MASINDE MULIRO UNIVERSITY OF SCIENCE AND TECHNOLOGY (MMUST)

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THE BRIBERY AND CORRUPTION PREVENTION POLICY

APPROVED BY:
MMUST COUNCIL
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BRIBERY AND CORRUPTION PREVENTION POLICY	
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FOREWORD

At Masinde Muliro University of Science and Technology (MMUST), we believe that integrity is the cornerstone of academic excellence and institutional success. The MMUST Bribery and Corruption Prevention Policy is a testament to our unwavering commitment to uphold the highest standards of ethics and transparency in all our operations.

I am proud to introduce this comprehensive policy, which is designed to foster a culture of accountability and trust within our university community. This policy outlines clear guidelines and procedures to prevent, detect, report and address bribery and corruption, ensuring that all stakeholders (students, staff, faculty, and partners) are aligned in our collective effort to maintain an environment free from unethical practices.

Our university's reputation is built on the trust and confidence of those we serve. By implementing this policy, we not only comply with legal and regulatory requirements but also demonstrate our dedication to ethical conduct as a fundamental value. I encourage all members of the MMUST community to familiarize themselves with this policy and to commit to its principles in their daily activities.

Together, we can build a stronger, more transparent and more equitable institution, setting a standard for others to follow. Let us all play our part in making MMUST a beacon of integrity in the academic world.

Dr. Pamela Sitienei

Chairperson of the University Council

PREFACE

I am delighted to present the Bribery and Corruption Prevention Policy, a landmark initiative aimed at safeguarding our institution's integrity and upholding the highest standards of ethical conduct.

Bribery and corruption pose a formidable challenge to academic institutions worldwide, threatening to undermine the principles of fairness, honesty, and accountability that lie at the heart of our mission. At MMUST, we recognize the imperative of confronting this challenge head-on and remain steadfast in our commitment to fostering an ethical and transparent milieu.

This policy serves as a comprehensive framework for preventing, detecting, and addressing corruption within the university community. It outlines clear guidelines, expectations, and mechanisms for promoting integrity and combating corrupt practices at all levels of our institution. Moreover, it reflects our dedication to comply with bribery and corruption prevention laws and regulations, as well as our unwavering support for whistleblowers who come forward with information about corruption.

As we embark on this journey, I urge all members of the MMUST community to embrace the principles enshrined in this policy and actively contribute to its implementation. Together, let us build a culture of integrity, transparency, and accountability that sets a precedent for academic institutions everywhere.

With determination and collective action, we believe that this policy will reaffirm MMUST's position as a bastion of academic excellence and ethical leadership.



Prof. Solomon I. Shibairo
Vice Chancellor, MMUST

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ABBREVIATIONS

ACECA	–	Anti-corruption and Economic Crimes Act No.3 of 2003
BCPP	–	Bribery and Corruption Prevention Policy
CoD	–	Chair of Department
CPC	–	Corruption Prevention Committee
EACC	–	Ethics and Anti-Corruption Commission
EACCA	–	Ethics and Anti-Corruption Commission Act, 2011
HRM	–	Human Resource Management
IAC	–	Integrity Assurance Committee
IAOs	–	Integrity Assurance Officers
MMUST	–	Masinde Muliro University of Science and Technology
PFMA	–	Public Finance Management Act
POCAMLA	–	Proceeds of Crime and Anti-Money Laundering Act
POEA	–	The Public Officer Ethics Act No.4 of 2003 (POEA)
SOPs	–	Standard Operating Procedures
LIA	–	The Leadership and Integrity Act 2012
UNCAC	–	United Nations Conventions Against Corruption

OPERATIONAL DEFINITION OF TERMS

Bribery	The exchange of something valuable, like money or gifts, to influence decisions or actions in one's favor. It may occur in various forms, such as offering, giving, receiving, or soliciting bribes.
Bribery and Corruption Prevention Policy	A set of guidelines and measures aimed at preventing bribery and corruption within MMUST.
Code of Conduct	Established guidelines and rules for behavior and actions within MMUST meant to promote integrity, professionalism, and ethical conduct among the MMUST community.
Conflict of Interest	When personal interests interfere with an individual's professional duties or decision-making, potentially compromising impartiality and integrity.
Corruption	Involves the abuse of entrusted power for private gain. It encompasses various unethical behaviors such as bribery, fraud, nepotism, and embezzlement.
Culture	Shared values, beliefs, and norms within MMUST that shape behavior and interactions aimed at fostering integrity and discouraging corrupt practices.
Gift	Any item of value given or received without expecting anything in return often regulated in professional settings to prevent bribery and maintain integrity.
Integrity	The adherence to moral and ethical principles, characterized by honesty, trustworthiness, and consistency in behavior and actions.
Integrity Assurance Committee	A committee responsible for ensuring integrity and ethical conduct within MMUST, typically through oversight, guidance, and enforcement of policies related to integrity and anti-corruption.
Integrity Assurance Officers	Individuals appointed or designated within MMUST and trained by EACC to uphold and promote integrity, ethics, and anti-corruption measures.

Standard Operating Procedures (SOPs)	Established procedures or protocols that outline the steps to be followed in various processes or operations within MMUST to ensure consistency, efficiency, and compliance with standards.
Values	Fundamental beliefs that guide behavior and decision-making, emphasizing principles such as honesty, fairness, and responsibility.
Virtues	Positive moral qualities, such as honesty and accountability that contribute to an ethical environment and promote integrity.
Whistleblower	An individual who exposes unethical or illegal activities within MMUST and is protected by law to encourage reporting without fear of retaliation, ensuring accountability and transparency.
Whistleblower Protection	Measures put in place to safeguard individuals who report instances of wrongdoing, corruption, or unethical behavior within MMUST from retaliation, discrimination, or adverse consequences.

MMUST VISION, MISSION AND CORE VALUES

VISION

To be the Premier University in Science, Technology and Innovation

Mission

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

Core Values

Customer Experience

Collegiality

Professionalism

Integrity

Accountability

Innovativeness

1.0 INTRODUCTION

1.1 Background Information and Historical Perspective

Corruption constitutes a significant menace to the fundamental principles and mission of any academic institution. Masinde Muliro University of Science and Technology (MMUST) acknowledges the grave ramifications of corruption, which undermine fairness, honesty, and responsibility-core tenets that form the foundation of our educational endeavors.

Recognizing the imperative of fostering an ethical and transparent milieu, MMUST emphasizes the pivotal role of integrity and accountability in shaping our institution. Confronting the challenges posed by corruption, we steadfastly affirm our dedication to preserving MMUST's integrity and cultivating a university community that adheres to the highest ethical standards. Beyond a mere set of regulations, this policy embodies our collective resolve to actively combat corruption, nurturing an environment that champions transparency, accountability, and ethical conduct. It signifies a proactive stride in fortifying our institutional framework, ensuring that each member of the MMUST community comprehends their responsibility in upholding these essential values.

Throughout history, corruption has posed a perennial threat to the integrity and efficacy of academic institutions worldwide. At MMUST, we are cognizant of the enduring struggle against corrupt practices, which have historically undermined the principles of fairness and honesty. As we reflect on the past, we draw inspiration from the resolve of those who have championed transparency and integrity, recognizing their efforts to uphold the sanctity of academic pursuits.

In alignment with Kenya's framework for bribery and corruption prevention and the University's 2024-2028 strategic plan, MMUST reaffirms its commitment to combating corruption and preserving the integrity of our academic community. The Bribery and Corruption Prevention Policy (BCPP) stands as a testament to our determination to learn from history and forge a path forward, free from the shackles of corruption. It encapsulates our dedication to upholding the values that have defined MMUST as a beacon of learning and innovation. By acknowledging the

lessons of the past, we endeavor to shape a future where integrity reigns supreme, ensuring that MMUST remains a bastion of academic excellence for generations to come.

1.2 Mandate and Functions

The mandate of the MMUST's Bribery and Corruption Prevention Policy is to establish a comprehensive framework for preventing, detecting, and reporting bribery and corruption within the university community. This policy functions as a guiding document that outlines the responsibilities of all stakeholders, including management, faculty, staff, students and external service providers in upholding integrity and ethical conduct. It mandates the establishment of procedures and mechanisms for detecting and reporting suspected cases of bribery and corruption and defines the procedures for investigating and addressing such cases. Additionally, the policy sets forth measures for promoting awareness and education on bribery and corruption prevention practices, fostering a culture of transparency, accountability and integrity throughout MMUST.

1.3 Policy Issue and Environment

The policy issue at hand pertains to the pervasive threat of corruption within academic institutions including Masinde Muliro University of Science and Technology. In the contemporary environment, where corruption can manifest in various forms such as bribery, nepotism, fraud and favoritism, it is imperative for MMUST to address this issue proactively. The university operates within a complex ecosystem that encompasses diverse stakeholders and interactions, making it susceptible to corruption risks at multiple levels. Furthermore, the increasing scrutiny and demand for accountability in higher education institutions necessitate robust bribery and corruption prevention measures to safeguard MMUST's reputation and integrity.

1.4 Goal and Objectives

The overarching goal of the Bribery and Corruption Prevention Policy is to foster a culture of integrity, transparency, and accountability within MMUST, thereby mitigating the risks and impact of bribery and corruption on the institution's core values and mission. The objectives of this policy will be to:

i. Establish clear guidelines and standards of conduct for all members of the MMUST community, outlining expectations regarding ethical behavior and compliance with bribery and corruption prevention laws and regulations.

ii. Promote awareness and understanding of bribery and corruption prevention principles and practices among heads of cost centers, staff, students, and other stakeholders through training, education, and outreach initiatives.

iii. Implement mechanisms for the timely detection and reporting of suspected cases of bribery and corruption, ensuring prompt investigation and appropriate disciplinary action where necessary.

iv. Foster a supportive environment that encourages whistleblowing and protects individuals who come forward with information about bribery and corruption from retaliation or reprisal.

v. Collaborate with external stakeholders, including government agencies, regulatory bodies, and law enforcement authorities to enhance the effectiveness of bribery and corruption prevention efforts and combat systemic corruption within the university's sphere of influence.

1.5 Rationale

The Bribery and Corruption Prevention Policy plays a strategic role in safeguarding MMUST's reputation, integrity, and institutional viability. By proactively addressing bribery and corruption risks and promoting ethical conduct, the policy reinforces the university's commitment to excellence, fairness, and accountability. Moreover, it enhances trust and confidence among stakeholders, including students, parents, donors, and the wider community thereby strengthening MMUST's position as a reputable institution of higher learning. From a strategic perspective, the implementation of robust bribery and corruption prevention measures aligns with MMUST's long-term objectives of fostering academic excellence, innovation, and societal impact.

1.6 Process and Scope

The process of implementing the Bribery and Corruption Prevention Policy involves collaboration and coordination among various stakeholders within MMUST. This includes the development of specific procedures and protocols for preventing, detecting, reporting, investigating and addressing suspected cases of bribery and corruption as well as the establishment of mechanisms for monitoring compliance and evaluating the effectiveness of bribery and corruption prevention initiatives. The scope of the policy encompasses all activities and interactions undertaken by members of the MMUST community, both within and outside the university that may have implications for the institution's integrity and reputation. Additionally, the policy extends to

partnerships, collaborations, and transactions involving third parties, where MMUST's interests are at stake.

2.0 SITUATIONAL ANALYSIS

2.1 Policy and Legal Framework

MMUST is committed to upholding the highest standards of integrity and compliance with anti-corruption laws and regulations. This commitment is reflected in the university's Bribery and Corruption Prevention Policy, which serves as a guiding framework for preventing, detecting, reporting, investigating and addressing corruption within the institution.

The policy operates within the broader legal environment established by national and international anti-corruption legislations. MMUST aligns its practices with the provisions of the Constitution of Kenya, 2010, Ethics and Anti-Corruption Commission Act, 2011, Anti-Corruption and Economic Crimes Act 2003, Leadership & Integrity Act, 2012, Public Officer Ethics Act, 2003, The Public Procurement and Asset Disposal Act, 2015, Proceeds of Crime and Anti-Money Laundering Act, 2009, Mutual Legal Assistance Act, 2011, The Bribery Act, 2016 and other relevant statutes. By adhering to these laws, MMUST ensures accountability and transparency in its operations, thereby safeguarding its reputation and integrity.

MMUST pledges to collaborate with law enforcement agencies in investigating and prosecuting bribery and corruption cases demonstrating its commitment to combating bribery and corruption at all levels. The university recognizes the importance of cooperation with external authorities to ensure that perpetrators of corruption are held accountable and justice is served.

MMUST benchmarks its bribery and corruption prevention efforts against national, regional, and international standards to ensure alignment with best practices and global expectations. The university's commitment to combating corruption is evidenced by its adherence to a range of legislative instruments, including:

i. The Access to Information Act, 2016: Promoting transparency and accountability by facilitating access to public information.

ii. The Anti-Corruption and Economic Crimes Act, 2003 (ACECA) (Revised 2016 [2014]): Providing a comprehensive framework for preventing and combating corruption and economic crimes in Kenya.
iii. The Bribery Act, 2016: Criminalizing bribery and related offenses to deter corrupt practices in both the public and private sectors.
iv. The Ethics and Anti-Corruption Commission Act, 2011 (EACCA): Establishing the Ethics and Anti-Corruption Commission to combat corruption and promote integrity in Kenya.
v. The Leadership and Integrity Act, 2012: Setting standards of integrity and ethical conduct for public officials and leaders.
vi. The Penal Code, Cap 63: Prohibiting various forms of corruption and prescribing penalties for offenders.
vii. The Proceeds of Crime and Anti-Money Laundering Act, 2009 (POCAMLA): Targeting money laundering and the proceeds of crime to disrupt illicit financial flows.
viii. The Public Officer Ethics Act, 2003: Regulating the conduct of public officers and ensuring integrity in public service.
ix. The Public Finance Management Act (PFMA), 2012: Governing the management of public finances to promote transparency and accountability.
x. The Public Procurement and Disposals Act, 2015: Regulating public procurement processes to prevent corruption and ensure fairness and efficiency.
xi. The Public Service Commission's Act, 2017: Establishing the Public Service Commission to promote integrity and professionalism in the public service.

By adhering to these benchmarks, MMUST demonstrates its commitment to combating bribery and corruption in line with national, regional, and international expectations. The university strives to uphold the principles of integrity, transparency, and accountability in all its activities, contributing to a culture of ethical conduct and good governance within the institution and beyond.

2.2 Policy Achievements

The implementation of the previous MMUST Bribery and Corruption Prevention Policy has resulted in significant achievements, fostering integrity, transparency, and accountability across the university community. Notably, the policy has led to heightened awareness among faculty, staff, students, and stakeholders regarding the detrimental impact of corruption and the imperative

of ethical conduct. Through a series of training sessions, workshops, and awareness campaigns, MMUST has effectively disseminated information on bribery and corruption prevention principles and practices, nurturing a culture of integrity throughout the institution. Moreover, the establishment of robust reporting mechanisms has enabled the timely detection and reporting of suspected cases of corruption, bolstering whistleblowing channels and empowering individuals to come forward with information without fear of reprisal. Additionally, MMUST has demonstrated a strengthened commitment to compliance with anti-corruption laws and regulations, aligning its practices with national and international standards. By integrating bribery and corruption prevention principles into its policies and procedures, the university has underscored its dedication to upholding the highest ethical standards in all endeavors.

2.3 Gaps, Lessons Learnt, and Opportunities

Despite the progress achieved, MMUST identifies several gaps, emerging issues, and associated risks that demand attention. Firstly, while MMUST has taken strides to strengthen compliance with bribery and corruption prevention laws as well as regulations, there remains a need for enhanced monitoring mechanisms to ensure ongoing adherence. Without effective monitoring, there is a risk of lapses in compliance, potentially compromising the efficacy of anti-corruption efforts. Secondly, concerns persist regarding the protection of whistleblowers from retaliation or reprisal, despite the establishment of whistleblowing channels. MMUST must prioritize the implementation of measures to safeguard individuals who report corruption, including confidentiality protections and anti-retaliation policies. Additionally, there is a need to strengthen coordination and collaboration of bribery and corruption prevention efforts among different stakeholders. It is also important to address the underlying cultural factors contributing to bribery and corruption practices which remain a challenge for MMUST. Efforts to foster a culture of integrity and ethical conduct must continue, emphasizing the importance of ethical leadership and accountability across all levels of the organization. Moreover, MMUST must remain vigilant to emerging threats such as cyber fraud, procurement irregularities, irregular human resource practices, misappropriation of resources and academic misconduct. Proactive responses are essential to adapt bribery and corruption prevention strategies accordingly and mitigate the impact of evolving threats on the university's integrity and reputation.

Through the implementation of the previous Policy, MMUST has learnt valuable lessons that can inform future efforts. Firstly, leadership commitment has emerged as a cornerstone for the success of bribery and corruption prevention initiatives. Strong support from leadership at all levels of the organization is crucial for driving cultural change and promoting a zero-tolerance approach to bribery and corruption. Secondly, stakeholder engagement has proven instrumental in advancing anti-bribery and corruption efforts. Engaging faculty, staff, students, and external partners foster collaboration, build consensus, and mobilize collective action against corruption. Lastly, the importance of continuous improvement has been underscored. Anti-bribery and corruption efforts necessitate ongoing monitoring, evaluation and adaptation to evolving threats. MMUST will remain agile and responsive, continuously refining its policies, procedures, and practices to enhance effectiveness and mitigate risks in the pursuit of a bribery and corruption free environment.

Looking ahead, MMUST shall identify several potential opportunities to further fortify its Bribery and Corruption Prevention Policy. Firstly, integrating technology stands out as a promising avenue to enhance the efficiency and effectiveness of bribery and corruption prevention measures. By leveraging digital tools for monitoring, reporting, and analyzing corruption-related data, MMUST shall facilitate proactive interventions and data-driven decision-making. Moreover, investing in capacity-building initiatives presents another opportunity to empower stakeholders with the knowledge, skills, and resources necessary to combat bribery and corruption effectively. Through training programs, workshops, and professional development opportunities, MMUST shall bolster awareness, compliance, and ethical decision-making within the university community. Additionally, forging partnerships with external entities, such as government agencies, civil society organizations, and international bodies, offers a strategic opportunity to amplify MMUST's anti-bribery and corruption efforts. Collaborative endeavors can facilitate information sharing, resource mobilization, and collective action against bribery and corruption, maximizing impact and sustainability in the pursuit of a bribery and corruption free environment.

By capitalizing on these opportunities and addressing the identified gaps and risks, MMUST can continue to advance its commitment to integrity, transparency and accountability, ensuring a bribery and corruption free environment for all stakeholders.

3.0 POLICY STATEMENTS

3.1 Policy Principles

i. Integrity: MMUST is committed to upholding the highest standards of integrity in all its activities and interactions. We recognize that integrity is fundamental to maintaining trust, credibility, and ethical conduct within the university community.

ii. Transparency: MMUST is dedicated to promoting transparency in its operations and decision-making processes. We believe that transparency fosters accountability, enhances public trust, and serves as a deterrent to corrupt practices.

iii. Accountability: MMUST holds itself accountable to its stakeholders for the responsible stewardship of resources and the ethical conduct of its members. We acknowledge our obligation to act with honesty, fairness, and diligence in fulfilling our institutional mission.

iv. Zero Tolerance: MMUST maintains a zero-tolerance policy towards bribery and corruption in all its forms. We reject bribery, fraud, nepotism, and other corrupt practices, recognizing their detrimental impact on the university's reputation, credibility, and mission.

v. Professional Ethics: MMUST emphasizes the importance of professional ethics among its faculty, staff, and students. We promote ethical behavior, respect for diversity, and the highest standards of professional conduct in all academic and administrative endeavors.

vi. Inclusivity: MMUST is committed to fostering an inclusive and diverse community where all individuals are valued and respected. We strive to create an environment that embraces diversity in its many forms, including but not limited to race, ethnicity, gender, religion, and socioeconomic background. Inclusivity enriches our academic discourse, enhances creativity and innovation, and prepares our students to thrive in a global society.

3.2 Policy Position

i. Commitment to Compliance: MMUST is committed to complying with all applicable anti-bribery and corruption laws, regulations, and ethical standards. We recognize that compliance is essential for upholding the rule of law, promoting good governance, and preserving the university's integrity.

ii. Cooperation with Authorities: MMUST pledges to cooperate fully with law enforcement agencies, regulatory bodies, and other relevant authorities in investigating and prosecuting corruption cases. We recognize the importance of collaborative efforts to combat bribery and corruption and ensure accountability.

iii. Promotion of Ethical Culture: MMUST is dedicated to fostering a culture of ethics, integrity, and accountability within the university community. We believe that promoting ethical behavior and values is essential for creating a conducive environment for learning, research, and innovation.

3.3 Policy Actions

i. Implementation of Preventive Measures: MMUST shall implement preventive measures to mitigate the risk of bribery, corruption and unethical conduct. These measures may include the development of policies, procedures, and controls, as well as the provision of training, awareness-raising, and capacity-building initiatives.

ii. Establishment of Reporting Mechanisms: MMUST shall establish and maintain effective mechanisms for reporting suspected cases of bribery and corruption. These mechanisms will provide avenues for whistleblowing, ensuring confidentiality, protection, and follow-up on reported incidents.

iii. Enforcement of Disciplinary Measures: MMUST shall enforce disciplinary measures against individuals found to have engaged in corrupt practices or unethical behavior. Such measures may include sanctions, penalties, and remedial actions, in accordance with public service commission code of conduct and ethics and other university applicable policies and procedures.

iv. Promotion of Bribery and Corruption Prevention Education: MMUST shall promote bribery and corruption prevention education through training and awareness-raising initiatives within the university community. These initiatives will enhance understanding of bribery and corruption risks, reporting mechanisms, whistleblower protection, ethical dilemmas, and the importance of integrity in academic and administrative settings.

v. Regular Monitoring and Evaluation: MMUST shall establish mechanisms for the regular monitoring and evaluation of its bribery and corruption prevention efforts. This will involve assessing the effectiveness of policies, procedures, and interventions, as well as identifying areas for improvement and best practices.

4.0 IMPLEMENTATION FRAMEWORK

4.1 Governance Structure

The Council, University Management, Senate, Corruption Prevention Committee (CPC), Integrity Assurance Committee (IAC) and cost centres form the core governance structures responsible for overseeing the implementation of the Bribery and Corruption Prevention Policy. Specifically, they:

University Council

i. Provide strategic direction for the university.
ii. Approve and endorse the policy to guide institutional governance.
iii. Offer oversight on bribery and corruption prevention mechanisms.

The University Management

i. Allocate adequate resources for implementation of Bribery and Corruption Prevention activities
ii. Implement the CPC reports

Corruption Prevention Committee (CPC)

i. Ensure seamless integration of the Bribery and Corruption Prevention Policy into daily operations.
ii. Execute the strategic vision outlined by the Council.
iii. Deliberate institutional anti-bribery and corruption agenda - at least quarterly;
iv. Plan and coordinate bribery and corruption prevention strategies;
v. Integrate and mainstream bribery and corruption prevention initiatives;
vi. Plan for the Bribery and Corruption Risk Assessments to be undertaken;
vii. Receive and review reports on bribery and corruption prevention initiatives and recommend appropriate actions;
viii. Plan for and review staff training on bribery and corruption prevention initiatives;
ix. Ensure institutional compliance with provisions of the Public Officer Ethics Act, 2003 and the Leadership and integrity Act, 2012.
x. Monitor and evaluate the impact of bribery and corruption prevention initiatives.

4.1.4 Integrity Assurance Committee (IAC)

The Integrity Assurance Committee shall comprise members appointed by the Vice Chancellor who shall be trained Integrity Assurance Officers (IAOs). The IAC shall be chaired by the Coordinator, Integrity Assurance (secretary of the CPC).

The IAC shall assist the CPC to:

i. Carry out bribery and corruption risk assessments.
ii. Prepare a bribery and corruption prevention plan.
iii. Establish schedule for implementation of bribery and corruption prevention Plan.
iv. Coordinate and facilitate implementation of bribery and corruption prevention programmes.
v. Monitor, evaluate and review the implementation of bribery and corruption prevention initiatives.
vi. Compile progress reports for the CPC.
vii. Implement bribery and corruption prevention education and awareness.
viii. Develop and monitor the implementation of organizational bribery and corruption prevention plan,
ix. Implement bribery and corruption prevention sensitization and awareness programmes
x. Open, record and present to the CPC reported cases of bribery and corruption for analysis
xi. Monitor and evaluate the implementation of integrity activities including Students Integrity Clubs.

4.2 Administrative Structures

The key administrators in the implementation of this policy shall include; the Vice Chancellor, Deputy Vice Chancellors, Registrars, Coordinator, Integrity Assurance Unit and all cost center heads. The specific responsibilities include:

4.2.1 The Vice Chancellor

i. Bears overall responsibility for the implementation and compliance of the Bribery and Corruption Prevention Policy.
ii. Provides leadership and sets the tone for a bribery and corruption free culture within the University.

iii. Advocates for ethical conduct, integrity and accountability.

4.2.2 The Deputy Vice Chancellors

i. Ensure strict adherence to the Bribery and Corruption Prevention Policy within their specific divisions.
ii. Cascade bribery and corruption prevention measures throughout their areas of responsibility.
iii. Champion a culture of integrity and transparency within their divisions.

4.2.3 Coordinator, Integrity Assurance

The roles of the Coordinator, Integrity Assurance shall be:

i. Secretary to the Corruption Prevention Committee
ii. Chair the Integrity Assurance Committee
iii. Coordinate and lead bribery and corruption prevention initiatives.
ii. Ensure alignment with the university's strategic goals.
iii. Liaise with senior management and the Bribery and Corruption Prevention Committee.

4.2.4 Cost Centre Heads

i. Implement bribery and corruption prevention measures in administrative and academic units under their purview.
ii. Enforce policy guidelines to promote transparency and ethical behavior.
iii. Act as frontline advocates for the Bribery and Corruption Prevention Policy within their respective.

4.3 Operationalization Framework

To ensure the effective implementation of the Bribery and Corruption Prevention Policy at MMUST, a comprehensive operationalization framework has been established.

4.3.1 Corruption Prevention Committee (CPC)

The Corruption Prevention Committee shall comprise:

i. The Vice Chancellor who shall be the chairperson of the committee
ii. The Deputy Vice Chancellors
iii. The Registrars
iv. The Legal Officer

v. The Finance Officer
vi. The Director Quality Assurance
vii. The Deans Representative
viii. The CoDs Representative
ix. The Dean of Students
x. The Secretariat
xi. Any other person as shall be deemed necessary

4.3.2 Integrity Champions

Cost Centre heads shall appoint Integrity Champions who will be responsible for overseeing the implementation of the policy. These champions will act as a link between the cost centres and integrity assurance committee by ensuring that bribery and corruption prevention measures are effectively communicated, understood, and executed within their respective units.

4.4 Bribery and Corruption Risks

Bribery and Corruption can manifest in various forms within public universities, impacting both academic and administrative aspects. These common acts of corruption include:

4.4.1 Academic Fraud

The forms of academic fraud are listed hereunder:

i. Cheating in exams, plagiarism, or academic dishonesty.
ii. Favoritism in grading and awarding of academic honors.
iii. Selling or buying academic credentials.
iv. Presentation of falsified certificates to gain employment
v. Lack of integrity in teaching and examinations by the lecturers
vi. Lack of integrity in supervision of postgraduate students.

4.4.2 Bribery and Extortion

The forms of Bribery and Extortion include:

i. Offering or accepting bribes for admission, favorable grades, or other academic favors.
ii. Extortion or coercion for academic or administrative benefits.
iii. Sexual harassment

4.4.3 Nepotism

The forms of Nepotism include:

i. Preferential treatment based on familial or personal relationships.
ii. Unfair hiring or promotion decisions influenced by kinship.

4.4.4 Financial Mismanagement

The forms of Financial Mismanagement include:

i. Lack of Budgeting and Planning - failing to create a comprehensive budget or financial plan can lead to uncontrolled spending and financial instability. Without a budget, it's challenging to track income and expenses accurately, leading to potential overspending.

ii. Improper Record Keeping - inaccurate or incomplete financial records can result in a lack of transparency and difficulties in managing finances. This can lead to errors in financial reporting, missed payments, and increased risk of fraud.

iii. Misallocation of Funds - Using funds for purposes other than those intended or budgeted for can create financial shortfalls. This includes using restricted funds for operational costs or diverting capital meant for investment into day-to-day expenses.

iv. Excessive Debt Accumulation - Over-relying on debt without a clear repayment strategy can lead to high interest costs and financial strain. This includes taking on more debt than can be reasonably managed or using debt to cover operational shortfalls instead of generating new revenue.

v. Poor Cash Flow Management - Inadequate monitoring and managing of cash flow can lead to liquidity problems. This includes failing to collect receivables promptly, paying expenses too quickly, or not maintaining sufficient cash reserves for emergencies.

vi. Lack of Internal Controls - Failing to implement proper internal controls can result in fraud, theft, and errors. This includes not segregating duties, lacking oversight, and not conducting regular audits.

vii. Inappropriate Investment Strategies - Engaging in high-risk investments without proper analysis or diversifying the investment portfolio can lead to significant financial losses. This also includes failing to align investment strategies with long-term financial goals.

viii. Ignoring Financial Red Flags - Overlooking or not addressing warning signs of financial trouble, such as declining revenues, increasing costs, or late payments, can exacerbate financial problems. Proactive management is essential to address these issues early.

ix. Inadequate Financial Reporting - Providing stakeholders with inaccurate, incomplete, or delayed financial information can erode trust and hinder informed decision-making. Transparent and timely reporting is crucial for accountability and strategic planning.

x. Overestimating Revenue Projections - Being overly optimistic about future revenues without a realistic basis can lead to financial shortfalls and unmet expectations. Accurate forecasting based on historical data and market trends is essential.

4.4.5 Procurement Irregularities

The forms of Procurement Irregularities include:

i. Bid Rigging - Collusion among bidders to manipulate the outcome of a tender process, often resulting in inflated prices and reduced competition. This can involve pre-arranged agreements to submit complementary bids or rotating winners.

ii. Conflicts of Interest - When procurement officials have personal or financial interests in the awarding of contracts, it can lead to biased decision-making. This includes awarding contracts to friends, family, or businesses in which the official has a stake.

iii. Kickbacks and Bribes - Procurement officials accepting bribes or kickbacks in exchange for awarding contracts. This illegal practice can lead to the selection of subpar vendors and inflated project costs.

iv. Fraudulent Invoicing - Submitting false or inflated invoices for goods or services that were never provided or were provided at lower quantities or quality than stated. This can involve collusion between vendors and procurement staff.

v. Non-competitive Bidding - Avoiding competitive bidding processes by improperly using sole-source justifications or splitting contracts to keep them below thresholds that require competitive bidding. This limits competition and can lead to higher costs and lower quality.

vi. Over-specification - Writing overly restrictive or tailor-made specifications that favor a particular supplier, often to the detriment of other potential bidders. This practice can reduce competition and lead to higher prices.

vii. Failure to Follow Procurement Policies - Ignoring established procurement policies and procedures, such as not obtaining the required number of bids, not documenting the decision-making process, or bypassing approval hierarchies. This can lead to unchecked spending and inefficiency.

viii. Manipulation of Evaluation Criteria - Changing or manipulating the evaluation criteria after bids have been received to favor a particular vendor. This can result in unfair advantages and undermine the integrity of the procurement process.

ix. Delayed Payments - Intentionally delaying payments to vendors to extract discounts or other benefits. This can damage relationships with suppliers and affect the delivery of goods and services.

x. Duplicate Payments - Making duplicate payments to suppliers, either intentionally or due to poor record-keeping. This can result in financial losses and complicate financial reconciliation processes.

4.4.6 Conflict of Interest

The forms of Conflict of Interest include:

i. Faculty or staff engaging in activities that conflict with their university roles for personal gain.
ii. Undisclosed financial interests influencing decision-making.
iii. use the office to unlawfully or wrongfully enrich himself or herself or any other person.
iv. accepting a personal loan or benefit which may compromise him/her in carrying out the duties Subject to Article 76(2)(b) of the Constitution.

4.4.7 Misuse of Research Funds

The forms of Misuse of Research Funds include:

i. Diverting research funds for personal use.
ii. Falsification of research expenses or outcomes.
iii. Delayed accounting of research funds

iv. Favoritism in award of research funds

4.4.8 Unethical Admission Practices

The forms of Unethical Admission Practices include:

i. Accepting bribes or favors for admission.
ii. Manipulating admission criteria for personal gain.
iii. Delay in admission process

4.4.9 Misuse of University Property

The Misuse of University Property includes:

i. Theft or unauthorized personal use of university resources.
ii. Vandalization of university property
iii. Unauthorized modification of university property
iv. Unauthorized subletting of university accommodation by students
v. Misuse of university vehicles for non-official work

4.4.10 Sexual Harassment and Exploitation

The types of Sexual Harassment and Exploitation include:

i. Abuse of power for sexual favors or inappropriate relationships.
ii. Favoritism in academic or administrative decisions based on personal relationships.

4.4.11 Human Resource Malpractices

The forms of Human Resource Malpractices include:

i. Ghost employees on the payroll.
ii. Employees with forged academic documents/certificates
iii. Absenteeism of employees
iv. Laxity in the performance of work
v. Fraudulent payment on the payroll
vi. Irregular employment practices
vii. Favoritism in allocation of training opportunities
viii. Lack of supervision of employees
ix. Lack of integrity in performance appraisal of employees by the supervisors
x. Discrimination in payment of salaries and allowances
xi. Serving on a fulltime basis while engaged in other gainful employment

xii.

4.4.12 Corruption in Student Services

The forms of Corruption in Students Services include:

i. Unfair allocation of student housing or facilities.
ii. Extortion or bribery related to student services
iii. Poor maintenance of students' facilities
iv. Discrimination in awarding of scholarships and work study

4.4.13 Unethical Fundraising Practices

The types of Unethical Fundraising Practices include:

i. Diverting funds raised for specific purposes to personal accounts.
ii. Fraudulent practices in donor relations.
iii. Using the University name to solicit funds from the public
iv. Operating a bank account outside Kenya without the approval.
v. Causing anything to be done through another person that would constitute a contravention of the Code of conduct if done by a MMUST Staff.

4.4.14 Political neutrality

i) Acting as an agent for, or furthering the interests of a political party or candidate in an election;
ii) Manifesting support for or opposition to any political party or candidate in an election.
iii) Engaging in any political activity that may compromise or be seen to compromise the political neutrality of the office.

4.4.15 Impartiality

i) Failing to carry out the duties of the office with impartiality and objectivity in accordance with Articles 10, 27, 73(2)(b) and 232 of the Constitution.
ii) Engaging in favoritism, nepotism, tribalism, cronyism, religious bias or engage in corrupt or unethical practices.

4.4.16 Records

i) Using any information obtained through or in connection with the office, which is not available in the public domain, for the furthering of any private interest, whether financial or otherwise.
ii) Falsifying any records or misrepresent information to the public.

4.5 Rewards and Sanctions

4.5.1 Rewards for Fighting Corruption

MMUST recognizes the importance of incentivizing and rewarding individuals and entities that actively participate in the fight against corruption. To encourage integrity and ethical behavior, rewards may be granted as per the MMUST Rewards and Sanctions Policy.

4.5.2 Sanctions for Condoning Corruption

MMUST maintains a zero-tolerance approach towards corruption and unethical conduct. Individuals found to be condoning or participating in corrupt activities will face appropriate disciplinary action in line with the MMUST Human Resource Management (HRM) Policy and procedures manual and the Public Service Code of Conduct.

4.6 Standard Operating Procedures (SOPs) for Preventing, Detecting, Reporting, Investigating, and Disciplinary Actions on Bribery and Corruption at MMUST

The SOPs include:

4.6.1 Preventive Measures

i. Policy Dissemination and Training: To uphold its commitment to integrity and zero tolerance towards bribery and corruption, MMUST implements rigorous preventive measures. The Bribery and Corruption Prevention Policy is disseminated comprehensively to all employees, students, and stakeholders. The policy is prominently featured on the MMUST website and intranet, ensuring accessibility and awareness across the university community.

ii. Training Programs: MMUST conducts mandatory training sessions on bribery and corruption prevention policies and ethical behavior for all employees and students. These training programs aim to educate participants on identifying and mitigating bribery and corruption risks, emphasizing the importance of ethical conduct in all university activities. Annual refresher courses are also implemented to keep the MMUST community updated on evolving practices and regulations related to bribery and corruption prevention.

iii. Systems Controls: The University enforces robust systems controls to establish checks and balances across its processes. These controls are designed to detect and prevent potential instances of bribery, fraud, and other corrupt practices. By integrating systematic controls into its operations, MMUST strengthens its governance framework and enhances

transparency and accountability throughout the organization. MMUST shall conduct quarterly Corruption Risk Assessments to assess effectiveness of these controls.

4.6.2 Ethical Culture Promotion

i. Leadership Commitment - senior management shall demonstrate a commitment to ethical practices and incorporate bribery and corruption prevention objectives into the performance goals of leadership.

ii. Code of Conduct - develop and enforce a comprehensive code of conduct outlining acceptable behaviors and practices. All employees and students shall sign an acknowledgement of understanding and adherence to the code.

4.6.3 Risk Assessment and Management

i. Risk Identification – Develop a Bribery and Corruption Risk Assessment and Mitigation Plan annually. Conduct quarterly risk assessments to identify areas susceptible to corruption and utilize surveys, interviews, and audits to gather data on potential risks.

ii. Risk Mitigation - develop and implement strategies to mitigate identified risks, monitor and review the effectiveness of strategies used.

4.6.4 Transparent Processes

i. Procurement Procedures - Implement clear, transparent, and competitive procurement processes and ensure all procurement activities are well-documented and open to audit in line with Public Procurement and Asset Disposal Act (2015).

ii. Financial Controls - Establish robust financial controls and procedures to prevent misuse of funds and regularly audit financial transactions and report any anomalies as per the Public Finance Management Act.

4.6.5 Whistleblowing Mechanism

i. Whistleblower Protection - create a secure and confidential reporting system for employees and students to report suspected bribery and corruption practices. Whistleblowers shall be protected in line with the Whistleblower Protection Act (2014).

ii. Awareness Campaigns - conduct annual campaigns to inform the MMUST community about the whistleblowing mechanism and how to use it.

4.6.6 Detection Procedures

i. Internal Audits - conduct annual internal audits to review and assess compliance with Bribery and Corruption Prevention Policy. Focus on high-risk areas identified during risk assessments.

ii. External Audits - engage or allow independent auditors to conduct external reviews and provide unbiased evaluations. Implement recommendations from audit reports to strengthen bribery and corruption prevention measures.

4.6.7 Incident Reporting and Investigation

i. Reporting Mechanism: MMUST maintains a robust reporting mechanism to address suspected incidents of corruption effectively. Clear procedures are established for reporting such incidents, ensuring that stakeholders can report anonymously if they choose to do so. This anonymity option encourages transparency and accountability by providing a safe channel for reporting without fear of retaliation. Reports can be submitted through designated channels, such as an ethics hotline or online reporting platform, to facilitate prompt action and investigation.

ii. Investigation Process: Upon receiving reports of suspected corruption, the CPC is tasked with conducting thorough and impartial investigations. The committee comprises qualified individuals with expertise in ethics, law, and governance, ensuring a balanced and objective approach to each case. Investigations are conducted promptly to gather evidence, interview relevant parties, and assess the veracity of reported incidents. Throughout the process, confidentiality is maintained to protect the identities of both the reporting individual and those involved in the investigation. The committee submits detailed findings and recommendations to university leadership for appropriate action, ensuring that all reported incidents are addressed swiftly and fairly according to established policies and procedures.

4.6.8 Data Analysis and Reporting

i. Data Collection - collect and analyze data related to incidents of bribery and corruption for improvement.

ii. Regular Reporting - prepare and distribute bribery and corruption risk assessment and mitigation plans.

iii. Share findings with university management and relevant government agency for implementation and corrective actions.

4.6.9 Continuous Improvement

i. Feedback Mechanism - get feedback on the Bribery and Corruption Prevention Policy and procedures from employees, students, and other stakeholders for continuous improvement.

ii. Policy Review - review the Bribery and Corruption Prevention Policy annually or when significant changes occur in the regulatory environment. Update procedures to reflect best practices and lessons learned from previous incidents.

4.6.10 Reporting Procedures

i. **Reporting channels:** Individuals can report corruption anonymously through various designated channels to ensure confidentiality and protection for whistleblowers. This will include:

a) Bribery and corruption reporting boxes/gripe boxes
b) Online bribery and corruption reporting portal
c) Bribery and corruption reporting email
d) Bribery and corruption reporting hot-line
e) Reporting to the Bribery and Corruption Integrity Office

ii. **Immediate reporting obligation:** There is a mandate for university members to report suspected bribery and corruption within 24 hours of discovery, emphasizing the importance of timely reporting.

iii. **Whistleblower protection:** Measures will be outlined to protect whistleblowers from retaliation, ensuring their safety and fostering a culture of reporting.

4.6.11 Investigation Procedure

i. **Establishment of investigation team:** A specialized team consisting of Anti-Corruption Officers and relevant experts will be formed to conduct thorough and impartial inquiries.

ii. **Evidence collection:** Guidelines will be provided for collecting, preserving, and documenting evidence to support the investigative process.

iii. **Interview protocols:** Standardized procedures will be established for conducting interviews with involved parties, witnesses, and other relevant individuals.

iv. **Interim measures:** Provision will be made for implementing interim measures, such as suspensions or reassignments, to prevent interference with the investigation process.

4.6.12 Disciplinary Action Procedure

i. **Determining the severity of offense:** Criteria will be set for assessing the severity of the offense to guide decision-making regarding the appropriate level of disciplinary action.

ii. **Fairness and Due Process:** Emphasis is placed on providing fair treatment to the accused, including the right to be heard, present evidence, and have legal representation.

iii. **Gradation of disciplinary actions:** A range of disciplinary actions will be established based on the severity of the offense, including warnings, suspension, termination, and legal action.

iv. **Approval process for disciplinary actions:** Clear procedures will be defined for obtaining approvals from relevant authorities, such as the Vice-Chancellor or designated committees, before implementing disciplinary actions.

v. **Record-keeping:** Requirements will be outlined for maintaining comprehensive records of the investigation and disciplinary proceedings to ensure transparency and accountability.

These SOPs are designed to create a standardized framework for reporting, investigating, and taking disciplinary actions related to corruption at MMUST. This will ensure consistency, fairness, and transparency in the university's response to such incidents.

4.7 Regular Training Programs

To enhance awareness and understanding of anti-corruption measures, regular training programs will be conducted for all staff and students. These programs will encompass the principles outlined in the Anti-Corruption Policy, providing practical insights, case studies, and guidance on ethical behavior. Training sessions will empower the university community to actively contribute to the prevention and detection of corruption, fostering a culture of integrity.

4.8 Periodic Reviews of Financial Transactions and Procurement Processes

To proactively identify irregularities and potential areas of corruption, the Anti-Corruption Policy will mandate periodic reviews of financial transactions and procurement processes. These reviews will be conducted by internal and external auditors, ensuring a thorough examination of financial

practices. Any anomalies or deviations from established procedures will be promptly investigated, reinforcing a commitment to fiscal transparency and accountability.

By operationalizing the Anti-Corruption Policy through this framework, MMUST aims to establish a systematic, responsive, and proactive approach to combating corruption. The designated officers, standardized procedures, ongoing training, and regular reviews will collectively contribute to creating an environment where corrupt practices are swiftly identified, addressed, and prevented, aligning the university with its commitment to integrity and excellence.

4.8.1 Internal Auditor

i. Conducting Regular Audits: Performing systematic and regular audits of financial transactions, procurement processes, and relevant activities within the university.
ii. Ensuring Compliance: Verifying adherence to the Anti-Corruption Policy and established procedures, policies, and regulations.
iii. Identifying Irregularities: Detecting and reporting any irregularities, discrepancies, or potential signs of corruption during the auditing process.
iv. Risk Assessment: Conducting risk assessments to identify areas vulnerable to corruption and proposing mitigation strategies.
v. Providing Recommendations: Offering recommendations for improvements in internal controls and anti-corruption measures based on audit findings.
vi. Collaborating with Anti-Corruption Officers: Collaborating with designated Anti-Corruption Officers to investigate and address reported cases of corruption.
vii. Reporting to University Management: Reporting audit findings, progress, and recommendations to the University Management for corrective action.

4.8.2 External Auditor

i. Independently Reviewing Financial Records: Conducting independent reviews of financial records, transactions, and procurement processes to ensure impartial evaluation.
ii. Verifying Compliance: Verifying the university's compliance with the Anti-Corruption Policy, legal requirements, and best practices.
iii. Assessing Financial Controls: Assessing the effectiveness of financial controls in place to prevent and detect corruption.

iv. Providing an External Perspective: Offering an external and unbiased perspective on the effectiveness of anti-corruption measures within the university.

v. Reporting Irregularities to Council: Reporting any identified irregularities, signs of corruption, or areas of concern directly to the university's Council.

vi. Ensuring Transparency: Ensuring transparency in the audit process and communicating directly with relevant university authorities regarding audit findings.

vii. Collaborating with Internal Auditors: Collaborating with internal auditors to share insights, coordinate efforts, and provide a comprehensive evaluation of the university's financial integrity.

The collaboration between internal and external auditors is critical to creating a robust and effective anti-corruption framework. Internal auditors focus on day-to-day operations, risk assessments, and internal controls, while external auditors provide an independent and objective evaluation, enhancing the overall credibility of the anti-corruption efforts. Their combined efforts contribute to the university's commitment to transparency, accountability, and the successful implementation of the Anti-Corruption Policy.

4.9 Awareness Programs

Awareness programs are instrumental in fostering a culture of transparency, integrity, and accountability within public universities. These initiatives aim to educate and engage the university community, including students, faculty, and staff, in understanding the implications of corruption and their role in preventing it. Effective awareness programs encompass a range of strategies tailored to the university's context and culture.

4.10 Training Sessions and Workshops

Conduct regular training sessions and workshops to educate the university community about the Anti-Corruption Policy, its implications, and the consequences of engaging in corrupt practices.

4.11 Orientation Programs for New Members

Integrate anti-corruption awareness into orientation programs for new students, faculty, and staff, emphasizing the institution's commitment to ethical conduct.

Provide information on reporting mechanisms and the protection offered to whistleblowers.

4.12 Incorporate Anti-Corruption Modules into Curriculum

Integrate anti-corruption modules into relevant academic programs, emphasizing ethical considerations within disciplines like business, law, and public administration.

Encourage critical thinking about the ethical dimensions of various professions.

4.13 Awareness Campaigns

Launch comprehensive awareness campaigns using various mediums such as posters, banners, and digital platforms.

Leverage social media to disseminate information, engage discussions, and promote a culture of integrity.

4.14 Guest Lectures and Seminars

Invite experts, anti-corruption advocates, and legal professionals to deliver guest lectures and seminars on the consequences of corruption and the importance of ethical behavior.

Encourage open dialogues and questions from the audience.

4.15 Interactive Platforms

Establish interactive platforms, such as forums or online discussion boards, where the university community can share insights, concerns, and best practices related to anti-corruption efforts.

Encourage active participation to create a sense of shared responsibility.

4.16 Institutional Communication

Regularly communicate updates on the Anti-Corruption Policy, successes in preventing corruption, and disciplinary actions taken.

Emphasize the university's commitment to maintaining high ethical standards.

4.17 Collaboration with Student Organizations

Partner with student organizations to promote anti-corruption initiatives, encouraging student-led campaigns and activities.

Recognize and reward student efforts in fostering an ethical culture.

4.18 Anonymous Reporting Mechanisms

Clearly communicate the existence and effectiveness of anonymous reporting mechanisms.

Assure the university community of protection against retaliation for reporting suspected acts of corruption.

5.0 MONITORING AND EVALUATION

5.1 Monitoring and Evaluation

The stakeholders involved in the monitoring and evaluation of the Bribery and Corruption Prevention Policy at MMUST encompass a diverse range of individuals and entities. These include faculty members responsible for academic activities, administrative staff involved in the day-to-day operations of the university, students who are integral members of the academic community, external partners and vendors engaged in collaborations and transactions with MMUST, the Integrity Assurance Office tasked with overseeing policy implementation, the Senior Management Team responsible for decision-making and strategic direction, and the University Council providing oversight and strategic direction.

To effectively monitor and evaluate the implementation of the Bribery and Corruption Prevention Policy at MMUST, several key questions shall be addressed. These questions include: assessing stakeholders' awareness of the policy; determining the level of compliance with bribery and corruption prevention laws and regulations; identifying any reported cases of bribery, corruption or unethical behavior; evaluating the utilization and effectiveness of whistleblowing channels; assessing the impact of training and awareness initiatives on bribery and corruption prevention principles; gauging the presence of a culture of integrity and ethical conduct within the University; and identifying any emerging threats or risks to the integrity of MMUST.

To measure progress and outcomes in monitoring and evaluating the Bribery and Corruption Prevention Policy, various indicators and data sources shall be utilized at MMUST. These include quantifiable measures such as the percentage of stakeholders aware of the policy, the number of reported cases of corruption or unethical behavior, the percentage of compliance with bribery and corruption prevention laws and regulations, the number of whistleblowing reports received and resolved, the participation rates in training and awareness initiatives, as well as qualitative insights gathered through interviews, surveys, and observations. Data sources range from official records and documents maintained by the Integrity Assurance Office to surveys, interviews, and other forms of data collection methods.

At MMUST, a range of data collection methods and tools shall be employed to gather information for monitoring and evaluating the Bribery and Corruption Prevention Policy. These methods shall

include surveys and questionnaires administered to stakeholders to assess awareness, compliance, and perceptions of integrity, interviews or focus group discussions conducted with key stakeholders to gather qualitative insights, reviews of records and documents such as audit reports and legal compliance assessments, observations of training sessions and workshops, and risk assessments conducted by the Integrity Assurance Office or external auditors.

To ensure effective reporting and dissemination of findings from the monitoring and evaluation process, MMUST has established a robust reporting mechanism. This mechanism shall include quarterly reports submitted by the Integrity Assurance Office to the university Management and the University Council, highlighting key findings, trends, and recommendations. Additionally, quarterly or annual updates shall be provided to stakeholders through internal communication channels such as newsletters, emails, or intranet postings. Transparency in reporting shall be maintained through the publication of summary reports or dashboards on the university's website or other public platforms, allowing stakeholders to access relevant information. Moreover, mechanisms for stakeholders to provide feedback or raise concerns regarding policy implementation will be put in place, such as dedicated email addresses or suggestion boxes, ensuring active participation and engagement in the monitoring and evaluation process.

5.2 Implementation and Revision Dates

The policy will be implemented immediately upon approval by the University Council. Reviews will be conducted every five years or as and when necessary to address emerging challenges.

REFERENCES

1. The Access to Information Act, 2016 ;
2. The Anti-Corruption and Economic Crimes Act, 2003 (ACECA); Revised 2016 [2014]
3. The Bribery Act, 2016
4. The Ethics and Anti-Corruption Commission Act, 2011 (EACCA);
5. The Leadership and Integrity Act, 2012;
6. The Penal Code, Cap 63;
7. The Proceeds of Crime and Anti-Money Laundering Act, 2009 (POCAMLA);
8. The Public Officer Ethics Act, 2003;
9. The Public Finance Management Act, 2012;
10. The Public Procurement and Disposals Act, 2015;
11. The Public Service Commissions, Act, 2017.