



# **KENYA INSTITUTE OF MASS COMMUNICATION**

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***K.I.M.C ANTI- CORRUPTION POLICY 2020***

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## FOREWORD

The Kenya institute of mass communication's 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 KIMC 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 KIMC family 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, fighting corruption must begin with each individual member of the KIMC 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 College 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 institute.

A handwritten signature in cursive script that reads "Brenda". Below the signature is a horizontal dotted line.A handwritten signature in cursive script that reads "M. Wacheke".

**MR HIRAM MUCHEKE**  
**Director/CEO**

## **1.0 INTRODUCTION**

### **1.1 Overview**

This chapter presents a brief history of the Kenya Institute of Mass Communication (KIMC) and the mandate of the institute as provided for in the Legal Notice 197 of 2011 (Amended 2012) as it highlights the key issues that are important to the realization of the mandate of the institute. The chapter puts into perspective the role of the institute in the national agenda.

### **1.2 Background**

Kenya institute of mass communication was established in 1961 as the Voice of Kenya Training School. The initial intention of starting the institute was to train electronic engineers and technicians for the Kenya Broadcasting Service (KBS), which in 1962 became the Kenya Broadcasting Corporation (KBC). KBC was nationalized in 1964, and changed to the Voice of Kenya (VOK). Nationalization occasioned the departure of expatriates who worked in the broadcaster, creating an urgent need for qualified manpower to fill the vacant positions left by the departing personnel.

In 1965, The VOK acquired a grant to start what became the Voice of Kenya Training School. The institution was to serve the Ministry of Information which equally lacked qualified journalists. Programme producers, announcers and cadre relevant in the field of mass communication.

The KIMC is among the leading specialized media and communication training institutions in Africa.

Initially, the objective of KIMC was to train middle -level media personnel specifically to work in and for the government. In response to expanded and growing demand for mass media personnel, the institute now trains for the public and private sectors in Kenya and the rest of Africa.

KIMC has grown into one of the most respected institutions of its kind in Africa admitting students not only from Kenya but also from several African countries. Over the years, the institute has trained students from countries such as Somalia, Sudan and Rwanda. In terms of quality and diversity in media training, KIMC possibly has few peers in eastern and central Africa.

The institute is focused on modernizing its facilities for training in electronic and telecommunication engineering, film production, radio and television production, print and broadcast journalism, and electronic and studio technology. The institute became a semiautonomous government agency vide the Legal Notice No. 197 of 2011 with a mandate to offer training in communication and cinematic arts.

### **1.3 Mandate and Functions of the Institute**

- To offer training in communication and the cinematic arts
- To produce and disseminate products in communication and cinematic-arts for education and info-attainment
- To produce and disseminate mass media products for training and commercial purposes
- To provide and advance education and training to appropriately qualified candidates, leading to the award of diplomas and certificates and such other qualifications as the council may from time to time prescribe.
- Conduct examinations for such academic awards as the council may from time to time prescribe,
- Develop as an institution of excellence in teaching, training, scholarship, entrepreneurship, innovation, research and consultancy services.
- Participate in resource generative services or commercial ventures and other activities for the benefit of the institute, the community and stakeholders
- Develop and provide educational, cultural, professional, technical and vocational services to the community and in particular foster corporate social responsibility and the development of performing arts
- To foster the general welfare of all staff and students.

#### **1.3.1 Vision**

To become a center of excellence within the African region in communication training and research.

#### **1.3.2 Mission**

To produce highly skilled technical and professional personnel through hands on training for the communication sector.

#### **1.3.3 Core Values**

- Professionalism
- Innovation
- Patriotism
- Transparency and Accountability
- Integrity

#### **1.3.4 Institutes motto**

We train today's media practitioners

## 2.0 INTRODUCTION ON CORRUPTION

Most people in Kenya have known through experience the adverse effects of corruption both on the personal level and the national level. The effects of corruption include poverty, lack of ethical values and respect for the law. The result has been enormous losses of public funds through fraud and mismanagement. Corruption is the cause of the downward spiral of both individual and national well-being. The Ethics and Anti-Corruption Commission (EACC) was established to help eradicate corruption in all public institutions.

The Integrity Committee of KIMC was established in October 2014. The objective of the Committee is to join efforts with EACC and other people of good will to reverse the trend of corruption that can cripple not only personal development, but also institutional and national development. Kenya institute of mass communication is cognizant of the benefits of operating in a corruption-free environment. The objective of an Anti-Corruption Policy of KIMC is to create a culture that is driven by two values: **Integrity and Ethics**.

The institutes culture refers to a set of shared values, understanding, assumptions, and attitudes that in turn give rise to standards of behaviour in KIMC community. Ethics refers to the standard of right and wrong against, upon which decisions will be based. The culture inspired by this Policy will enable KIMC employees to make the right decisions, justify those decisions and honestly evaluate the outcome of those decisions.

The objective of this Policy is to create a culture of integrity at two levels: personal level and Institute's level. At a personal level, integrity would mean developing positive qualities (honesty, trustworthiness, loyalty, courage, truthfulness, impartiality, and steadfastness) in the principles that one holds. At the institutional level, integrity would mean a group of people who uphold law, legitimacy, rationality, completeness, soundness and efficacy of institutes objectives, programmes, structures, systems, processes and procedures.

### **In order to realize the objective, KIMC is committed to the following standards:**

- Periodic evaluation of its Strategic Plan, Vision, Mission and Core Values
- Regular review of institutional documents such as handbooks and policies
- Socialization of new members through orientation and mentoring
- Employment of professionalism in services offered to stakeholders
- Fostering of an environment of openness to facilitate communication and accessibility
- Review of all interview records and correspondence
- Fostering of discussion along all levels to create room for airing concerns with regard to irregularity in various sections of the University features and practices
- From time-to-time, conducting surveys to determine attitudes towards corruption
- From time-to-time, conducting surveys to determine staff satisfaction with work environment, promotion, procurement, financial, and recruitment procedures

To this end, all members of KIMC are enjoined with the responsibility of fighting corruption by reporting any corruption practices as provided for in this Policy. In this way, the common



goal of a corruption-free work environment will be realized, creating a culture of ethics and integrity within which KIMC'S vision, mission and core values will in turn be realized.

## **2.1 Policy statement**

The purpose of this Policy is to ensure compliance by all employees, customers, service providers and any other stakeholders or bodies associated with KIMC in eradication of any form of corruption, fraud, theft, misadministration and other dishonest activities. This Policy is intended to provide a framework for conformity to legal requirements within the Institute.

Kenya Institute of Mass Communication will transact and conduct its business in an honest and ethical manner. Neither KIMC (or entity associated with it) nor any other person, shall facilitate payments or relationships with third parties, or offer, pay, promise, authorize or receive any bribe, kickback, or other illicit inducement payments or benefits in violation of the Ethics and Anti-Corruption Laws.

In this Policy, corruption, which involves an inducement or reward that is provided to gain any academic, commercial, contractual, or personal advantage for KIMC, will not be tolerated. Such irregular activities will be investigated and followed up by application of all the measures available within national laws, as well as the application of appropriate prevention and detection controls. Such prevention controls include existing financial and other control and check mechanisms as stipulated in the Institute's Statutes.

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees and mechanisms for confidential reporting of any suspicious case have been put in place. It is the responsibility of all employees and other stakeholders to report all incidences of corruption and malpractices to their head of department or sections. KIMC Management is committed to sensitization and training of staff on matters of ethics and integrity in a bid to eradicate corruption in all its forms.

## **2.2 Legislative and administrative requirements/context**

The institute shall comply with and enforce legal instruments in the conduct of its business which includes:

- Leadership and integrity in chapter six of the constitution of Kenya 2010.
- The ethics and anti-corruption act 2011.
- The public officer's ethics act 2003
- The public procurement and disposal act 2005
- The public procurement and disposal regulations 2006
- The public financial management act 2012
- Performance contract
- Government circulars
- The State corporations act

With regard to this human resource Policy, the culture of KIMC is zero-tolerance to corruption. In a bid to focus the attention of the College's employees on fighting corruption, specific requirements have been developed to act as guides.

**These requirements are:**

- To promote public confidence in the integrity of the institute.
- To serve all people equally.
- To employ, promote and appoint staff based on qualification, integrity, competence and suitability of the position.
- To be honest in the execution of our duties.
- To declare any personal interest that may conflict with our duties.
- To be accountable to the public for decisions and actions made.
- To be objective and impartial in decision-making and in ensuring that decisions are not influenced by nepotism, favoritism, or other improper motives.
- To be disciplined and committed at work and in providing service to the stakeholders.
- To ensure that staff contractual terms are complied with.
- To ensure that the KIMC achieves the targets in the Performance Contract.
- To ensure that all expenditures made are lawful authorized, effective, and economical.
- To keep proper financial and accounting records.
- To ensure adequate protection of any financial or accounting records kept in electronic format by ensuring that such records are adequately backed-up and adequately protected against computer viruses.
- To ensure that all applicable procedures are followed in acquisition or disposal of property and that adequate arrangements are made for the custody, safeguarding and maintenance of property.
- To declare gifts received in the course of duty to the Management.
- To ensure that proper procedures are followed in admission, teaching and examination of all students.
- To train all KIMC staff on integrity.
- To comply with all statutory and legal requirements in force.

### **2.3 Scope/ applicability**

This policy applies to all individuals working at all levels and grades, including senior management officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, casual workers, agents, partners or any other person associated with us wherever located (collectively referred to as "Workers" in this policy).

### **3.0 DEFINITION OF CORRUPTION**

Corruption: It refers to misuse of office or authority for the benefit of an individual or a group through coercion, undue influence, misrepresentation, falsification, dishonesty, or any other improper acts or means in breach of laws, regulations and rules in force (EACC, 2003).

A bribe: It is an offer of money or favour to influence a public official. appropriate.

Offense: it refers to 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:

- Bribery or bribing of an agent (employee)
- Secret inducements for advice
- Deceiving the employer (Management)
- Conflict of interest
- Improper benefits to trustees for appointment
- Bid rigging
- Abuse of office
- Fraud
- Embezzlement or misappropriation of public funds
- Breach of trust
- Dishonesty in relation to taxes, rates or imposed levies
- Dishonesty in relation to election of persons to public office

## **4.0 BREAKDOWN OF CORRUPTION RISK AREAS AND CORRUPTION PRACTICES IN THE INSTITUTION**

### **4.1 Accounting department**

The accounting Department is one of the corruption risky areas, owing to the nature of work there that deals with finances all the time. In this Department, the Anti-Corruption Policy aims at preventing corruption through increased accountability, transparency, and minimizing discretion in financial matters.

#### **4.1.1 Corruption risky areas**

Corruption-risky areas within the Accounting Department include:

- Payment for goods and services
- Management of revenue and student debts
- Management of imprests
- Financial management information systems
- Expenditures and payment
- Handling of finances
- Clearance of students
- Handling of the safe

#### **4.1.2 Possible corruption practices**

Any of the following practices would be considered a corruption activity:

- Altering of cheque amount and name
- Holding/delaying cheques with a view to gaining financially from the customer
- Forging of signatures in cheques or authorizing documents
- Fraudulent activities such as bribing of cash/pay agents
- Extorting cash at pay points
- Misrepresenting financial statements
- Theft of cash and other resources
- Irregular investment of cash
- Fictitious payment for goods and services

#### **4.1.3 Strategies for corruption preventions**

- Receipts should only be raised in respect to provision of the deposit slip.
- All accountable documents and cash should be kept in a fireproof safe.
- Bank reconciliation should be up to date.
- Only an authorized person of integrity should keep keys to the safe.
- Cashbook should be up-to-date
- All the cash should be transported with at least two armed police officer escorts.
- Limit the amount of cash being transported at any one particular time.
- There should be an insurance cover for all cash in transit, as well as against fire and burglary damages.
- Establish financial policy and procedures to govern, revenue collection, imprest management, cash handling and banking, book keeping and accounting, investment, expenditure, payment and student data management.
- Operate within the budget and financial plan.
- Strictly adhere to relevant laws and regulations and best practices
- Institute strong internal control systems.
- Maintain proper accounting systems.
- Have a strong Internal Audit Department.
- Conduct periodic audits.

## **4.2 Supply chain Department**

Supply chain Department is one of the corruption-risk areas owing to its responsibility to award tenders for goods and services worth huge amounts of cash.

### **4.2.1 Possible corruption practices**

- Unfair distribution of request for quotations.
- 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.
- Unclear specifications tailored to favour a particular company.
- Inflation of prices of items in collaboration with the suppliers.
- Discouraging certain suppliers by not processing their documents in time.
- Personal use of goods in the pretext that they are being used in KIMC.
- Receiving substandard items and services on behalf of the KIMC.
- Delaying processing of suppliers' documents for payment.
- Indicating that items that have not been received have been received.
- Indicating that items that have not been issued have been issued.

### **4.2.2 Corruption prevention strategies**

- Ensure there is a proper Open Tendering system in place.
- Ensure goods are clearly specified and that the Inspection Committee inspects the goods before receiving them in the store.
- Ensure users receive issue notes for the goods issued to them.
- Issuing of goods should be done by several persons to verify requisitions.
- Ensure involvement of various committees to evaluate and award tenders.
- Bidders' representatives should attend opening of tenders to witness the opening.
- Use of pre-qualified suppliers who should be allowed to quote for goods and services.
- Users should leave the Procurement Department to do its work without interference.
- All specifications for particular items should be uniform.
- Brand names should not be used in specifications, as they indicate favouritism of certain manufacturers.
- Market research on prices should always be done every three months.
- Use of the price list provided by the Public Procurement Oversight Authority.
- Suggestion boxes should be availed to receive feedback from suppliers.
- Practice the open-door policy where suppliers can express their views.
- Hold regular meetings with suppliers.
- Ensure all quotations are sealed and submitted as hard copies.

### **4.3 Transport Department**

The transport unit has possible loopholes of corruption, ranging from fuel mismanagement, stretching journeys beyond authorized radius, to transporting of unauthorized goods or persons.

#### **4.3.1 Possible corruption practices**

The corruption practices in the Transport Department may include wrong fuel claims, using institutional vehicles for personal gain, and carrying unauthorized goods and persons at a fee while on official duty.

#### **4.3.2 Corruption prevention strategies**

- Approval of fuel should be commensurate to the distance covered (mileage) and fuel consumption to avoid surplus fuel remaining in the vehicle tanks.
- Authority to use the vehicles should be approved by the Director to avoid use of the vehicles for personal gain or exaggerated errands.
- There should always be someone in-charge to prohibit the driver from carrying unauthorized goods or passengers when the vehicles are out on official duty.
- Vehicle usage should be audited to verify distance covered.

### **4.4 Security unit**

There is a possibility of corruption owing to the long periods of time during which security of KIMC's goods, property, students and personnel is left to the discretion of staff of this unit.

#### **4.4.1 Possible corruption practices**

- Colluding with workers or students to pilfer college assets.
- Colluding with thugs to steal from the college premises.
- Lack of commitment to specific duties, e.g. accurate record-keeping at the gate.

#### **4.4.2 Corruption prevention strategies**

- Any item moving out of the college gate must be accompanied with a gate pass duly signed by the concerned department and approved by the Security Officer.
- Goods coming through the college gate must be checked and their intended final destination ascertained.
- Regular checking on security records by the person in-charge to ensure accountability.
- Hiring of security personnel of highest reputation and integrity.

## **4.5 Catering and Accommodation Department**

The Department's loopholes of corruption include security of goods in the store, meal services in the dining hall and allocation of accommodation spaces to students.

### **4.5.1 Possible corrupt practices**

- Pilfering of foodstuff, favoritism when serving students.
- Colluding with supplier to inflate the price/quantity of items supplied.
- Giving accommodation to students who have not paid.
- Providing substandard services to students.
- Interacting with the clients and giving them favours.
- Receiving undocumented goods, not spiking receipts, which end up re-circulating.

### **4.5.2 Corruption prevention strategies**

- Ensure the storekeeper controls what is being used in the kitchen.
- Reconcile the bed capacity with money collected in the Finance Department.

## **4.6 Examinations Section**

Examinations Office is one of the most important Departments in the institute. If the Department is not well guarded against corruption practices, it could result in leakage of examinations for financial gain or other benefits.

### **4.6.1 Possible corruption practices**

There are potentially many corruption loopholes in the Examinations Section by virtue of the fact that it is one of the core mandates of the institute. The following actions in the Examination Section are regarded by the college's as corruption practices:

- Setting sub-standard examinations due to inadequate coverage of subject or syllabus.
- Selling examination drafts to students.
- Careless handling of examination drafts as they are processed, leading to leakage of the examination questions.
- Allowing entry with bags, this may be used to siphon out examination papers.
- Allowing movement of unauthorized people in and out of the Examination Office.
- Failure to shred waste examination papers and disposing them off carelessly.
- Photocopying examinations outside the Examination Office.
- Illegal issuance of examination cards to students not cleared to sit examinations.
- Students mingling freely with the staff handling examinations.
- Failure of the internal examiner to proofread the examination, thus requiring proofreading by other persons.
- Failure to account for all examinations distributed to the typing pool.
- Colluding with students so that they can copy during examination sessions.
- Favoritism and discrimination when marking exams.
- Failure to report those found cheating in the examination.
- Students passing exceptionally in certain examinations.

#### **4.6.2 Strategies for prevention of corruption**

- Ensuring that examination rules and regulations are adhered to.
- Staff typing examinations should be senior and well remunerated.
- Ensuring that examination processing is as documented.
- Ensuring that officers of high integrity are deployed in the Examination Department.
- Appropriate identification of examiners when processing, proof-reading and administering examinations.

### **4.7 Training Departments**

There is a likelihood of occurrence of corruption practices, owing to the enormous discretion controlled by the lecturers. Such discretions include reporting on duty, instruction of students, assessment of students, and setting and marking of examination papers.

#### **4.7.1 Possible corruption practices**

The following practices are considered corrupt activities:

- Teaching contents of examinations with the aim of examining the same.
- Harassing students by demanding special favours from them in order to pass.
- Failing to attend classes as required.
- Going for lectures late and leaving lecture rooms early.
- Conspiring with students to skip some lectures.
- Failing to cover the subject matter in the course outline.
- Revealing sections that will be used to set examinations.
- Failing to mark and submit continuous assessment tests to students.
- Failing to give students adequate contact hours.
- Using alternative teaching modes and materials such as handouts.
- Favouring students with marks.
- Discriminating some students by gender, religion, and ethnicity.
- Seeking sexual favours from students in exchange for grades.
- Failing to keenly supervise students' assessments.
- Awarding of grades without assessment.

#### **4.7.2 Preventive measures**

- Paying attention to students' complaints about lecturer's method of teaching and grades that he/she is awarding.
- Monitoring and apprehending lecturers, who only make technical appearances.
- Constant monitoring of lecturers by the heads of departments.
- Allocating courses to ensure lecturers receive courses they can teach competently.
- Ensuring that the lectures know what is expected of them and addressing their needs.
- Assessing performance of lecturers by students.



## **4.8 Admissions Section**

In the Admissions Section, there is a likelihood of corruption practices, owing to discretion exercised by the person(s) charged with admitting, when to admit and criterion for admission.

### **4.8.1 Possible corrupt practices**

- Admitting non-qualified students.
- Bending admission rules to favour certain candidate(s).
- Registering students after the deadline has passed.
- Transferring students irregularly to another programme.
- Finalizing admission before approval of applications.
- Losing students files.
- Misadvising applicants and the public.
- Lack of updated and proper records.
- Lack of proper operating procedures.
- Engaging in tribalism when admitting students.
- Lack of admission criteria for certain programmes.

### **4.8.2 Preventive measures**

- Ensure admission documents (spreadsheets) are independently proof-read.
- Capture any form of inducement/bribery.
- Ensure that forms without application receipts are not accepted.
- Unduly signed application forms should not be accepted.
- Ensure that intake number tallies with the approved number.
- Ensure the Deans' Committee approves the short-listed candidates.
- Strictly adhere to admission criteria.
- Display the minimum entry requirements.
- Properly vet officers manning the Admission section
- Properly remunerate staff working in the Admission section
- Register/record all forms received.
- Compare class lists, nominal rolls with Deans' Committee recommendations.
- All forms to be duly signed by HODs, Deans and Registrar (Academic Affairs).
- All admission letters should be signed by the Director
- Computerize the Admissions section
- Institute effective filing system and practice good record keeping.

## **4.9 Human Resources Department**

### **4.9.1 Possible corruption practices**

- Engaging in tribalism/nepotism when recruiting.
- Recruiting unqualified staff.
- Demanding favours from recruits.
- Leaking interview questions to recruits.
- Involving interested parties in preparing job descriptions and in short-listing.
- Limiting circulation of job advertisements.
- Deploying employees in areas in which they are not competent to handle.
- Deploying or transferring employees for personal interests or punitive purposes.
- Constituting interview panelists with vested interests.
- The possible loopholes under human resource planning include ad hoc employment due to lack of employment guidelines, retention of redundant employees due to lack of succession plans, work-skills gap, leading to poor productivity, and lack of elaborate organizational structures.
- The process of staff training and development in the college is at times arbitrary and prone to abuse through arbitrary identification of persons to attend training, training staff not based on needs assessments, lack of a training plan, denying opportunities to deserving staff, and employees proceeding on training without knowledge of the employer.

### **4.9.2 Preventive measures**

- Adherence to terms and conditions of service.
- Adherence to scheme of work, indicating job descriptions and requisite qualifications.
- Interested parties should not take part in the recruitment and selection process.
- Advertisements should conform strictly to the job description and specification.
- Advertisements should be widely circulated to give room for wide exposure, competition and impartiality.
- Short-listing and appointment panelists should be people of integrity and who hold relevant and higher qualifications/ranking in the job at hand.
- A high integrity committee should deploy staff based on merit
- loopholes could be sealed by having a defined staff establishment plan consisting of:
  - Clear guidelines on the quantity and quality of personnel needed.
  - Types of skills required by KIMC from time-to-time.
- Short-term, intermediate and long-term plans to safeguard against ad hoc hiring, particularly of unqualified persons.
- Undertake training needs assessment and develop a training schedule to guide the training exercise.
- Develop a comprehensive plan for orientating newly recruited employees.
- Establish a training committee to award opportunities to deserving employees.
- Applying standard criteria in all staff training and development processes

## **4.10 Library Department**

The Library is one of the important sections as it is the custodian of learning resources in the college. The Management intends to make the library corruption-free to ensure all who use it benefit from the services and resources in it.

### **4.10.1 Possible corrupt practices**

- Staff may be sweet-talked to waive fines.
- Staff conspiring with the offender to under-charge.
- Failure to issue receipts for payments made.
- Staff issuing themselves with information materials un-procedurally.
- Staff may borrow for a client at the expense of other clients.
- Issuing clients with extra borrowing tickets.
- Plucking out pages and chapters from books.

### **4.10.2 Preventive measures**

- All prospective suppliers (booksellers), except publishers and Government institutions should be pre-qualified.
- Library staff should not lend themselves books, but instead ask their colleagues to process issuance to them.
- Clients should not borrow materials for friends.
- Clients should observe borrowing periods for fairness to prevail.
- All reserved materials should be issued to the deserving clients.
- Borrowers should not be allowed to use other identifications to borrow reserved materials apart from the Student or Staff ID cards
- Installing of CCTV cameras to deter vandalism and hiding of books in the library.

### **4.10.3 Structures to fight corruption**

The institute shall engage the established committee i.e. corruption prevention committee, audit committee of the council in devising mechanism to combat the corruption vice. It will also strength its internal auditing function to provide assurance on governance, risk management and internal control framework to ensure that they adequate and effective to deter corruption.

The institution will also partner with ethics and anti corruption commission in devising strategies, training and sensitization programs that will help imparting a good culture.

## **5.0 Composition of the CPC/ Integrity committee**

The KIMC Integrity Committee comprises:

- Director
- Deputy Director (Finance and Administration)
- Registrar (Academics)
- Corporate Secretary
- Administration Manager
- Head of production training
- Head of engineering training
- Head of film training
- Head of information training
- Head of post graduate training
- Chief librarian
- Principal hospitality officer
- Human resource manager
- Chief supply chain management officer
- Security in charge
- Head of ICT
- Chief internal auditor
- Head of corporate communication
- Finance Manager
- Dean of students
- Integrity assurance officer (secretary)

### **5.1.1 Mandate and the operations of the CPC**

The mandate of the corruption prevention committee is as follows:

- Setting priorities in prevention of corruption within the institute.
- Planning and coordinating corruption prevention strategies.
- Integrating all corruption prevention initiatives in the institution.
- Receiving and reviewing reports on corruption prevention initiatives and recommending appropriate action.
- Receiving and acting on corruption reports lodged by all KIMC clients and stakeholders. Evidence of concrete measures taken will be made available and any referrals to other agencies will be documented.
- Spearheading anti-corruption campaigns within its jurisdiction.
- Monitoring and evaluating the impact of corruption prevention initiatives.
- Submitting quarterly reports to the Performance Contract Steering Committee.

### **5.1.2 Internal audit reviews**

The internal audit unit will continuously review the internal control framework, the governance arrangements and risk managements aspects and make recommendations to management to streamline and strengthen controls. The reviews shall focus on high risk areas.

### **5.1.3 How to report corruption internally and externally**

All staff members and other stakeholders are charged with fighting corruption in all its forms. It is, therefore, the duty of all the staff members and stakeholders to report any corruption practices as soon as it is detected.

### **5.1.4 Avenues for Reporting Corruption Incidences**

The avenues could include any of the following routes:

- A letter
- Hotline
- Drop-in boxes
- Anonymous reporting to EACC available at the EACC website
- In person to EACC Officers
- Any other means convenient to the reporter
- Internal website

### **5.1.5 Handling of corruption cases**

The corruption cases shall be handled within the established mechanism provided in the human resource policies and procedure manual and filing both formal and informal complaints to the Ethics and Anti Corruption Commission.

### **5.1.6 Protection of whistleblowers**

Any person (whistleblower), who discloses corruption activities, will be protected against reprisals. No information leading to the identification of the reporter will be released without the whistleblower's consent.

### **5.1.7 Disciplinary measures**

The reports will be acted upon promptly and fairly by investigating the evidence according to the law. Any employee accused of corruption will have to step down to pave way for investigation. In all cases regarding the Anti-Corruption Policy, KIMC Management is the implementing authority. The Management will go about implementation of the Policy in accordance with established laws and other relevant anti-corruption legislation.

### **5.1.8 Training**

Kenya institute of mass communication will periodically carry out training and sensitization workshops to employees and members of the CPC. This will be through an engagement with EACC and other motivational speakers.

The Institute will also produce brochures and fliers which will be circulated to members of staff and its clients.

### **5.1.9 Management/ implementation authority**

The KIMC Management will be responsible of implementation of this Policy. However, all the stakeholders shall be called upon to participate at the individual and collective level.

Management and senior staff at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

### **5.1.10 Responsibilities of employees**

- You must ensure that you read, understand and comply with this policy at all times.
- You must be open about gifts and hospitality given or received and you must disclose these to your manager in advance (where it is possible to do so, or as soon as possible afterwards).
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your manager or the Chief Internal Auditor as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a customer or potential customer offers you something to gain a business advantage with us, or indicates to you that a gift or payment is

- required to secure their business. Further indicators that may point towards bribery or corruption.
- Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.
  - We reserve our right to terminate our contractual relationship with other Workers if they breach this policy.

#### **5.1.11 Monitoring and Review**

- The Corruption prevention committee members will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible.
- All Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- Workers are invited to comment on this policy and suggest ways in which it might be improved.
- Comments, suggestions and queries should be addressed to the Compliance officer.
- This policy will be reviewed regularly in consultation with the Integrity Committee. The Committee shall further ensure that data relating to corrupt practices in the institute is updated annually. The Committee shall also monitor both staff and students to evaluate the degree of satisfaction with the services provided.