

# GREAT LAKES UNIVERSITY OF KISUMU (GLUK)



## ANTI- CORRUPTION POLICY

FEBRUARY, 2018

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Policy Contact: Deputy Vice Chancellor Academic Affairs

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Signed:

\_\_\_\_\_  
Vice Chancellor, Secretary to Council

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Date:

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Chairman of Council

\_\_\_\_\_  
Date

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## Executive Summary

The GLUK Anti-Corruption Policy is intended to put in place a framework for ensuring a corruption-free working environment. In this endeavor it is noteworthy that GLUK is propelled by ideals enshrined in its Mandate, Philosophy, Mission, Vision and Core Values. These ideals and aspirations are only possible within a framework of integrity and ethics, which creates a culture of zero-tolerance of any corruption practices. The benefits of the Anti-Corruption Policy cannot be over-estimated. All the stakeholders of the University are potential beneficiaries through efficient and quality services; improved infrastructure; fairness, justice and equity; respect for the rule of law; stability of policies, assurance of proper planning and sustained development; and improved personal safety and security of property. To achieve the status of a corruption-free University, fighting corruption must begin with each individual member of the University before it spreads to groups and the entire citizenry. This is due to the fact that it is only by changing ourselves that we can be able to effect changes to others. The desired change is one that bestows positive service delivery to humanity. Towards this end, the University Management is committed to the implementation of the Anti-Corruption Policy. This will be done through allocation of resources for training, establishment of corruption prevention mechanisms in every sector, and provision of avenues for reporting corruption incidences within the University.

Signed:

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Vice Chancellor, Chair of the University Senate

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Date:

## 1.0. GENERAL UNIVERSITY INFORMATION

Great Lakes University of Kisumu is committed to maintaining high standards of education and training of professionals who are responsible stewards of resources and services in the society. GLUK graduates after going through the learning experience with the institution go out equipped with the following rare and important attributes; high level of integrity, transparency and accountability, they are selfless, inclusive and participatory providing space and voice for all people. Our curricula prepare them to meet the needs of the market and professional bodies.

The following section provides guidelines that are applied to determine the eligibility of the applicants seeking admission to various programmes offered at GLUK.

### 1.1. Vision, Mission, Philosophy and Core Values of the University.

#### 1.1.1. Vision:

The Great Lakes University of Kisumu (GLUK) is established as a centre of excellence bridging academics with community and institutional based development.

#### 1.1.2. Mission:

The Mission of GLUK is to develop effective and concerned managers or leaders with a vision for the transformation of situations in the African context.

#### 1.1.3. Philosophy of the University:

GLUK believes that all people and communities have capacities and are fully engaged in individual, collective and collaborative actions to solve their own problems.

#### 1.1.4. Core Values and principles:

All members of the University in their individual and collective capacities shall be fully committed to high standards of good governance and shall act in a manner consistent with the following values and principles which shall provide the framework within which all the University activities shall be performed:

- a) Excellence.
- b) Respect for dignity of every person.
- c) Results orientation.
- d) Accountability and prudent stewardship of resources.
- e) Integrity and honesty.
- f) Mutual respect.

Inclusive participation.

### 1.2. Preamble

Great Lakes University of Kisumu Management is committed to zero tolerance on corruption in all the sectors of the institution.

Great Lakes University of Kisumu 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. 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.

### 1.3. Policy Statement

Corruption is a serious scourge that has eaten into the fabric of the Kenyan Society and may occur in any public institutions. The University Anti-Corruption Policy is aimed at improving institutional productivity, efficiency and good governance. The roles of management, staff, students and other stakeholders in preventing corruption or unethical behavior/practices are clearly spelt out and based on the Code of Conduct and Ethics for Public Universities (Legal Notice No.170, Law of Kenya). All areas of operation within the University that may be prone to corruption have been spelt out (Section 6.0) and guidelines and handling procedures given in order to assist stakeholders in preventing unethical behavior. The University therefore expects all its stakeholders to strive to eliminate all avenues of corruption in order to make Great Lakes University of Kisumu a corruption free institution. Any crime or corrupt practices identified will be dealt with firmly using this policy together with the other anti-corruption policies or procedures of the government including, the Anti-Corruption and Economic Crime Act (ACECA 2003), the Public Officers Ethics Act (POEA, 2003) and the Code of Conduct and Ethics for Public Universities (Legal Notice No. 170

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.

## 2.0. LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

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

### 2.1. Legal Instruments

- i. Anti-corruption and Economic Crimes Act, revised 2012
- ii. Public Officers Ethics Act, 2003

- iii. Public Procurement and Disposal Act, 2005 and Public Procurement and Disposal Regulations, 2006.
- iv. Public Financial Management Act, 2004
- v. Public Audit Act, 2003
- vi. GLUK Charter and University of GLUK Statutes, 2013
- vii. The Code of Conduct and Ethics for Public University (Legal Notice No.170)
- viii. The Employment Act, 2007
- ix. The Witness Protection Act 2006

## 2.2. Institutional Instruments

- |   |  |
|---|--|
| 1. GLUK Quality Manuals and Procedures                          | 20. Transcripts & Certificates Procedures        |
| 2. GLUK Service Charter   | 21. Health Clinics Policy                        |
| 3. GLUK Strategic Plan  | 22. HIV/ AIDS Policy                             |
| 4. Annual Budget and Establishment                              | 23. Fee Payment Policy                           |
| 5. GLUK Research Policy   | 24. Resource Mobilisation Policy                 |
| 6. GLUK Examination Rules and Regulations                       | 25. Human Resource Policy                        |
| 7. GLUK Scheme of Service                                       | 26. Code of Conduct Policy                       |
| 8. GLUK Internal Audit Manual                                   | 27. Performance Appraisal                        |
| 9. GLUK Rules and Regulations Governing the Conduct of Students | 28. Grievances Policy                            |
| 10. GLUK Senate Rules (Admissions, Curriculum Developments,     | 29. Record Keeping Policy                        |
| 11. Examination Rules and Regulations)                          | 30. ICT Policy                                   |
| 12. GLUK Security Manual  | 31. Farm Enterprise Policy                       |
| 13. GLUK Library Rules and Regulations                          | 32. Communication & Marketing Policy             |
| 14. Gender and Sexual Harassment Policy                         | 33. Procurement Policy                           |
| 15. Timetabling SOP   | 34. Gender & Sexual Harassment Policy            |
| 16. Curriculum Policy   | 35. Disability and Disabled Policy               |
| 17. Business Centre Policy                                      | 36. Anti-Narcotic, Alcohol and Drug Abuse Policy |
| 18. Admission Policy  | 37. Benchmarking Policy                          |
| 19. Graduation Policy   | 38. Special Needs and The Vulnerable Policy      |
|   | 39. Environmental and Waste Management Policy    |

## 2.3. Scope/Applicability

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

### 3.0. 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

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.

#### 3.1. Corruption Risk Areas and Corruption Practices in The University

All functional areas as 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

### 4.0. STRUCTURES FOR FIGHTING CORRUPTION

The management has constituted the University Corruption Prevention Committee to be chaired by the Vice-Chancellor and Campus Corruption Prevention Committees chaired by the Campus



directors, the Central Units Corruption Prevention Committee chaired by the Registrar Administration and Students Welfare Authority Corruption Prevention Committee chaired by the dean of students 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.

## 5.0. 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.

### 5.1 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: -

- |                                |                         |
|--------------------------------|-------------------------|
| a. Vice-Chancellor             | h. Internal Auditor     |
| b. Deputy Vice-Chancellor(A&F) | i. Procurement Manager  |
| c. Deputy Vice-Chancellor (AA) | j. Medical Officer      |
| d. Campus Directors            | k. Director ICT         |
| e. Finance Officer             | l. University Librarian |
| f. Registrar, Academic         | m. Dean of Students     |
| g. Registrar, Administration   |                         |

by:

- By letter or E-mail.
- Telephone or Fax.
- You could also report anonymously.
- Use any other method convenient to you.
- You may also report directly to the Kenya Anti-Corruption Commission.

## 6.0. 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.

## 7.0. PROTECTION OF WHISTLE BLOWERS

It is the responsibility of all Kenyans to prevent and fight corruption. The Management assures all stake holders 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.

## 8.0. DISCIPLINARY MEASURES

Staff members, students and other out-sourced 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 maybe.

## 9.0. TRAINING

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

## 10.0. MANAGEMENT/IMPLEMENTATION AUTHORITY

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

## 11.0. REVIEW

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

## 12.0. REFERENCES:

This policy was informed by relevant national legislation and documents such as:

1. The Constitution of Kenya
2. The Commission for University Education Standards and Guidelines
3. Universities Act 2012 (revised 2016)