

MBEYA UNIVERSITY OF SCIENCE AND TECHNOLOGY



ANTI-CORRUPTION POLICY

AUGUST 2024

FOREWORDS

Mbeya University of Science and Technology (MUST) has an obligation to implement the prevention and combating of corruption Act of 2007, the National Anti-Corruption Strategic Plan III (NACSAP III 2017-2022) and Strategic Objective B of the MUST Corporate Strategic Plan 2021/2022 - 2026/2027 which deals with the Nation Anti-Corruption Agenda. The Policy provides a framework for ensuring a corruption-free service delivery at MUST. In this endeavour, it is worth that MUST is propelled by its mandate, vision, mission, core values and strategic objectives contained in the Corporate Strategic Plan (2021/22 - 2026/27).

In this regard, MUST seeks to contribute to the nation by creating a generation of graduates and staff who are against corruption. It aims at ensuring that those who work and study at the University are aware that corruption is unacceptable. In order to achieve the objective B, adequate measures must be in place through reviewing, formulation and implementation of appropriate Anti-Corruption Policy strategies. Consequently, the production of the University's quality and competitive products shall greatly imply quality training and committed teamwork in implementing among others the Anti-Corruption Policy that best fits the clients' needs and satisfactions from services delivered by MUST. All MUST staff and the community at large are obliged to effectively implement this Policy in order to maintain integrity, transparency, fairness, justice, equity, respect for the Rule of Law towards quality training, research and consultancy services to our esteemed clients. Henceforth, MUST Management shall not tolerate any form of corruption.

Prof. Aloys Mvuma
Vice Chancellor
August, 2024

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ABBREVIATIONS AND ACRONYMS

CC	Corporate Council
DVC ARC	Deputy Vice Chancellor Academic Research and Consultancy
DVC PFA	Deputy Vice Chancellor Planning Finance and Administration
ESC	Ethics Sub Committee
GoT	Government of Tanzania
MCB	MUST Consultancy Bureau
MIST	Mbeya Institute of Science and Technology
MTC	Mbeya Technical College
MUST	Mbeya University of Science and Technology
MUSTSO	Mbeya University of Science and Technology Students Organization
PCCB	Prevention and Combating of Corruption Bureau
SMC	Special
TCU	Tanzania Commission for Universities
VC	Vice Chancellor
VFM	Value for Money

DEFINITION OF TERMS

In the context of this Policy the following definitions shall apply:

MUST Community Entails Employees of MUST, Students and the MUST Management.

Bribery Is the offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Inducement can take the form of gifts, hospitality, fees, rewards, jobs, internships, examination grades, favours or other advantages.

Conflict of Interest Means a clash of interest between benefits to individual and that of an Institution.

Coordinator Means a Secretary of Ethics Subcommittee, also known as a Focal Person.

Corruption Means a dishonest activity in which an individual acts contrary to the interests of an Institution and abuses their position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.

e-Mrejesho Means is a platform that enables stakeholders

to submit and track complaints.

Illegal Income Means any income generated from breach of law.

Personal Benefits Refers to a gift, favour and concession given to an individual against the law and procedures.

Property Includes money, resources visible or invisible, movable or immovable, tangible or intangible.

Public Means the community.

Public Institution A facility that is either an organizational part of a governmental entity or over which a governmental unit exercises final administrative control.

Minor Value Procurement Means procurement with an amount of money up to a maximum limit for the procurement of goods, works or consultancy of a minor nature.

The University Means Mbeya University of Science and Technology (MUST).

The Institute Means Mbeya Institute of Science and Technology (MIST).

University Official Means any person holding leadership

responsibilities and position at the University.

Whistle-blower

Includes, anybody, who in good spirit, reports on corruption to the responsible person or MUST Office.

Gender

Social and cultural differences between men and women, boys and girls offer them a value, unequal opportunities and chances in life. The inequality rests also on masculine and feminine characteristics as well as aptitudes and perspectives concerning the comportment of women and men in society.

CHAPTER ONE

BACKGROUND INFORMATION

1.1 Background Information

The history of Mbeya University of Science and Technology (MUST) dates back to 1986 when Mbeya Technical College (MTC) was established by the Government of Tanzania for the purpose of training Full Technicians at Certificate Level (FTC) under the Russia - Tanzania Training Support. The College existed up to mid-2005 offering programmes in the fields of Architecture Technology, Electrical Engineering, Civil Engineering and Mechanical Engineering. In July 2005, MTC was transformed into a comprehensive multi-disciplinary Mbeya Institute of Science and Technology (MIST) by the National Council for Technical Education (NACTE) Establishment Order, 2004.

The transformation was a Government move towards strengthening the College to become a fully-fledged University. Mbeya Institute of Science and Technology registered a number of achievements including restructuring of FTC programmes to Ordinary Diploma programme and introduction of Undergraduate Degree programmes which eventually lead to expansion of student enrolment. Following these achievements, on 29th March 2012 after being issued with a University Provisional License by Tanzania Commission for Universities (TCU), the Institute was transformed to a fully-fledged University namely Mbeya University of Science and Technology (MUST). The University was granted Mbeya University of Science and Technology Charter, 2013 on 20th August 2013.

The purpose of this Policy is to guide general conduct of anti-corruption issues at the University.

1.2 MUST Vision

The Vision of Mbeya University of Science and Technology is to become the leading center of excellence for knowledge, skills and applied education in science and technology.

1.3 MUST Mission

The Mission of Mbeya University of Science and Technology is to develop academically, technologically and socially competent students, staff and other stakeholders who shall be responsive to the broader needs and challenges of the society specified by:

- (a) Facilitating appropriate tuition, practical training and support according to the needs of students and other customers;
- (b) Encouraging staff commitment to quality education and services including research, consultancy and innovation;
- (c) Fostering lifelong learning, honesty and responsibility;
- (d) Promoting an environment conducive to human development; and
- (e) Promoting effective entrepreneurship and usage of appropriate technology that meet national and international needs and standards through skills and practical oriented training, research and consultancy.

1.4 Situational Analysis

As of 2024, the time of revising this policy, MUST has done the following intervention to foster anti-corruption related activities:

- (a) Establishment of Students Anti-corruption club;
- (b) Increased training and sensitization to MUST staff and students on anti-corruption related issues;

- (c) Review of the MUST Anti-Corruption Policy (2018);
- (d) Administer anti-corruption issues through University Anti-Corruption Sub-committee; and
- (e) Establishment of fraud risk management guideline.

1.5 Justification for MUST Anti-Corruption Policy

One of the major constraints that have hampered the Government's drive towards achieving improvement in the economy is the widespread of corruption that flourish at all levels of the Society. This has led to, among others, mistrust of public administration by members of the public. Under these circumstances, the Government finds it is absolutely imperative to institute drastic measures to deal with the scourge.

Since MUST is among public institutions, it is imperative to take proactive measures to re-address the issue of corruption more systematically. The University acknowledges that corruption denies the rights of an individual, debilitates morale and clogs the working and learning environment for the University as a whole. The MUST Anti-Corruption Policy, therefore, aspires to pre-empt these vices in MUST Community and beyond.

CHAPTER TWO

POLICY INTRODUCTION

2.1 INTRODUCTION

The Anti-Corruption Policy based on the anti-corruption legislation of Prevention and Combating of Corruption Act No. 11 Revised Edition of 2022, requires that any citizen must not either directly or indirectly:

- (a) Offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or a company, wherever they are located and whether they are a public official or body, or private person; and
- (b) Gain or retain any commercial, contractual or regulatory advantage through unethical or illegal means when conducting functions on behalf of the University or its subsidiaries.

Staff are supposed to read, understand and strictly comply with the Prevention and Combating of Corruption Act in all duties they are engaged in.

2.2 POLICY VISION

To be a University with zero tolerance in bribery and corruption issues.

2.3 POLICY MISSION

To develop anti-corruption system that shall increase highest level of transparency, integrity and accountability.

2.4 POLICY GOAL

The goal of the Anti-Corruption Policy is to promote a culture of ethics and values.

2.5 POLICY OBJECTIVE

2.5.1 Main Objective

The main objective of MUST Anticorruption Policy is to minimize and prevent the occurrence of both petty and grand corruption.

2.5.2 Specific Objectives

The Specific objectives of the Policy are to:

- (a) Ensure fairness in both academic and administrative service delivery;
- (b) Set out clear University's position on corruption and anti-corruption measures;
- (c) Ensure participation by all employees and students in fighting against corruption;
- (d) Discourage all forms of corruption in utilization of University's resources and assets; and
- (e) Enhance customer satisfaction and value for money for the rendered services.

2.6 POLICY PHILOSOPHY

The philosophy of this policy is to enhance accountability, transparency and ethical practices.

2.7 POLICY SCOPE

This Policy applies to all University activities and procedures undertaken by the Mbeya University of Science and Technology. Generally, it applies to all Colleges, Schools, Institutes, Directorates, Administrative Divisions/Units, Centre and any University activities and to all third parties who are retained by the University to perform services for or on behalf of the University including but not limited to contractors, agents, associates, subsidiaries, joint ventures and consortium partners for both in Tanzania and overseas.

CHAPTER THREE

POLICY ISSUES, STATEMENTS AND STRATEGIES

3.0 Introduction

This chapter presents policy issues, statements and strategies. Its purpose is to introduce the subject matters to work on, state what requires to be adhere to, its objectives, standards, and values of the issue. It also describes what to accomplish in each policy statement and the aim to address the issue.

3.1 Policy Issue: Students' Admission and Registration

The number of admitted students at MUST has been increasing each year, thus leading to circumstances which may induce corrupt practices during student admission and registration. This is due to the fact that some applicants may not meet the minimum prerequisite conditions for admission. In addition, those who meet requirements may have not been admitted in programmes of their choices thus trying to change programmes during registration.

3.1.1 Policy statement

MUST shall endeavour to improve the admission system with clear organizational structure and competent staff built on principles of accountability, transparency and fairness so as to eliminate occurrence of corruption.

3.1.2 Policy strategy

In this regard, MUST shall:

- (i) Ensure that the admission and registration guidelines are set, complied with TCU guidelines, published and observed;

- (ii) Ensure that the process of admission and registration is transparent;
- (iii) Institute effective filing system and practice good record keeping of all admission and registration documents;
- (iv) Ensure that only vetted officers are working at the Admission Office;
- (v) Strictly maintain automated admission process; and
- (vi) Prescribe stringent penalties for contravention of admission and registration guidelines.

3.2 Policy Issue: Examinations

Examinations are central in ensuring quality of education in an academic institution. Moreover, examination is a key to assess students learning outcomes and academic competences. The examination system in place is modelled around the semester system whereby, student's assessments take the form of:

- (a) Continuous Assessments through assignments, timed tests, essays, case studies, laboratory reports, studio reports and project reports; and
- (b) University Examinations at the end of the semester; this is normally written but also can be oral depending on the subject.

Both, continuous assessment and end of the semester examinations, bribe may happen through examination setters, moderators and invigilators on the leakage of examinations, adjusting examinations results, and tempering with uploaded results.

3.2.1 Policy Statement

MUST shall strive to improve quality of its examination system by instituting fairness, equity, public acceptance, transparency and

efficiency by adhering to examination regulations with the view of eliminating loopholes for bribery.

3.2.2 Policy Strategy

In this regard, MUST shall:

- (i) Adhere to regulations and guidelines for handling examinations;
- (ii) Set examinations in a confidential manner;
- (iii) Vet Examination Officers of high integrity for Examination Unit, Departments and Colleges;
- (iv) Appropriately identify examiners for moderation, processing, proof-reading invigilation and administering examinations;
- (v) Safeguard examination and track any examination leakages;
- (vi) Issue examination IDs to MUST bonafide students; and
- (vii) Ensure University's examinations are fairly marked and coursework are fairly distributed.

3.3 Policy Issue: Student Welfare

The student welfare covers student accommodation, catering, student health, guidance and counselling.

3.3.1 Policy Issue 1: Student Accommodation

The pace of increasing students' population is not proportional to the development of the infrastructure such as students' hostels. This situation creates environment whereby students compete for the few hostels available, hence attract corruption practices.

3.3.1.1 Policy statement

MUST shall strive to improve student accommodation system and infrastructure.

3.3.1.2 Policy strategy

In this regard, MUST shall:

- (i) Adhere to regulations and guidelines for students' accommodation;
- (ii) Build more hostels to accommodate more students;
- (iii) Strengthen Public Private Partnership;
- (iv) Ensure accessible accommodation system;
- (v) Ensure ethical practices and high customer care in service delivery; and
- (vi) Encourage reporting mechanism for any suspicious issues.

3.3.2 Policy Issue 2: Catering

MUST has government sponsored students who qualify for food services from the government caterer. During the process of service delivery; there are issues or activities that attract corruption practices such as consuming food services without paying and providing food service to non-government sponsored students. These issues attract corruption practice for accountants, students and staff dealing with student welfares.

3.3.2.1 Policy statement

MUST shall strive to improve catering service and systems to government sponsored students.

3.3.2.2 Policy strategy

In this regard, MUST shall:

- (i) Provide channels for whistleblowers to report any irregularities;
- (ii) Conduct regular audit for catering service; and
- (iii) Strictly maintain transparency and good identification system for government sponsored students.

3.3.3 Policy Issue 3: Student Health

Health Centre receives patients from outside and within the University. In the health service delivery, there is the likelihood of handling incorrectly liquid cash collected from patients, pricing drugs and medical equipment with intention of getting bribe. Also, there is a possibility of corrupt practices to students who request medical examination report to excuse them to sit for examination or as the justification for not sitting for an examination.

3.3.3.1 Policy statement

MUST shall ensure health service delivery in a transparency and ethical manner.

3.3.3.2 Policy strategy

In this regard, MUST shall:

- (i) Ensure that health center is connected to the health government payment system to control all payments;
- (ii) Develop a cueing system whereby patients are issued with numbers in the order to see a doctor except in emergency cases;
- (iii) Ensure there is appropriate documentation for emergency patients when they get service before paying; and
- (iv) Provide regular ethical training for both staff and students.

3.3.4 Policy Issue 4: Sports and games

MUST is experiencing gradual increase in number of students and staff who are interested with sports and games while the financial resources are inadequate to accommodate all to participate sports events. This situation attracts bribe in selection of players, and creates chance for gender bias in participating in various competitions.

3.3.4.1 Policy Statement

MUST shall strive to ensure adequate budget against number of players with gender equality.

3.3.4.2 Policy strategy

In this regard, MUST shall:

- (i) Adhere to requirements of MUST Sports and Games and Gender Policy;
- (ii) Ensure fair distributions of financial resources in Sports and Games Policy; and
- (iii) Promote a culture of fairness, respect and integrity.

3.4 Policy Issue: Staff Matters and Administration

The University employs academic, technical and administrative staff. As the University grows and its activities expand, the loopholes for bribe and abuse of power may happen when employees entrusted by the University are not committed to their responsibilities.

3.4.1 Policy Statement

MUST shall embark on fairness and transparency on recruitment, training, promotion, provision of staff welfare, adherence of rules and regulation and among others.

3.4.2 Policy strategy

In this regard, MUST shall:

- (i) Ensure fairness and transparency in the recruitment process;
- (ii) Ensure Training Need Assessment (TNA) is adhered;
- (iii) Adhere to rules and regulations governing administration and human resource issues; and
- (iv) Ensure fair provision of staff welfare.

3.5 Policy Issue: Healthy Service

MUST Health Centre receives patients within and outside the University Campuses. In the health service delivery, there are issues of handling liquid cash, issuing medical equipment, non-adherence to queuing arrangement and pricing of drugs. Hence, create loopholes for corrupt practices.

3.5.1 Policy Statement

MUST shall ensure good health of its community through provision of optimal health services.

3.5.2 Policy Strategies

In this regard, MUST shall:

- (i) Ensure that Health Centre is connected to the health government payment system to control all payments;
- (ii) Develop a queuing system whereby patients are issued with numbers to see a doctor, except in emergency cases; and
- (iii) Ensure that there is appropriate documentation for emergency patients when admitted.

3.6 Policy Issue: Student governance

MUST is experiencing an increased number of students due the expansion of its infrastructure to admit and enroll a large number from time to time so as to meet its demand. Loopholes for bribe and abuse of power such as nepotism and favoritism and weak financial control may happen when the student governance entrusted is not committed to its responsibilities.

3.6.1 Policy Statement

MUST shall ensure that all services are easily accessible and understood by the student governance.

3.6.2 Policy strategies

In this regard MUST shall:

- (i) Conduct workshop and awareness campaigns to educate students about the effects of corruption and importance of ethical governance;
- (ii) Establish a clear code of conduct for student governance, outlining expected behavior and consequences for violating ethical standards;
- (iii) Implement mechanisms to protect whistleblowers who report corrupt practices and fostering a culture where individuals feel safe to give out information; and
- (iv) Conduct regular audits of student governance finances and activities to identify and address any irregularities.

3.7 Policy issue: Gender

Gender imbalance is one of the major problems in higher learning institutions in Tanzania particularly in science and technology institutions. Corruption in gender-related issues can involve various

loopholes, such as biased hiring processes, sponsoring students and favoritism.

3.7.1 Policy statement

MUST shall address corrupt practices encompassing all aspects of gender dimensions.

3.7.2 Policy strategies

In this regard, MUST shall:

- (i) Endeavor to continue to fight against corruption in all forms of discrimination or favoritism based on gender;
- (ii) Promote accountability;
- (iii) Enforce anti- corruption measures; and
- (iv) Foster a culture of equality and fairness.

3.8 Policy issue: Compliance to Financial Rules and Regulation

In performing core mission and support activities, some financial transactions guided by financial regulations are involved. Utilization of funds shall be done appropriately and in accordance with the University Financial Regulations. Corrupt practices may arise when there is no adherence to these regulations and *lacuna*.

3.8.1 Policy Statement

MUST shall endeavour to ensure all staff members and clients become accountable in using Government funds by adhering to University Financial Regulations and procedures. In case of any weakness to these controls, regular review shall be implemented to get rid of corrupt practices.

3.8.2 Policy strategies

In this regard, MUST shall ensure that:

- (i) Financial regulations in place are adhered to by each member of the community;
- (ii) Accountability is enhanced to every user of the public funds;
- (iii) Regulations are reviewed on regular basis following weaknesses found in them; and
- (iv) Transparency is enhanced while implementing the financial regulations.

3.9 Policy Issue: Procurement and Tendering

Public procurement is particularly susceptible to corruption such as collusion to fix prices, maintenance of alliance and other practices that prevent competition and mean that the University does not receive Value for Money (VFM) in the procurement process.

Also, corruption may arise in the whole tendering process (pre- tendering phase, tendering phase and post award phase) subject to lack of integrity among the MUST officials entrusted to execute their duties on tendering and procurement, as a result corruption loopholes.

3.9.1 Policy Statement

MUST shall ensure compliance of Value for Money (VFM) in the procurement process.

3.9.2 Policy Strategies

In this regard, MUST shall ensure that:

- (i) E-procurement is enhanced than the manual procurement process;

- (ii) Transparency in the tendering process and tendering committee in evaluation and awarding of tenders;
- (iii) Tendering committee entails ethical people with high level of integrity;
- (iv) Inspection committee inspects the goods before receiving them in the store and goods must be clearly specified;
- (v) Issuing of goods shall be done with several persons to verify requisitions;
- (vi) Engineers' estimates shall be entrusted to one person before the opening of the tender to avoid leakage of information;
- (vii) Opening of tenders shall be witnessed by the representatives of bidders;
- (viii) Tendering procedures, purchases of materials and services as well as the award of contracts adheres to the Public Procurement Act as amended from time to time; and
- (ix) The value for money to all goods and services offered is achieved.

3.10 Policy Issue: Contract Management

On tendering process vendors may fail to disclose accurate cost or pricing data in their price proposals, that may result in significant increased price (variations) on contract price and there could be a conflict of interest and corruption in the approval process.

On post-award phase there could be abuses of the supplier in performing the contract in relation to its quality, price and timing, substantial change in contract conditions to allow more time and/or higher prices for the bidder. Furthermore, the procurement processes and procedures of goods

and services which fall under minor value procurement are problematic and provide loopholes for corrupt individuals to benefit.

3.10.1 Policy Statement

MUST is committed to ensure that it receives the value for money (VFM) in contracts executed.

3.10.2 Policy Strategies

In this regard, MUST shall ensure that:

- (i) Engagement of suppliers and contractors of building and estate related services is subject to approval;
- (ii) The Estate Manager shall not single-handedly certify any contractor and work done. But, it shall do it together with the team members including quality controllers;
- (iii) Transparency is adhered in hiring contract workers;
- (iv) Contract workers are closely supervised for delivery of quality work;
- (v) Regular review of weaknesses found in internal controls is conducted;
- (vi) Contractors and suppliers involved in corrupt practices recover losses;
- (vii) Contractors and suppliers involved in corrupt practices shall be blacklisted in partnering with MUST; and
- (viii) The principles of integrity and transparency are enhanced to achieve the value for money of contracts.

CHAPTER FOUR

POLICY COMMUNICATION AND IMPLEMENTATION

4.0 Introduction

This chapter presents organization structure of the University and responsibilities of different offices and obligations of stakeholders in the implementation of Anti-corruption Policy.

4.1 Organization Structure

The purpose of the administrative structure is to define and delegate responsibilities, to establish relationships for enabling people to work and ensure effective systems and mechanisms for communications. The Anti-corruption Policy is under the office of the Vice Chancellor whose administrative structure is shown in Figure 1.

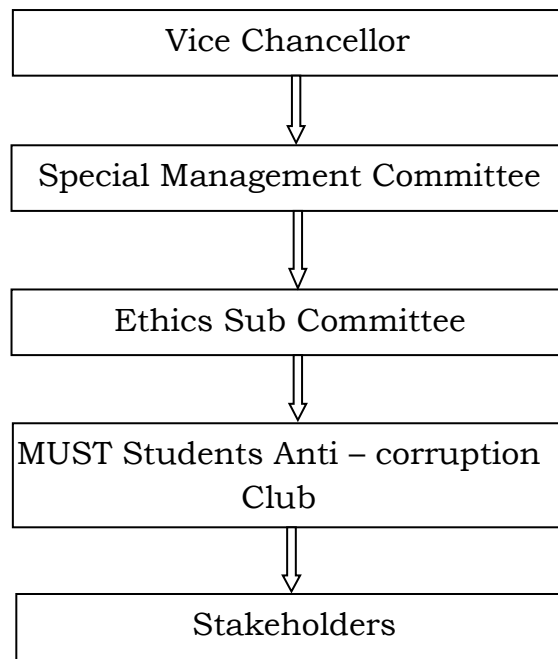


Figure 1: Anti-Corruption Administrative Structure

4.2 The Role of Vice chancellor

The Vice Chancellor shall be responsible to:

- (a) Set the ethical tone at the top, fostering a culture of integrity and zero tolerance for corruption;
- (b) Ensure the effective implementation of Anti-Corruption Policy across the university; and
- (c) Monitor and evaluate the effectiveness of the Anti-Corruption Policy, assessing whether the procedures in place are being followed to achieve the desired outcomes.

4.3 Composition of Special Management Committee

There shall be Special Management Committee which shall consist of:

- (a) The Vice Chancellor, who shall be the Chairperson;
- (b) Principals/Directors/Head of Units operating under VC;
- (c) Units under the Vice Chancellor`s office: Corporate Counsel, Head of communication and Marketing Unit, Head of Internal Audit Unit and Head of Procurement and Management Unit; and
- (d) The Secretary who shall be appointed by the Vice Chancellor amongst Special Management Committee members.

4.3.1 The Roles of the Special Management Committee

Special Management Committee shall be responsible to:

- (a) Ensure Ethics Subcommittee is establishment and operates in accordance with the monitoring, evaluation, and learning framework;
- (b) Ensure the implementation of the anti-corruption strategy is included in the annual budget in order to perform planned activities;
- (c) Prepare, endorse and implement the Anti-corruption Policy;

- (d) Ensure Staff adhere and implement laws, regulations and guidelines in relation to their professional ethics;
- (e) Take necessary measures to control all forms of corruption, administrative offenses and unethical practices;
- (f) Promote transparency and accountability in implementing University objectives;
- (g) Establish a system for receiving and handling complaints that ensures confidentiality;
- (h) Include the results of the corruption risk assessment in the risks register; and
- (i) Receive and review quarterly and annual report from Ethics Subcommittee and submit them to the Chief Secretary.

4.3.2 The Roles of Chairperson in Special Management Committee

The Chairperson of Special Management Committee shall be responsible to:

- (a) Ensure meetings are conducted according to schedules;
- (b) Chair and facilitate the smooth running of the meetings;
- (c) Report the outcome of the meetings to the Management; and
- (d) Ensure that extraordinary meetings are conducted when necessary.

4.3.3 The Roles of Secretary in Special Management Committee

The Secretary of Ethics Subcommittee shall be responsible to:

- (a) Coordinate as focal person for the implementation of the National Anti-Corruption Strategy;
- (b) Organize the subcommittee meetings after consultation with Chairperson;
- (c) Present report on corruptions complains to the Subcommittee;
- (d) Prepare minutes and keep records of the meetings;
- (e) Oversee implementation of deliberations of the meetings; and

- (f) Present reports on implementations of anti-corruption interventions to the meetings.

4.3.4 Tenure of Special Management Committee

The Special Management Committee shall have a tenure of three (3) years from appointment date.

4.4 Composition of Ethics Subcommittee (ESC)

There shall be Ethics Subcommittee which shall mainstream anti-corruption practices in the University. The subcommittee shall be composed of five (5) members with gender balance. The composition of the subcommittee shall be:

- (a) The Chairperson, who shall be appointed by the Vice Chancellor from amongst University senior staff with integrity character;
- (b) Three members appointed by the Vice Chancellor;
- (c) One member shall be appointed by Vice Chancellor from other government institution; and
- (d) The Secretary shall be appointed by the Vice Chancellor amongst staff under Directorate of Administration and Human Resource Management who shall also be the coordinator (focal person) in implementing NASCAP-2023/2030.

4.4.1 Roles of the Ethics Subcommittee

Ethics Subcommittee shall be responsible to:

- (a) Prepare and submit quarterly and annual report to the Special Management Committee;
- (b) Identify vulnerable areas to corruption and prepare interventions;

- (c) Identify and prepare an action plan for implementing anti-corruption activities that align with the strategy and report to a special management committee;
- (d) Receive, analyze, and address complaints from within and outside the College arising from ethical violations. The committee will take action within seven days;
- (e) Planning and implementing capacity-building initiatives for employees and students on ethics, combating corruption, and good governance;
- (f) Monitor the implementation of orientation seminar for new employees/students and employees who have been promoted or appointed;
- (g) Advise the management on issues related to ethics, corruption and good governance;
- (h) Develop and execute the action plan for the fourth NASCAP 2023/2030 strategy in collaboration with the MUST Students Anti-Corruption Club;
- (i) Organize meetings and seminars related to anti-corruption matters in service delivery;
- (j) Advertise and promote anti-corruption activities; and
- (k) Perform any other duty as may be assigned by higher authority.

4.4.2 The roles of Chairperson in Ethics Subcommittee

The Chairperson of Ethics Subcommittee shall be responsible to:

- (a) Ensure meetings are conducted according to schedules;
- (b) Chair and facilitate the smooth running of the meetings;
- (c) Report the outcome of the meetings to the Special Management Committee; and
- (d) Ensure that extraordinary meetings are conducted when necessary.

4.4.3 The roles of Secretary in Ethics Subcommittee

The Secretary of Ethics Subcommittee shall be responsible to:

- (a) Coordinate as focal person for the implementation of the National Anti-Corruption Strategy;
- (b) Organize the subcommittee meetings after consultation with Chairperson;
- (c) Collect and document corruption complaints then present them to the Ethics Subcommittee;
- (d) Prepare minutes and keep records of the meetings;
- (e) Oversee implementation of deliberations of the meetings; and
- (f) Present reports on implementations of anti-corruption interventions to the meetings.

4.4.4 Tenure of Ethics Subcommittee (ESC)

The Ethics Subcommittee shall have a tenure of three (3) years from appointment date.

4.5 Roles of MUST Students Anti-Corruption Club

The MUST Students Anti-Corruption Club shall perform the following duties:

- (a) Prepare and submit quarterly and annual report to the Special Management Committee;
- (a) Keeping and updating records of anti-corruption activities undertaken at the University;
- (b) Day to day operations and management of the anti-corruption activities;
- (c) Monitoring of unethical activities in service delivery to students across the University;
- (d) Spearhead the implementation of the Anti-Corruption strategies;
- (e) Communicate with anti-corruption collaborators;
- (f) Preparing budgets for students' anti-corruption activities;

- (g) Oversee MUSTSO leaders' procedures during annual election on compliance to students' by-laws;
- (h) Plan the schedule of annual activities and submit to the Sub Committee for recommendations; and
- (i) Perform any other duty as may be assigned by higher authority.

4.6 Rights and obligations of stakeholders

The rights and obligations of anti-corruption stakeholders shall include:

(a) Stakeholders' rights

Stakeholders right shall be:

- (i) Protection from retaliation or harm when reporting corruption or unethical behavior;
- (ii) Confidentiality on their identities and the information they provide kept confidential, if desired;
- (iii) Fair treatment and equitability in all proceedings related to their reports or involvement in anti-corruption efforts; and
- (iv) Participate in anti-corruption initiatives and to have their voices heard in relevant forums or discussions.

(b) Stakeholders' Obligations

Stakeholders' obligations shall be:

- (i) Reporting any observed or suspected corruption or unethical behavior in a timely and accurate manner;
- (ii) Providing accurate information with truthful and based on evidence to support effective investigation and action;
- (iii) Cooperating with investigations and other anti-corruption activities, including providing necessary documentation or testimony;
- (iv) Respecting confidentiality of others involved in the anti-corruption process and avoid disclosing sensitive information inappropriately;

- (v) Promoting integrity and uphold ethical standards in their own conduct and within their spheres of influence; and
- (i) Adhering to the Anti-Corruption Policy in service delivery.

4.7 Methods for submitting corruption complaints

The methods of submitting corruption complains shall be through:

- (a) e-Mrejesho system;
- (b) Email or postal mail through postal address and traditional mail;
- (c) In-person through direct speaking with the coordinator;
- (d) Telephone through making a phone call or sending a message; and
- (e) Suggestion box.

4.8 Procedures of submitting and handling corruption complaints

The procedure for submitting corruptions and unethical complaints will be as follows;

- (a) All complaints shall be submitted to the Secretary of Ethics Subcommittee (Coordinator);
- (b) The coordinator will receive, document and present the complaint to the Ethics Subcommittee;
- (c) Ethics Subcommittee shall receive and scrutinize the complaint accordingly then take action within seven days; and
- (d) The Ethics Subcommittee shall report the matter(s) in the Quarterly or Annual Special Management Committee.

CHAPTER FIVE

MONITORING AND EVALUATION

5.0 Introduction

This chapter presents monitoring and evaluation in the process of the implementation of Anti-corruption Policy.

5.1 Monitoring

Monitoring is a continuous process to assess progress and bottlenecks on the process of implementation of the Policy. Evaluation is to assess the achieved results against expected ones. The process of evaluation observes what have happened and how activities have been implemented in relation to ethical matters.

The main indicators for Monitoring and evaluation (M&E) include: input, process, output, outcome, impact and sustainability:

- (i) Inputs - refers to resources required to achieve a given objective (% of resources invested);
- (ii) Process - focuses on how objectives shall be implemented and how it operates through the use of resources to accomplish the planned activities (Efficiency of the process in comparison to inputs and outputs);
- (iii) Output – Products and services which result from the execution of activities;
- (iv) Outcome - what is likely to be achieved in short and medium-term/long term effects of the planned activities (extent of behavioral change of participants);
- (v) Impact - positive or negative, primary or secondary long-term effects produced by a development intervention, directly or indirectly, intended or unintended (positive or negative change); and

- (vi) Sustainability as learning - whether the participants in the planned activities have become capable of learning and managing the outcomes (Duration since its inception).

5.2 Tools for Monitoring and Evaluation

Some tools for M&E can be chosen among others in the following list as deemed necessary:

- (i) **Case study:** A detailed descriptive narrative of individuals, departments, colleges, events, program, or time periods. They are particularly useful in evaluating situations and exploring qualitative impact related to ethical matters.
- (ii) **Checklist:** A list of items used for validating or inspecting that procedures/steps have been followed, or the presence of examined behaviours that influence unethical matters;
- (iii) **Closed-ended (structured) interview:** A technique for interviewing that uses carefully organized questions that only allow a limited range of answers, such as “Yes/No,” or expressed by a rating/number on a scale. Replies can easily be numerically coded for statistical analysis;
- (iv) **Community interviews/meeting:** A form of public meeting open to all community members. Interaction is between the participants and the interviewer, who presides over the meeting and asks questions following a prepared interview guide;
- (v) **Direct observation:** A record of what observers see and hear at a specified site, using a detailed observation form. Observation may be of physical surroundings, activities, or processes in service delivery;
- (vi) **Focus group discussion:** Focused discussion with a small group of participants to record attitudes, perceptions, and beliefs pertinent to the issues being examined in ethical matters;

A moderator introduces the topic and uses a prepared interview guide to lead the discussion and elicit discussion, opinions, and reactions;

- (vii) **Key informant interview:** An interview with a person having special information on corruption practices. These interviews are generally conducted in an open-ended or semi-structured fashion;
- (viii) **Mini-survey:** Data collected from limited participants, usually selected using non-probability sampling techniques. Structured questionnaires with a limited number of closed-ended questions are used to generate quantitative data that can be collected and analysed quickly;
- (ix) **Most Significant Change:** A participatory monitoring technique based on stories about important or significant changes on ethical practices, rather than indicators. They give a rich picture of the impact of development work and provide the basis for dialogue over key objectives and the value of development programs;
- (x) **Open-ended interview:** A technique for questioning that allows the interviewer to probe and follow up topics of interest in depth (rather than just “yes/no” questions);
- (xi) **Participant observation:** A technique that requires the researcher to spend considerable time with the group being studied (days) and to interact with them as a participant. This method gathers insights that might otherwise be overlooked, but is time-consuming;
- (xii) **Participatory Rapid Appraisal:** This uses community engagement techniques to understand community views on a particular issue. It is usually done quickly and intensively – over a given period. Methods include interviews, focus groups, and community mapping;
- (xiii) **Questionnaire:** A data collection instrument containing a set of questions organized in a systematic way, as well as a set of

instructions to the enumerator/interviewer about how to ask the questions (typically used in a survey);

- (xiv) **Rapid appraisal (or assessment):** A quick cost-effective technique to gather data systematically for decision making, using qualitative and quantitative methods, such as observations and sample surveys. This technique shares many of the characteristics of participatory appraisal (such as triangulation and multidisciplinary teams) and recognizes that indigenous knowledge is a critical consideration for decision-making in ethical issues; and
- (xv) **Self-administered survey:** Written surveys completed by the respondent, either in a group setting or in a separate location. Respondents must be literate; for example, it can be used to survey teacher opinions.

5.3 Periodic Evaluation of the Policy

This part describes a M&E framework for anti-corruption activities. The framework operates at three levels: University, College/Centers/Units and Departments.

5.3.1 University Level

- (a) The Vice Chancellor has responsibility for the evaluation of the University's anti-corruption performance. The ESC shall advise the Vice Chancellor on the University's performance, its status with regard to unethical available practices prevailing, opportunities for development and the impact to the community;
- (b) The ESC shall maintain database on a list of staff and students' involved in corruptions;
- (c) Ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place,

or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other;

- (d) Encourage openness and shall support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken;
- (e) The ESC Secretary's Office has primary and day-to-day responsibility for implementing this policy, for monitoring its use and effectiveness and dealing with any queries on its interpretation; and
- (f) The ESC shall carry out the following M & E responsibilities:
 - (i) M&E of staff, students and other stakeholders of ethical issues;
 - (ii) Ensure compliance to ethical standards in service delivery;
 - (iii) Recommend for approval unethical matters that affects standards of performance;
 - (iv) Prepare quarterly and annual reports;
 - (v) Conduct planned or incidental evaluations of anti-corruption events by staff or students or both;
 - (vi) Conduct institutional seminars for dissemination of Anti-Corruption Policy;
 - (vii) Establish and recommend for approval of internal procedures for M&E of anti-corruption practices; and
 - (viii) Introduce anti-corruption performance measurements and rewarding system.

5.3.2 College/Centre/Directorate Level/Units Level

- (a) The relevant Principal or Director shall monitor the performance of College/Centre/Directorate/Unit in accordance with the evaluation of Anti-Corruption Policy.
- (b) College/Centre/Directorate boards or committees shall receive and discuss anti-corruption matters and make recommendations to ESC for improvement.

- (c) Colleges/Centres /Directorates/Units shall have strong anti-corruption matters in routine committees to the following M&E activities:
 - (i) Receive and discuss unethical matters from both staff and students;
 - (ii) Monitor supervision process of students in service delivery;
 - (iii) Monitor and evaluate anti-corruption activities at college/Centre/directorate/Unit level;
 - (iv) Hold annual meetings where results of anti-corruption activities shall be disseminated; and
 - (v) Receive quarterly and annual reports from departmental on anti-corruption events.

5.3.3 Departmental Level

- (a) Staff and their heads of departments are required to plan and implement performance targets for anti-corruption activities;
- (b) Staff are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing;
- (c) Staff 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 ESC;
- (d) A standard Anti-Corruption clause be inserted into all contracts University engages with other stakeholders; and
- (e) Departments shall have the following M & E responsibilities:
 - (i) Monitor knowledge generation in anti-corruption issues;
 - (ii) Prepare and monitor implementation of anti-corruption activities within the department; and
 - (iii) Ensure adherence to the Anti-corruption Policy and Client Service Charter Guidelines.

5.4 Evaluation Report

The ESC in collaboration with other University organs shall institute a process of evaluation, monitoring, and reporting on anti-corruption performance at MUST based on the following indicators on an annual basis:

- (a) Offering an unusual generous gift or offered lavish hospitality by a third party;
- (b) Awareness that a third party engages in, or has been accused of engaging in improper business practices;
- (c) Learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials/contractors;
- (d) A third party:
 - (i) Insisting on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
 - (ii) Asks for payment in cash and/or refuses to sign a formal document;
 - (iii) Commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - (iv) Asks that payment be made to a country or geographic location different from where the third party resides or conducts business;
 - (v) Asks for an unexpected additional fee or commission to facilitate a service;
 - (vi) Demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - (vii) Asks that a payment is made to overlook potential legal violations; and

- (viii) Asks that you provide employment or some other advantage to a friend or relative.
- (e) Receiving an invoice from a third party that appears to be non-standard or customized;
- (f) A third party insists on the use of side letters or refuses to put agreed terms in writing;
- (g) Noticing that it has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (h) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; and
- (i) Both postgraduate and undergraduate degree completion rates with respect to time frame of study period.

5.5 Policy Review and Amendments

The MUST Anti-Corruption Policy shall commence upon approval with the University Council and shall be amended as deemed necessary. In this regard, MUST shall Review the Policy after every three (3) years.

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APPROVAL

At its 43rd Meeting held on 6th day of September 2024, the COUNCIL of Mbeya University of Science and Technology RECEIVED, DISCUSSED and APPROVED the Revised Anti-Corruption Policy.

Hon. Zakia Hamdani Meghji

CHAIRPERSON

Adv. Lugano Mwakilasa

SECRETARY