



**UNIVERSITIES FUND**

**CONFLICT OF INTEREST POLICY**

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# CONTENTS

<b>FOREWORD .....</b>	<b>VI</b>
<b>ABBREVIATIONS .....</b>	<b>VII</b>
<b>DEFINITIONS.....</b>	<b>VIII</b>
<b>1.0 INTRODUCTION .....</b>	<b>1</b>
1.1 Legislative and Administration Requirements .....	1
1.2 Scope .....	2
1.3 Objectives .....	2
1.4 Applicability .....	3
1.5 Guiding Principles .....	3
<b>2.0 REGISTRABLE INTERESTS.....</b>	<b>3</b>
2.1 Direct Financial Interest .....	3
2.2 Indirect Financial Interest .....	4
2.3 Other Business Interests.....	4
2.4 Ancillary Employments.....	4
2.5 Corporate Directorships .....	5
2.6 Confidentiality.....	5
2.7 Non-Financial Interests.....	5
<b>3.0 HIGH RISK AREAS IN CONFLICT OF INTEREST</b>	<b>6</b>
3.1 Board of Trustees .....	6
3.2 Senior Management.....	6
3.3 Human Resource Management .....	7
3.4 Procurement and Disposal of goods and services .....	7
3.5 Finance and Accounts.....	8
3.6 Grants management .....	9
3.7 Records Management in records management.....	9
3.8 Utilization of Public Resources.....	10
3.9 Strategies for preventing occurrence of conflict of interest.	

**4.0 DISCLOSURE OF CONFLICT OF INTEREST.....11**

- 4.1 General Provisions..... 11**
- 4.2 Disclosures at the Commencement of a Meeting ..... 11**
- 4.3 Provision for Confidential Reporting..... 12**
- 4.4 Conflict of Interest Register ..... 13**

**5.0 MANAGEMENT OF CONFLICT OF INTEREST..14**

- 5.1 Evaluation..... 14**
- 5.2 Investigation ..... 15**
- 5.3 Disciplinary action ..... 15**

**6.0 MONITORING, EVALUATION, AND IMPLEMENTATION .....15**

**7.0 CONCLUSION .....16**

- 7.1 Review ..... 16**
- 7.2 Disclaimer ..... 17**

**8.0 SCHEDULES .....17**



## FOREWORD

The Universities Fund is mandated by Section 53 of the Universities Act, 2012 to finance universities in Kenya. The mandate of the Universities Fund is to develop a detailed institutional funding criterion, apportioning and disbursing grants, resource mobilization, monitoring the utilization and impact of the funds by the universities. In order to achieve this, the UF should be able to carry out the following: develop incentives for private sector participation in university education, develop public- private partnership frameworks for university education, negotiate tax waivers to foster individual and corporate/institutional support to university education.

To achieve its mandate, the Universities Fund has developed a strategic plan 2021-2026 with the key pillars. The expectations placed on the Fund are high, and it is imperative that we foster a culture committed to promoting and maintaining high standards of transparency, accountability, ethics and integrity at the service of the Fund.

Against this background, the UF has developed this conflict-of-interest policy to support the Fund's core values. The procedures contained in this policy provide a process of evaluation and management of conflict of interest.

The policy demonstrates that the UF has promoted a transparent and accountable mechanism to voice improper and genuine concerns pertaining to conflict of interest. The UF commits itself to the implementation of this policy and will subject it to periodic reviews to ensure its relevance in line with the changing circumstances and needs of our stakeholders.

**Geoffrey Monari**  
**Chief Executive Officer**

## ABBREVIATIONS

<b>UF</b>	Universities Fund
<b>SAGA</b>	Semi-Autonomous Government Agency



## DEFINITIONS

### **Conflict of Interest**

Conflict of interest occurs when a personal interest of a public official competes or is perceived to compete with the interest of the public in performance of their official duties. Personal interests include the interests of spouse, child, business associate or agent or any other matter in which the state or public officer has a direct or indirect pecuniary interest.

### **Perceived conflicts**

A public officer is able to appear to be influenced by his or her private interests in doing his or her duties.

### **Potential Conflicts**

A public officer is in a position where he /she may be influenced in the future.

### **Actual Conflicts**

A public officer is able to be influenced by his or her private interest when doing his/her job.

## 1.0 INTRODUCTION

The Universities fund (UF) is a Semi-Autonomous Government Agency (SAGA) established by section 53 of the Universities Act, 2012 with the main mandate of financing universities in Kenya. The Fund is managed by board of trustees.

The functions of the trustees are to: advise the cabinet secretary in matters of university education funding; develop a transparent and fair criterion for allocation of funds to universities; apportion funds to universities; establish the maximum differentiated unit cost for the programs offered and to mobilize and receive funds for purposes of the Fund from the Government, donors, and from any other source.

In furtherance of its mandate, the UF has developed a conflict-of-interest policy which outlines the procedures to be followed by internal and external stakeholders when a possible conflict exists between their own personal interests and the interests of the Fund.

### 1.1 Legislative and Administration Requirements

This Policy aims to provide a mechanism for disclosure of conflict of interests and its effective management. The declaration of a conflict of interest does not resolve a conflict, hence the requirement for additional measures to manage the conflict positively.

The UF Chief Executive Officer is responsible for ensuring implementation of this Policy and may suspend all relevant activities until the conflict of interest is resolved or other action deemed appropriate is implemented. Violation of any part of this policy may also constitute cause for disciplinary or other administrative action pursuant to institutional policy.

This policy should be used alongside the following legal frameworks:

- i. The Constitution of Kenya 2010,
- ii. The Public Officers Ethics Act (2003),
- iii. The Public Service Code of Conduct and Ethics (2016),

- iv. Leadership and Integrity Act (2012),
- v. Ethics and Anti-Corruption Commission Act (2011),
- vi. Anti-Corruption and Economic Crimes Act (2003),
- vii. UF Code of Conduct Ethics and related policies,
- viii. Public Procurement and Disposal Act (2015), AND
- ix. Public Procurement and Disposal Regulations, 2020.

## **1.2 Scope**

This policy is designed, as a general guideline, to enable the Board of Trustees, employees and other relevant stakeholders manage actual or perceived conflict of interest cases before they escalate into a malpractice. It covers;

- i. Nature of registrable interests/conflict of interest situations,
- ii. Procedure for disclosure of conflict of interests,
- iii. Evaluation of conflict-of-interest cases, and
- iv. Investigation and disciplinary actions.

This policy covers the activities of the UF. This includes performance of its mandate as well as operational functions.

## **1.3 Objectives**

This Policy requires the Board of Trustees, staff, and other relevant stakeholders to act with utmost integrity in discharging their duties, devoid of any external or personal influences which may blur the impartiality in decision making.

Specific objectives of the Policy are:

- i. To promote impartial administrative decisions within the institution devoid of personal biases and interests,
- ii. To promote fair competition among UF stakeholders without undue influence from the employees, Board of Trustees or other stakeholders,
- iii. To provide conflict of interest register,
- iv. To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the UF,

- v. To provide clear procedures for reporting and handling such concern(s), and
- vi. To proactively prevent and deter misconduct which could impact the financial performance and damage the UF's reputation.

#### **1.4 Applicability**

This policy applies to Board trustees, all employees and relevant stakeholders of UF. In the event of conflict between this and other policies dealing with the issue of conflict of interest, this policy will take precedence as far as conflicts of interest are concerned.

#### **1.5 Guiding Principles**

The guiding principles for this policy include;

- i. Service to the public,
- ii. Transparency and accountability,
- iii. Integrity,
- iv. Legitimacy,
- v. Fairness,
- vi. Equity, and
- vii. Responsiveness, efficiency, and effectiveness.

### **2.0 REGISTRABLE INTERESTS**

This policy is based on the expectation that all UF Board of Trustees and staff shall conduct their affairs in a fair and transparent manner so as to avoid or minimize conflicts of interest and must respond appropriately when conflicts of interest arise. To that end, this policy informs the UF staff about situations that generate real, potential, or perceived conflicts of interest. Schedule I to this Policy provides a list of interests deemed registrable.

#### **2.1 Direct Financial Interest**

A direct financial conflict of interest arises when a UF member directly benefits, or appears to directly benefit financially, over and above any agreed pay and terms of service contract, because of a

decision they have made or influenced by virtue of their position. These include:

- i. Having a personal financial, partnership or profit-sharing interest in a firm that is doing or seeking to do business with the UF.
- ii. The sale or disposal of assets to a member or someone connected to the member.

## **2.2 Indirect Financial Interest**

This arises when a close relative, business associate of a UF staff benefits or appears to benefit from the decisions of UF. These include;

- i. Award of contract to an organization where a close relation, business associate or agent, or other proxy of the UF staff is a director or has a substantial or controlling interest.
- ii. Employing or influencing employment of a relative, friend or associate.
- iii. Soliciting or obtaining favors, gifts, other guarantees, or personal obligations, monetary or non-monetary, for the staff member, relation or close associates, from entities doing business with the UF.

## **2.3 Other Business Interests**

Participation in any other business activity other than the UF's during working hours, thus preventing the employee's best effort on the job, is a direct conflict of interest.

## **2.4 Ancillary Employments**

UF staff intending to engage in part-time employment or other businesses outside the UF's working hours, shall seek written approval from their respective departmental head, provided that the employment;

- i. Does not encroach on the time or attention that should otherwise be devoted to the UF;
- ii. Does not adversely affect the quality of work performed;

- iii. Competes, directly or indirectly with the UF's activities;
- iv. Involves the use of the UF's human and material resources; and
- v. Adversely affect, directly or indirectly, the good name of the UF

Such approvals, if granted, will be reviewed periodically by the respective departmental head to ensure that the provisions in this subsection are not contravened.

## **2.5 Corporate Directorships**

A person in a position of senior management in the UF, shall not serve as a director of another corporation. However, with prior approval of the Board of Trustees, senior management may act as directors of non-profit public service companies, such as religious, educational, cultural, social, welfare, and philanthropic or charitable institutions, subject to policy guidelines of the group.

## **2.6 Confidentiality**

An employee shall not disclose or use any confidential information of the UF or any information of third parties obtained while executing his/her duties for the UF, for any purposes other than to fulfil his/her duties to UF.

## **2.7 Non-Financial Interests**

Non-financial conflict of interest can occur when a UF staff;

- i. Gains or is perceived to gain some other benefit such as reputational advantage or influence in their personal or professional relationships.
- ii. Makes an official decision of a significant nature involving the organization, its resources, strategies, staff, functions, administrative or statutory responsibilities such as a draft law, expenditure, purchase, budgetary allocation, implementation of a law or policy, recruitments, promotions, disciplines, performance assessments etc. to his/her personal advantage either as an individual or as an office.

- iii. Receives gifts and other forms of benefit on behalf of the UF that exceeds the reportable gift thresholds set by the UF in line with the National laws.

### **3.0 HIGH RISK AREAS IN CONFLICT OF INTEREST**

Some of the high-risk areas in the Universities Fund where conflict of interest may arise include the following:

#### **3.1 Board of Trustees**

The Board of trustees at Universities Fund are involved in management, policy formulation and implementation.

The following are potential forms of conflict of interest in Board functions.

- i. Skewed policy formulation, planning, and budgeting which favor personal interest,
- ii. Imprudent acquisition and disposal of public resources.
- iii. Making decisions that influence operational processes to further personal or private interests,
- iv. Accepting gifts, favors or benefits may compromise performance of official duties,
- v. Succumbing to political influence in decision making
- vi. Lobbying to influence decisions aimed at furthering personal and private interests,
- vii. Influencing award of contracts to relatives, friends, and associates, and
- viii. Making recruitment, selection and separation decisions that favor relatives, friends, and associates.

#### **3.2 Senior Management**

Senior management at UF primarily undertakes the execution of policies and strategic decisions designed to achieve organizational goals and objectives. In discharging these duties, the following forms of conflict of interest may arise: -

- i. Illegal acquisition, mortgage, and disposal of public property, service, or benefit,
- ii. Manipulation of books of accounts, payments, or receipts for personal benefit in respect of taxes, fees, levies, or charges that are due to a public body,
- iii. Soliciting and accepting gifts, favors and benefits intended to influence decisions,
- iv. Utilization of public resources to further private and personal interests,
- v. Making trips disguised as official but aimed at advancing personal or other officers' gain, and
- vi. Influencing operational processes such as procurement, recruitment, budgeting, financial management, strategic planning, and others to advance personal or private interest.

### **3.3 Human Resource Management**

- i. Skewed management of performance appraisal to advance private or personal interest,
- ii. Abuse of privileged information to advance private or personal interest,
- iii. Accepting gifts and favors to further private interests.
- iv. Harboring personal and private interest in staff welfare and benefit schemes, and
- v. Nepotism, favoritism, tribalism and cronyism in recruitment, deployment, transfers, training, disciplinary procedures, and promotion of staff provided who meets the jobs requirement should not be discriminated against on the basis of an existing relationship.

### **3.4 Procurement and Disposal of goods and services**

The procurement process of goods and services as well as their disposal involves various stages, each with distinct roles handled by different actors. Procurement processes in public service face the high risk of experiencing integrity and ethical challenges including conflict of interest. Some of the notable conflict of interest cases include:

- i. Failing to declare conflict of interest in procurement processes.
- ii. Skewed appointment of committee members in order to serve certain personal or private interests,
- iii. Entertaining or encouraging influence from politicians, management, staff, vendors, intermediaries, and other unauthorized persons during procurement process,
- iv. Undervaluing assets with a view to conferring a benefit to oneself or another during disposal of assets,
- v. Participating in the proceedings for disposal of government assets without first disclosing personal interest,
- vi. Awarding or influencing the award of a contract to oneself, spouse or relative, a business associate, close friends or a corporation, partnership or other body in which the officer has an interest,
- vii. Participating in a tender for the supply of goods or services to a public entity in which the officer has interest,
- viii. Engaging in bid rigging to favor oneself or another person,
- ix. Inflating contract prices to favor oneself or another person,
- x. Approving inflated invoices or paying for works or services not rendered, and goods not delivered,
- xi. Substitution of evaluation criteria and delays in evaluation beyond 30 days,
- xii. Placing orders for same goods to different suppliers by order splitting and unjustifiably awarding high number of contracts to particular suppliers,
- xiii. Payment before delivery or Payment for goods, services or works not received/done, and
- xiv. Disposal of items not worth disposing, non disposal of disposable items, disposal to a favoured buyer and disposal to staff without involving competitive process.

### **3.5 Finance and Accounts**

The UF has finance policy and procedures manual among other guidelines and regulations that govern utilization of public funds.

In applying these procedures and guidelines, UF officers may deliberately create and make use of opportunities and situations that are designed to serve personal or private interests in the management of public funds.

Some of the key areas of conflict of interest include the following:-

- i. Drawing or altering work plans and budgets to favour projects in which an officer has a personal interest,
- ii. Participating in finance meetings where the officer has personal interest in the matter under deliberation,
- iii. Fast tracking/delayed processing of payments to persons or entities where the officer has personal or other private interest.
- iv. Deliberately allocating excessive funds to departments where the concerned officers have personal interest,
- v. Failing to raise or concealing audit queries in respect to matters where one has an interest; and
- vi. Using one's position to misappropriate public funds.

### **3.6 Grants management**

The UF has put in place the Grants Management Policy and the Monitoring and Evaluation policy to guide the operations of the Grants management department. Areas of conflict of interest in the Grants Department include:

- i. Manipulation of grants allocation schedules for universities in which an officer has a personal interest,
- ii. Manipulation of amounts allocated to students in form of scholarships in which an officer has a personal interest, and
- iii. Altering the monitoring and evaluation report of universities in which an officer has a personal interest.

### **3.7 Records Management in records management**

The Fund has put in place a records management policy to guide the staff on management of records. Areas of conflict of interest in records management include:

- i. Manipulation of records in which an officer has a personal interest, and
- ii. Giving unauthorized access to confidential files where an officer has a personal interest.

### **3.8 Utilization of Public Resources**

The UF staff are entrusted with numerous resources to facilitate execution of public duty. It is expected that the staff will exercise prudence in the utilization of the resources. A conflict of interest shall be deemed to have occurred when a UF staff member uses public resources to further personal or private interest. Examples include:

- i. Influencing the acquisition of property for purposes of personal use or misappropriation,
- ii. Using one's position to influence allocation of resources to oneself or other person to whom the officer owes allegiance, and
- iii. Acquiring for oneself benefits that the officer is not entitled to
- iv. Utilizing public resources to acquire goods and services that are not official or authorized.

### **3.9 Strategies for preventing occurrence of conflict of interest.**

UF shall formulate and implement effective strategies aimed at combating and preventing conflict of interest. Some of the strategies include the following:

- i. Conduct regular risks assessment of conflict-of-interest areas,
- ii. Develop and implement conflict of interest policies, guidelines and manuals,
- iii. Sensitize staff to conflict of interest,
- iv. Enforce sanctions in respect to violations of conflict-of-interest policies,
- v. Benchmark for best practices on conflict-of-interest policies.
- vi. Always serve the public interest,
- vii. Support transparency and accountability,
- viii. Promote individual responsibility and personal example,

- ix. Create an organizational culture which is intolerant of conflicts of interest,
- x. Foster partnerships and collaborations in managing conflict of interest,
- xi. Compel employees to disclose any conflict of interest by availing conflict of interest registers and forms in all processes that involve risks,
- xii. Provide employees with professional development and training to increase knowledge on ethical issues, and
- xiii. Develop strong and easily accessible communication channels.

## **4.0 DISCLOSURE OF CONFLICT OF INTEREST**

### **4.1 General Provisions**

All UF staff and the Board of Trustees are individually responsible for disclosing their conflicts of interest to the institution on an ad hoc basis as soon as a conflict of interest is realized. The CEO is responsible for the distribution, receipt, processing, review, and retention of disclosure forms (As per Schedule II) and the conflict-of-interest registers. (As per Schedule III),

The disclosure forms and conflict-of-interest registers shall be made available at the various functional departments within UF for ease of admission, and

The individual willing to make a disclosure of a real or perceived conflict of interest will fill the disclosure forms in duplicate and submit the original to the CEO.

### **4.2 Disclosures at the Commencement of a Meeting**

Where a UF staff member is present at a meeting and where an issue which is likely to result in a conflict of interest is to be discussed, he/she shall declare the interest at the beginning of the meeting, or before the issue is deliberated upon. A declaration of a conflict of interest will then be recorded in the minutes of that meeting.

The Secretary of the various meetings will ensure that a conflict-of-interest register is availed and attendees to declare whether they have a conflict of interest or not based on the agenda. These meetings include but not limited to;

- i. Board of Trustees meetings,
- ii. UF management's meetings,
- iii. PC Committee meetings,
- iv. All departmental meetings, and
- v. External Stakeholder engagement meetings.

### **4.3 Provision for Confidential Reporting**

UF shall, as far as is reasonably practicable, make provisions for confidential reporting of conflict of interests where applicable. Information on conflict of interest can be provided to Universities Fund through the following mechanisms:

#### **a. Writing to Universities Fund:**

The written report can be mailed to Universities Fund through the following address:

The CEO

Universities Fund

P.O Box 28237-00100

Nairobi

#### **b. In-person reporting.**

The person can personally report conflict of interest at Universities Fund.

#### **c. Via Email**

The email address to use is [corruption.reporting@ufb.go.ke](mailto:corruption.reporting@ufb.go.ke). The custodians of this email address in the secretary of the corruption prevention committee and the chairperson of the integrity assurance committee.

#### **d. Telephone**

A person can report conflict of interest by calling the following numbers:

Tel. No. +254746737935 / +254207903331

#### **e. Third party or agents**

All third-party disclosures are provided for in accordance with the whistle-blowing procedures unless it is made on behalf of an employee with a conflict of interest.

### **4.4 Conflict of Interest Register**

Duly filled conflict of interest forms will be kept in a register at the CEO's office, who is the custodian of the conflict-of-interest register.

The register herein shall be open to the public. Where there are personal safety or similar serious concerns about full publicity, parts or even the whole of the declaration should be submitted to the chairperson of the Board of Trustees, who shall hold it, and act upon it as appropriate, in confidence.

#### **4.4.1 Inspection of the Register**

To the extent permitted by law, all conflict-of-interest disclosure forms and related information will be confidential. The register will be available for inspection by making an application to the CEO detailing the reasons for seeking to access the register.

#### **4.4.2 Update of the Register**

It shall be the responsibility of the employees and board of trustees to ensure that an entry of registrable interests in the conflict-of-interest register is updated and to notify UF of any changes in the registrable interests within one month of each change occurring. Notification should be in written format, addressed to the CEO.

#### **4.4.3 Conflict of Interest Register – the Board of Trustees**

A separate conflict of interest register shall be held for the Board of Trustees to declare their financial or non-financial interests which could potentially lead to or could conceivably be perceived as a conflict of interest, with the provisions of subsection 3.1 withstanding.

#### **4.4.4 Time limitation of the Register**

UF shall keep the register of conflicts of interest for five years after the last entry in each volume of the register.

### **5.0 MANAGEMENT OF CONFLICT OF INTEREST**

#### **5.1 Evaluation**

The evaluation of a conflict of interest must be done by the Board of Trustees or the UF corruption prevention committee (CPC). The evaluation process will take into account aspects such as recurrence, gravity, and the the evaluation may determine the absence or presence of a conflict of interest.

The following measures should be taken in the event there is conflict of interest;

- i. He/she should recuse him/herself from participating in the relevant decision making by UF,
- ii. To retrospectively assess other significant decisions made by the employee in their official capacity,
- iii. Divestment or liquidation of the interest by the employee,
- iv. Restriction of access by the affected staff to information,
- v. Transfer or re-assignment of the employee to a non-conflicting function,
- vi. Resignation from UF or from the conflicting private-capacity function, and
- vii. The staff or any other person involved in the transaction shall not be present during the Committee/Board's discussion or determination of whether a conflict of interest exists.

## **5.2 Investigation**

The UF can on its own motion or on receipt of a complaint or declaration of interest initiate an investigation to establish the veracity and extent of the conflict of interest. The internal audit department will carry out the investigation upon the recommendation of the Audit Committee, CEO or Board of Directors.

## **5.3 Disciplinary action**

The CEO may refer the internal audits recommendations to the Staff Disciplinary Committee for further deliberation and recommendation of appropriate action.

Disciplinary actions may constitute;

- i. Disciplinary action in line with the existing policies and legal frameworks,
- ii. Civil and/or criminal prosecution, and
- iii. In the event of failure to comply with this Policy, the CEO may suspend all relevant activities, or take other disciplinary action until the matter is resolved or another action deemed appropriate is implemented.

## **6.0 MONITORING, EVALUATION, AND IMPLEMENTATION**

The UF will assess the implementation and impact of the conflict-of-interest policy through various monitoring and evaluation activities. The UF shall integrate strategies and mechanisms for Monitoring and evaluation of this policy.

The following activities shall be conducted:

- i. Undertake regular checks on implementation of the policy,
- ii. Carry out annual evaluation on the implementation of the policy,
- iii. Use the evaluation reports to define the short term and long-term requirements for effective implementation,

- iv. Use the information for planning and management; and
- v. Suggest possible areas for review.

A monitoring and evaluation plan will be formulated to monitor progress against target outcomes. The implementation of the conflict-of-interest policy will also be measured against several Specific, Measurable, Accurate, Relevant and Timely (SMART) objectives.

The UF shall provide the requisite resources for monitoring and evaluation.

## **7.0 CONCLUSION**

Conflict of interest is one of the forms of corruption and unethical conduct that continue to deny the public efficient delivery of service. The Universities Fund Board and staff being public trustees must always perform their duties in the interest of the public.

It is expected that this policy will assist Universities Fund to understand what is expected of them. It is a useful tool in designing and implementing appropriate mechanisms to ensure that stakeholders do not engage in activities that amount to conflict of interest while managing public affairs.

Members of the public should use this policy to equip them with the knowledge, skills, and attitudes that will enable them to demand accountability, transparency, responsiveness, efficiency, and effectiveness from holders of public offices.

Managing conflict of interest in public service will significantly bolster the war against corrupt and unethical conduct. This will enable Kenyans to realize the values and ideals embedded in our constitution as well as achieve Vision 2030.

### **7.1 Review**

This Policy will be reviewed after every three (3) years or earlier as the need arises with an aim to enhance efficient delivery of effective outcomes.

## **7.2 Disclaimer**

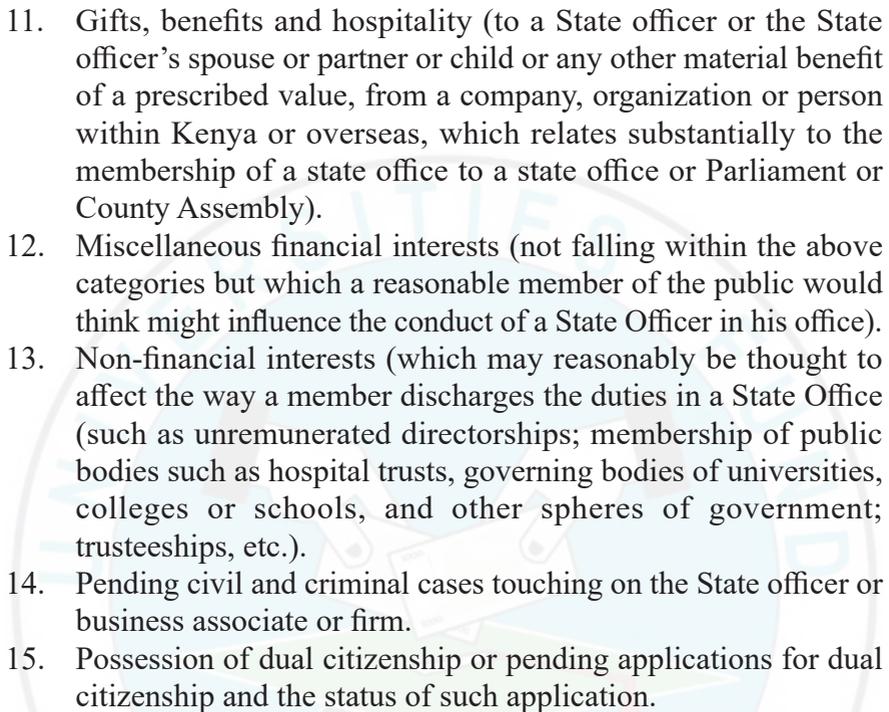
Every care has been taken in preparing this policy to avoid errors of commission and omission. In the event of any errors being discovered, an amendment shall be made in that respect and no person shall be allowed to benefit from or suffer from such error.

## **8.0 SCHEDULES**

### **Schedule 1**

#### **REGISTRABLE INTERESTS**

1. Directorships in public or private companies, whether or not remunerated directly or indirectly.
2. Remunerated employment (including office, trade, profession or vocation which is remunerated or which the State officer has any pecuniary interest).
3. Securities (shares, bonds, debentures or any other similar holding) in a company or enterprise or undertaking the aggregate nominal or market value of which exceeds a prescribed value while the state officer was in office.
4. Contracts for supply of goods and services.
5. Plans or expectations for or offers of future employment.
6. Public affairs advice and services to clients.
7. Shareholdings (amounting or not amounting to a controlling interest).
8. Land and property.
9. Sponsorship (from companies, trade unions, professional bodies, charities, universities or other organizations or individuals).
10. Travel facilities and overseas visits (made by a State officer or the State officer's spouse or child substantially catered for by the office of the State officer).

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- The background of the page features a large, faint watermark of the University of Nairobi logo. The logo is circular and contains an open book with a tassel, the word "KENYA" in large letters, and a banner at the bottom that reads "SUSTAINABLE UNIVERSITY FINANCING".
11. Gifts, benefits and hospitality (to a State officer or the State officer's spouse or partner or child or any other material benefit of a prescribed value, from a company, organization or person within Kenya or overseas, which relates substantially to the membership of a state office to a state office or Parliament or County Assembly).
  12. Miscellaneous financial interests (not falling within the above categories but which a reasonable member of the public would think might influence the conduct of a State Officer in his office).
  13. Non-financial interests (which may reasonably be thought to affect the way a member discharges the duties in a State Office (such as unremunerated directorships; membership of public bodies such as hospital trusts, governing bodies of universities, colleges or schools, and other spheres of government; trusteeships, etc.).
  14. Pending civil and criminal cases touching on the State officer or business associate or firm.
  15. Possession of dual citizenship or pending applications for dual citizenship and the status of such application.

## Schedule II

**FORM C**

**( r. 11(1))**

**Serial No.....**

### **DECLARATION OF CONFLICT OF INTEREST**

*(To be submitted in duplicate)*

Name of State Officer or Public officer: .....

Designation of the officer:.....

Personal File No.....

#### **Description of the Conflict of Interest**

Name and Address of the person with whom the officer has an interest	Nature of interest	Estimated value of the interest	Date the interest was acquired	Date the interest ceased (if applicable)	Remarks(if any)

I, .....the

undersigned, holding the position of .....

at .....ID/PP No.....being aware of the provisions of 46 (1) (d) and 46 (2) of the Leadership and Integrity Act, 2012 declare the above information to be true to the best of my knowledge.

80

*Kenya Subsidiary Legislation, 2015*

Signature of the Officer:.....

Date:.....

Submitted to:.....

Designation of the person submitted to:.....

Signature:.....Date:.....

**Schedule III**

**FORM E**

**(r. 13(1))**

**REGISTER OF CONFLICT OF INTEREST**

Serial No.	Name and address of the officer making the declaration	ID/PP No. of the officer making declaration	Registrable interest	Nature of Conflict	Date of Declaration	Name & signature of person making entry	Remarks or Directions issued	Date	Update of registered interests

