



# **UNIVERSITY OF NAIROBI**

## **ANTI CORRUPTION POLICY**

## **VISION**

**“A world-Class University committed to Scholarly Excellence”**

## **MISSION**

**“To Provide Quality University Education and Training and to Embody the Aspirations of the Kenyan people and the Global community through the Creation, Preservation, Transmission and Utilization of Knowledge”**

## **CORE VALUES**

- **Freedom of Thought and Expression.**
- **Innovativeness and Creativity.**
- **Good Corporate Governance.**
- **Team Spirit and Teamwork.**
- **Professionalism.**
- **Quality Customer Services.**
- **Responsible Corporate Citizenship and Strong Social Responsibility.**

## **FOREWORD**

The University of Nairobi Management is committed to Zero Tolerance for Corruption in all the sectors of the institution.

The University of Nairobi as the oldest University in Kenya holds a special and nostalgic place of pride which it intends to maintain even in the midst of all the challenges likely to be brought out by corrupt activities in the Institution as indeed in the whole spectrum of activities in the country.

In order to realize this commitment, the University Management will monitor and review its anti-corruption policy from time to time to help staff and all our stakeholders to embrace appropriate behaviour and attitude change to help stem corruption in the University and the country.

.....  
**VICE-CHANCELLOR**

## **1. POLICY STATEMENT**

This policy is a determination of the University of Nairobi Management's commitment to zero tolerance for corruption. Recognizing the benefits of fighting corruption the university management accepts the responsibility of spearheading the fight in a decisive sustainable and all inclusive manner and with the involvement of all stakeholders. All activities of the Institution will be guided by the University anti corruption policy and non conformities will be dealt with swiftly and appropriately.

## **2. SCOPE/APPLICABILITY**

This policy applies to the University Management, Students, all staff and outsourced service providers of the University.

## **3. LEGISLATURE AND ADMINISTRATIVE REQUIREMENTS**

The University of Nairobi Act Cap. 210, Anti Corruption and Economic Crimes Act, 2003, Public Officer Ethics Act, 2003, Public Procurement and Disposal Act 2005, the Code of Conduct and Ethics for Public Universities.

## **4. DEFINITION OF CORRUPTION**

The term Corruption is not only a complex governance problem that transcends national boundaries but also a criminal phenomenon that requires a coalition of global efforts to tackle. In order to intervene effectively and fight corruption, recent global evidence, points towards a combination of strategies that revolve around law enforcement, prevention and public education.

In the Anti-corruption and Economic Crimes Act, 2003 Corruption is defined as:

- a) An offence under any of the provision of sections 39 to 44, 46 and 47;
- b) Bribery;
- c) Fraud;
- d) Embezzlement or misappropriation of public funds;
- e) Abuse of office;
- f) Breach of trust; or
- g) An offence involving dishonesty –
  - (i) In connection with any tax, rate or impost levied under any act;

The World Bank defines corruption as the abuse of power for personal gain or for the benefit of a group to which one owes allegiance. The United Nations Convention Against Corruption (UNCAC) in Chapter 3 Articles 15 to 24 lists circumstances or situations that could constitute corruption and these include bribery, embezzlement, misappropriation or other diversion of property by a public official, trading in influence, abuse of functions, illicit enrichment, laundering of the proceeds of crime, obstruction of justice and concealment.

The African Union Convention on Preventing and combating corruption describes corruption as “solicitation or acceptance, directly or indirectly by a public official or any other person of any goods of monetary value or other benefit such as gift, favour or advantage for himself or herself or for another person or entity in exchange for any act or omission in the performance of his or her functions”.

The National Anti-Corruption Plan defines corruption as:

- Abuse of position or office for personal advantage or for the advantage of another person;
- Bribery, theft, embezzlement and fraud;
- Evasion of payment of government revenues, taxes, rates, fees and other dues;
- Practicing of nepotism, tribalism, clanism;
- Practicing discrimination on the basis of religion, gender or disability;
- Inversion and distortion of social values including soliciting for and giving sexual and other favours; and
- Negligence of professional ethics.

## **5. CORRUPTION RISK AREAS AND CORRUPTION PRACTICES IN THE UNIVERSITY**

All functional areas in the institution are potential risk areas. They include: -

- Financial Management Systems and Procedures
- Information, Communication and Technology Systems (ICT)
- Procurement, Processes and Disposal of Stores
- Human Resources and other areas
- Planning and Management of Projects
- Records Management among others
- Teaching and Conduct of Examinations (Code of Conduct and Ethics for Public Universities – Section 6)
  - Setting or moderating of examination;
  - Typing, printing, photocopying, or otherwise producing or reproducing the examination papers;
  - Transporting examination papers;

- Invigilation at the examination;
- Marking or entering of grades attained,

## **6. STRUCTURES FOR FIGHTING CORRUPTION**

The management has constituted the University Corruption Prevention Committee to be chaired by the Vice-Chancellor and College Corruption Prevention Committees chaired by the College Principals, the Central Units Corruption Prevention Committee chaired by the Registrar Administration and Students Welfare Authority Corruption Prevention Committee chaired by the Director SWA to address the corruption risks identified and codified in the University Corruption Prevention Plan.

The management will also develop and implement an awareness raising program to ensure all staff, customers, clients, collaborating institutions, partners and the public understand the risks and are committed to corruption prevention in the University; and thus ensure success in the eradication of corruption.

The management will monitor implementation of the planned activities to address the identified risks, we shall also use our internal units especially security, audit including external forces to investigate identified offenders and prosecute them before our internal disciplinary committees and the courts of law as appropriate.

All stakeholders are encouraged to disclose acts of corruption verbally and or in writing to the integrity assurance officers at the designated report offices. Stakeholders are also encouraged to drop written reports in the corruption report boxes located all over the university.

The management assures all persons of protection and non-disclosure of identity.

## **7. COMPOSITION OF THE UNIVERSITY OF NAIROBI CENTRAL CORRUPTION**

### **PREVENTION COMMITTEE**

Vice-Chancellor	-	] <b>CHAIRMAN</b>
Deputy Vice-Chancellor (A&F)	-	] Member
Deputy Vice-Chancellor (AA)	-	] Member
College Principals	-	] Member
Deputy College Principals	-	] Member
Finance Officer	-	] Member
Registrar, Academic	-	] Member
Registrar, Administration	-	] Member
Registrar, Planning	-	] Member
Chief Legal Officer	-	] Member
Director, SWA	-	] Member
Chief Internal Auditor	-	] Member
Procurement Manager	-	] Member
Chief Medical Officer	-	] Member
Director ICT	-	] Member
Estates Manager	-	] Member
University Librarian	-	] Member
Manager, Construction and Maintenance	-	] Member
Managing Director, UNES	-	] Member
Integrity Assurance Officer	-	] <b>SECRETARY</b>

## **8. MANDATE AND OPERATIONS OF THE UNIVERSITY OF NAIROBI CORRUPTION PREVENTION COMMITTEE**

The Corruption Prevention Committees will perform the following



functions: -

- Setting priorities in the prevention of corruption within the University.
- Planning and coordinating corruption prevention strategies.
- Integrating all corruption prevention initiatives in the University.
- Receiving and reviewing reports on corruption prevention initiatives and recommend appropriate action.
- Receiving and taking action on corruption reports made by staff and other stakeholders.
- Spearheading anti-corruption campaigns within the University.
- Monitoring and evaluating the impact of corruption prevention initiatives.
- Preparing and submitting quarterly progress reports to the management and the Performance Contract Steering Committee.

## **9. INTERNAL AUDIT REVIEWS**

In recognition of the crucial role the Internal Audit plays in an organization in prevention and detection of corruption and fraud the Management will ensure the University Internal Audit has a free hand and a strong mechanism that enables supervision, control and review of the operational systems of the University.

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

The management has provided avenues for reporting corrupt practices within the University. All forms of corruption can be reported to the following: -

Vice-Chancellor	Email	-	<a href="mailto:vc@uonbi.ac.ke">vc@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
	Fax	-	+254-20-2212604/2216030

Deputy Vice-Chancellor (A&F)	Email	-	<a href="mailto:dvcaf@uonbi.ac.ke">dvcaf@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
	Fax	-	+254-20-2226329
Deputy Vice-Chancellor (AA)	Email	-	<a href="mailto:dvca@uonbi.ac.ke">dvca@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
	Fax	-	+254-20-2214325
Principal, CAVS	Email	-	<a href="mailto:principal-cavs@uonbi.ac.ke">principal-cavs@uonbi.ac.ke</a>
	Telephone	-	+254-20-631340, 631353, 631277
	Fax	-	+254-20-631007
Principal, CAE	Email	-	<a href="mailto:principal-cae@uonbi.ac.ke">principal-cae@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
	Fax	-	+254-20-251107
Principal, CBPS	Email	-	<a href="mailto:principal-cbps@uonbi.ac.ke">principal-cbps@uonbi.ac.ke</a>
	Telephone	-	+254-20-4445308
	Fax	-	+254-20-4449902
Principal, CHS	Email	-	<a href="mailto:principal-chs@uonbi.ac.ke">principal-chs@uonbi.ac.ke</a>
	Telephone	-	+254-20-2725452
	Fax	-	+254-20-2711483
Principal, CHSS	Email	-	<a href="mailto:principal-chss@uonbi.ac.ke">principal-chss@uonbi.ac.ke</a>
	Telephone	-	+254-20-242000
	Fax	-	+254-20-251107
Principal, CEES	Email	-	<a href="mailto:principal-cees@uonbi.ac.ke">principal-cees@uonbi.ac.ke</a>
	Telephone	-	+254-20-2500759, 2500760/1
	Fax	-	+254-20-2386028
Deputy Principal, CHSS	Email	-	<a href="mailto:depprincipal-chss@uonbi.ac.ke">depprincipal-chss@uonbi.ac.ke</a>
	Telephone	-	+254-20-242000
	Fax	-	+254-20-251107
Deputy Principal, Kenya Science C.	Email	-	<a href="mailto:kscampus@uonbi.ac.ke">kscampus@uonbi.ac.ke</a>
	Telephone	-	+254-20-3865641
	Fax	-	+254-20-3872554

Finance Officer	Email	-	<a href="mailto:fo@uonbi.ac.ke">fo@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Registrar, Academic	Email	-	<a href="mailto:reg-academic@uonbi.ac.ke">reg-academic@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Registrar, Administration	Email	-	<a href="mailto:reg-administration@uonbi.ac.ke">reg-administration@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Registrar, Planning	Email	-	<a href="mailto:reg-planning@uonbi.ac.ke">reg-planning@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Chief Legal Officer	Email	-	<a href="mailto:legal-officer@uonbi.ac.ke">legal-officer@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Director, SWA	Email	-	<a href="mailto:director-swa@uonbi.ac.ke">director-swa@uonbi.ac.ke</a>
	Telephone	-	+254-20-2728116, 2728673
	Fax	-	+254-20-2717665
Chief Internal Auditor	Email	-	<a href="mailto:cia@uonbi.ac.ke">cia@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Chief Medical Officer	Email	-	<a href="mailto:cmo@uonbi.ac.ke">cmo@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Procurement Manager	Email	-	<a href="mailto:manager-procurement@uonbi.ac.ke">manager-procurement@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Director, ICT	Email	-	<a href="mailto:director-ict@uonbi.ac.ke">director-ict@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Estates Manager	Email	-	<a href="mailto:manager-estates@uonbi.ac.ke">manager-estates@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
University Librarian	Email	-	<a href="mailto:librarian@uonbi.ac.ke">librarian@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
Manager, Construction & Maint	Email	-	<a href="mailto:dept-construct@uonbi.ac.ke">dept-construct@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262
MD, UNES	Email	-	<a href="mailto:director-unes@uonbi.ac.ke">director-unes@uonbi.ac.ke</a>
	Telephone	-	+254-20-318262

- By letter or E-mail.
- Telephone or Fax.
- You could also report anonymously.
- Drop your report in the Corruption reporting boxes provided conspicuously all over the University.
- Use any other method convenient to you.
- You may also report directly to the Kenya Anti – Corruption Commission.

## **11. HANDLING CORRUPTION CASES**

All corruption cases reported and supported by compelling, convincing, evidence or reasonable suspicion will be handled promptly fairly and expeditiously in compliance with University policies and the Law of the Land.

There will be no victimization of any staff member wrongly accused of engaging or being involved in corrupt activities.

## **12. PROTECTION OF WHISTLE BLOWERS**

It is the responsibility of all Kenyans to prevent and fight corruption. The Management assures all stakeholders that the identity of persons reporting corruption cases will be protected and no disclosure will be made or consequent reprisal or detrimental action visited on the persons reporting.

## **13. DISCIPLINARY MEASURES**

Staff members, students and other outsourced service providers who contravene this policy will face disciplinary action as provided for in the Terms of Service, the student regulations governing the conduct and discipline of students and/or the Contract Agreement as the case may be.

**14. TRAINING**

The Management commits itself to continuous training of Staff and Students in matters of Ethics and Integrity.

**15. MANAGEMENT/IMPLEMENTATION AUTHORITY**

The implementation of this policy shall be the responsibility of the University Corruption Prevention Committee chaired by the Vice-Chancellor.

**16. REVIEW**

The policy shall be subject to review by the management after every twelve (12) Months or as the management may determine.

**17. EFFECTIVE DATE**

This policy shall come into effect on July 1 2010

Issued this .....day of .....2010

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**VICE-CHANCELLOR**