



MACHAKOS UNIVERSITY

WHISTLE BLOWING POLICY

SEPTEMBER, 2023

APPROVAL

Policy Guide Title: Whistle Blowing Policy

Contact Office: Deputy Vice-Chancellor (APF)

Approval Authority: The University Council

Category: Division of Administration, Planning & Finance

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Effective date: Date of Signing

Approved by the University Council:

Signature: Date.....

**PROF. JOYCE J. AGALO, PhD
VICE CHANCELLOR**

Signature: Date.....

**DR. CHRISTOPHER GATAMA GAKAHU, PhD
CHAIRMAN, MACHAKOS UNIVERSITY COUNCIL**

FOREWORD

The aim of the Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The University is committed to conducting its business with honesty, integrity and expect its entire staff to maintain high standards in realisation of its mandate and to ensure that as a Public institution, good ethical conduct, integrity, accountability and zero tolerance to corruption is observed in line with the Constitution of Kenya and all relevant and applicable laws. To ensure this, the University through this Policy aims at cultivating a culture of openness and accountability which is essential in order to prevent situations occurring or to address them when unethical conduct is exhibited.

The policy supplements Machakos University's code of conduct and other statutory reporting procedures and is in line with the witness protection act cap 79 of 2006(revised 2012) which provides for protection for employees for disclosures made without malice and in good faith. It is benchmarked with and informed by international best practices, the Constitution of Kenya, 2010, national legal and policy frameworks, and the Machakos University Statutes. Where this policy conflicts with an act of parliament/ or other government circulars' the act will take precedence.

This Policy aims to encourage staff, students and all stakeholders to report suspected wrongdoing as soon as possible and to also outline guidance on how to raise such concerns. The mechanisms outlined in the Policy shall ensure that reports made shall be made without fear of reprisals.

PROF. JOYCE J. AGALO, PhD
VICE-CHANCELLOR

UNIVERSITY FUNDAMENTAL STATEMENTS

VISION

Excellence in transformative scholarship and community service

MISSION

To provide scholarship through teaching, training, research and innovation; and community service for sustainable industrial and socioeconomic transformation

Machakos University Identity Statement

Machakos University is an Academic Institution Committed to Generating and Transmitting Knowledge, Skills, and Attitudes through Science, Technology, Research, and Innovation for the Benefit of Humanity.

Machakos University Philosophy Statement

The Philosophy of Machakos University is ‘Education for Industrial and Economic Transformation’

Mandate

The mandate of Machakos University is to Teach, Train, Conduct research, Innovate, Collaborate, generate new knowledge and Community Service

Core Values

Creativity: We shall use imagination and original ideas to create value for our customers.

Agility: We shall embrace urgency and flexibility in responding to customer demands

Meritocracy: We shall promote merit-based services

- Professionalism:** We are committed to high standards of training, research and service delivery
- Integrity:** We shall uphold honesty and high moral standards
- Inclusivity:** We shall offer equitable access to opportunities and resources

ABBREVIATIONS AND ACRONYMS

APF:	~	Administration, Planning and Finance
DVC:	~	Deputy Vice Chancellor
MksU	~	Machakos University
VC	~	Vice-Chancellor

DEFINITIONS

Complaint: An allegation or concern that is subject to investigation by the University or an appropriate authority.

“Corruption”: Corruption means the misuse or abuse of the University office for private gain. Circumstances that would constitute corruption include:

- a) Bribery
- b) Embezzlement
- c) Misappropriation or diversion of public property and public funds
- d) Abuse of functions
- e) Misuse of cash or University resources
- f) Illicit enrichment
- g) Obstruction of justice and concealment
- h) Practicing of nepotism, tribalism, clannism
- i) Practicing discrimination based on religion, gender, or disability
- j) Improper reporting of time (timecard, sick or vacation leave reporting)
- k) Activities causing environmental pollution and degradation
- l) Inversion and distortion of social values including soliciting for and giving sexual and assorted favours
- m) Negligence of professional ethics
- n) Electoral fraud including election manipulation or vote rigging, and
- o) Any other acts of corruption as defined in the Anti-Corruption and Economic Crimes Act, 2003.

Detriment: Victimization or reprisal of a whistle-blower which can take any or a combination of the following forms; dismissal,

termination, redundancy, undue influence, duress, withholding of benefit and/or entitlements and any other act that has negative impact on the whistle-blower.

Good Faith: This is evident when a report or concern is made without malice or consideration of personal benefit and the employee, student or stakeholder has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

Investigation: A process designed to gather and analyse information in order to determine whether misconduct has occurred and if so, the party or parties responsible.

Misconduct: Failure by a staff member or other relevant stakeholder to observe the rules of conduct or standards of behaviour prescribed by the University or any written law, rule and regulation.

Suspect: A person who is alleged to have committed a misconduct and subject of investigation.

Whistle-blower: Any person(s) including employee, students, management, Directors, service providers and other stakeholders of the University who report any form of unethical behaviour or dishonesty to the appropriate authority.

Whistleblowing: The act of reporting an observed/perceived unethical misconduct of employees, management, Directors and other stakeholders of the University by an employee or other person to appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action where appropriate and applicable.

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1.0 INTRODUCTION

MksU in ensuring a high ethical standard in all its business activities has established a code of ethics and Anti-Corruption Policy which sets out the standard of conduct expected in the management of its businesses across MksU. All stakeholders are expected to comply with these standards in the discharge of their duties.

In furtherance of this, this Whistleblowing Policy and Procedure provides a channel for MksU's employees and other relevant stakeholders to raise concerns about workplace malpractices, in a confidential manner; for the University to investigate alleged malpractices and take steps to deal with such in a manner consistent with University's policies and procedures and relevant regulations.

This policy and procedure manual outlines Mksu's Policy on whistle blowing and the procedure for investigating and dealing with all reported cases of illegal and unethical conduct and any other misconduct across the University. This policy is in compliance with the requirements of various regulatory authorities with oversight on the conduct of Public Officers in conducting their duties.

1.1 Scope

This policy and procedure manual is designed to enable employees and other relevant stakeholders to report any perceived act of impropriety which should not be based on mere speculation, rumors and gossips but on knowledge of facts. Reportable misconducts covered under this policy include: -

- i. All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft and concealment;
- ii. Failure to comply with legal obligations, statutes, and regulatory directives;
- iii. Actions detrimental to Health and Safety or the work environment;
- iv. Any form of criminal activity;
- v. Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness;
- vi. Other forms of corporate governance breaches;
- vii. Connected transactions not disclosed or reported in line with regulations;
- viii. Insider abuse;
- ix. Non-disclosure of interests;

- x. Sexual or physical abuse of staff, students, customers, prospective staff, service providers and other relevant stakeholders; and
- xi. Attempt to conceal any of the above listed acts.

The above listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion is required to determine misconduct that should be reported under this policy. The general guide in identifying reportable misconduct is to report concerns which are repugnant to the interest of the MksU and the general public and appropriate sanctions applied.

This policy covers the activities of the University. This is without prejudice to the requirements by regulators of the various subsidiaries to put in place their respective whistleblowing policies. Furthermore, this policy shall be read in conjunction with all the National laid down policies, rules and regulations governing whistleblowing in Kenya. Finally, this policy does not cover individual staff grievances and other employee related matters already covered in the staff hand-books of the University.

1.2 Objectives

This policy is intended to encourage staff and other relevant stakeholders to report perceived unethical or illegal conduct of employees, management, directors and other stakeholders across the University to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this policy.

Specific objectives of the policy are:

- i. To ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical or inappropriate conduct within MksU;
- ii. To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the University;
- iii. To provide clear procedures for reporting and handling such concern(s);
- iv. To proactively prevent and deter misconduct which could impact the financial performance and damage the University's reputation;
- v. To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- vi. To help promote and develop a culture of openness, accountability and integrity.

1.3 Guiding Principle

This policy is guided by five key principles:

- a) Fairness:
Fairness and appropriateness of response complaints on fraudulent or unethical conduct that is genuine.
- b) Protection:
Freedom to raise genuine concerns without fear of harassment, discrimination, and victimization.
- c) Confidentiality:
Information on any individual making a Disclosure will be kept confidential unless he/she agrees otherwise
- d) Transparency and feedback towards the persons raising the Concern:
The Machakos University will ensure that any individual raising a concern is aware of who is handling the matter and that feedback is provided as appropriate.
- e) The legitimacy of Concern:
This policy supports all genuine Concerns and does not cover any issues that are raised maliciously and those based on falsehood.

1.4 Legal Framework

This policy will be guided by the relevant legal and policy frameworks, which include:

- (a) Constitution of Kenya, 2010
- (b) Anti-Corruption and Economic Crimes Act, 2003
- (c) Commission on Administrative Justice Act, 2011
- (d) Ethics and Anti-Corruption Commission Act, 2011
- (e) Fair Administrative Action Act, 2015
- (f) Leadership and Integrity Act, 2012

- (g) Official Secrets Act (Cap 187)
- (h) Penal Code (Cap. 63)
- (i) Public Officer Ethics Act, 2003
- (j) Public Procurement and Asset Disposal Act, 2015
- (k) Proceeds of Crime and Anti-Money Laundering Act, 2009
- (l) Public Audit Act, 2015
- (m) Public Finance Management Act, 2012
- (n) Universities Act, 2012
- (o) Witness Protection Act, 2006
- (p) Leadership and Integrity Code
- (q) Mwongozo Code of Conduct
- (r) Machakos University Rules and Regulations Governing Student Conduct
- (s) Machakos University Service Charter
- (t) Machakos University Staff Code of Conduct
- (u) Machakos University Statutes

2.0 ADMINISTRATION OF THE POLICY

- i. The Policy shall be administered by the Council and the Vice-Chancellor who shall where appropriate, appoint an ad hoc committee to investigate matters that have been brought to the attention of the University through the whistle blowing mechanism.
- ii. The role and responsibility of the key parties in the whistle blowing process shall be as follows:

S/No	RESPONSIBLE OFFICER	RESPONSIBILITIES
1.	Whistle-blower	Are expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s), and also provide further evidence at his/her disposal to aid investigation of the issues reported.
2.	Suspect	Suspect has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator (s).
3.	Investigator (s)	The investigator(s) is expected to handle all matters with high professionalism, confidentially, promptly and shall be independent and unbiased in carrying out investigation. The investigator shall provide to the Chairperson of the Audit and Risk Committee of Council, the Council and the University Management a report of the investigation including the result of the investigation. The investigator(s) shall refrain from discussing or disclosing matters under investigation.
4.	Head of Human Resource	Once investigations are complete, the Head of Human resources shall handle the report of investigation that relates to the University's employees in line with the laid down disciplinary procedure as contained in the University's Human Resource Procedure Manual.
5.	Audit and Risk Committee of Council	The Chairperson, Audit and Risk Committee of Council through the Vice-Chancellor shall make available to all committee members quarterly reports submitted by the Head of

		Internal Audit on whistleblowing, and also treat all whistleblowing concern(s) brought to the attention of the committee with confidentiality and speedy resolutions.
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3.0 WHISTLEBLOWING PROCEDURE

The whistle blowing procedure involves steps that should be taken by the whistle-blower in reporting misconduct, and steps required for the investigation of the reported misconduct. The following procedures shall guide the whistle blowing process:

3.1 Internal Whistleblowing Procedure

- i. Internal whistle blowing involves staff members across MksU raising concerns about unethical conduct.
- ii. Any internal whistleblower that feels victimized can report his/her grievance(s) to the Chairman of Council. This is without prejudice to the fundamental right of the internal whistleblower to seek redress in the court of law.
- iii. The following procedure shall be adopted for the purpose of internal whistle blowing:

Step One: Raising concern(s) by whistle-blower ~ medium and format

- i. An internal whistleblower may raise concern through any of the following media (this can be done either by declaration or in confidence/ anonymously):
 - a. Formal letter to the Chairman of Council or the Vice-Chancellor of MksU,
 - b. Dedicated phone number/ communicator (insert number)
 - c. Dedicated email address mksuwhistleblowing@mksu.ac.ke or chairofcouncil@mksu.ac.ke
 - d. Via MksUs website: www.MksU.com/whistleblowing
- ii. Where the concern is received by staff other than the Chairman of Council or Vice-Chancellor, the recipient of such concerns shall be required to;

- a. Immediately pass the concern(s) to the Vice-Chancellor.
 - b. If the concerns affect the Vice-Chancellor, the Chairman of Council shall be notified.
- iii. The concern(s) shall be presented in the following format;
- a. Background of the concerns (with relevant dates)
 - b. Reason(s) why the whistleblower is particularly concerned about the situation.
- iv. Disciplinary measures in line with the University's disciplinary policy shall be taken against any staff that receives concerns and fails to escalate. Also disciplinary measure shall be taken against an internal whistleblower who acted out of malice.

Step Two: Investigation of Concerns and update on progress of investigation.

- i. The Vice-Chancellor shall on receipt of the concern(s) acknowledge receipt of the concern from the whistleblower within 5 working days, and immediately commence investigation. The purposes of investigation are to:
 - a. Establish if a wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and
 - b. To minimize the risk of further wrongdoing, prevent any further loss of assets, damage to the group's reputation and if possible, protect all sources of evidence.
- ii. If preliminary investigation shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out. If otherwise or the concern is outside the reportable misconduct, then the Vice-Chancellor shall refer the matter to appropriate department for further action.
- iii. If the concern raised by the whistleblower is frivolous or unwarranted, the VC shall ignore such concern, if necessary disciplinary measure in line with Human Resources policy shall apply to staff that raise concern out of malice.

Step Three: Report of Investigation and action on report.

- i. Upon conclusion of investigation, the VC shall ensure that the report is discussed by the management of the University and a report to the Council. The VC shall ensure that the Council is kept abreast of developments in whistleblowing.

- ii. All disciplinary action relating to the report shall follow MksU's disciplinary procedure as contained in the Human Resource Procedure Manual.

Step Four: Non-Satisfaction with result of investigation/action

In the event that the whistleblower is not satisfied with the extent of investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the Chairman of the Council.

3.2 External Whistleblowing Procedure

External whistle-blowers are non-staff of MksU. External whistle-blowers can fall into any of these categories: students, contractors, service providers, job applicants, and the general public.

External whistle blowing shall follow the following procedure:

- i. External whistle blowing involves staff members across MksU raising concerns about unethical conduct.
- ii. An external whistle-blower shall be at liberty to report to appropriate regulatory body or seek further redress in the court of laws if he/she is not satisfied with the action taken to address the concern(s).
- iii. The following procedure shall be adopted for the purpose of external whistle blowing:

Step One : Raising concern(s) by whistle-blower ~ medium and format

- i. An external whistleblower may raise concern through any of the following media (this can be done either by declaration or in confidence/ anonymously):
 - a. Formal letter to the Chairman of Council or the Vice-Chancellor of MKSU,
 - b. Dedicated phone number/ communicator (insert number)
 - e. Dedicated email address mksuwhistleblowing@mksu.ac.ke or chairofCouncil@mksu.ac.ke
 - c. Via MKSUs website: www.MksU.com/whistleblowing
- ii. Where the concern is received by staff other than the Chairman of Council or Vice-Chancellor, the recipient of such concerns shall be required to;

- a. Immediately pass the concern(s) to the Vice-Chancellor.
 - b. If the concerns affect the Vice-Chancellor, the Chairman of Council shall be notified.
- iii. The concern(s) shall be presented in the following format;
- a. Background of the concerns (with relevant dates)
 - b. Reason(s) why the whistleblower is particularly concerned about the situation.
- iv. Disciplinary measures in line with the Human Resource Procedure Manual shall be taken against any staff that receives concerns and fails to escalate. Also disciplinary measure shall be taken against an external whistleblower who acted out of malice.

Step Two: Investigation of Concerns and update on progress of investigation.

- i. The Vice-Chancellor shall on receipt of the concern(s) acknowledge receipt of the concern from the whistleblower within 5 working days, and immediately commence investigation. The purposes of investigation are to:
 - a. Establish if a wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and
 - b. To minimize the risk of further wrongdoing, prevent any further loss of assets, damage to the group's reputation and if possible, protect all sources of evidence.
- ii. If preliminary investigation shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out. If otherwise or the concern is outside the reportable misconduct, then the Vice-Chancellor shall refer the matter to appropriate department for further action.
- iii. If the concern raised by the whistleblower is frivolous or unwarranted, the VC shall ignore such concern.
- iv. Where it is established that a criminal activity has taken place, the matter may be referred to the Director Criminal Investigations or Ethics and Anti-Corruption Commission, and where appropriate legal action taken.

Step Three: Report of Investigation and action on report.

- i. Upon conclusion of investigation, the VC shall ensure that the report is discussed by the management of the University and a report to the University Council. The VC shall ensure that the University Council is kept abreast of developments in whistleblowing.
- ii. All disciplinary action relating to the report shall follow MksU's disciplinary procedure as contained in the Human Resource Procedure Manual.

Step Four: Non-Satisfaction with result of investigation/action

In the event that the whistleblower is not satisfied with the extent of investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the Chairman of Council.

3.3 Time Limit for Investigation

- i. It shall be the policy of MksU to handle investigations promptly and as fairly as possible. While it might not be possible to set a specified time frame for the conclusion of investigation, since the diverse nature of potential concerns may make this impracticable.
- ii. The VC shall endeavour to resolve all concerns within three (3) months. Where for any reason, proper resolution is unable to be achieved within this time frame; the VC shall advise the University Management accordingly, and report to the Council.

4.0 ANONYMOUS ALLEGATIONS

Whistle-blowers making disclosures under this policy are encouraged to reveal their identities. Anonymous disclosures may prove difficult to investigate but will be considered at the discretion of the University. In exercising this discretion, the Designated Office will take into account the following:

- a) the seriousness of the issues raised;
- b) the credibility of the information disclosed; and
- c) likelihood of confirming the information from other sources.

This policy encourages Stakeholders and Employees raising concerns to provide their names and contact details to facilitate follow-up and feedback. To the extent

possible, all Concerns should be factual and be supported by evidence, rather than being speculative or presumptive; and should contain as much information as possible to allow for proper assessment. Concerns expressed anonymously are less powerful but will be considered at the discretion of Machakos University. In exercising this discretion, the factors to be taken into account shall include:

- a) The seriousness of the issues raised
- b) The credibility of the Concern and
- c) The likelihood of confirming the allegation from reputable independent sources.

5.0 PROTECTION FOR WHISTLE BLOWER

If a member of staff discloses in conformity with this Policy, the member may not:

- a) be dismissed from employment;
- b) have salary increases or employment-related benefits withheld;
- c) be transferred or reassigned;
- d) be denied a promotion that the employee otherwise would have received;
or
- e) be demoted.

If a student discloses in conformity with this Policy, the student may not:

- a) be suspended or expelled from the University;
- b) have financial aid or other benefits withheld;
- c) be harassed by lecturers, employees, or other students;
- d) be denied enrolment in classes;
- e) have their grades reduced; or
- f) be subject to any other form of discrimination.

If any other member of the University community discloses in conformity with this policy, the University will not subject them to detrimental action.

Any member of the University community who takes the above detrimental action against a whistle-blower will be subject to disciplinary action up to and including termination of services or expulsion from the university as appropriate.

6.0 PROTECTION OF THE SUSPECT

In the interest of natural justice, the suspect will be presumed innocent and will be accorded the right to be heard. The suspect will be taken through fair due process.

7.0 WITHDRAWAL OF PROTECTION

The University may revoke the whistle-blower protection conferred under this Policy if it believes, based on its investigation or in the course of its investigation finds that:

- a) the whistle-blower has participated in the corruption or malpractice disclosed;
- b) the whistle-blower wilfully made in his/her disclosure of corruption or malpractice a material statement that he knew or believed to be false or did not believe to be true;
- c) the disclosure of corruption or malpractice is malicious or baseless;
- d) the disclosure of corruption or malpractice principally involves questioning the merits of government policy, including the policy of a public body.

If the whistle-blower protection has been revoked, the Designated Office will give written notification to that effect to the whistle-blower.

8.0 POLICY IMPLEMENTATION

8.1 Implementation Date

- i. This policy takes effect on the date it is approved by the University Council.
- ii. The Vice-Chancellor is responsible, in consultation the Public Complaints Handling Committee, the Corruption Prevention Committee (CPC) of the University and the University Management Board, for ensuring that the MksU Whistle Blowing Policy is distributed and complied with.

8.2 Monitoring and Evaluation

- i. The University shall conduct monitoring and evaluation of the effectiveness of this Policy in line with the Monitoring, Evaluation and Reporting framework through the Ethics and Anti-Corruption Committee.
- ii. The Committee shall:
 - a) Develop and maintain strategies and mechanisms for monitoring and evaluation of this policy.
 - b) Undertake regular check on implementation of the policy.
 - c) Carry out biennial evaluation on the implementation of the policy.
 - d) Use the information for planning and management.
 - e) Propose potential areas for review.

8.3 Review

The policy will be reviewed after every five (5) years or earlier as need arises with an aim to enhance efficient delivery of effective outcomes.