KARUNYA INSTITUTE OF TECHNOLOGY AND SCIENCES

KITS/ABAC/2025/01

Anti-Bribery and Anti-Corruption Policy

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Anti-Bribery and Anti-Corruption Policy

PREAMBLE

Karunya Institute of Technology and Sciences (KITS) is committed to upholding the highest standards of integrity, transparency, and accountability in all academic, administrative, financial, and governance practices. The Institute recognizes that bribery and corruption undermine Institutional credibility, ethical governance, and public trust, and are incompatible with the core values of higher education.

KITS adopts a zero-tolerance approach to bribery and corruption and is committed to preventing, detecting, and responding to unethical practices across all its operations. This policy aligns with national legal frameworks, global governance standards, and Institutional commitments to ethical conduct, sustainability, and responsible management.

This policy is developed in alignment with:

- Prevention of Corruption Act, 1988 (India)
- Central Vigilance Commission (CVC) Guidelines
- UGC Regulations on Governance and Transparency
- AICTE Approval Process Handbook (Ethics & Integrity provisions)
- NAAC Criterion 7 – Institutional Values & Best Practices
- NBA Graduate Attributes – Ethics and Professional Responsibility
- ABET Student Outcome 4 – Ethical and Professional Responsibility
- UN Sustainable Development Goal (SDG 16 – Peace, Justice and Strong Institutions)
- ISO 37001: 2016 – Anti-Bribery Management Systems

RATIONALE

Bribery and corruption pose serious risks to Institutional governance, financial integrity, and stakeholder trust. In a higher education ecosystem, such practices can affect admissions, procurement, recruitment, research funding, and academic evaluation.

Therefore, KITS establishes this policy to:

- Prevent bribery and corrupt practices across all Institutional activities
- Ensure compliance with national laws and regulatory bodies
- Promote transparency and accountability in decision-making
- Strengthen Institutional governance aligned with NAAC/NBA standards
- Enhance credibility in global rankings (QS, THE Impact Rankings)
- Foster ethical culture among students, faculty, and staff

EXECUTIVE SUMMARY

This policy provides a structured framework for preventing and addressing bribery and corruption at KITS.

Key Features:

1. Zero-Tolerance Approach to bribery and corruption
2. Clear Definitions and Scope aligned with legal frameworks
3. Prohibition of Facilitation Payments, Kickbacks, and Undue Advantages
4. Transparent Reporting Mechanism with whistle-blower protection
5. Risk-Based Governance including due diligence and audits
6. Strict Disciplinary Actions for violations
7. Training and Awareness Programmes for stakeholders
8. Integration with Institutional Governance and IQAC Monitoring
9. Alignment with National Regulations and Global Standards
10. Periodic Review and Continuous Improvement

PURPOSE AND SCOPE

Purpose:

- To prevent bribery, corruption, fraud, and unethical practices
- To ensure transparency in Institutional governance and financial management
- To establish accountability mechanisms
- To promote ethical conduct across all stakeholders

Scope:

This policy applies to:

- All students, faculty, staff, and administrators
- All Institutional operations including admissions, procurement, finance, recruitment, and research
- All third parties including vendors, contractors, consultants, and partners
- All on-campus and off-campus Institutional activities

DOCUMENT CONTROL & REVISION HISTORY

Policy Title	Anti-Bribery and Anti-Corruption Policy
Reference Number	KITS/ABAC/2025/01
Version	1.0
Issue	02
Policy Created on	July 2022
Revision History	Revised on 29th August 2025 (28th IQAC Meeting).
Responsible Executives	Vice-Chancellor, Registrar & Finance Officer
Responsible Office	Office of the Registrar & IQAC
Policy Review Frequency	Policy shall be reviewed every three years, or earlier if required by UGC, AICTE or other regulatory authorities.

The policy is described in the following articles

ARTICLE 1

STATEMENT OF POLICY

KITS enforces a zero-tolerance policy towards bribery and corruption in any form.

The Institute strictly prohibits:

- Offering, giving, soliciting or accepting bribes
- Facilitation payments or kickbacks
- Misuse of authority for personal gain
- Fraudulent or dishonest financial practices

This policy shall operate in compliance with applicable laws including the Prevention of Corruption Act, 1988, and in case of conflict, statutory provisions shall prevail. All stakeholders shall act with integrity, transparency, and accountability in all Institutional dealings.

ARTICLE 2

POLICY OBJECTIVES

This policy aims to:

- Prevent bribery and corruption across Institutional operations
- Ensure compliance with legal and regulatory frameworks
- Promote ethical governance and accountability
- Strengthen transparency in financial and administrative processes
- Protect Institutional reputation and stakeholder trust
- Align with SDG 16 and global governance standards

ARTICLE 3

POLICY PRINCIPLES

KITS adopts the following guiding principles to ensure effective prevention and management of bribery and corruption:

3.1 Integrity and Ethical Conduct

All Institutional stakeholders shall uphold the highest standards of honesty, fairness, and ethical responsibility in all academic, administrative, and financial activities.

3.2 Transparency and Accountability

All decisions, especially in procurement, recruitment, admissions, research funding, and financial transactions, shall be transparent, documented, and auditable, in line with NAAC Institutional Values and Best Practices.

3.3 Zero Tolerance

KITS enforces a strict zero-tolerance approach toward bribery, corruption, fraud, and unethical practices, consistent with the Prevention of Corruption Act, 1988 and Central Vigilance Commission (CVC) guidelines.

3.4 Legal and Regulatory Compliance

All Institutional activities shall comply with:

- Constitution of India (Articles 14, 16, 21 – equality, fairness, due process)
- Prevention of Corruption Act, 1988
- UGC Regulations on governance and transparency
- AICTE norms on Institutional integrity and accountability

3.5 Conflict of Interest Management

All stakeholders shall disclose any personal, financial, or professional interests that may influence Institutional decisions, ensuring fairness and impartiality.

3.6 Confidentiality and Protection

All reports, investigations, and records related to bribery and corruption shall be handled confidentially, ensuring protection of whistle-blowers in line with good governance practices.

3.7 Risk-Based Approach

KITS shall adopt a risk-based framework to identify high-risk areas such as procurement, vendor selection, and financial transactions, aligned with ISO 37001:2016 Anti-Bribery Management Systems.

3.8 Continuous Improvement

The Institution shall continuously review and strengthen anti-corruption measures through audits, training, and policy updates, guided by IQAC quality assurance mechanisms.

ARTICLE 4

ROLES & RESPONSIBILITIES

To ensure effective implementation:

Vice-Chancellor

- Provides strategic leadership and policy oversight
- Ensures compliance with statutory bodies (UGC, AICTE, MoE)
- Approves major disciplinary and corrective actions

Registrar

- Acts as the central authority for policy implementation
- Receives and registers complaints
- Coordinates investigations and maintains records

Finance Officer

- Monitors financial transactions and controls
- Conducts audits and risk assessments

- Ensures compliance with financial regulations and procurement norms

Internal Quality Assurance Cell (IQAC)

- Integrates policy into NAAC/NBA documentation
- Conducts periodic compliance audits
- Prepares annual governance and ethics reports

Heads of Divisions (HoDs)

- Ensure adherence within Divisions
- Promote ethical academic and administrative practices

Faculty and Staff

- Maintain integrity in teaching, evaluation, and administration
- Avoid conflicts of interest
- Report any suspicious activities

Students

- Uphold ethical conduct
- Avoid malpractice, bribery, or unfair practices
- Report violations responsibly

Vendors, Contractors, and Third Parties

- Must comply with Institutional anti-corruption norms
- Subject to due diligence and contractual obligations

ARTICLE 5

PROHIBITED PRACTICES

The following practices are strictly prohibited:

5.1 Bribery

- Offering, giving, receiving, or soliciting any undue advantage to influence decisions.

5.2 Facilitation Payments

- Any payment made to expedite routine administrative processes is strictly prohibited.

5.3 Kickbacks and Commissions

- Unauthorized financial or non-financial benefits linked to contracts or services.

5.4 Gifts and Hospitality

- Excessive or inappropriate gifts are prohibited
- Only nominal, transparent, and approved hospitality is permitted
- Nominal gifts may be accepted only within permissible limits as defined by Institutional guidelines.

5.5 Conflict of Interest

- Failure to disclose personal interests that influence Institutional decisions.

5.6 Fraudulent Practices

- Manipulation of financial records
- Misuse of Institutional funds

- Academic or administrative malpractice

ARTICLE 6

REPORTING AND INVESTIGATION

6.1 Reporting Mechanism

- Complaints may be submitted to the Registrar or Finance Officer
- Reporting may be written, verbal, or through digital platforms

6.2 Whistle-blower Protection

- No retaliation against complainants
- Confidentiality assured
- Any retaliation against whistle-blowers shall be treated as a violation of this policy.

6.3 Investigation Process

- Preliminary review within defined timeline
- Formal investigation with documented evidence
- Findings submitted to competent authority

6.4 Legal Compliance

Serious cases may be reported to:

- Law enforcement agencies
- Regulatory authorities (UGC, AICTE, MoE)

6.5 Bribery and Corruption Review Committee (BCRC)

Where concerns are required to be taken forward under this policy, they shall be reviewed by a Bribery and Corruption Review Committee (BCRC).

The Committee shall comprise:

- Registrar – Convener
- Finance Officer – Member
- Finance Manager – Member
- Special Investigation Officer (as appointed by the Registrar) – Member

The BCRC shall be responsible for determining and overseeing appropriate actions, including:

- Investigating complaints and allegations
- Notifying the Police and relevant regulatory authorities where required
- Controlling potential damage and preventing further loss
- Ensuring compliance with Institutional insurance requirements
- Securing and preserving evidence for disciplinary and legal proceedings
- Initiating recovery of financial or reputational losses
- Recommending appropriate disciplinary actions
- Managing communication with internal stakeholders and external agencies on a need-to-know basis

- Notifying funding agencies where allegations relate to funded projects
- Ensuring appropriate legal measures are undertaken

In cases requiring immediate action, the Registrar or Finance Officer may take necessary steps and subsequently report to the BCRC.

The designated investigator shall keep the BCRC informed of the progress of investigations and ensure timely completion. The Registrar, in consultation with the Audit and Scrutiny Committee, shall recommend appropriate disciplinary action to the Vice-Chancellor.

ARTICLE 7

VIOLATIONS AND ENFORCEMENT

Violations shall result in:

- **For Students:** Warning, suspension, or expulsion
- **For Staff:** Disciplinary action, suspension, termination
- **For Vendors:** Contract termination, blacklisting
- **Severe Cases:** Legal action under Prevention of Corruption Act

ARTICLE 8

MONITORING, REPORTING AND REVIEW

- Annual anti-corruption compliance report
- Periodic financial and governance audits
- IQAC-based monitoring aligned with NAAC/NBA
- Continuous improvement through PDCA cycle
- All records and data shall be handled in accordance with applicable data protection and privacy regulations.

ARTICLE 9

ETHICS, TRAINING AND AWARENESS

- Mandatory ethics and integrity training Programmes
- Awareness programs for staff and students
- Integration into curriculum (NAAC/NBA/ABET alignment)

References

1. https://www.indiacode.nic.in/bitstream/123456789/16124/1/the_constitution_of_india.pdf
2. Prevention of Corruption Act, 1988 (Amended 2018), Government of India
3. Central Vigilance Commission (CVC) Guidelines and Vigilance Manual
4. Indian Penal Code (IPC), Sections related to fraud, bribery, and criminal misconduct
5. University Grants Commission (UGC) Regulations on Governance, Transparency and Ethics
6. AICTE Approval Process Handbook – Institutional Governance and Integrity Norms

7. Ministry of Education (MoE) Guidelines on Institutional Governance and Financial Transparency
8. NAAC Manual: Institutional Values and Best Practices
9. NBA Accreditation Manual – Graduate Attributes on Ethics and Professional Responsibility
10. ABET - Ethics and Professional Responsibility
11. ISO 37001:2016 – Anti-Bribery Management Systems
12. United Nations Sustainable Development Goals (SDG 16 – Peace, Justice and Strong Institutions)
13. OECD Guidelines for Anti-Corruption and Integrity in Public Institutions

Definitions

For the purpose of this policy:

- Bribery: Offering, promising, giving, requesting, or accepting any undue financial or non-financial advantage to influence a decision or action.
- Corruption: Abuse of entrusted power for private or personal gain, including financial misconduct, fraud, or unethical practices.
- Facilitation Payment: A payment made to expedite routine administrative actions; strictly prohibited under this policy.
- Kickback: Illegal payment or benefit received in return for facilitating a transaction or contract.
- Conflict of Interest: A situation where personal, financial, or professional interests interfere with official responsibilities.
- Whistle-blower: Any individual who reports suspected bribery, corruption, or unethical conduct.
- Fraud: Intentional deception for personal or financial gain, including falsification of records or misrepresentation.
- Associated Person: Any individual or entity acting on behalf of KITS, including vendors, contractors, consultants, and partners.
- Due Diligence: Risk-based assessment conducted before entering into agreements or transactions to prevent corruption risks.
- Improper Conduct: Any act that violates ethical, legal, or Institutional standards.

ANNEXURE I – POLICY ALIGNMENT WITH NATIONAL & INTERNATIONAL FRAMEWORKS

KITS Policy Action	Framework	Institutional Commitment
Zero tolerance to bribery and corruption	Prevention of Corruption Act, 1988; CVC Guidelines	Strict prohibition and disciplinary enforcement
Ethical governance and accountability	NAAC Manual; NBA Graduate Attributes	Integration into governance and quality systems
Transparency in financial operations	UGC Regulations; AICTE norms	Auditable financial systems and reporting
Anti-bribery risk management	ISO 37001:2016	Risk assessment and preventive controls

Global ethical standards	ABET Criteria; OECD Guidelines	Ethical conduct in academic and administrative practices
Sustainable governance	UN SDG 16	Institutional commitment to justice and integrity

ANNEXURE II – REPORTING & INVESTIGATION FLOW

1. Incident observed or suspected
2. Complaint submitted to Registrar / Finance Officer
3. Preliminary review (within defined timeline)
4. Investigation initiated
5. Evidence collection and analysis
6. Report submitted to Vice-Chancellor
7. Corrective / disciplinary action
8. Record maintenance by IQAC
9. Option for appeal

ANNEXURE III – RISK AREAS AND PREVENTIVE CONTROLS

Risk Area	Potential Risk	Preventive Measures
Procurement	Vendor bribery, kickbacks	Transparent tender process, audits
Admissions	Undue influence	Merit-based systems, digital verification
Recruitment	Favoritism, bribery	Structured selection procedures
Finance	Fraud, misappropriation	Internal audits, approvals
Research Funding	Misuse of grants	Compliance monitoring
Vendor Management	Conflict of interest	Due diligence and contracts

ANNEXURE IV – CODE OF ETHICAL CONDUCT

All stakeholders shall:

- Act with honesty, integrity, and transparency
- Avoid any form of bribery or corruption
- Declare conflicts of interest
- Comply with Institutional and legal requirements
- Report unethical practices promptly
- Maintain confidentiality and accountability

ANNEXURE V – ACRONYMS AND ABBREVIATIONS

Acronym	Full Form
AICTE	All India Council for Technical Education
ABET	Accreditation Board for Engineering and Technology
CVC	Central Vigilance Commission
IQAC	Internal Quality Assurance Cell
KITS	Karunya Institute of Technology and Sciences
MoE	Ministry of Education
NAAC	National Assessment and Accreditation Council

NBA	National Board of Accreditation
OECD	Organisation for Economic Co-operation and Development
SDG	Sustainable Development Goal
UGC	University Grants Commission
ISO	International Organization for Standardization
BCRC	Bribery and Corruption Review Committee

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ARISE AND SHINE
Karunya