



Kampala International University, Uganda

COMPLIANCE FRAMEWORK

September 2024

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INTRODUCTION

Kampala International University (KIU) is a chartered privately funded University in Uganda, founded in 2001 and a member of The Inter-University Council of East Africa, Association of African Universities, East African Quality Assurance Network (EAQAN) and Uganda Universities Quality Assurance Form (UUQAF).

KIU offers quality, market driven and learner-centered education. The University has two campuses: 1) The Main campus in Kampala which is located along Kansanga, Ggaba Road offering undergraduate, postgraduate and Doctoral programmes in Economics and Management, Education, Engineering and Applied Sciences, Humanities and Social Sciences, Computing and Information Technology. 2) The Western Campus which is located in Ishaka- Bushenyi (About 300 km from Kampala); It offers Medical Sciences programmes as well as Education, Business and Management courses.

The Vision of KIU is to become a premier institution of international repute that prepares students for the world and for an inclusive society.

KIU's Mission is to respond to societal needs by designing and delivering education guided by the principles and values of respect for society, economy and environment as well as to provide and develop a supportive research environment in which scholars at every stage of their career can flourish.

KIU also strives to ensure that graduates understand and are prepared to carry out the expected tasks that comply with applicable laws, rules, regulations and University policies.

KIU requires its Schools/Faculties/Colleges, students and staff to act in a legal manner, consistent with all applicable government standards, requirements and

University policies. The Compliance Plan is designed to strengthen and further demonstrate KIU’s commitment to achieve the highest level of awareness of governmental standards and University policies so as to prevent and detect violations. This would ensure that the minimum quality standards of both processes and products or outputs in the University are met.

Quality in higher education is perceived by stakeholders differently as highlighted in Fig 1. Quality assurance in KIU is therefore very crucial in ensuring that programmes, research and other University activities are of quality as prescribed by the KIU polices and quality assurance frameworks of regulators (i.e. the National Council of Higher Education and Inter-University Council of East Africa).

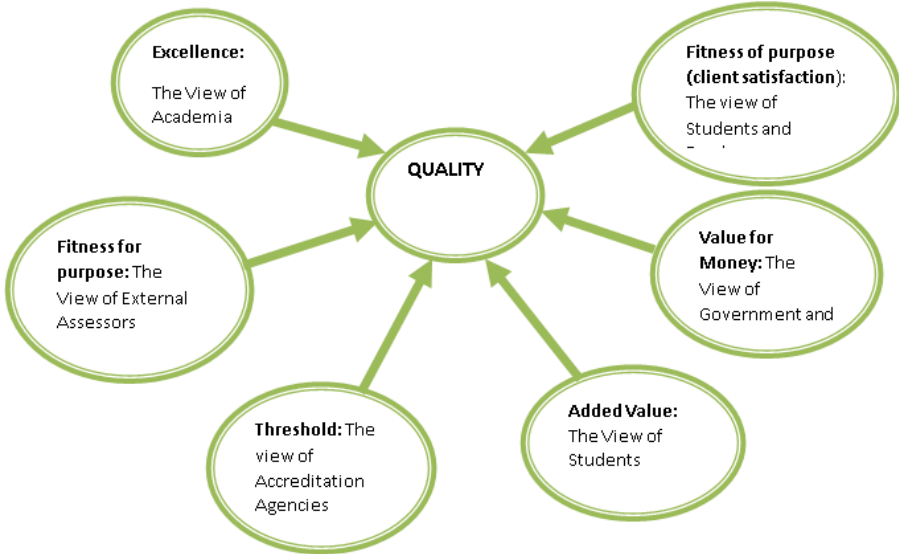


Fig 1: Stakeholders perception of quality in Higher Education

The KIU Compliance Plan establishes a framework for compliance with applicable academic and research laws, regulations and policies of the University and other regulators. Each faculty member and staff is responsible to ensure that their actions comply with the Plan. The Plan is not intended to set forth all the substantive programs and practices of KIU that are designed to achieve compliance. KIU already maintains various compliance practices, and those practices continue to be part of its overall compliance efforts. This Plan is applicable to all employees of KIU, which

includes any officer, employee, contractors, subcontractors and agents acting on behalf of KIU.

The goals and objectives of the Compliance Plan are as follows:

- a) Ensure compliance with the University's Rules and Regulations;
- b) Implement written policies and procedures delineating ethics and compliance requirements;
- c) Conduct effective training and education;
- d) Monitor KIU's operations on an ongoing basis to assess compliance;
- e) Establish and maintain a confidential mechanism for employees to report instances of non-compliance allowing reports to be fully and independently investigated;
- f) Implement disciplinary action for individuals who violate compliance policies and procedures as well as formulate a corrective action plan to address any issues of non-compliance;
- g) Evaluate current compliance activity at each Unit/department, and where appropriate, develop compliance initiatives at each level;
- h) Provide regular reviews of overall compliance efforts, including plans that reflect current requirements and to identify any necessary adjustments needed to improve the program;
- i) Document KIU's compliance effort in regular reports to the KIU Compliance Committee,
- j) Develop quarterly reports on the compliance check and;
- k) Annually review the Plan for the purpose of ascertaining whether changes or additions are necessary and make appropriate recommendations to the Vice Chancellor and Board of Trustees as may be approved by the University Council.

COMPLIANCE OVERSIGHT

The Compliance plan shall encompass multiple units as indicated in Table 1. There shall also be specified audit periods as indicated in Table II. Compliance oversight

shall be implemented through the Directorate of Quality Assurance to ensure Ethics, Compliance and Corporate Integrity with the full authority of Management Executive.

- a) The Director Quality Assurance (DQA) shall be responsible for the implementation of the Plan.
- b) The DQA, in collaboration with Director, Human Resource shall appoint Unit Compliance Officers/QA monitors who shall assist the DQA in overseeing and implementing the Plan and additional requirements unique to the Unit.
- c) Each Unit Compliance Officer /QA monitor shall be subject to approval of the DQA, establish a supplemental Compliance Plan, if necessary or desirable for the Unit.
- d) Under the direction of the DQA, the Unit Compliance Officer /QA Monitor shall be responsible for implementing and managing the Unit Compliance Program.
- e) The Unit Compliance Officer shall report to DQA, but the Compliance Program's support shall be the joint responsibility of the Dean/Principal or Director and the DQA. The DQA will work closely with the Deans/Principals of the Schools/Colleges or Departments to foster and enhance compliance with all applicable Academic and Non-Academic laws, regulations and requirements of the University

Table 1: Showing the Organization for the Compliance Plan and its Committees across the multiple Units, which are shown below.

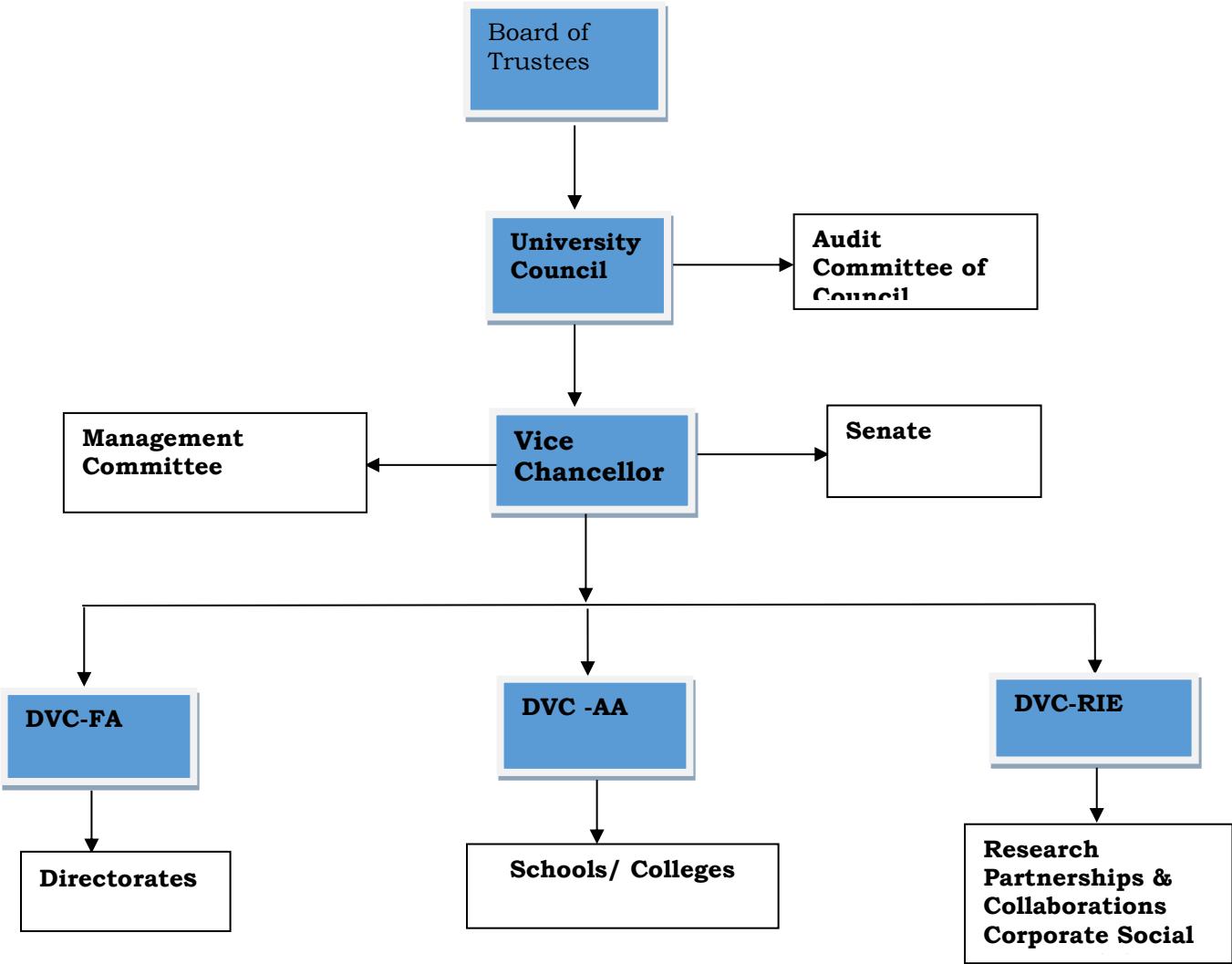


Table 2: Frequency of regular audits regular AUDITS

Sn.	CATEGORY	FREQUENCY OF REGULAR AUDITS
1	BOARD OF TRUSTEES (BOT)	3 Years
2	UNIVERSITY COUNCIL	Once a year
3	MANAGEMENT	Once a year
4	ACADEMIC UNITS	Twice a year per Semester
5	ADMINISTRATIVE UNITS	Twice a year per Semester

The Director of Quality Assurance's responsibilities

- a) Implementation, administration and oversight of the Plan.
- b) Coordinating with each Unit to develop and implement Unit compliance plans, including approval of Unit reviews, oversight of the sample selection process, and review of the documentation process to ensure all reviews are conducted in a consistent manner.
- c) Monitoring all developments or changes relevant to local, and national statutes, regulations and applicable court decisions that may affect the Plan, while coordinating and conducting all necessary as well as appropriate periodic in-house educational compliance trainings for Schools/Colleges/Faculties or Departments.
- d) Developing, reviewing and approving training materials/ programs, monitoring and coordinating training classes through the development of core class curricula at the Unit and assistance in the development of departmental curricula related to compliance issues.
- e) Developing, implementing and directing a process which facilitates reporting of all possible non-compliance by employees to the Directorate of QA on issues pertaining Ethics, Compliance and Corporate Integrity.
- f) Developing appropriate corrective action plans to address compliance issues.

- g) Preparing annual and quarterly compliance reports for submission to the management executive and Council. The documents should detail the organization's compliance efforts, summarizes compliance activities and identifies suggested changes and enhancements.
- h) Review, revise and develop appropriate policies to guide all Schools/Colleges/Faculties employees in their compliance efforts.
- i) Review, revise and approve all Unit Compliance plans.
- j) Provide overall leadership for the Unit Compliance Plans.
- k) Coordinating with the KIU legal department regarding all legal issues of compliance.
- l) Reporting on all activities to the Vice Chancellor.

RESEARCH COMPLIANCE

The University's research compliance effort shall be coordinated through a cooperative interaction of the DQA with the Deputy Vice Chancellor- Research, Innovation, Consultancy and Extension.

UNIT IMPLEMENTATION

Each Unit may, as deemed appropriate by the Unit Compliance Officer/QA monitor in conjunction with the Dean or Principal or Director of the Unit, develop a compliance plan. An administrator may be appointed to assist in the implementation and monitoring of the Unit's plan. Before becoming effective, the unit compliance plan shall be reviewed and recommended by the DQA to Management. Each Unit's compliance plan shall include, as a minimum:

- a) Written policies and procedures for activities undertaken by the Unit;
- b) Coordination of mandatory education and training programs provided by the Unit Compliance Officer/ QA Monitor to address issues of interest or of particular importance to the Unit;
- c) A program for ensuring and documenting that all new Unit employees receive training with regard to compliance issues within three months of initial employment to instruct them as appropriate on expected practices and documentation requirements;
- d) Preparation of annual and quarterly reports by the Unit for submission to the DQA which describes the compliance activities completed within the department for that specific period;
- e) An annual assessment of the Units compliance plan identifying necessary changes and specific compliance objectives for the subsequent reporting period.

COMPLIANCE POLICIES AND PROCEDURES

POLICY GUIDELINES

The Directorate of Quality Assurance will ensure and develop any additional policies for the University as well as review existing policies. Relevant policies will be incorporated into this Plan as they are approved by the Senate Quality Assurance and Gender Committee. Such policies may include but are not limited to:

- a) Policy on Record Documentation
- b) Policy on Teaching and Learning Rules
- c) Policy on Annual Reviews of Providers' Compliance
- d) Policy on Reporting Compliance and Ethics Concerns
- e) Policy on Sanctions for Plan Violations
- f) Policy on Review of Disciplinary Action Related to Non-Compliance

EDUCATION AND TRAINING

The Director, Quality Assurance shall be responsible for overseeing the development, coordination and implementation of training and education programs

to ensure that policies, guidelines and regulations involving compliance issues are disseminated and understood. To accomplish this objective, the Unit Compliance Officers/QA Monitors will work with the DQA to provide a systemic, ongoing training program that enhances and maintains awareness of compliance policies among existing employees. All training material that addresses compliance issues should be submitted to the DQA for review and approval before such training are conducted.

Areas of mandatory training and education shall include the following:

- a) General Teaching Guidelines and Regulations
- b) Evaluation and Management (E/M) Guidelines
- c) Specialty specific training
- d) University regulations and requirements
- e) Any issues brought forward as a result of department audits
- f) Advising employees of their obligations under the compliance plan
- g) Appropriate reporting to prevent errors

INTERNAL REVIEW AND MONITORING

Each employee engaged in the University shall be reviewed periodically by the Unit Compliance Officer/QA Monitor. The Unit Compliance Officer/QA Monitor may require more frequent reviews as deemed necessary and appropriate. If a review identifies issues of non-compliance, the Unit Compliance Officer/QA Monitor shall report the issue to the DQA and copy to Heads of either academic or non-academic units. In consultation with the Director, Human Resource, the DQA shall review the situation to determine if there has been any activity inconsistent with the University policies before referring the issue to the legal officer. If, at the conclusion of any investigation, it appears there are compliance concerns, a corrective action plan will be formulated and initiated as quickly as possible.

All employees will be trained on the importance of adherence to this Plan. All newly appointed employees will be required to acknowledge that adherence to the Compliance Program outlined in this Plan as a material condition of employment.

Employees will be informed that failure to comply with the requirements of the Plan will result in disciplinary action against them up to and including immediate dismissal.

The DQA shall report to the Vice Chancellor that the Plan has achieved among others the following goals:

- a) Established compliance standards and procedures that are reasonably capable of assuring ethical and compliant conduct;
- b) Designated specific individuals with a sufficient level of authority to oversee compliance with the standards and procedures set out in the Compliance Plan;
- c) Communicated effectively the standards and procedures to be followed by employees and established a mechanism to report possible issues of non-compliance and misconduct by means which minimizes the potential for retaliation and harassment;
- d) Used monitoring and auditing systems reasonably designed to detect illegal conduct and achieve substantial compliance with the applicable standards and procedures to the best knowledge of the Director, Quality Assurance;
- e) Consistently enforced appropriate discipline of individuals who engage in activity which equates to non-compliance or misconduct and for individuals who are responsible for, and fail to detect, noncompliance or misconduct;
- f) Implemented effective compliance practices to prevent reoccurrence of non compliance or misconduct; responded to any reports of possible misconduct; and modified standards and procedures as necessary to achieve compliance.

REPORTING

The University maintains an “open door” policy with respect to information of suspected violations of compliance. To achieve the goals of this Plan, employees are

required to report any activity which they believe is in violation of this plan or any legal requirements to the Unit Compliance Officer/ QA Monitor who then forwards the report to the DQA and copies to Heads of either academic or non-academic units.

Failure to report knowledge of wrong doing may itself result in disciplinary action.

- a) Any manager or supervisor receiving a report of possible misconduct must immediately advise the Unit Compliance Officer/QA Monitor.
- b) In accordance with this Plan, the University will not tolerate retaliation against any individual who reports actual or suspected violations of the laws, regulations, or policies. All reported violations will be handled with the utmost integrity and confidentiality to keep the identity (if and when known) of the reporting individual, and the identity of the person or persons involved in the suspected violation is only given to those persons with an absolute need to know.
- c) Whenever a compliance issue is identified, the Unit Compliance Officer shall obtain advice and guidance, as needed, from the DQA based on reports presented. There may also be consultation with the Dean/Principal and/or the Director of a non-academic Unit. The DQA, in collaboration with the appropriate senior leadership of the Unit, shall make any necessary reports to the Vice Chancellor.
- d) Corrective action plans shall be designed to ensure not only that the specific issue is addressed, but also that similar problems do not occur in other areas or departments.

ENFORCEMENT AND DISCIPLINE

The aim of the Plan is to clarify the expectations of the University for its employees in order to achieve its goal of accurate compliance practices. It is each employee's responsibility to comply with the policies of KIU and to conduct them in an honest and ethical manner. This responsibility cannot be delegated or assumed by the

University. Violating laws, regulations, University policies, or failing to report such violations can result in disciplinary action by the University up to and including termination. In addition, violators could be subject to civil or criminal charges by outside regulatory agencies.

KIU has a policy (Human Resource Manual) of progressive discipline for violations committed by employees, except where immediate termination is justified due to the nature of the violation. KIU reserves the right to take whatever disciplinary measures it deems appropriate based upon the circumstances surrounding the finding of non-compliance.

RESPONSE AND PREVENTION

This Plan will be revised annually as necessary. To facilitate appropriate revisions to the Plan, the DQA shall prepare a report annually, which describes the general compliance efforts that have been undertaken during the previous year. The report will further identify necessary changes that may improve the effectiveness of the Plan.

The annual compliance report will address all pertinent compliance issues from the preceding year including:

- a) Education and training regarding compliance policies, laws and regulations;
- b) Unit initiated compliance efforts to correct compliance issues;
- c) Corrective actions taken.
- d) Findings of the compliance violations.

The Plan should be revised to address concerns in the above areas and other identified areas to ensure every possible effort to achieve maximum compliance.

PRIVACY AND SECURITY RULES

The KIU Privacy and Security Officer, with direction from the DQA, handles questions and issues relating to KIU compliance with all relevant student and employee privacy and electronic security of student information. Where appropriate,

the DQA will arrange for privacy and security training with the KIU Privacy and Security Officer.

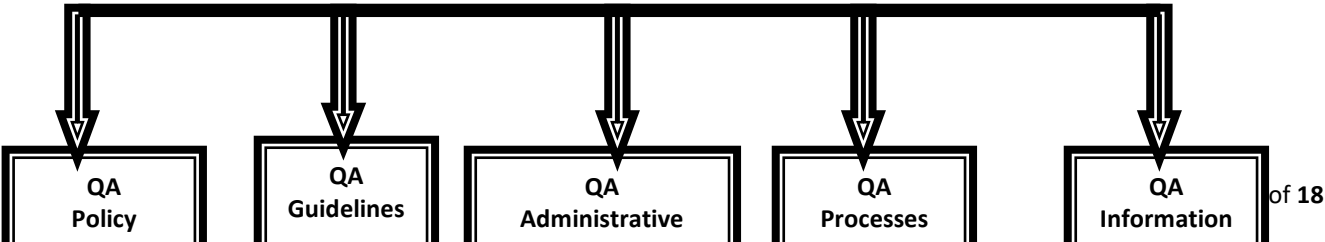
CONCLUSION

The amount and complexity of regulation and the need for compliance adherence in higher education will continue to grow. Compliance failures in higher education have been receiving more attention, and the consequences have become prohibitively expensive. Universities need a means to protect against these consequences.

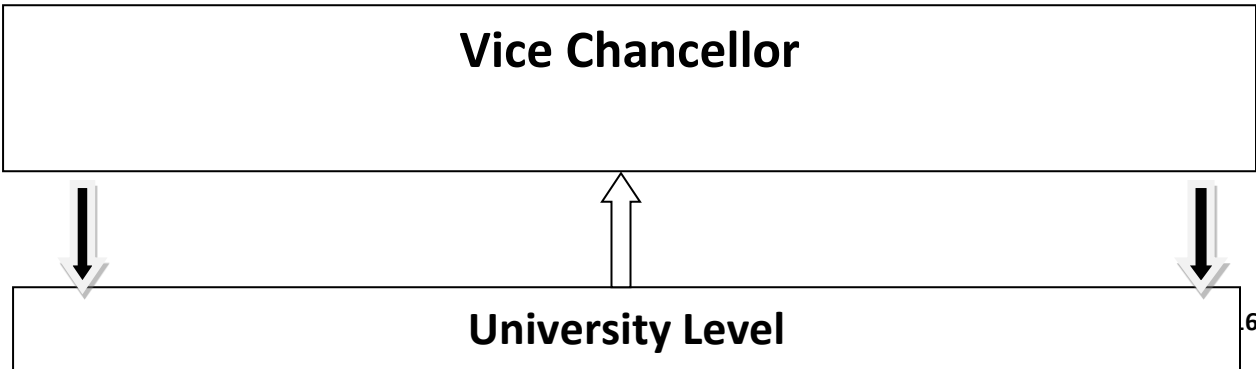
The Directorate of Quality Assurance has the obligation to assist the University to improve governance and controls (to work with the audit committees) to systematically develop work plans to capture and document information across the institution, especially in areas related to controls and monitoring in both academic and non-academic unit.

APPENDIX

1. INTERNAL QUALITY ASSURANCE POLICY



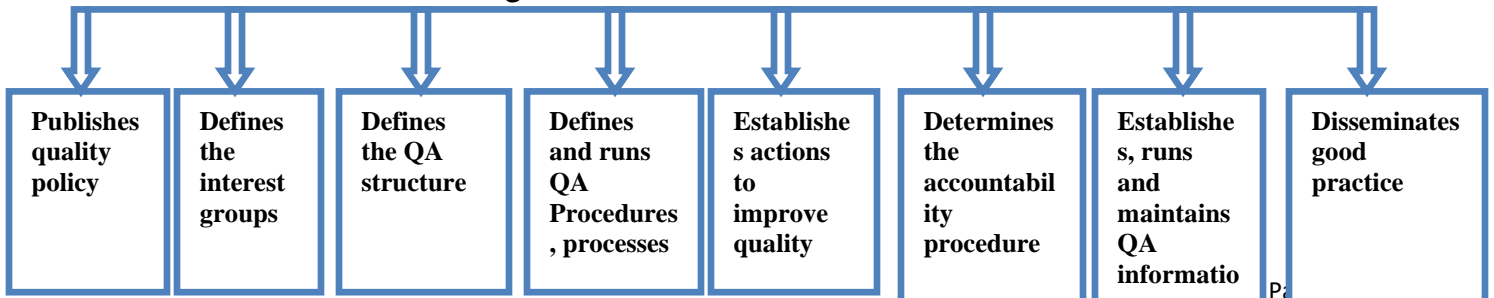
2. INTERNAL QA STRUCTURE



**Admin Dept. Level
Dept. QA Committee**

1. QUALITY ASSURANCE AND ENHANCEMENT MECHANISMS

QA Unit Mission and Tasks



Prepared by:

**Director Quality Assurance and Monitoring with advice from the
University Management Committee**