



KOSHIN TECHNICAL TRAINING INSTITUTE

P.O BOX 4040 - 30100 ELDORET

PERFORMANCE CONTRACTING

CORRUPTION RISK ASSESSMENT

AND

CORRUPTION MITIGATION PLAN

POLICY

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FOREWORD

Koshin Technical and Training Institute is committed to the highest levels of integrity. This material echoes our devotion and belief that businesses within our institution should be steered in a corruption free manner. This material outlines potential corruption risk areas within our institution and mitigation measures to be put in place to stop corruption. It should be noted that these guidelines should be a reference to all stakeholders (staff, students, suppliers, community, government, international and local Partners) while conducting business to prevent corruption. Every person has a responsibility to adhere with the provisions outlined in this Policy and to maintain the highest standards of integrity to ensure the Institution is a corruption free zone.

PHILOSOPHY

Creative, scientific, technological,
Innovative and critical thinking responsive to societal needs and service to humanity.

VISION

To be a global center of excellence in quality technical and entrepreneurship training,
research and innovation.

MISSION

To provide quality technical and entrepreneurship skills, research and innovation that meet the
human resource needs for industrial and societal sustainable development.

MOTTO

Creativity and innovation.

CORE VALUES

Customer focus: To promote team spirit, collaboration and adapt participation approach.

Integrity: To uphold accountability, transparency, honesty, sincerity and trustworthiness in
delivery of services.

Team work: Continually determine and meet clients' requirements.

Competitiveness: To emphasize creativity and innovation among staff and students by
becoming open and proactive in seeking better and more efficient methods of service delivery.

Diversity: To promote equity in gender age education ethnicity religion and disability.

QUALITY POLICY STATEMENT

Commitment to offering quality technical training research and innovation.

Introduction

Definition of corruption

Corruption can be defined as improper acts or omissions, improper use of Influence or position, or improper use of information. It can also be defined as misuse of public office which involves a criminal offence, a disciplinary offence or such an offence providing reasonable grounds for dismissal. It may include fraud, collusion, coercion, breach of trust, bribery, blackmail, theft, embezzlement, tax evasion, forgery or violence, among others.

Corruption offence

Corruption offence means any action contravening the law and/or regulations.

According to the Anti-corruption and Economic Crimes Act (2003) the following actions are considered corruption offences/practices:

- ❖ 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 nepotism, tribalism and cronyism;
- ❖ 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;
- ❖ Negligence of professional ethics.

POTENTIAL CORRUPTION RISK AREAS

All sections of the institution are considered corruption-risk areas. However, the institute has identified the following departments as being potentially high risk based on the nature of their operations:

1. FINANCE DEPARTMENT.

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Illegal and unauthorized access or manipulation of the financial management information system;
- b) Using forged receipts;
- c) Misuse of government grant monies;
- d) Making cheques out of falsified documents;
- e) Misusing or illegal disclosure of official information;
- f) Falsifying signatures and documents;
- g) Using institutes funds for personal purposes;
- h) Certifying the performance of service without being certain that the service was really provided;
- i) Writing off recoverable assets or debts;
- j) Theft of assets;
- k) Manipulation of financial statements.
- l) Some suppliers and contractors are given first priority over the others when it comes to payment.

Proposed mitigation measures.

- Limit access using passwords and codes.
- Verify receipts accordingly.

- Use prescribed expenditure procedure for all grants and monies from the government and other sponsors.
- Develop policies on recoverable assets and debts recovery.
- Payment of suppliers and contractors should be based on 'First Come First Serve' basis.

2. PROCUREMENT AND SUPPLIES DEPARTMENT

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Receiving personal benefits (bribe) from suppliers/contractors in exchange of winning tenders/bids at the Institute.
- b) Manipulating a tendering process to achieve a desired outcome;
- c) Bids not opened in public;
- d) Unclear specifications tailored to favour a particular company;
- e) Unfair distribution of request for quotations;
- f) Inflation of prices of items in collaboration with the suppliers;
- g) Receiving substandard items and services on behalf of the Institute.
- h) Client using influence to order that quotations be given to suppliers who are not pre-qualified or to friends who are on the pre-qualified list;
- i) Delay time between deadline for submission and opening of bids;
- j) Advance release of bid information;
- k) Contract specifications are changed after contract award;
- l) No procurement plan or non-compliance with it;
- m) Non-compliance with standard documents;
- n) Lack of transparent procedures for handling complaints;
- o) Evaluation of contractors' performance not recorded; and
- p) No follow up to indications of corruption.

Proposed mitigation measures.

- Stick to the given procurement policies and plan (if any) or develop them. The policy should cover the following parts.
 - Tendering process
 - Quotation distributions
 - Roles of tendering committee.
 - Evaluation process.
 - Complaints handling.
- Follow up any indication of corruption.
- Acquire and use all the necessary documents.

3. ACADEMIC AFFAIRS, FACULTIES, TEACHING AND EXAMINATION DEPARTMENTS

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Admitting non-qualified students; (direct admission)
- b) Accepting bribes for admission of students (direct admissions)
- c) Bending admission rules to favour certain candidate(s);
- d) Finalizing admission before approval of applications;
- e) Losing students' files;
- f) Lack of updated and proper records;
- g) Academic fraud e.g. plagiarism or inappropriate use or acknowledgement of another person's work, misrepresenting qualifications on employment applications inter alia;
- h) Teaching contents of examinations with the aim of examining the same;
- i) Harassing students by demanding special favours from them in order to pass;
- j) Failing to attend classes as required;
- k) Failing to cover the subject matter in the course outline;
- l) Failing to mark and submit continuous assessment tests to students;
- m) Failing to give students adequate contact hours;
- n) Awarding of grades without assessment;

- o) Allowing movement of unauthorized people in and out of the Examination Office;
- p) Selling examination drafts to students;
- q) Failure to report those found cheating in the examination;
- r) Careless handling of examination drafts as they are processed, leading to leakage of the examination questions; and
- s) Illegal issuance of examination cards to students not cleared to sit examinations.

Proposed mitigation measures.

- Develop and implement examination policy which should cover the following areas.
 - Admission requirements and procedure.
 - Academic writings.
 - Students files and record management.
 - Teacher/Student class attendance minimum requirements.
 - Exam cheating implications
 - Student assessment and evaluation
 - Examination room/area restrictions.
- Make examination office an out of bound area.
- Avoid improper disposal of examination papers.

4. ADMINISTRATION DEPARTMENT

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Favouring an applicant for employment on criteria other than merit;
- b) Recruiting unqualified staff;
- c) Manipulating the selection process for staff appointment;
- d) Allowing a conflict of interest to undermine independence;
- e) Leaking interview questions to recruits;
- f) Limiting circulation of job advertisements;
- g) Deploying employees in areas in which they are not competent to handle;

- h) Use of Institutes time to pursue private interests/business;
- i) Abuse of position and power for personal gain;
- j) Lack of an elaborate organizational structure; and
- k) Unfair selection of persons for promotion or training.

Proposed mitigation measures.

- The organizational structure of the institute should be easily accessible with distinct roles for each office(r)
- The recruitment procedure should be documented.
- Employees deployment should be based on competence and qualification.
- Promotion and appointment for trainings etc. should be procedural, not repetitive, and involving HODs among other parties of interest.

5. INFORMATION COMMUNICATIONS TECHNOLOGY DEPARTMENT

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Theft of ICT equipment
- b) Unauthorized and/or illegal use of assets, information or services for private purposes, including; computers, email and internet;
- c) Using imaging and desktop publishing to produce apparent original invoices
- d) Manipulation of computer programs for improper purposes, such as:
 - Unauthorized approval to pay;
 - Diversion of proceeds;
 - Writing off debts; and
 - Accessing confidential information.

Proposed mitigation measures.

- The ICT lab should be an out of bound zone.
- There should be clearly defined rules about the access and use of ICT equipment's.
- Develop and use passwords with constant review.
- Develop a policy to cover the following areas.
 - Punitive measures for illegal assessment.
 - How to recover a stolen item
 - Stake taking process
 - Labeling process.
 - Disposal of assets procedure.

6. SECURITY DEPARTMENT

Possible corruption practices

Possible corruption practices in this department include the following:

- a) Collecting bribes to drop charges against suspected offenders;
- b) Colluding with external trespassers to steal from the Institute's premises;
- c) Allowing unauthorized persons to enter the institute's premises through the gates;
- d) Colluding with workers or students to steal Institutes assets; and
- e) Poor record-keeping leading to lack of vital information during investigations.

Proposed mitigation measures.

- Develop a procedure of handling suspected criminal offenders.

- Nobody should be allowed into the school premises without the knowledge and acknowledgement from the security.
- There should be clear directions and specified areas for vehicle parking.
- All bags entering and leaving the Institutes premise should be thoroughly checked.
- Records for every single criminal activity should be kept well.
- Follow up any corruption indication observed or reported.

PLAN IMPLEMENTATION

The Corruption Prevention Committee shall be responsible for implementing this Plan.

PLAN REVIEW

The Plan shall be reviewed and modified by the Koshin TTI Corruption prevention committee from time to time or when deemed necessary to reflect the current environment.

EFFECTIVE DATE

The effective date for this Policy is as indicated hereunder:
EFFECTIVE DATE: 3rd July 2019

Corruption Prevention Committee Chairperson; (Marita Nickson)

Sign Date

PC Coordinator.

Sign Date