



National Open University of Nigeria

Policy Title	Anti-Corruption Policy
Policy No:	NQSA/POL/IGM/001
Owner:	National Open University of Nigeria (NOUN)
Approved By:	The University Senate
Manager/Driver:	Anti-Corruption and Transparency Unit (ACTU)
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1.0 Introduction

The National Open University of Nigeria (NOUN) is dedicated to the attainment of high standards of openness, integrity, and accountability. The university pursues its operations in a responsible manner giving high regards to its vision and mission statements.

In tune with the aforementioned, the management, staff and students of NOUN are required to always act honestly, with integrity and to protect the university resources (cash, assets, etc.) with which they have been entrusted and be accountable at all times. To this end, all members of staff shall imbibe the five basic principles of work ethics, integrity, objectivity, accountability,

openness, and honesty in the efficient discharge of their assigned responsibilities.

This Anti-Corruption policy aligns with the extant Regulations Guiding the Conditions of Service of the Senior and Junior Staff of NOUN, Public Service Rules and anti-corruption laws of the Federal Republic of Nigeria. Staff of NOUN must therefore acquaint themselves with the requirements and comply accordingly.

2.0 Purpose

The purpose of this policy is to set out the responsibilities of NOUN-ACTU in controlling and managing fraudulent activities within the National Open University of Nigeria (NOUN) and the responsibilities of management, staff, and students of NOUN in preventing fraud and corruption in the University. It will also highlight the procedures to be followed where fraud and corruption are detected or suspected within the university system.

3.0 Scope

The Policy applies to all employees, students and other stakeholders such as vendors, contractors, and the general public in all locations where the university operates.

Definitions

4.1 Corruption:

This means the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.

4.2 Work Ethics:

A set of values, principles, and beliefs guiding professional behaviour, comprising integrity, responsibility, quality, discipline, and teamwork.

4.3 Integrity:

This involves doing the right thing even when no one is watching you or without trying to impress anyone or gain favour. This shows individual level of honesty, ethical values, and being reliable in all professional dealings.

4.4 Objectivity:

An individual who is not influenced by personal feelings or opinions in considering and representing facts.

4.5 Responsibility:

Taking ownership of one's actions, decisions, and being accountable for the outcomes of the action or decision taken.

4.6 Quality:

Striving for excellence in your duties, responsibilities, and taking pride in what you do.

4.7 Discipline:

This involves individual's commitment and perseverance in achieving one's goals and excellent job performance.

4.8 Teamwork:

This means working effectively with others to achieve common goal and higher productivity.

4.9 Reliability:

Individuals that are known for their strong set of values and can be depended upon at any time. These individuals are known to meeting deadlines, fulfilling commitments, and

can be counted upon for effective and efficient delivery of tasks. They gain the trust of their colleagues and superiors.

4.10 Dedication:

The level of individual's commitment to work which goes above and beyond in achieving excellence and with the willingness to put in extra effort when needed. They are self-motivated by their passion for the job and take pride in achieving excellent results and productivity.

4.11 Initiative:

Ability to be proactive and taking initiative in performing assigned tasks. The individuals in this category seek opportunities to contribute and make a difference instead of waiting for instruction. They are willing to take up new challenges that can improve organisational performance.

4.12 Professionalism:

Ability to conduct oneself in a manner that reflects on the organisational growth. This includes the demonstration of positive attitude, effective communication, respect and courtesy given to others, and recognising the need to have a good image for the organisation.

4.13 Adaptability:

This involves individuals' level of flexibility in their approach to tasks or duties. The individuals in this category can easily adapt to changing circumstances and embrace new technologies. They maintain high performance level irrespective of the circumstances.

4.14 Accountability:

Individuals' ability to take responsibility for their actions and outcomes. They do not shift blames to others or make excuses but own up to their actions, learn from it and strive for improvement and to achieve the best.

4.15 Time Management:

Ability to prioritise tasks, set realistic goals, meet deadlines without compromising quality in assigned tasks towards increased performance and productivity for the growth and image of the organisation.

4.16 Openness:

This means transparency an individual exercises when performing task. The processes and procedures in performing the tasks are verifiable.

4.17 Honesty:

Individual adherence to facts and fairness without compromise in his/her job performance.

4.18 Whistle Blowing:

When someone voluntarily reports or reveals information about someone's wrongdoing or misconduct within an organisation.

4.19 Misconduct:

This means the failure by employees to observe the University's Code of Business Conduct and Ethics.

4.20 Coercive practices:

This means impairing or harming, or threatening to impair or harm, directly or indirectly, any party or property of the party to influence improperly the actions of a party.

4.21 Collusive practices:

This means an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly, the actions of another party.

4.22 Insider Abuses:

This refers to cases of bullying, physical/sexual harassment and those concerning dignity at work.

4.23 General Malpractice:

This could be immoral, illegal or unethical conduct (including where a person's health and safety has been put in danger).

Principles

- 5.1 NOUN is committed to the highest possible standards of transparency, probity, and accountability in line with globally recognized international standards and best practices.
- 5.2 NOUN operates in line with its Act and the national policies guiding its operations.

Policy Statements

- 6.1 NOUN shall have a process for reporting corrupt practices or offences.
- 6.2 To process corruption reports, NOUN shall operate in line with ICPC Act 2000 – 2020.
- 6.3 NOUN shall establish a unit under the office of the Vice Chancellor to manage cases of corruption and offences.
- 6.4 NOUN shall receive reports or petitions on:
 - 6.4.1 Gratification by a staff member.
 - 6.4.2 Corrupt offer to students, staff, vendors, contractors, and the public.
 - 6.4.3 Corrupt demands by staff members.
 - 6.4.4 Bribing of staff members.
 - 6.4.5 Failure to report bribery transactions.

- 6.5** NOUN will ensure that every staff, student and other relevant stakeholders receives a response on their report and that they are aware of how to pursue them if not satisfied.
- 6.6** NOUN shall apply the whistle blowing technique in gathering reports on corrupt practices in the university and will adopt the national legal framework for whistle blowing.
- 6.7** NOUN shall apply whistle blowing techniques to:
- a. provide intelligence,
 - b. safeguard public interest,
 - c. promote culture of public accountability and transparency,
 - d. promote integrity,
 - e. prevent scandals, danger and loss of resources,
 - f. establish good governance practices, and
 - g. encourage proper management of public funds.
- 6.8** The aim of the whistle-blowing technique shall be to create a work environment where staff, students, service providers, customers and other stakeholders can report/expose misconduct, irregularities, or malpractices, without fear of harassment and/or victimization and with an assurance that their concerns will be taken seriously by the Management of the University.
- 6.9** NOUN shall recognise that staff are often the first to realize that there may be something seriously wrong within the university. It will therefore provide avenues for reporting misconduct in confidence and receive feedback on any action taken.
- 6.10** NOUN will ensure that staff of the university are aware of the importance of preventing and eliminating workplace

misconduct. If any case of misconduct is upheld by staff, they will be seriously dealt with.

- 6.11** NOUN will encourage staff to use internal mechanisms for reporting malpractice or illegal acts or misconduct and that management will listen to the seriousness of the concerns raised and promptly launch an investigation into it.
- 6.12** Staff shall be allowed to take a reported matter further if they are dissatisfied with management's response or course of action.
- 6.13** NOUN will ensure the protection of staff and students against reprisals or victimization when a disclosure is made in good faith.
- 6.14** NOUN will be committed to investigating promptly any reported misconduct and the protection of those who might have come forward to report such activities.
- 6.15** NOUN shall ensure that adequate resources are made available to fulfil the aims of this policy.
- 6.16** NOUN shall encourage staff, students and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the university, to come forward and report them through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.
- 6.17** All reports shall be treated in strict confidence. NOUN procedures are intended to detect and prevent or deter improper activities. This policy is intended to investigate and take appropriate action against any reported misconduct or concern.

- 6.18** The Policy will be widely promoted, and copies will be freely available to the university community and displayed on the university's website.

Policy Implementation

- 7.1** Corrupt practices or offences shall be reported by:
- 7.1.1 Members of the University Council.
 - 7.1.2 Management Staff of the University.
 - 7.1.3 Staff directly/Indirectly employed by the university.
 - 7.1.4 All registered students at the university.
 - 7.1.5 The public.
 - 7.1.6 Any other constituted or recognised body by the Federal Republic of Nigeria. This shall include government parastatals, professional bodies, and the like.
- 7.2** The channel for reporting offences, being it reports or petitions shall be through the office of the Vice-Chancellor. The university will also provide electronic channels for reporting offences.
- 7.3** On receipt of a report or petition (either anonymous, in-person or signed) about suspected corrupt conduct, NOUN shall do the following:
- a. Acknowledge receipt of the report or petition.
 - b. If the report is made orally, the matter will be written out and read to the understanding and agreement of the petitioner or informant.
 - c. The verbal report will be put into writing by an assigned staff who will endorse the document after it has been read to the hearing of the petitioner or informer and has been certified as correct by the petitioner or informant.
 - d. There shall be a register (electronic or hard copy) to register all petitions and reports.

- e. More information shall be requested from the petitioner or informant if necessary.
- f. The petition or report shall be treated in line with the ICPC and NOUN Acts.
- g. The petition or report shall be referred to ICPC where it is outside the jurisdiction of NOUN.

7.4 There shall be a reward system in form of awards, commendations, and appreciation to staff of the university who consistently demonstrate integrity and professional conduct.

8.0 Sanctions on Violating this Policy

Any member of Staff or Student or Alumni who violates the policy will face disciplinary action in accordance with the University's Conditions of Service

Policy Alignment

This policy aligns with the following documents:

- 9.1** Public Service Rules and Anti-Corruption Laws of the Federal Republic of Nigeria.
- 9.2** Federal Ministry of Justice, Nigeria: National Anti-Corruption Strategy (2017 – 2000).
- 9.3** Independent Corrupt Practices & Other Related Offences Commission – ICPC (2000 – 2020)
- 9.4** NOUN's Conditions of Service (2016)

10.0 Team of Developers

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