



REVIEWING INSTITUTION: ETHICS AND ANTI-CORRUPTION COMMISSION

ORGANIZATION: UNIVERSITY OF NAIROBI

IMPLEMENTATION OF CORRUPTION RISK MITIGATION PLAN (QUARTER THREE 2015/2016 – JANUARY, 2016 – MARCH, 2016)

FUNCTIONAL AREA	RISKS IDENTIFIED	MEASURES UNDERTAKEN	OUTCOME/IMPACT
Financial & project management	b) Management of Research funds.	<p>The University through the office of the Finance Officer has guidelines on management of research funds.</p> <p>The University has sensitized concerned staff members on the need to observe the University guidelines and policies in expediting prompt processing of financial requests.</p> <p>The University of Nairobi Research and Grants Management Information System (RGMIS) is in place and there is a committee appointed to oversee the same. RMIS was launched on 24.02.2016.</p> <p>The Grants Management Strategic Plan is in place.</p> <p>The Division of Research, Production and Extension awarded 28 Deans Committee research Grants of a Maximum of Ksh. 250, 000.00 per year</p>	<p>The management of research funds is done in a completely transparent manner and projects are financed to conclusion against the set budgets and agreements in the Memoranda of Understanding.</p> <p>Effective Management of Research Grants and Reporting Mechanisms.</p> <p>Transparency and accountability in the management of research funds</p> <p>Structure for effective management of research grant</p> <p>Enhanced new body of knowledge as a result of new discoveries</p>

			Properly developed winning research proposals In the event of any failures to account for the monies used, the researchers are surcharged.
	Low attraction of research funds	<p>The University of Nairobi has a policy on the management of donor funds – University of Nairobi Policy on Donor Funds for Research.</p> <p>Thirty Five (35) members of teaching staff were trained on PhD supervision</p> <p>The University continually trains staff members in the relevant Faculties/Schools/Departments and Units on proposals writing to attract more research funds.</p>	Completion of studies by students within the stipulated period motivates sponsors of their researcher to sponsor. More Ph.D student researchers
	Financial Management	<p>The University has financial regulations that ensure sound financial management of funds the following legislations and guidelines the operations of Finance unit :</p> <ul style="list-style-type: none"> - The Universities Act, No. 42 of 2012 and the University of Nairobi Charter, 2013. - The Finance Act - The Financial Regulations - Financial Management Information System (FMIS) - Fiscal Management Act, 2009 - The State Corporation Act, Cap. 466 - The Public Audit Act, 2003 - The Exchequer and Audit Act - The Value Added Tax, Cap. 476 - The Income Tax Act <p>-The University uses ACCPAC Enterprise Resource Planning for Financial Reporting and Management</p> <p>-International Financial Reporting Standards</p>	<p>All funds received online to the designated research accounts</p> <p>Ensuring compliance with all related legislation and government and University policy guidelines</p>

	Official Advance/Imprest Management	<p>There are controls to check proposer utilization and accounting of funds.</p> <p>Staff with unaccounted Advances/Imprest are required to surrender within approved timelines.</p>	Unaccounted Advances/imprest are recovered from the respective staff members' salary upon expiry of the approved timelines.
	Student Fees	<p>Students pay fees through direct banking. Bank reconciliations is done and student debt portfolio maintained and updated.</p> <p>The University has implemented auto receipting of student's fees deposited directly to the bank. There is also online receipting.</p>	Improved fees collection and management.
	Staff and other General Debtors	An updated staff debtor's ledger is maintained, where debtors fail to comply with repayment deadlines their salaries are attached as appropriate.	Ensure compliance with the financial regulations of the University on debtor management
	Revenue Collection	Ensure timely collection and banking of all University Revenue.	<p>Compliance with the Financial Regulations of the University</p> <p>All University revenue is collected and accounted for.</p>
	Budget and Budgetary Control	The Authority to Incur Expenditure (A.I.E.) are used for control of expenditure.	<p>Budget is prepared as per the Government guidelines and compliance with set levels observed.</p> <p>Improved financial systems and ensure compliance as appropriate.</p>
	Payments	Only approved payments as per the budget and financial regulations are processed.	Compliance with University and Government Regulations and Guidelines

		The Internal Audit section ensures audit of all payments.	All Payments are managed as per University Financial Management Policy. Compliance with the Labour Laws.
Procurement/Supply Chain Management and Disposal of unserviceable Items	Public Procurement and Asset Disposal Act of 2015 and the Public Procurement Disposal Regulations of 2015	<p>E- Procurement is in place since March, 2015.</p> <p>-The University has qualified personnel working in the Procurement Department.</p> <p>-The following committees are in place;</p> <p>-Inspection and Acceptance Committees -Disposal Committee,</p> <p>All the committees are required to keep minutes of all meetings and submit quarterly reports for all the activities undertaken for reference.</p> <p>Members of the Committees have been extensively sensitized on the operation of the Act.</p> <p>The Ethics and Anti-Corruption Commission, Public Procurement regulatory Authority (PPRA) and Treasury regularly offer advice on the operations of the department.</p> <p>Suppliers are required to provide a written commitment not to participate in corrupt activities.</p> <p>The University compiles annually lists of obsolete items due for disposal in compliance with the Act and Regulations</p> <p>The Inspection and Acceptance and Disposal Committees meet regularly as guided by the relevant Act.</p> <p>The Procurement Department during the quarter procured Goods worth Kshs.101,563 ,330.66 of which Kshs. 9,325,042.00 were for Women, Youth and Persons with Disabilities as shown in the attached summary</p>	<p>The Procurement process is transparent.</p> <p>Each Department/Unit has a Procurement Plan and products are purchased as per specifications and recommended standards.</p> <p>Ensures confidentiality and strict compliance to the relevant Acts and Regulations.</p> <p>Compliance with the Public Procurement and Assets Disposal Act, 2015 and the Public Procurement and Disposal Regulations, 2015.</p> <p>The University complies with government guidelines on tenders for youth, women and persons with disability.</p> <p>A summary of the Tender Awards is herewith attached as ANNEXURE I</p>
Human Resource Management	Recruitment	The University has a Staff Recruitment and Selection Policy.	Compliance with the Labour Laws as well as internal University Policies, Terms of Service and

Promotion	<p>The University continuously promotes staff to different grades on merit.</p> <p>Appointment Committees are sensitized on the format for writing Shortlisting & Appointment Committees minutes. During the Quarter a total of <u>Fifty (50) were</u> recruited as new staff and <u>(29) were promoted</u> on different grades</p>	<p>guidelines which have been uploaded in the intranet.</p> <p>The University has a cohesive, competent and diverse workforce.</p>
Training	<p>A Staff Training and Development Policy is in place.</p> <p>The Staff Members are continuously sensitized on matters of corruption prevention at their various units.</p>	
Appraisal	<p>The University conducts Staff Appraisal annually which forms part of the information used in considering staff members for training and promotion.</p>	
Staff Discipline	<p>The Terms of Service for all cadres of staff are fully enforced. The Public Officer Ethics Act, 2003, the Leadership and Integrity Act, 2012, the Code of Conduct and Ethics for Public Universities and the University of Nairobi Staff Code of Conduct also form part of the terms.</p> <p>One staff Mr. Peter Nzau, a Jjunior Technologist from department of Human Anatomy appeared before the Staff College Disciplinary Committee and was charged with insubordination and negligence of duty and was issued with a final warning letter.</p> <p>Staff Members who contravene policies are suspended and subjected to the disciplinary committee and their services terminated when found guilty. There were no staff suspended during the quarter under the review</p>	
Vetting of staff	<p>Two Hundred and Sixty Four (264) members of staff vetted were sensitized on the University of Nairobi Code of Conduct and Ethics</p>	
Staff Benefits	<p>The following policies are also in place and operational: -</p>	
Retirement Benefits	<p>-The University of Nairobi Anti-Corruption Policy</p>	
Staff Health and Welfare	<p>-The University of Nairobi Code of Conduct and Ethics</p> <p>-The Training, Promotion and Establishment Policy</p>	
Succession		

	Planning	<ul style="list-style-type: none"> -University Disabilities Mainstreaming Policy. -University of Nairobi Gender Policy -HIV/AIDS Policy -Research Policy -ICT Policy -Policy on Records Management -Prevention of Alcohol & Drug Abuse Policy -Maintenance Policy -University of Nairobi System of Websites Policy - Open Access Policy -University of Nairobi Intellectual Property (IP) Policy. -University of Nairobi Plagiarism Policy. -Human Resource Policy. -University of Nairobi Research Policy -Communication Policy. -Safety Plan. -Fixed Assets Management Policy 	
	Disability Mainstreaming	There have been continuous training on Sign language for staff members and students in key units. Computers and Printers with special software are being provided for visually impaired staff and students.	Compliance with the requisites legislation in place and the Constitution of Kenya, 2010
	Declaration of Income, Assets and Liabilities	The University of Nairobi coordinates the Declaration of Income, Assets and Liabilities exercise for University staff members ensuring that the relevant guidelines from the Commission for University Education are followed to the latter in compliance to Part IV, Section 26 of the Public Officer Ethics Act, 2003.	The Declaration of Income, Assets and Liabilities is conducted every two (2) years as prescribed in the Public Officer Ethics Act, 2003.

	The Universities Act, No. 42 of 2012	The University of Nairobi was audited by the Commission of University Education and was awarded the University of Nairobi Charter on March 1, 2013.	The University of Nairobi has complied with the stipulation of the Universities Act, No. 42 of 2012.
	The Leadership and Integrity Act, 2012	<p>The University did not receive or give gift in compliance to Section 14 of the Act on Leadership and Integrity</p> <p>There were no cases of conflict of interest reported to the University in compliance to the provisions of Section 16 of the Act.</p> <p>There were no reports recorded on institutional disciplinary committee on breach of codes</p>	<p>The University of Nairobi has complied with the stipulation of the Leadership and Integrity Act, 2012.</p> <p>A copy of the report is herewith attached as ANNEXURE III</p>
	Alignment of the University Policies to the constitution of Kenya, 2010	The University of Nairobi is currently aligning its Twenty two (22) to the Constitution of Kenya, 2010.	For updating and enhancement of service delivery
Records Management	Records Management	<p>The University has an operational Records Management Policy and is effectively implemented in all the Departments/Units.</p> <p>There is continuous review of the Records Management Systems, procedures and practices to enhance accountability and efficiency in access, storage, use and preservation of information.</p> <p>There is continuous sensitization of staff members drawn from various departments of the University on the requirement and implementation of University's Records Management Policy.</p> <p>The University through the office of the Records Manager implements the Records Management Policy through which;</p> <ul style="list-style-type: none"> ▪ Records surveys are conducted. ▪ Reviews on the classification and indexing schemes of records 	The documents are kept in good condition for future reference.

		<p>are done.</p> <ul style="list-style-type: none"> ▪ Tools to control records have been put in place in registries. ▪ Draft retention schedules have been put in place. ▪ An appraisal of closed records is done. ▪ Records disposal lists are kept. 	
ICT/computerization	<p>Unauthorized Access to the University's information Systems</p> <p>Safety of data and ICT equipment</p> <p>Upgrading of ICT Infrastructure</p> <p>Reliance on Manual operations</p>	<p>The University has an operational ICT Policy</p> <p>The Center upgrades the Internet Server to improve capacity, reliability and accessibility of the same.</p> <p>The University has computerized the methods of safe keeping information which include engraving new ICT equipment and installing anti-virus facility to safeguard data in some computers.</p> <p>The Center has also reduced reliance on manual operations.</p> <p>Staff members are able to follow the happenings at the University by simply logging into the University website using their respective user identifications.</p> <p>There has also been installation of antivirus software in some computers to safeguard data.</p> <p>The ICT Center has developed the following software;-</p> <p>- Customer Relationship Management System (CRMS)</p>	<p>Access to information is safely controlled and only authorized ICT officers with overriding personalized passwords are allowed to access specific information such as student grades. The use of fingerprint scanners will eliminate instances of illegal access to the system.</p> <p>Easy access to information website used as a communication tool</p> <p>Records are also kept electronically as back up for future reference.</p>

		<ul style="list-style-type: none"> -Student Management Information System (SMIS) -Student Clearance System -Human Resource Management Information System (HRIMS) -HAMIS -SWA System (Online room booking) -E-learning System -Performance Contract Management Information System (PCMIS) -Catering Management Information System -Staff Appraisal System. -Online Leave Application System (OLAPS) -Staff Education Support Fund -University Health Management Information System (UHIMS) -JAB System. - Fleet Management System - On line room allocation System was launched - Research Management Information System (RGMIS) was launched - Upgraded internet bandwidth from 652 mbps to 1,118 mbps -Catering Management Information System is being studied in preparation for implementation -A baseline survey on all the e-waste in the entire university is being conducted -Implementation of SSL certificates to ensure security of web systems and transactions was done during the quarter The next generation of firewall was rolled out to reduce cyber security 	
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Fleet management	<p>Policy of Fleet Management</p> <p>Branding of Vehicles</p> <p>Repair & Service of vehicles</p>	<p>The implementation of the Transport Management Information System to enhance and improve efficiency and to greatly reduce misuse of services and fuel cards has been completed apart from an up-to-date inventory of all fleet vehicles.</p> <p>The University has a policy on branding of University Motor Vehicles. All Motor Vehicles have been branded with Stickers, UoN Logo, name and address respectively. The process is on-going.</p> <p>All quotations for repair and service works for University Vehicles are obtained from pre-qualified garages and service/repairs done.</p> <p>Work tickets are effectively used to monitor and control movement of University vehicles which is updated on a daily basis.</p>	Cost efficient fleet management by maintaining a fleet inventory.
Academic Matters	<p>Graduation of students</p> <p>Student Health and Welfare</p> <p>Examination</p>	<p>The University has policies that are followed to ensure that the academic services offered to students are compliant to:-</p> <ul style="list-style-type: none"> - Procedure for Graduation (UON/OP/09) - Procedure for Management of Examinations (UON/OP/07) - Procedure for Admission (UON/OP/10) - Procedure for Management of Transfer of Credits (UON/OP/13) - Procedure for Student Disciplinary Matters (UON/OP/14) - Procedure for Management of Accreditation (UON/OP/17) - Procedure for Management of Inaugural and public Lectures. <p>The University of Nairobi also ensures that all students attending lecturers have cleared their respective fees as the students' data is continuously uploaded from the bank and reconciled with banking slips.</p> <p>In addition, the University of Nairobi ensures that students receive</p>	<p>There is continuous sensitization of invigilators, examiners and students on strict observance of examination regulations.</p> <p>The University adheres to Examination Regulation on invigilation and the recommended Staff to Student ratio is 1:50.</p> <p>The University ensures that invigilators are only identified from among the teaching members of staff.</p> <p>Some Examination rooms are fitted with CCTV cameras to ensure there is full compliance to the Regulations.</p> <p>The University has clear guidelines on admission of new students which ensures that it only admits a number of students that it can comfortably cater for.</p> <p>The University has set Rules and regulations</p>

	procedures	<p>communication on conduct of examinations by way of circulars from the Registrar, Academic and the respective Deans and Directors.</p> <p>Students caught engaging in examination malpractice are suspended pending the disciplinary process. A total of Eight (8) student examination disciplinary cases were processed the respective students suspended after they were caught cheating in examination.</p> <p>The Students results are considered by the respective School Boards and the College Academic Boards and released to the candidates on time.</p> <p>Registration of the Students in the Student Information Management System (SMIS) is on going to ensure that all students are in the system</p>	Governing the Conduct and Discipline of Students which ensure that there is sufficient cohesion among students and the administration.
	Admission of Students	<p>The Board of Postgraduate Studies has published Admission and Scholarship Award guidelines</p>	<p>For transparency in the process.</p> <p>Graduands have sufficient knowledge to enable them to effectively compete with those from other Universities in the job market.</p> <p>There have been no complaints with regard to the process of issuance of scholarships.</p>
Management of University Farms	<p>Accountability of the Farm Produce and Animals.</p> <p>Stores Management:</p> <p>Sale of Horticultural Produce</p> <p>Milk production</p> <p>Disposal of dead/deceased farm animals</p>	<ul style="list-style-type: none"> ▪ There are sustained visits to the farms and carrying out increased surveillance of the farm produce including supervision of workers in the farm. ▪ Stock movement is recorded and ncoming stock is formally accepted by an Inspection and Acceptance Committee. ▪ All the produce is weighed upon harvest and recorded in the Farm and Kiosk register. ▪ Milk records for both production and sales are kept. ▪ The University post mortem reports on all dead animals from the Departments of Veterinary Pathology, Microbiology and 	Adequate and sufficient strategies in place have curbed corrupt activities and farm records are properly maintained through a register.

	Weighing of farm animals	<p>Parasitology are properly kept apart from ensuring that disposal of dead/deceased animals is done in compliance with existing procedures</p> <ul style="list-style-type: none"> ▪ Animals are weighed before sale so as to assist in determining the price 	
Real Asset Management	Management of University Assets, Properties and Utilities	<p>There exist lease agreements for the lessor and the lessee.</p> <p>The University has managed to process to completion twenty two (23) title deeds for various University lands and the remaining two (2) titles are in process to safeguard University property from private developers.</p> <p>This is in compliance to: -</p> <ul style="list-style-type: none"> ▪ National Lands Commission Act, 2012 ▪ Government Lands Act, Cap. 280 ▪ Rating Act, Cap. 267 ▪ Factories Act, Cap. 514 <p>The University protects its lands against any encroachment by fencing.</p> <p>The University of Nairobi complies with the relevant legislation which include payment of stamp duty and registration of leases as appropriate.</p> <p>Routine repairs and maintenance of University buildings also carried out including the expansion of the Sewage system where necessary.</p> <p>Finance department has automated the University fixed Assets register, activated the asset module and incorporated CESSP into the ACCPAC system</p>	<p>There is proper and coordinated management of the University's assets and properties as there are no more dubious claims made on University land by outsiders/imposters.</p> <p>Appropriate controls have been put in place to ensure there is no payment of bills that do not belong to the University.</p>
	<p>Corruption Prevention Committees,</p> <p>Training of Integrity Assurance Officers.</p>	<p>The University Corruption Prevention Committee members were sensitized on capacity building on Corruption Prevention, ethics and Integrity.</p> <p>The University of Nairobi has sixty one (61) trained Integrity Assurance Officers. They held a joint meeting with the Central Corruption Prevention Committee on 23.03.2016 to discuss the Corruption Risk</p>	<p>Strengthening of the fight against corruption.</p> <p>All the Corruption Prevention Committees have in place schedules of monthly and quarterly meetings tabulated for the current financial year (2015/2016)</p>

	<p>Sensitization of various cadre of staff and students on Corruption Prevention, Ethics and Integrity</p>	<p>Assessment/ Corruption Mitigation Plan 2015-2017</p> <p>The staff members from all cadres continuously watch the video on the Integrity Testing Program during the sensitization workshops on the same in their respective college/units.</p> <p>Staff members from the Internal Audit Department were sensitized on the new Public Procurement and Asset Disposal Act, 2015</p> <p>A total of Nineteen (19) staff members from UNES attended a sensitization training on Information Security Management System (ISMS).</p> <p>members of staff from the Library Department who were trained on Tunitin software to improve skills on Anti-Plagiarism.</p> <p>The Integrity Assurance Officers held a Joint Meeting with the Central</p> <p>Corruption Prevention Committee Meeting Quarter 3 (2015/2016) meeting and discussed the UoN Corruption Risk Assessment/ Corruption Mitigation Plan (2015-2017)</p> <p>That a total of Two Hundred and Sixty Four (264) members of staff were vetted, three (49) from Central Examination Center, Fifty Four (54) Department of ICTC, Thirty Seven (37) from the UNES LTD and One Hundred and Twenty Four (124) members of staff from Central Administration.</p> <p>Training on Capacity Building on Corruption Prevention, Ethics and Integrity was conducted in the following departments: Student Welfare Authority - 200 staff College of Education and External Studies – 80 staff College of Architecture and Engineering - 149 staff</p>	
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		Internal and External Integrity Testing Programs are on-going.	
			Submission of Quarterly Reports
Number of Officers Suspended	Action taken		
None			

NOTES.

1. Organizations that have **not** formulated *Anti-Corruption Policies, Codes of Conduct, and Corruption Prevention Plans* will be required to develop the documents and submit the same to EACC for analysis.
2. All organizations should attach copies of quarterly CPC/Integrity Committee minutes when submitting returns.
3. Institutions that undertook Baseline Surveys on Corruption perception in 2013/2014 and 2014/2015 are required to provide the corruption perception index above. Institutions that have not undertaken a Baseline survey will be required to do so and provide the Corruption Perception index on a scale 1-10 when submitting the 4th quarter returns.
4. Under Activity **A** - Implement Corruption Prevention Strategies/Corruption Prevention Plans (CPP) Organizations should customize this section and include **technical departments** not listed above in line with their core mandates. In reporting on this section provide information for only those strategies that have been implemented within the reporting quarter or are-ongoing.
5. Under activity **B** - Establish mechanisms to reduce corruption related audit queries, organizations should indicate measures undertaken to address any queries arising from the 2011/12 Audit Report. This performance target will be assessed against the following aspects: Resolution of Audit queries; Reduction or increase in the number of Audit queries; monetary value of audit queries raised and the adequacy of mechanisms instituted to reduce corruption related audit queries.
6. EACC has provided guidelines for developing Anti-Corruption Policy; Code of Conduct and undertaking a Baseline Survey on Corruption Perception. The documents are available on the Commission website www.eacc.go.ke.

Name

Chairperson CPC

Permanent Secretary/Chief Executive Officer /Clerk/Principal

Sign..... Date.....

