



KMTC is ISO 9001:2015 Certified

# Kenya Medical Training College



**CODE OF CONDUCT AND ETHICS  
POLICY**

**MAY 2019**

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## PREFACE

On behalf of the Kenya Medical Training College (KMTc) Board of Directors, I am pleased to approve this Employee Code of Conduct and Ethics for use by Management. It is the mission of KMTc to improve access to and equity of quality medical training and to ensure that the institution plays its role in the realization of Sustainable Development Goals (SDGs), Vision 2030, health sector policies and the government agenda on the “Big Four”. Inadequate numbers of skilled care providers have had a negative impact on efforts to expand access and improve the quality of health services. This situation is compounded by continued high prevalence of communicable and non-communicable diseases in the country. As the Board continues to realize the set milestones which contribute to improving the quality and quantity of essential health care providers, it is equally alive to its commitment to ensure that KMTc operates in an ethical and lawful manner.

Towards this end, the KMTc Board of Directors under my leadership resolved to critically delineate long-term strategies for addressing the constraints to training and development of quality health care providers through:

- i. Improved policy and corporate governance for enhancing accountability and decision making.
- ii. Enhanced access, quality, relevance and equity in medical training.
- iii. Prudent resource utilization and good infrastructural management.
- iv. Increased visibility of Kenya Medical Training College nationally and internationally as a premier institution focusing on training, research and consultancy.
- v. Improved resource base, partnership and linkages.

In response to the 2010 Constitutional agenda, the Board will continue to direct efforts at advancing community – oriented programs that respond positively to the country’s social and economic development agenda. This Policy therefore provides an analysis of the internal and external environment, and makes strong statement on the role KMTc will play in supporting the Government to realize sustainable growth in the health sector. The Board is dedicated to offer oversight on the operations and management of the College to ensure sustainable delivery of health coverage in the country and beyond. I believe successful implementation of the Employee Code of Conduct and Ethics Policy will be realized through total cooperation and commitment of the entire staff, students and other key stakeholders.



**Prof. Philip Kaloki, MBS,**

**Chairperson, KMTc Board of Directors.**

## FOREWORD

The employees of Kenya Medical Training College (KMTC) are public servants who are required to abide by the rule of law governing public servants. This Code of Conduct and Ethics has been formulated to specifically govern the conduct of all College members.

KMTC staff are responsible for acquainting themselves with the contents of this code, and must accept by signing the Integrity Pact annexed to this Policy. Violations of the tenets of this Policy shall lead to disciplinary action.

The College shall ensure that all staff adhere to this Code. In addition, where a member within the context of working for the College, is in contravention of any Kenyan law and/or statutory regulation, it is the Policy of the College to bring such a contravention to the attention of the authorities concerned, who shall deal with the contravention as provided by the law.

I thank the Ethics and Anti-Corruption Commission for facilitating development of this Code. Without the support of EACC, this Code would not have been possible. Through this Code, employees of KMTC are expected to conduct their public and private obligations/affairs in a way which will not bring ridicule and dishonour to the College.



**Prof. Michael Kiptoo,**

**Chief Executive Officer.**

## **VISION**

A model institution in the training and development of competent health professionals

## **MISSION**

To produce competent health professionals through training and research, and provide consultancy services

## **CORE VALUES**

Accountability

Integrity

Responsiveness

Equity

Teamwork

Professionalism

Creativity and innovation

## ABBREVIATIONS

<b>CEO:</b>	Chief Executive Officer
<b>CoD:</b>	Chairperson of Department
<b>COR:</b>	Codes of Regulations
<b>CPC:</b>	Corruption Prevention Committee
<b>EACC:</b>	Ethics and Anti-Corruption Commission
<b>HoD:</b>	Head of Department
<b>HRM:</b>	Human Resource Manager
<b>KMTC:</b>	Kenya Medical Training College
<b>PCSC:</b>	Public Complaints Steering Committee



## DEFINITION OF TERMS

<b>Board member:</b>	Means a member of the KMTC Board of Directors.
<b>Board:</b>	Means the KMTC Board of Directors.
<b>Chairman:</b>	Means the Chairman of the Kenya Medical Training College Board of Directors.
<b>Chief Executive Officer:</b>	Refers to the academic and administrative executive head of KMTC.
<b>Code:</b>	Refers to this Code of Conduct and Ethics.
<b>Confidential:</b>	Refers to information that shall be kept out of the general public domain and includes business strategies, pending contracts, unannounced services, unpublished research results and bio data of students and employees.
<b>College Member:</b>	Means any person appointed, employed, or admitted to be part of KMTC to render services or obtain education. The term therefore, refers to Board Directors, Staff and bonafide students.
<b>College Resources:</b>	Means physical facilities including the buildings, recreational facilities, infrastructure and all immovable assets of the College; College funds (however obtained) including funds received from students as tuition or accommodation fees, any donations, contributions or gifts, and any funds otherwise obtained for use for College education; furniture, equipment, apparatus, stationery and research materials, whether living or dead; and motor vehicles and transport facilities provided for the purposes of College education.
<b>College:</b>	Means Kenya Medical Training College.
<b>Contract of Employment:</b>	Means engagement relationship between employer and employees.
<b>Employee:</b>	Refers to staff members of the College.
<b>Favouritism:</b>	Refers to application of undue double standards during dispensation of judgement.
<b>Head of Department:</b>	Refers to the person who is responsible for a department within the College.
<b>Losses of Public Funds:</b>	Means actual loss or destruction of, or damage (other than fair wear and tear) to, or failure to account for the disposal of public monies, stamps, securities, or property movable or immovable (including any money or other property, not belonging to KMTC which is held or used by an employee in his/her official capacity, either alone or jointly with any other person); non collection of any monies due or belonging to KMTC, or for the collection of which the KMTC is responsible; payments or liabilities incurred without or in excess of any statutory, administrative or other authority, including nugatory and other similar payments and payments arising from incorrect certificates, and irregular or excess issues of stored, rations etc; unauthorized use of KMTC stores, vehicles, buildings, equipment, or any other property, or service (e.g. repair workshop) provided for

official purposes; and compensation and similar payments (including third party claims in respect of vehicle accident), and any other additional expenditure or liability incurred which was avoidable and need not have been incurred.

<b>Nepotism:</b>	Refers to favouritism of an individual by virtue of him/her being a relative.
<b>Officer:</b>	Refers to employees bestowed with authority in KMTC.
<b>Relative:</b>	Refers to a person affiliated to another by birth or marriage including a child, grandchild, parent or sister, spouse, brother or sister of spouse or any other prescribed relative.
<b>Resources:</b>	Broadly means inputs to a process for the purpose of realizing a product and includes physical and natural inputs.
<b>Salary:</b>	Means the monthly pay of an employee but does not include overtime, subsistence or any extra allowance or benefit.
<b>Student:</b>	Means a person enrolled as a learner in a College or educational institution.

## 1.0 INTRODUCTION

### 1.1 Preamble

- i. Ethics are a set of values, principles and standards of what is good, upright, moral, or just. They admonish and moderate conscience. They are rules of conduct that define behaviour and set principles for the conduct of a given category of people. Ethics promote standards by:
  - a) Defining what is approved or disapproved conduct or practice and regulating self-control.
  - b) Setting qualities of character, attitudes, habits and behaviour of individual practitioners.
  - c) Guiding choice among alternatives, and giving rational direction on course of action.
  - d) Promoting justice, impartial evaluation or assessments and instilling both fortitude and rectitude.
- ii. The purpose of this Code of Ethics is to socialize and promote the culture of ethical values in the practice and realization of the KMTC's vision, mission, mandate and core values.
- iii. It is intended to guide the conduct of all employees of KMTC in their day to day activities. The Code contains general rules to be observed by employees of KMTC so as to maintain integrity and loyalty to the Government of Kenya and also to uphold the dignity of the public office to which one has been appointed. It should be borne in mind that each employee of KMTC occupies a special position within the College and ought to be proud of that position and ensure that his/her conduct in public and in private does not bring KMTC to disrepute. It is imperative that every member of staff adheres to this code and such other rules which may be established by the College from time to time.

### 1.2 Purpose

The purpose of this Code is to enhance ethical conduct and integrity of employees at KMTC. Its purpose is to affirm that the College expects that those who carry out work and related activities for the College will observe the highest standards of conduct and probity.

### 1.3 Objectives

The objectives of this Code are to:

- i. Foster and maintain public trust and confidence in the integrity and professionalism of KMTC employees.
- ii. Ensure uniformity of conduct amongst the employees of KMTC.
- iii. Uphold the dignity of the public offices at KMTC.
- iv. Serve customers in a timely manner and in accordance with the law and Service Charter.
- v. Act as a reference point for the College and those members of the community with who KMTC has dealings from time to time.
- vi. Ensure that employees carry out their work in an ethical, collegial environment and perform their duties with efficiency, fairness, impartiality and honesty.

## **1.4 Information and Resources**

This Code derives its authority from the following legal and administrative documents, and it should therefore be read alongside them:

- i. The Constitution of Kenya, 2010.
- ii. Public Officer Ethics Act, 2003.
- iii. The Leadership and Integrity Act, 2012.
- iv. The KMTC Act, 1990 (as amended).
- v. KMTC statutes.
- vi. The Employment Act, 2007.
- vii. The Public Collections Act, CAP 106.
- viii. The Education Act, CAP 211.

## **2.0 PRELIMINARY**

### **2.1 Citation**

This Code may be cited as the Kenya Medical Training College Code of Conduct and Ethics, and shall come into operation on such date as the Board may ratify, and shall be gazetted in accordance with the law.

### **2.2 Application**

This Code shall apply to all academic and non-teaching staff members of KMTC.

## **3.0 REQUIREMENTS**

### **3.1 Compliance with the Code**

This Code sets minimum standards and obligations relating to the behaviour expected of staff members of the College community. Staff members of KMTC shall comply with all requirements of this Code and those in the general Code of Conduct and Ethics set out in Part III of the Public Officers Ethics Act, 2003 and Part II of the Leadership and Integrity Act, 2012, which shall form part of this Code.

### **3.2 Guiding Principles**

In implementation of this Code, the following general rules of ethical conduct shall apply to all employees of KMTC:

- i. Integrity  
Employees of KMTC shall:
  - a) Perform their work with honesty, diligence and responsibility.
  - b) Observe the law and make disclosures expected by law and the profession.
  - c) Not knowingly be a party to any illegal activity or engage in acts that are discreditable to the medical profession and KMTC.
  - d) Reflect and contribute to the legitimate and ethical objectives of KMTC.

ii. Objectivity

Employees of KMTC shall:

- a) Not participate in any activity or relationship that may impair or be presumed to impair their professionalism. This participation includes those activities or relationships that may be in conflict with the interest of the organization.
- b) Not accept anything that may impair or is likely to impair their professional judgement.
- c) Disclose all material facts known to them that, if not disclosed, may distort the reporting of activities under review under their purview.

iii. Confidentiality

Employees of KMTC shall:

- a) Be prudent in the use and protection of information acquired in the cause of their duties.
- b) Not use information for any manner that will be contrary to the law and detrimental to the legitimate and ethical objectives of the College.
- c) Any corporate disclosure by a Board Member or employee of KMTC shall be in tandem with the provisions of the Communication Policy and other national regulations.

iv. Competency

Employees of KMTC shall:

- a) Engage only on those services for which they have the necessary knowledge, skills and experience.
- b) Provide all their professional services in accordance with the College's Quality Standards.
- c) Continually improve their proficiency and the effectiveness and quality of their services.

v. Respect

Employees of KMTC shall:

- a) Not intentionally injure the professional reputation or career of another staff member.
- b) Present information to the Management for appropriate action if they have evidence that a member has engaged in unethical, illegal or unfair practices, including practices in violation of this Code.

vi. Accountability

An employee shall at all times be personally accountable for their actions, decisions and/or omissions during their service.

vii. Discipline

An employee shall carry out their duties with utmost discipline as per this code of conduct

### 3.3 The Rights and Dignity of all Individuals

Respect for the dignity of the individual is the cornerstone of professionalism. The relationship between a staff member and any recipient of service or a colleague shall be one of mutual trust and respect, based on a clear recognition of the rights of all parties. The existence of honesty, tolerance and truthfulness in the relationship is implied.

### **3.4 Rights of Students/Customers**

A student/customer has the right to:

- i. Receive the best possible service.
- ii. Be protected from over-servicing out of self-interest. A commitment to quality service delivery is rightfully expected from staff members or KMTC.
- iii. Be treated humanely. At all times the student/customer shall be treated by the staff member with the sensitivity and mindfulness of his/her dignity as a human being.
- iv. Self-determination and freedom to make his or her decisions concerning obtaining services or alternative services.

### **3.5 Rights of the Staff Member**

The staff member has the right to:

- i. Professional independence and autonomy.
- ii. Freedom from unwarranted attacks on his/her honour, reputation and competency, and the right to be advised of any written complaint of unprofessional conduct against him/her and to be given reasonable opportunity to defend him/herself against such charges in accordance with the rules of natural justice.
- iii. Expect cooperation from colleagues.
- iv. Reasonable remuneration for services offered.

### **3.6 Care of Property**

KMTC employees shall take all reasonable steps to ensure that property which is entrusted to their care is adequately protected and not misused or misappropriated. Employees who contravene this rule shall be personally liable for losses resulting from the contravention.

### **3.7 Use of Internet, Email and Electronic Media**

A member of staff shall not knowingly transmit, view, print, retrieve, download or store information of a discriminatory or damaging and harassing nature, or any mail inappropriate for College environment.

### **3.8 Political Neutrality**

KMTC members shall not:

- i. In the performance of their duties, act as an agent for, or further the interest of a political party or publicly indicate support for or opposition to any political party or candidate in an election.
- ii. Engage in political activity that may compromise or be seen to compromise the political neutrality of the office.
- iii. Contest for parliamentary, county, civic or any other political office while still an employee. An employee who wishes to contest for any such office shall be required to resign from the College.
- iv. Seek the influence of political leaders with a view to consideration for promotion or other favours.

### **3.9 Conduct of Private Affairs**

An employee shall conduct his/her private affairs in a way that maintains public confidence in the integrity of his/her office.

### **3.10 Tax, Financial and Legal Obligations**

An employee shall:

- i. Pay any taxes due from him or her within the prescribed period.
- ii. Not neglect their financial or legal obligations.

### **3.11 Alcohol, Drug and Substance Abuse**

An KMTC employee shall not be intoxicated during working hours.

### **3.12 Outside Employment/Business**

A staff member shall not engage in any other business or employment during the employer's official working hours.

### **3.13 Non-discrimination**

A staff member of KMTC shall not discriminate, directly or indirectly, individuals on the ground of age, gender, race, colour, ethnic origin, social origin, language, religion, opinion, nationality, marital status, pregnancy, disability or HIV status.

### **3.14 Sexual Harassment**

- i. An employee shall not sexually harass a fellow employee or any other member of the College or public.
- ii. Sexual Harassment includes any of the following, if the person doing it knows or ought to know that it is unwelcome -
  - a) Making a request or exerting pressure for sexual activities or favours.
  - b) Making intentional or careless physical contact that is sexual in nature.
  - c) Making gestures, noises, jokes or comments, including innuendo, regarding another person's sexuality.

### **3.15 Workplace Harassment**

A staff member of KMTC shall avoid unwelcome, abusive, belittling or threatening behaviour to his/her colleagues.

### **3.16 Conflict of interest**

- i. Employees shall use their best efforts to avoid being in a position in which their personal interests conflict or appear to conflict with their official duties.
- ii. An employee shall not hold shares or have any other interest in a corporation, partnership or other body, directly or through another person, if holding, those shares or having that interest would result in the employees' personal interest conflicting with his/her official duties.
- iii. An employee whose personal interests conflict with the official duties, shall declare the personal interest to his/her superior through the prescribed form (see Appendix I), or the EACC.
- iv. When a conflict of interest is reported through the prescribed form, it shall be recorded and a decision made in respect of the conflict as provided.
- v. The College may give directions on the appropriate action to be taken by the employee to avoid conflict of interest and the employee shall:

- a. Comply with the directions; and
- b. Refrain from participating in any deliberations with respect to the matter.
- vi. An employee shall not award any contract or influence the award of any contract to:
  - a. Himself/herself;
  - b. Spouse or close relative;
  - c. Business associate or agent; or
  - d. A corporation, private company, partnership or other body in which the officer has a substantial or controlling interest.
- vii. An employee shall not use or allow the use of information acquired in connection with his/her duties that is not public for his own benefit or others.
- viii. Personal interest includes the interest of a spouse, relative or business associate or agent or any other matter in which the employee has a direct or indirect pecuniary or non-pecuniary interest.

### **3.17 Performance of duties**

An employee shall, to the best of their ability:

- i. Carry out the duties of the office efficiently and honestly;
- ii. Carry out the duties in a transparent and accountable manner;
- iii. Keep accurate records and documents relating to the functions of the office; and
- iv. Report truthfully on all matters of the College.

### **3.18 Professionalism**

An employee shall:

- i. Strictly adhere to the terms of their employment contract. Any breach of the employment contract shall be deemed to be a breach of this Code.
- ii. Carry out their duties in a manner that maintains public confidence and integrity of their office.
- iii. Treat members of the public and fellow employees with courtesy and respect.
- iv. Seek to improve the standards of performance and level of professionalism at KMTC to the extent appropriate to his/her office.
- v. Observe and subscribe to the ethical and professional requirements of the professional body of which he/she is a member in so far as those requirements do not contravene the constitution, the Leadership and Integrity Act and this Code.
- vi. Observe official hours and not be absent without proper authorization or reasonable cause.
- vii. Conduct himself or herself with personal decency and always be well groomed by maintaining an appropriate standard of dress and personal hygiene.
- viii. Actively and personally promote a culture in the College that aims at providing fast, friendly, responsive and efficient services.
- ix. Maintain high ethical standards when engaging and dealing with customers.
- x. Discharge any professional responsibility in a professional manner.



### 3.19 Teaching and Conduct of Examinations

An employee who is a member of the teaching staff shall:

- i. Organize his/her instructions, assessments and examinations in a manner that complies with all KMTC requirements and expectations.
- ii. Ensure that the examinations are delivered to students as scheduled and that the results are processed without undue delay.
- iii. Exercise diligence, care and attention on the performance of his/her duties and shall seek to achieve high standards in teaching and administrative duties.
- iv. Promote the culture of research among KMTC students, and shall assist in the overall development of the students as scholars and decent human beings.
- v. Ensure that the contents of the examination papers are kept secret and are only released to students when they are sitting for the particular examination.
- vi. Report any form of academic indiscipline promptly to the relevant offices for appropriate action.
- vii. Maintain high ethical standards when engaging and dealing with students.

### 3.20 Rule of Law

An employee shall:

- i. Respect and abide by the Constitution and the law.
- ii. Carry out the duties of the office in accordance with the law.
- iii. In carrying out the duties of the office, not violate the rights and fundamental freedoms of any person unless otherwise expressly provided for in the law and in accordance with Article 24 of the Constitution.

### 3.21 Improper Enrichment

An employee:

- i. Shall not use their offices to improperly, wrongfully or unlawfully enrich themselves or others. An employee shall ensure that the College resources under his/her charge are properly utilized and fully accounted for.
- ii. Who is utilizing the College resources to conduct research shall disclose this fact to the College and his /her activities shall be governed by such agreement as may be made between him/herself and the College.
- iii. Shall observe the principles of law governing Intellectual Property, Copyright and other related matters in order to promote the culture of research and to uphold the integrity and academic freedom that members and students of Public Colleges enjoy.
- iv. Shall not convert College property for personal use.

### 3.22 Gifts, Benefits and Favours

This section applies to both internal and external gifts and an employee:

- i. Shall not solicit or accept gifts or favours from persons who;
  - a) Have an interest that may be affected by the carrying out, or not carrying out, of the employee's duty;
  - b) Carry on regulated activities with respect to which the College has a role; or
  - c) Have a contractual or similar relationship with the College.

- ii. An employee shall not solicit for any property or benefit of any kind, for himself or for any person, on account of anything to be done or omitted by him in discharge of his duties or by virtue of his official position.
- iii. An employee shall, to the best of his/her ability, ensure that no members of his/her family solicits or accepts any gift, money, hospitality, free passage or favours from any person or organization that might reasonably be thought to influence or be intended to influence the officer in discharging his/ her official duties and responsibilities.
- iv. Where a gift is given without the employee's knowledge or where refusal of a gift would be offensive to custom or might amount to bad public relations, the employee shall inform the College by filling the gift declaration form. (See Appendix II)
- v. A gift or donation given to an KMTC employee on a public or official occasion shall be treated as a gift or donation to the College and shall be declared appropriately.
- vi. An employee shall not accept gifts of jewellery or other gifts comprising of precious metal or stones ivory or any other animal part protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora or any other type of gift specified by the Ethics and Anti Corruption Commission in its regulations
- vii. An employee shall not receive a gift which is given with the intention of compromising the integrity, objectivity or impartiality of the employee.
- viii. Notwithstanding any other provision of this Code, an employee may accept gifts which are;
  - a) Not monetary.
  - b) Occasional and inexpensive or in form of souvenir or gifts whose value does not exceed twenty thousand shillings.
  - c) Within the ordinary bounds of propriety, a usual expression of courtesy or protocol and within the ordinary standards of hospitality.
  - d) Donations from relatives or friends on such special occasions as may be recognized by custom.
  - e) In the form of information for educational or literary purpose, research purposes or other similar purposes.
- ix. When any gift or donation is made for the development of the College, the College Management shall:
  - a) Disclose to the Board of Directors the nature of the gift or donation and how it intends to utilize the same; and
  - b) Register the gift or donation and fully account for its use.
- x. The College shall keep a register of:
  - a) Gifts received by employees serving in the College.
  - b) Gifts given by the College to other persons and institutions.
- xi. The College shall adhere to the EACC regulations regarding receipt and disposal of gifts under this section.

### 3.23 Nepotism

An employee shall not practice nepotism or favouritism in decision making or provision of service.

### 3.24 Financial Dealings

- i. Employees shall live within their means and avoid incurring any financial liability that they cannot satisfy. An employee who becomes bankrupt, becomes a judgement-debtor or against whom proceedings are taken in bankruptcy shall forthwith report the matter to the employer.
- ii. Pecuniary embarrassment, from whatever cause, will be regarded as necessarily impairing the efficiency of an employee and rendering him/her liable to disciplinary proceedings.
- iii. KMTC will endeavour to give opportunity to employees who are in debt to extricate themselves from their financial embarrassment. In the event that they are not able to, the College shall act in accordance to the provisions of the law.
- iv. If an employee sustains a loss of public funds in consequence of neglect or fault, he/she will be held to have incurred a pecuniary liability in respect of the loss, and he/she may be required to meet this liability in whole or in part.

### 3.25 Collections and Harambees

An employee shall not, either as a collector or promoter of a public collection, obtain money or other property from a person by using their official position in any way to exert pressure.

### 3.26 Declaration of Income, Assets and Liabilities

Every employee shall on first appointment and bi-annually thereafter submit to the Public Service Commission a declaration of income, assets and liabilities of himself/herself, spouse(s) and dependent children under the age of eighteen (18) years in accordance with the Public Officer Ethics Act, 2003.

### 3.27 Official Secrets

All employees shall be required to adhere to the Official Secrets Act (CAP. 187).

### 3.28 Giving of Advice

An employee who has a duty to give advice shall give honest and impartial advice without fear or favour.

### 3.29 Misleading the Public

An employee shall not knowingly give false or misleading information to members of the public or to other employees.

### 3.30 Acting for Foreigners

- i. No employee shall, in a manner that may be detrimental to the security interest of Kenya, be an agent for, or further the interest of a foreign government, organization or individual.
- ii. For the purpose of this Code:
  - a) An individual is foreign if the individual is not a citizen of Kenya.
  - b) An organization is foreign if it is established outside Kenya or of it is owned or controlled by a foreign government, organization or individual.

### 3.31 Absence from Kenya

A staff member who wishes to travel outside of Kenya shall inform the Chief Executive Officer), prior to such travel and get approval from the Board of Directors of the Board Chairperson.

### 3.32 Acting Through Others

- i. An employee contravenes this Code if:
  - a) He/she causes anything to be done through another person that would be a contravention of this code if done by the employee or;
  - b) He/she allows or directs a person under his/her supervision or control to do anything that is a contravention of the Code of Conduct and Ethics.
- ii. This does not apply with respect to anything done without the employee's knowledge or consent if the employee took reasonable steps to prevent it.

### 3.33 Participation in Tenders

- i. An employee shall not participate in a tender for the supply of goods or services to the College or any other public organization in which the employee is similarly associated.
- ii. The holding of shares in a company shall not be construed as participating in the tender of the College unless the employee has a controlling shareholding in the company.

### 3.34 Bank Accounts Outside Kenya

An employee:

- a) Shall not open or continue to operate a bank account outside Kenya without the approval of EACC.
- b) Who has reasonable grounds for opening or operating a bank account outside Kenya shall apply to the EACC for approval to open or operate the account.

### 3.35 Dress Code

An employee's dressing shall, at all times reflect appropriate professional discretion, decency and modesty.

## 4.0 IMPLEMENTATION

### 4.1 Enforcement of Ethical Standards

- i. All employees shall be required to sign the Code of Conduct and Ethics Commitment form. (see Appendix III)
- ii. When an employee has committed a breach of this Code, an appropriate action will be taken in accordance with the provisions of the Leadership and Integrity Act, 2012, Public Officers Ethics Act, 2003; other laws; other organizational policies; and the terms and conditions of service of the employee.
- iii. The Board of Directors shall have the ultimate responsibility for enforcement of this Code at all levels of the College. The Human Resource Committee of the Board shall receive quarterly reports and make recommendations to the Board of Directors.

- iv. The Top Management shall ensure that this Code is implemented and enforced at all levels of the College.
- v. The Heads of Department/ Section have the delegated responsibility for enforcement of this Code at their respective levels.
- vi. The HRM Department and Corruption Prevention Committee shall be involved in facilitating the sensitization, enforcement, monitoring and evaluation of this Code.
- vii. All individual staff members, service providers and other stakeholders shall carry out their activities in the spirit and letter of this Code.

## **4.2 Reporting breach of the Code**

- i. Any breach of the provisions of this Code shall be reported in writing either openly or anonymously and in confidence by a student, staff member, customer or another stakeholder. The report shall specify the nature of the complaint, the dates and actual place where the incident took place.
- ii. If any employee considers that anything required of him/her is a contravention of the code of conduct and ethics or is otherwise improper or unethical, he/she shall report the matter to the appropriate College authority.
- iii. Upon receipt of the complaint, it shall be handled in accordance with the College procedures.

## **4.3 Review**

This Code will be reviewed every three (3) years by the CPC in consultation with the HRM Department.

## **4.4 Effective Date**

This Code, which provides the general rules of conduct and ethics to be observed by employees of KMTC so as to maintain integrity and uphold the dignity of the public office, shall come into force after its approval by the KMTC Board of Directors.

## APPENDIX I : DECLARATION OF CONFLICT OF INTEREST

### Part A- Declaration (to be completed by staff member)

Reported to: .....

I would like to report the following existing/ potential\* conflict of interest situation arising during the discharge of my official duties:

1. Persons/ companies where there is conflict of interest

(a) .....

(b) .....

(c) .....

(d) .....

(e) .....

2. Brief description of the nature of conflict of interest.

.....  
 .....  
 .....  
 .....  
 .....  
 .....

.....	.....	.....
<b>Name of declaring staff member</b>	<b>Title/ Department</b>	<b>Signature and Date</b>

### Part B - Acknowledgment (to be completed by approving authority)

To: (Declaring member).....

This information contained in your declaration for.....is noted. It has been decided that:

☐ You should refrain from performing or getting involved in performing the work/participating in deliberations regarding the issue as described in Part A.

OR

☐ You should continue to handle the assigned duty provided that there is no change in information declared in Part A.

Other conditions (please specify).....

.....

.....	.....	.....
<b>Name of Approving Authority</b>	<b>Title/ Department</b>	<b>Signature and Date</b>

## APPENDIX II: REPORT OF GIFTS RECEIVED

### Part A - Declaration (to be completed by member)

To: (Approving authority).....

Description of Gift.....

Name and title of presenter.....

Name of presenting Institution.....

Occasion on which the gift was received.....

Assessed value of gift.....

Proposed method of disposal (Please tick one)

- ☐ Retained by receiving staff
- ☐ Retained for display/ souvenir in the office
- ☐ Shared among the officers involved (specify)
- ☐ Reserve as luck draw prize at staff function
- ☐ Donate to charitable organization
- ☐ Return to presenter
- ☐ Others (specify)

.....	.....	.....
<b>Name of declaring staff member</b>	<b>Title/ Department</b>	<b>Signature and Date</b>

### Part B - Approval (to be completed by approving authority)

The recommended method of disposal is approved/ not approved\*

The gift(s) concerned should be disposed of by way of:

.....

.....	.....	.....
<b>Name of Approving Authority</b>	<b>Title/ Department</b>	<b>Signature and Date</b>

### APPENDIX III: COMMITMENT TO THE CODE

I .....Holder of National ID/Passport No. .... and Postal

Box No.....PF No....., as an employee of Kenya Medical Training College, do hereby confirm that I have read and understood the KMTC Code of Conduct and Ethics and do commit to abide by the provisions of the Code at all times.

Signed this.....day of .....20.....

.....	.....	.....
Name of staff member	Title/ Department	Signature and Date

Witnessed by:

Human Resource Manager/Designate .....

**Name, Signature & Date**



## APPROVAL

**Title** : Code of Conduct and Ethics

**Contact** : Deputy Director Finance and Administration

**Approving Authority** : The Board of Directors

**Commencement Date** : May 2019

## SIGNED



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**Prof. Philip Kaloki, MBS,**  
**Chairperson, KMTC Board of Directors.**

15th May 2019  
**Date**



KMTC is ISO 9001:2015 Certified.

**Kenya Medical Training College**


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