF MMUST**

### **Vision**

To be a Premier University in Science Technology and innovation

### **Mission**

To provide excellent education training and research through integrating science, technology and innovation into quality programmes to suit the needs of a dynamic world.

### **Core Values**

We are committed to:

- Customer focus
- Collegiality
- Excellence
- Professionalism
- Equity
- Accountability
- Integrity
- Innovativeness
- Competitiveness

### **Mandate**

The mandate of MMUST, as contained in the Act of Parliament of 30<sup>th</sup> December, 2006 and states as follows:

- a) To provide directly, or in collaboration with other institutions of higher learning, facilities for university education (including technological, scientific and professional education) the integration of knowledge and skills to the life, work and welfare of citizens of Kenya.
- b) To participate in the discovery, transmission and enhancement of knowledge and to stimulate the intellectual life in economic, social, cultural, scientific and technological development of Kenya.
- c) To harness acquired knowledge through Scientific and Technological innovation
- d) To conduct examinations for such academic awards as may be provided in the statutes pertaining to the University;
- e) To examine and make proposals for new faculties, departments, resource and research centres, degree courses and subjects of study.
- f) To determine who may teach, what may be taught and how it may be taught in the University.

The **functions** of the University are listed in the University Charter Part II (6).

## **1. POLICY STATEMENT**

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

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

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

## **2. LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS**

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

### **2.1. Legal Instruments**

- i. Anti-corruption and Economic Crimes Act, revised 2012
- ii. Public Officers Ethics Act, 2003
- iii. Public Procurement and Disposal Act, 2005 and Public Procurement and Disposal Regulations, 2006.
- iv. Public Financial Management Act, 2004
- v. Public Audit Act, 2003
- vi. University Charter and University Statutes, 2013
- vii. The Code of Conduct and Ethics for Public University (Legal Notice No.170)
- viii. The Employment Act, 2007

ix. The Witness Protection Act 2006

## **2.2. Institutional Instruments**

- i. University Quality Manuals and Procedures, 2013
- ii. University Service Charter
- iii. University Strategic Plan 2013
- iv. Performance Contracting Guidelines
- v. Terms of Service and Collective Bargaining Agreements.
- vi. Annual Budget and Establishment
- vii. University Financial Regulations
- viii. University Financial Manual
- ix. University Accounting Manual
- x. University Research Policy
- xi. University Intellectual Property Policy
- xii. University Examination Rules and Regulations
- xiii. University Part-Time Teaching Policy
- xiv. University of Scheme of Service
- xv. University Internal Audit Manual
- xvi. University Rules and Regulations Governing the Conduct of Students
- xvii. University Gender Policy
- xviii. University Senate Rules (Admissions, Curriculum Developments, Examination Rules and Regulations)
- xix. University Wardens Manual
- xx. University Library Rules and Regulations
- xxi. University of Sexual Harassment and Discrimination Policy

### **3. SCOPE/APPLICABILITY**

This Policy applies to Members of Masinde Muliro University of Science & Technology Council, all Officers, Staff and Students.

### **4. DEFINITION OF CORRUPTION**

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

- i. Abuse of position or office, for personal gain or for the advantage of another person;
- ii. Bribery, theft, embezzlement and fraud;
- iii. Evasion of payment of Government revenues, taxes, rates, fees and other dues;
- iv. Practicing of nepotism, 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; and
- viii. Breach of trust;
- ix. In addition to this, failure to report corruption

### **5. ROLES AND RESPONSIBILITIES**

#### **5.1. Role of Management**

The University Management is responsible for:

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

#### **5.2. Role of University Staff and other Stakeholders**

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

### **5.3. The Supervisors are responsible for:**

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

## **6. FUNCTIONAL AREAS AND CORRUPTION PRONE PRACTICES**

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

### **6.1. Management**

- i. Security
- ii. Procurement planning and management
- iii. Internal Audit
- iv. Public Relations

### **6.2. Academic and Student Affairs**

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

### **6.3. Administrative and Finance**

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

### **6.4. Planning Research and Innovation**

- i. Management of research funds and activities
- ii. Outreach services

### **6.5 Administrative & Finance**

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

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

## 7. STRUCTURES TO FIGHT CORRUPTION

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

- i. University Corruption Prevention Committee
- ii. Campus Corruption prevention Committee
- iii. Integrity Office responsible for:
  - a) Regular vetting of staff
  - b) Regular monitoring of University functional areas
  - c) Monitoring systems/controls as per-ISO 9001:2008 procedures
  - d) Supervisory checks and controls within the University
  - e) Staff integrity and mentorship
  - f) Institutionalization of efficiency, transparency and accountability of transactions
  - g) Regular updates and monitoring of University assets
  - h) Monitoring of declaration of conflict of interest

## 8. COMPOSITION OF THE CORRUPTION PREVENTION COMMITTEE

The following is the composition of the Corruption Prevention Committee:

Vice-Chancellor	-	Chairperson
Deputy Vice-Chancellor Academic and Students affairs	-	Member
Deputy Vice-Chancellor Administration and Finance	-	Member
Deputy Vice-Chancellor Planning Research & Innovation	-	Member
Finance Officer	-	Member
Two Senate Representatives	-	Members
Director, Quality Assurance	-	Member
Human Resource Officer	-	Member
Director, ICT	-	Member
Representatives (Admin)	-	Member
Representative (Audit)	-	Member
Representative Procurement	-	Member

Performance Monitoring & Evaluation Coordinator	-	Member
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## **9. MANDATE AND OPERATIONS OF THE CORRUPTION PREVENTION COMMITTEE**

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

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

## **10. INTERNAL AUDIT REVIEWS**

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

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

## **11. HOW TO REPORT CORRUPTION INTERNALLY AND EXTERNALLY**

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

- a) Placing corruption reporting boxes at strategic points within the University
- b) Creation of hotline numbers that people can use
- c) Reporting directly to the C.E.O

- d) Creating an interactive page on the University website where claimants can log on and send claims.
- e) Students and members of staff are encouraged to report to their immediate superior all conducts they consider unethical, or criminal to facilitate appropriate action by the relevant agents.

Such reports shall:

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

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

## **12. HANDLING OF CORRUPTION CASES**

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

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

The committee will then make decisions to:

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

## **13. PROTECTION OF WHISTLE BLOWERS**

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

#### **14. DISCIPLINARY MEASURES**

Any breach of the provisions of this Policy by any member of staff shall be dealt with in accordance with the provisions of the University disciplinary procedures, the Anti-Corruption, Economic Crimes Act 2003 and the Public officer Ethics Act 2003 and conduct for public University Legal Notice N0. 71.

#### **15. TRAINING**

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

#### **16. MANAGEMENT/IMPLEMENTATION AUTHORITY**

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

#### **17. REVIEW**

This policy will be subjected to review from time to time whenever necessary but otherwise after every three (3) years.

#### **18. EFFECTIVE DATE**

The policy shall take effect from (the date it will be approved by University Council).

## **APPENDIX I: FUNCTIONAL AREAS**

### **Management Organs**

#### **Decision Making**

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

#### **Administrative**

- Staff conduct and ethics
- Non adherence to public officers ethics
- Pilferage
- Reporting to work late and leaving early

#### **Student Admissions**

- KUCCPS Admissions
- Irregular inter-university/interschool transfers
- Delay in processing of admission letters
- PSSP Admissions
- Biased application of admission criteria
- Fake results slips
- Non remittance of application fees

- Delay in processing of admission letters
- Delay assurance of admissions letters
- Mature Entry Admissions
- Fake/forged result slips
- Non-adherence to the set down criteria of admissions and placement into the correct entry into the year of study
- Irregular transfers from PSSP to mature entry admission
- Unethical practices in admissions
- Delay in processing of admission letters
- Postgraduate Admissions
- Favoritism in admission, especially in cases where chances are limited
- None adherence to senate criteria on post graduate admissions

## **Curriculum**

- Use of outdated teaching content/delay in curriculum review
- Inadequate coverage of curriculum
- Delay in provision of course outline
- Adherence to 20% Rule
- Delay in releasing of time table
- Delay in student reporting
- Delay in commencement of lectures
- Fee Payment
- Use of nominal rolls
- Part-Time lecturers and External Examiners
- Irregular hiring of part-time lectures and external examiners
- Irregular payments

- Poor service delivery

## **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
- Setting and moderating of examinations
- Delay in setting and lack of moderating examinations
- Inadequate coverage of the topics and curriculum
- Recycling of examination year after year
- Setting different examinations for different campuses but same courses
- Leakage of examination
- Setting of examination
- Moderation of examination
- Delivery of examination
- Processing of examination
- Receiving
- Typing
- Photocopying
- Collating
- Conflict of interest

## APPENDIX II: CORRUPTION RISK ASSESSMENT AREAS

FUNCTIONAL AREA DESCRIPTION		CORRUPTION RISK
Academic	Issuance of examination	<ul style="list-style-type: none"> <li>• Lack of full payment of fee</li> <li>• Use of fake examination cards</li> </ul>
	Invigilation of examination	<ul style="list-style-type: none"> <li>• Non-adherence to set examination rules</li> <li>• Irregular issuance of examination booklets</li> </ul>
	Processing of Results	<ul style="list-style-type: none"> <li>• Issuance of undeserved marks</li> <li>• Altering of marks</li> <li>• Unethical issuance of transcripts and certificates</li> <li>• Changing of names</li> <li>• Presentation of complete set of examination scripts to the external examiners</li> </ul>
	Graduation	<ul style="list-style-type: none"> <li>• Fee balance problem</li> <li>• Incompletion of courses required</li> <li>• Pending disciplinary cases</li> <li>• Insurance of graduation gowns without payment of graduation fee</li> <li>• Loss of graduation gowns</li> </ul>
Library Services	Issuing and return of books	<ul style="list-style-type: none"> <li>• Irregular issuing of books at the library</li> <li>• Mutilation of books, records and documents</li> <li>• Delay in re-calling of issued books</li> <li>• Non-payment of overdue books</li> </ul>

Students Affairs	Games and Sports	<ul style="list-style-type: none"> <li>• Irregular issuing of sports equipment</li> <li>• Selection of participants</li> <li>• Misuse of sports equipment</li> <li>• False claims</li> </ul>
	Accommodation	<ul style="list-style-type: none"> <li>• Allocation of rooms</li> <li>• Abetting non-ethical practices (cohabiting, “piracy”, sub-letting of rooms)</li> <li>• Carrying out illegal business in hostels</li> <li>• Non-adherence to “10-10” rule</li> </ul>
Warden ship	Policy	<ul style="list-style-type: none"> <li>• Non observance of the Wardens Policy guidelines</li> </ul>
Student welfare		<ul style="list-style-type: none"> <li>• By-passing chain of command</li> <li>• Student election</li> <li>• Entertainment</li> <li>• Allocation of business premises</li> <li>• Work study programme</li> </ul>
Development	Infrastructural development and refurbishment	<ul style="list-style-type: none"> <li>• Pilferage of building materials</li> <li>• Over employment of labourers</li> <li>• Delayed completion of projects</li> <li>• Receiving of building material</li> <li>• Poor workmanship</li> </ul>
Research	Research Funds	<ul style="list-style-type: none"> <li>• Irregular disbursement of research funds</li> <li>• Lack of monitoring</li> <li>• Delay in disbursement of the research funds</li> <li>• Lack of transparency while allocating the research funds</li> </ul>

Recruitment	Job Advertised	<ul style="list-style-type: none"> <li>• Job specification tailored to favour certain individuals</li> <li>• Elimination of suitable candidates to favor weaker ones</li> </ul>
	Short listing of persons	<ul style="list-style-type: none"> <li>• Short listing of persons that do not meet the requirements</li> <li>• Biased composition of the short listing committee</li> </ul>
	Interviews	<ul style="list-style-type: none"> <li>• Biased composition of the appointments committee</li> <li>• Lack of score cards for interviews</li> <li>• Deliberate delays of interview invitation notices and in other instances withholding of the invitation</li> <li>• Lobbying for specific candidates among panel members</li> </ul>
	Hiring of staff	<ul style="list-style-type: none"> <li>• Hiring of staff without regard to the establishment</li> <li>• Hiring of casuals when there is no actual need for them</li> </ul>
Deployment	Transfer and placements	<ul style="list-style-type: none"> <li>• Favourism of certain staff during placement</li> </ul>
Staff Development	Promotion	<ul style="list-style-type: none"> <li>• Uncoordinated promotion of staff</li> <li>• Promotion of unqualified staff</li> </ul>
	Training	<ul style="list-style-type: none"> <li>• Biased nomination of staff training and sponsorship</li> </ul>
Medical	Referrals	<ul style="list-style-type: none"> <li>• Biased and corrupt referrals of staff for medical treatment</li> </ul>
	Medical Claims	<ul style="list-style-type: none"> <li>• Approval of false claims</li> </ul>

	Dependants lists	<ul style="list-style-type: none"> <li>• Collaboration with staff to include non bonafide person in lists of dependants</li> </ul>
Leave	Leave of absence/Sabbatical leave	<ul style="list-style-type: none"> <li>• Favoritism of staff on approval of this leave</li> </ul>
	Leave approval and computation	<ul style="list-style-type: none"> <li>• Deliberate miscalculation of balance of leave days</li> </ul>
Records	Records	<ul style="list-style-type: none"> <li>• Mishandling and mismanagement of records</li> <li>• Tempering with records in personal files</li> </ul>
Catering and Hostels	Room allocation	<ul style="list-style-type: none"> <li>• Asking for bribes for students to secure them rooms</li> <li>• Selling of rooms for personal gain</li> </ul>
	Procurement of food stuff	<ul style="list-style-type: none"> <li>• Single scouring of food items</li> </ul>
	Loss of revenue	<ul style="list-style-type: none"> <li>• Under payment of served food</li> <li>• Serving food that has not been paid for</li> <li>• Theft of food items cooked and uncooked</li> </ul>
University Property	Management of university property	<ul style="list-style-type: none"> <li>• Stationary</li> <li>• Office equipment</li> <li>• Time</li> <li>• Sanitary and cleansing materials</li> <li>• Use of University property for personal gain</li> <li>• Information/intellectual property</li> <li>• Use of University information for personal gain</li> </ul>

Transport and Garage	Fuel	<ul style="list-style-type: none"> <li>• Siphoning of university fuel</li> <li>• Misuse of fuel cards</li> <li>• Overstating the cost of fuel</li> </ul>
	University Vehicles	<ul style="list-style-type: none"> <li>• Use of University vehicles for personal use</li> <li>• Single sourcing and theft of spear parts</li> </ul>
Waivers	Approval of Fee Waivers	<ul style="list-style-type: none"> <li>• Collaboration with staff to approve fee waiver for non bonafide person</li> </ul>
Retirement	Retention of Service	<ul style="list-style-type: none"> <li>• Discrimination in selection of staff to be retained upon retirement</li> </ul>
Housing	House allocation	<ul style="list-style-type: none"> <li>• Unfair/discriminative allocation of University houses</li> </ul>
Legal Office	Payment of legal fees	<ul style="list-style-type: none"> <li>• Collusion with external lawyers or parties to defraud the university e.g. in legal gee</li> </ul>
	Handling of legal matters	<ul style="list-style-type: none"> <li>• Compromising of cases</li> </ul>
Finance	Part-time payments	<ul style="list-style-type: none"> <li>• Fake claim as per timetable even when courses are not taught</li> </ul>
	Payroll	<ul style="list-style-type: none"> <li>• Wrong rate of payments, dummy payments</li> <li>• Payments made to retired and terminated staff</li> <li>• Irregular stoppage deductions</li> <li>• Delayed remittance</li> </ul>
Cash Office	Cash office	<ul style="list-style-type: none"> <li>• Fictitious payments</li> <li>• Double payments</li> <li>• Unauthorized cheque/cash payments</li> <li>• Missing documents To support</li> </ul>

		payments
	Students Finance	<ul style="list-style-type: none"> <li>• Understating of students fees</li> <li>• HELB loans, CDF and other Bursaries</li> <li>• Fictitious and/or incomplete posting of students records</li> <li>• Use of fake statement and receipts</li> </ul>
	Revenue	<ul style="list-style-type: none"> <li>• Use of fake receipt books</li> <li>• Collection of debts</li> <li>• Unauthorized use of revenue</li> </ul>
	Expenditure	<ul style="list-style-type: none"> <li>• Inflated invoices and quotations</li> <li>• Invoices for unsupplied goods and services. LPOs</li> </ul>
	Budgetary control	<ul style="list-style-type: none"> <li>• Vote misallocation, non-commitment of payments, wrong postings</li> </ul>
	Bank	<ul style="list-style-type: none"> <li>• Erroneous payments, double payments, frauds through bank accounts</li> </ul>
	Financial accounts	<ul style="list-style-type: none"> <li>• Creative accounts, Un-reconciled accounts</li> </ul>
	Examination	<ul style="list-style-type: none"> <li>• Lack of objectivity in checking the payments and passing of irregular payments</li> </ul>
	Imprest	<ul style="list-style-type: none"> <li>• Imprest use for wrong purposes. Staff taking imprest while having other uncounted imprests</li> <li>• Irregular actions on processing of imprests, such as deliberate delays</li> </ul>
	Fuel/Calling cards	<ul style="list-style-type: none"> <li>• Erroneous issues of calling cards and fuel cards</li> </ul>

	Medical Refund payments	<ul style="list-style-type: none"> <li>• Claims made on basis of fake receipts and/or signatures used for claims</li> <li>• Inflated invoices by referral doctors</li> </ul>
Procurement	Ordering and stocking	<ul style="list-style-type: none"> <li>• Stocking become obsolete/expire</li> <li>• Lack of regular inventory/stock taking</li> </ul>
	Specifications	<ul style="list-style-type: none"> <li>• Vague and bias specifications</li> </ul>
	Methods of procurement	<ul style="list-style-type: none"> <li>• Limited competition</li> <li>• Inflated quotations</li> <li>• Lobbying of suppliers</li> </ul>
	Receiving and issuance	<ul style="list-style-type: none"> <li>• Items of wrong specifications, under delivering</li> <li>• Irregular release of good</li> </ul>
	Storage	<ul style="list-style-type: none"> <li>• Poor storage, pilferage, discrepancy in issuing items</li> <li>• Loss of accounting documents</li> <li>• Unauthorized removal of documents/assets</li> </ul>
	Disposal	<ul style="list-style-type: none"> <li>• Identification and Valuation of assets</li> <li>• Delayed disposal</li> </ul>
Internal Audit	Internal Audit	<ul style="list-style-type: none"> <li>• Selection auditing of specified areas and selective reporting</li> </ul>
Security	Investigation process	<ul style="list-style-type: none"> <li>• Poor follow up of reported cases, especially stolen materials/equipments</li> <li>• Doctoring of investigation reports to suit the culprit</li> <li>• Delayed investigations</li> </ul>
Farm	Revenue collection	<ul style="list-style-type: none"> <li>• Uncoordinated revenue collection</li> <li>• Uncoordinated labour/productivity</li> </ul>

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

**APPENDIX III: ORGANIZATIONAL STRUCTURE OF ANTI-CORRUPTION COMMITTEE**

