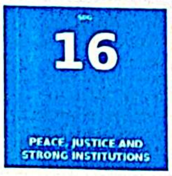
Grand Asian University, Sialkot

Anti-Corruption Policy

(2025)

ALIGNED WITH UNITED NATIONS
Sustainable Development Goals 2030



SDG 16

PEACE, JUSTICE AND STRONG INSTITUTIONS

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all

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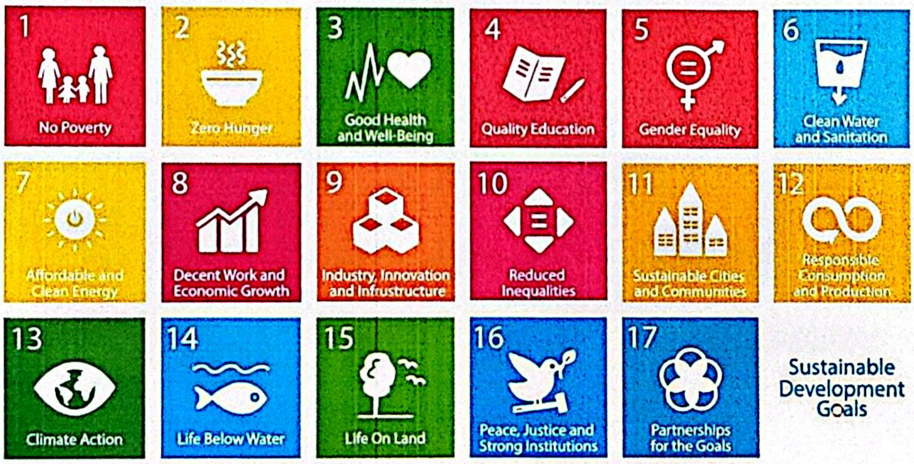

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ANTI-CORRUPTION POLICY, RULES & REGULATIONS

The Anti-Corruption Policy shall come into force with immediate effect for all programmes of the Grand Asian University Sialkot (GAUS) and shall be applicable to all faculty members, staff, students, and associated third parties.

1.1 PURPOSE

To prevent, detect, and address corruption, bribery, and financial misconduct in all operations of Grand Asian University Sialkot (GAUS). This Policy has been formulated in compliance with Pakistan's National Accountability Ordinance (NAO) 1999, Higher Education Commission (HEC) Financial Guidelines, and the Islamic prohibition of Rishwah (bribery) and Ghulul (misappropriation). GAUS is committed to maintaining the highest standards of institutional integrity and public trust.

1.2 SCOPE

This Policy applies to all members of the GAUS community, including:

i. All full-time, part-time, visiting, and contractual faculty members;
ii. All administrative, support, and technical staff;
iii. Students enrolled in any degree, diploma, or certificate programme;
iv. Vendors, contractors, partners, and agents acting on behalf of the University;
v. Members of governing and advisory bodies.

The Policy covers all university activities including admissions, examinations, procurement, payroll, grants, partnerships, vendor contracts, infrastructure projects, and all financial and administrative transactions.

1.3 DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

i. "Corruption" means the abuse of entrusted authority for private gain, whether financial or otherwise.
ii. "Bribery" (Rishwah) means the offering, giving, receiving, or soliciting of anything of value to influence an official act or decision.
iii. "Facilitation Payment" means an unofficial payment to expedite a routine process; prohibited under this Policy.
iv. "Misappropriation" (Ghulul) means the unlawful use or diversion of university funds or assets for personal benefit.
v. "Conflict of Interest" means a situation in which a personal relationship or financial interest may compromise objectivity in official duties.
vi. "Whistleblower" means a person who in good faith reports suspected misconduct or corruption.

1.4 KEY POLICY STATEMENTS

The following key statements shall govern conduct with respect to anti-corruption:

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Zero Tolerance:

i. No member of the GAUS community shall offer, accept, or solicit bribes, kickbacks, or gifts exceeding PKR 2,000 in value.

ii. Facilitation payments of any kind are strictly prohibited regardless of local custom or business practice.

iii. Any gift received above the threshold must be declared to the HROffice within 48 hours.

Transparent Processes:

iv. Admissions merit lists shall be published publicly and remain accessible for verification.

v. Examination paper handling shall follow a documented chain-of-custody procedure as prescribed by the Controller of Examinations.

vi. All purchases exceeding PKR 50,000 shall require a minimum of three competitive quotations with documented justification.

Financial Controls:

vii. Petty cash shall be reconciled on a weekly basis; bank reconciliations shall be conducted monthly.

viii. All payroll transactions shall be processed via bank transfer only; cash disbursements to individuals are prohibited.

ix. Surprise cash counts shall be conducted quarterly by the Finance Office with representation from the Disciplinary Committee.

Third-Party Accountability:

x. All vendors, agents, and contractors engaged by GAUS must sign an Anti-Corruption Undertaking prior to contract award.

xi. All new partnerships and institutional agreements shall be subject to due diligence and a corruption risk assessment before execution.

1.5 ROLES & RESPONSIBILITIES

i. Finance Office: Enforce financial controls, conduct internal audits, flag irregularities to the Disciplinary Committee, and prepare monthly management reports with corruption risk indicators.

ii. Procurement Committee: Ensure transparent and competitive bidding processes, maintain and update the vendor blacklist, and verify Anti-Corruption Undertakings.

iii. HR & Legal Offices: Screen for conflicts of interest during recruitment and procurement, advise on NAO and PECA 2016 compliance, and maintain conflict-of-interest declarations.

iv. All Staff & Faculty: Adhere to this Policy, report suspected corruption via the Whistleblowing Desk, and complete annual anti-corruption orientation.

v. Disciplinary Committee: Adjudicate violations of this Policy and recommend appropriate penalties including termination and referral to NAB or relevant law enforcement authorities.

vi. Vice Chancellor: Provide institutional leadership on anti-corruption, approve policy amendments, and ensure alignment with HEC and government requirements.

1.6 CONDUCT PROCEDURE

The following procedure shall be observed upon detection or reporting of a suspected violation:

Reporting:

i. Any member of the GAUS community may report a suspected violation to the Registrar's Office Whistleblowing Desk or via the anonymous physical drop-box maintained by the Registrar's Office.

ii. Reports shall be acknowledged within 48 working hours and assigned a case reference number by the Registrar's Office.

Investigation:

iii. Upon receipt of a complaint, the relevant Committee shall convene within ten (10) working days.

iv. The Committee shall have authority to interview relevant parties and access all documentation pertaining to the case.

v. The Committee shall be permissible to conduct one or more than one session to investigate and probe the matter.

vi. Investigations shall be completed within thirty (30) working days from the first sitting; extensions may be granted by the Vice Chancellor.

vii. The quorum for a meeting of the Committee shall be a minimum of three members.

viii. In the event all members disagree among themselves, the case shall be referred to the Vice Chancellor for decision.

Decision & Notification:

ix. The recommendations and report of the Committee shall be submitted to the Vice Chancellor, who shall have power to accept, reject, or modify the recommendations.

x. The final notification of each case shall be published by the Registrar's Office and communicated to all concerned parties.

1.7 RIGHT OF APPEAL

The affected party shall have the right to submit an appeal against the first decision to the Appellant Committee within fifteen (15) days of publication of notification, failing which the first decision shall be considered as the final decision.

1.8 IMPOSITION OF PENALTIES

The following penalties may be imposed regarding anti-corruption violations, singly or in combination:

i. Formal written warning recorded in the personal file;

ii. Recovery of misappropriated funds or assets;

iii. Demotion or withholding of increment or promotion;

iv. Suspension from duties for a defined period;

v. Termination of employment or expulsion from the University;

vi. Debarment from future engagement with GAUS in any capacity;

vii. Cash penalty may be imposed from PKR 10,000 to an amount equivalent to one semester's fee;

viii. Referral to NAB, FIA, or other competent authority for criminal proceedings;

ix. Any other penalty as deemed appropriate by the Vice Chancellor in light of the circumstances of the case.

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1.9 MONITORING & COMPLIANCE

i. The Finance Office shall conduct quarterly internal audit sampling specifically targeting corruption risk indicators.

ii. Annual external audits shall include a corruption risk assessment component.

iii. The Registrar's Office shall maintain a centralized register of all reported cases, outcomes, and pending matters.

iv. A quarterly anonymized compliance report shall be submitted to the Vice Chancellor.

v. Non-compliance with this Policy shall be addressed through the GAUS disciplinary process and, where applicable, referral to NAB.

1.10 IMPLEMENTATION

i. Anti-corruption awareness shall be incorporated into existing staff induction programmes using free NAB awareness materials and HEC webinars.

ii. An 'Anti-Corruption Compliance' checkpoint shall be added to existing procurement and admission process logs.

iii. The Finance Officer shall include corruption risk indicators in monthly management reports submitted to the Vice Chancellor.

iv. An anonymous drop-box and dedicated email address, managed by the Registrar's Office, shall remain accessible as reporting channels for all community members.

1.11 REVIEW & AMENDMENT

i. This Policy shall be reviewed annually by the the Registrar's Office, Finance Office, and Legal Office.

ii. All amendments shall be aligned with current HEC guidelines and applicable national legislation.

iii. Proposed amendments shall be submitted to the Vice Chancellor for approval before coming into effect.

iv. The revised Policy shall be communicated to all stakeholders and updated on the GAUS official website within fifteen (15) days of approval.

Prepared By: Registrar's Office, GAUS

Signature: ____________________

Date: 11 Nov 25

Approved By: Vice Chancellor, GAUS

Signature: ____________________

Date: ____________________