CHUKWUEMEKA ODUMEGWU OJUKWU UNIVERSITY

POLICY ON ZERO TOLERANCE FOR CORRUPTION, BRIBERY, FRAUD AND ORGANISED CRIME

1. INTRODUCTION

Chukwuemeka Odumegwu Ojukwu University (COOU) recognises that integrity, transparency, accountability, fairness and ethical conduct are fundamental to effective university governance and sustainable institutional development.

As a public university committed to academic excellence, responsible leadership and service to society, the University acknowledges its responsibility to prevent and combat corruption, bribery, fraud, financial misconduct, organised crime and other forms of unethical behaviour within its institutional environment.

The University is committed to upholding applicable Nigerian laws and regulations, including the Corrupt Practices and Other Related Offences Act, 2000; the Economic and Financial Crimes Commission (Establishment) Act, 2004; the Public Procurement Act, 2007, where applicable; and other relevant legislation and regulations.

This policy establishes the principles, commitments, preventive measures, reporting mechanisms and accountability procedures through which COOU shall maintain an institutional environment that rejects corruption, bribery and organised criminal activities.

2. POLICY STATEMENT

Chukwuemeka Odumegwu Ojukwu University adopts a zero-tolerance approach to corruption, bribery, fraud, embezzlement, financial impropriety, abuse of office and participation in organised criminal activities.

The University shall not tolerate any member of its governing bodies, management, academic or non-academic staff, students, contractors, consultants, suppliers or other persons acting on its behalf engaging in activities that compromise institutional integrity or violate applicable anti-corruption laws.

All members of the University community are expected to conduct their activities with honesty, impartiality, accountability and respect for the law.

The University shall promote a culture in which unethical conduct is discouraged, suspected wrongdoing can be reported without fear of retaliation, and established violations are addressed through appropriate disciplinary and legal procedures.

3. AIM AND OBJECTIVES

The aim of this policy is to establish a transparent, accountable and corruption-free institutional environment at Chukwuemeka Odumegwu Ojukwu University.

The specific objectives are to:

a. Establish clear institutional principles and commitments against corruption, bribery, fraud and organised crime.

b. Prevent the misuse of university funds, assets, facilities and other resources.

c. Promote transparency and accountability in financial administration, procurement, recruitment, admissions and other university operations.

d. Prohibit bribery, extortion, favouritism, nepotism and other forms of improper influence in university decision-making.

e. Establish appropriate channels for reporting suspected corruption and unethical conduct.

f. Protect individuals who report suspected wrongdoing in good faith against intimidation, victimisation and retaliation.

g. Strengthen internal controls, institutional oversight and ethical leadership.

h. Promote awareness of anti-corruption principles among staff, students and external stakeholders.

i. Ensure that established cases of misconduct are investigated and addressed fairly and consistently.

j. Prevent the use of university facilities, resources or institutional relationships to facilitate organised crime or other unlawful activities.

4. SCOPE AND APPLICATION

This policy applies to:

a. Members of the Governing Council and other university governing bodies.

b. The Vice-Chancellor, principal officers and members of university management.

c. Academic and non-academic staff, irrespective of rank, appointment status or employment category.

d. Undergraduate and postgraduate students.

e. Contractors, consultants, suppliers, service providers and business partners.

f. Alumni, volunteers, visiting scholars and other persons undertaking official activities on behalf of the University, to the extent applicable.

g. Organisations and individuals engaged in financial, commercial, research, development or other formal partnerships with the University, subject to applicable contractual obligations.

The policy covers all university campuses, facilities, offices, academic programmes, research activities, financial transactions, procurement processes, partnerships and other institutional operations.

5. GUIDING PRINCIPLES

The implementation of this policy shall be guided by the following principles:

5.1 Integrity: All university activities shall be conducted honestly and ethically.

5.2 Transparency: Institutional decisions and transactions shall be conducted through transparent and verifiable procedures.

5.3 Accountability: Individuals entrusted with university responsibilities shall be answerable for their decisions and actions.

5.4 Fairness and Impartiality: University processes shall be free from bribery, discrimination, favouritism and improper influence.

5.5 Rule of Law: All members of the University community shall comply with applicable laws and institutional regulations.

5.6 Confidentiality: Reports of suspected wrongdoing shall be handled with appropriate confidentiality, subject to due process and legal requirements.

5.7 Non-Retaliation: No individual shall be victimised for making a genuine report of suspected corruption or cooperating with an authorised investigation.

5.8 Due Process: Allegations shall be investigated fairly, and no person shall be presumed guilty without appropriate determination under applicable procedures.

6. UNIVERSITY COMMITMENTS AGAINST CORRUPTION AND BRIBERY

The University expressly commits to the following:

6.1 Prohibition of Bribery

The University prohibits the offering, giving, soliciting, receiving or accepting bribes, kickbacks, inducements or other improper benefits in connection with university activities.

No staff member, student or representative of the University shall demand or accept money, gifts, favours or other benefits in exchange for admissions, examination results, grades, recruitment, promotion, contract awards or other institutional decisions.

6.2 Prevention of Fraud and Financial Misconduct

The University shall prevent and address fraudulent financial practices, including:

- Embezzlement and misappropriation of university funds.
- Falsification of financial records and official documents.
- Diversion of institutional revenue.
- False claims and fraudulent payments.
- Manipulation of financial transactions.
- Unauthorised use or disposal of university property.

6.3 Prevention of Abuse of Office

University officials shall not use their positions, authority or access to institutional resources to obtain improper personal, financial or professional advantages for themselves or others.

6.4 Opposition to Organised Crime

The University shall not knowingly permit its facilities, financial systems, personnel or institutional relationships to be used to facilitate organised criminal activities, money laundering, human trafficking, illegal financial transactions, drug trafficking or other serious unlawful activities.

The University shall cooperate with competent law enforcement and regulatory authorities in accordance with applicable laws.

6.5 Prevention of Examination and Admissions Malpractice

The University prohibits bribery, impersonation, result falsification, examination malpractice, unauthorised alteration of academic records and other fraudulent practices intended to compromise academic integrity.

7. TRANSPARENCY IN UNIVERSITY ADMINISTRATION

The University shall promote transparent and accountable administrative practices in the following areas:

7.1 Procurement and Contract Administration

All procurement and contract-award activities shall comply with applicable procurement laws, regulations and university procedures. Processes shall promote competition, fairness, transparency and value for money.

7.2 Financial Management

The University shall maintain appropriate financial records, internal controls, audit procedures and accountability mechanisms for all institutional funds and resources.

7.3 Recruitment and Promotion

Staff recruitment, appointment, assessment and promotion shall be conducted in accordance with approved university regulations and established merit-based procedures.

7.4 Admissions and Academic Administration

Admission, registration, assessment, grading and graduation processes shall be conducted transparently and in accordance with approved academic regulations.

7.5 Research and Grant Administration

Research grants, externally funded projects and research-related expenditures shall be managed transparently and in accordance with approved financial, ethical and contractual requirements.

8. CONFLICT OF INTEREST

All university officials and employees shall avoid situations in which personal, family, financial or business interests improperly influence their official responsibilities.

Individuals involved in procurement, recruitment, admissions, examination administration, contract management and other decision-making processes shall disclose any actual, potential or perceived conflict of interest.

Where a conflict exists, the affected individual shall withdraw from the relevant decision-making process or take other appropriate measures as determined by the authorised university authority.

9. GIFTS, HOSPITALITY AND UNDUE INFLUENCE

University personnel shall not solicit or accept gifts, payments, hospitality or other benefits that could compromise, or reasonably appear to compromise, their impartiality or professional judgement.

Any permitted ceremonial or institutional gifts shall be handled in accordance with university regulations and applicable laws.

No gift or benefit shall be accepted as an inducement for preferential treatment in university affairs.

10. REPORTING OF SUSPECTED CORRUPTION AND WRONGDOING

The University shall establish and maintain appropriate channels through which members of the university community and external stakeholders can report suspected corruption, bribery, fraud and other unethical practices.

Reports may be submitted through designated channels, including:

a. The Office of the Vice-Chancellor.

b. The Internal Audit Unit.

c. The Registrar or designated administrative office.

d. Other officially designated reporting mechanisms established by the University.

The University shall provide clear information on available reporting procedures, including relevant contact details and submission arrangements.

Reports should, where possible, contain sufficient information to enable preliminary assessment and appropriate investigation.

11. WHISTLEBLOWER PROTECTION

COOU shall promote an environment in which individuals can report suspected wrongdoing in good faith without fear of intimidation, harassment, victimisation or retaliation.

The identity of persons making reports shall be protected to the extent permitted by law and consistent with the requirements of a fair investigation.

Any person found to have retaliated against a whistleblower or deliberately obstructed the reporting of genuine misconduct may be subject to appropriate disciplinary action.

Knowingly false or malicious allegations may also be addressed in accordance with applicable university regulations and due process.

12. INVESTIGATION AND DISCIPLINARY PROCEDURES

All allegations of corruption, bribery, fraud and organised criminal activities shall be handled through appropriate institutional procedures.

The University shall:

a. Conduct preliminary assessments of reported allegations.

b. Refer credible allegations to the appropriate investigative or disciplinary bodies.

c. Ensure that investigations are conducted impartially and confidentially.

d. Provide affected individuals with opportunities to respond to allegations in accordance with applicable procedures.

e. Apply appropriate disciplinary measures where misconduct is established.

f. Refer suspected criminal conduct to competent law enforcement or regulatory authorities where required.

g. Maintain appropriate records of investigations, findings and actions taken.

Disciplinary measures shall be consistent with applicable laws, university regulations and the nature and seriousness of the established misconduct.

13. ROLES AND RESPONSIBILITIES

13.1 Governing Council

The Governing Council shall provide institutional oversight and ensure that appropriate governance arrangements are maintained for the implementation of this policy.

13.2 Vice-Chancellor

The Vice-Chancellor shall provide leadership for the implementation of the University's anti-corruption commitments and ensure that relevant administrative units perform their assigned responsibilities.

13.3 Registrar

The Registrar shall coordinate the administrative communication and institutional implementation of the policy and ensure its dissemination to relevant university organs.

13.4 Bursar

The Bursar shall promote financial accountability, proper documentation, effective financial controls and compliance with approved financial regulations.

13.5 Internal Audit Unit

The Internal Audit Unit shall undertake appropriate internal control assessments, identify financial and administrative risks, and report significant irregularities through established institutional channels.

13.6 Procurement Unit

The Procurement Unit shall promote transparent procurement procedures and appropriate documentation of procurement and contract-award activities.

13.7 Deans, Directors and Heads of Department

They shall ensure that staff and students under their supervision are informed of the policy and comply with its provisions.

13.8 Staff and Students

All staff and students shall uphold the University's integrity principles, comply with this policy and report suspected misconduct through appropriate channels.

14. AWARENESS AND CAPACITY BUILDING

The University shall periodically organise awareness and capacity-building programmes on anti-corruption, ethical conduct, transparency and accountability.

Such programmes may include:

a. Anti-corruption sensitisation workshops.

b. Staff orientation and professional development programmes.

c. Student orientation and ethical leadership campaigns.

d. Seminars on financial accountability and responsible institutional governance.

e. Public awareness activities involving external stakeholders and development partners.

The University may collaborate with relevant government agencies, professional organisations, civil society organisations and development partners in delivering these programmes.

15. MONITORING, EVALUATION AND COMPLIANCE

The implementation of this policy shall be monitored through appropriate institutional mechanisms.

The University shall periodically assess:

a. Compliance with anti-corruption and financial accountability procedures.

b. Effectiveness of internal controls and audit recommendations.

c. Awareness of the policy among staff and students.

d. Availability and accessibility of reporting channels.

e. Management of reported cases and implementation of corrective measures.

f. Effectiveness of procurement and financial transparency procedures.

Relevant university units shall maintain appropriate records and submit implementation reports to the designated university authority.

16. PUBLICATION AND ACCESSIBILITY

Chukwuemeka Odumegwu Ojukwu University shall make this policy publicly accessible through its official website.

The University shall ensure that the policy is communicated to staff, students, contractors, suppliers, partners and other relevant stakeholders.

The publicly accessible version shall clearly state the University's principles and commitments concerning corruption, bribery, fraud and organised crime.

17. POLICY REVIEW AND AMENDMENT

This policy shall be reviewed at least once every three years or earlier where necessary to accommodate changes in applicable legislation, university governance arrangements or institutional requirements.

Proposed amendments shall be processed through the appropriate university approval procedures.



Date: 24/10/2026

Prof. Kate Azuka Omenugha, Fnipr

Vice Chancellor