



ETHICS AND ANTI-CORRUPTION COMMISSION

# Guidelines

For Establishment and Operationalization of  
the Corruption Prevention Committee





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For Establishment and Operationalization of  
the Corruption Prevention Committee

EACC/CPC Guidelines No. 1 of June 2023

*Tuangamize Ufisadi, Tuijenge Kenya*



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## First Publisher 2023

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Preventive Services Directorate

Education and Public Awareness Department

Ethics and Anti-Corruption Commission

P.O. Box 61130-00100

Nairobi, Kenya



## MANDATE

To combat and prevent corruption, economic crime and unethical conduct in Kenya through law enforcement, prevention, public education, promotion of standards and practices of integrity, ethics and anti-corruption.



## VISION

An integrity and value-driven Kenyan society



## MISSION

To promote integrity and combat corruption through law enforcement, prevention and education



## CORE VALUES

Fidelity to the law  
Integrity  
Teamwork  
Innovation  
Professionalism  
Courage



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## FOREWORD



**T**he Ethics and Anti-Corruption Commission (EACC) is a Constitutional Commission established pursuant to Articles 79 and 253 of the Constitution of Kenya. The mandate of the Commission is to combat and prevent corruption, economic crime and unethical conduct in Kenya through law enforcement, prevention, public education, and promotion of standards and best practices in ethics and integrity.

The National Ethics and Anti-Corruption Policy Sessional Paper No. 2 of 2018 is critical in coordinating and creating synergy among stakeholders in the fight against corruption and unethical conduct. The policy seeks to enhance public participation and engagement by mainstreaming ethics and integrity in the management of public affairs. Successful implementation of this policy would enhance service delivery in devolved units.

The Commission collaborates and cooperates with stakeholders in prevention of corruption and unethical conduct to build public trust, entrench a culture of integrity and ensure effective service delivery. The primary role of the Corruption Prevention Committees is to mainstream corruption prevention measures within their organizations. In this regard, the Commission reiterates its commitment to continue building capacity of public entities and the private sector in the prevention of corruption.

A handwritten signature in black ink, appearing to read "DAVID OGINDE".

**DAVID OGINDE, PhD  
CHAIRPERSON  
ETHICS AND ANTI-CORRUPTION COMMISSION**



## PREFACE



The Commission has made progress in the fight against corruption, economic crime, and unethical conduct. Corruption distorts policy implementation leading to the pilferage of public resources hence denying service seekers quality and efficient services.

The Commission has developed guidelines for the establishment and operationalization of the Corruption Prevention Committee. The guidelines will assist in building the capacity of public entities to respond to challenges related to corruption and unethical practices. As part of the mechanisms geared toward corruption prevention, institutions are required to constitute and operationalize Corruption Prevention Committees (CPCs) and appoint Integrity Assurance Officers (IAOs).

The Commission acknowledges the support of GIZ – Good Governance Programme and the valuable contribution of the inter-directorate technical committee in the development of these guidelines.

It is incumbent upon all public and private entities to implement the Guidelines for the establishment and operationalization of Corruption Prevention Committees as a tool for corruption prevention.

**TWALIB MBARAK, CBS**  
**SECRETARY /CHIEF EXECUTIVE OFFICER**  
**ETHICS AND ANTI-CORRUPTION COMMISSION**

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## LIST OF ABBREVIATIONS AND ACRONYMS

EACC	Ethics and Anti-Corruption Commission
CECMs	County Executive Committee Members
COs	Chief Officers
CPC	Corruption Prevention Committee
CPP	Corruption Prevention Plan
CRA	Corruption Risk Assessment
IAO	Integrity Assurance Officer
PC	Performance Contract
PSIP	Public Sector Integrity Programme



## II

*The guidelines provide roles, responsibilities, framework for the handling of corruption reports, capacity building, monitoring, and evaluation, reporting and organizational learning."*

# 1. INTRODUCTION

The purpose of these guidelines is to provide a systematic approach to public entities on the establishment, composition and operation of an institutional Corruption Prevention Committee (CPC). The guidelines provide roles, responsibilities, framework for the handling of corruption reports, capacity building, monitoring, and evaluation, reporting and organizational learning. The guidelines target the management and staff of public entities in ensuring that management and staff play their role actively and effectively in mainstreaming corruption prevention, ethics and integrity within the entity. The guidelines complement existing laws, policies and procedures.

## 1.1. GUIDING PRINCIPLES

The following principles will apply in the implementation of the CPC guidelines:

- a) **Equitable Representation** -In establishing the CPC, the Accounting Officer and management of entities should ensure equitable representation in terms of gender, age and persons with disabilities.
- a) **Collaboration and Cooperation** -The Accounting Officer and management of entities should cooperate and collaborate with the Commission and stakeholders in corruption prevention.
- b) **Integrity** - Members of CPC should be persons of integrity and possess high standards of professional ethics.
- c) **Confidentiality and Commitment** - Conduct of CPC meetings and others shall be with utmost confidentiality and dedication.
- d) **Diligence** – Accurate recording of CPC proceedings/deliberations.
- e) **Transparency, Accountability and Responsiveness** - CPC should be responsive, prompt, effective and efficient in implementing these guidelines.
- f) **Fidelity** - CPC should carry out its duties in strict compliance with the law.



*These  
guidelines  
are meant  
to augment  
but not  
replace the  
existing laws,  
policies and  
procedures."*



## 1.2. OVERVIEW OF THE ANTI-CORRUPTION FRAMEWORK IN KENYA

Efforts to fight corruption in Kenya date back to 1956, following the enactment of the Prevention of Corruption Ordinance that later became the Prevention Act (Cap.65) at independence. The period between 1992 and 1997, saw the establishment of the Anti-Corruption Squad within the Kenya Police and Kenya Anti-Corruption Authority (KACA). The Kenya Anti-Corruption Authority was declared unconstitutional in 2000. The Anti-Corruption Police Unit was set up in the Directorate of Criminal Investigations to carry out anti-corruption functions between 2001 and 2003. In 2003, Kenya enacted the Anti-Corruption and Economic Crimes Act 2003 that established the Kenya Anti-Corruption Commission (KACC). In addition, the Public Officer Ethics Act was enacted in 2003 to regulate the ethics of public officers. The law buttressed the Public Service Integrity Programme (PSIP) launched in 2002 to promote transparency, and accountability and restore confidence in public service. A PSIP Sourcebook for Corruption Prevention published in May 2003 recommended the formation and operationalization of CPCs in Public Institutions to spearhead the fight against corruption in respective institutions.

The PSIP Sourcebook was reviewed in 2009 to take into account developments in the operating environment and ensure the achievement of the desired impact of restoring transparency, accountability and integrity in the public service. The revised sourcebook underscored the roles and responsibilities of Chief Executive Officers, CPCs and Integrity Assurance Officers in mainstreaming corruption prevention through the Corruption Eradication Indicator in the Performance Contracts and other anti-corruption mechanisms.

The Constitution of Kenya promulgated in 2010 established an independent Ethics and Anti-Corruption Commission pursuant to Article 79 and Section 3 of the Ethics and Anti-Corruption Commission Act, 2011. EACC replaced KACC in September 2011. The Constitution decentralized governance and devolved resources to the County level. This necessitated the need for entrenching corruption prevention at the County level of governance through the establishment of CPCs and the appointment of Integrity Assurance Officers (IAOs) among other strategies. The CPCs are responsible for overseeing the implementation of codes of conduct and ethics and ensuring adherence to the values and principles of public service provided in Article 232 of the Constitution. These guidelines will therefore, provide a framework for the implementation of Corruption Prevention initiatives by the CPCs.



*CPCs have the responsibility of overseeing the implementation of the codes of conduct and ethics and ensuring adherence to the values and principles of public service."*

## **2. POLICY, LEGAL AND REGULATORY FRAMEWORK**

Corruption Prevention is anchored on various policy and legal instruments as highlighted below.

### **2.1. POLICY**

The Sessional Paper No. 2 of 2018 on the National Ethics and Anti-Corruption Policy (NEAP) is the overarching policy guiding anti-corruption initiatives in the Country. The policy aims to mainstream and institutionalize corruption prevention in all Ministries, Departments, Agencies (MDAs) and County governments. In addition, the policy seeks to promote the participation of the private sector and other non-state actors in the prevention of Corruption.

### **2.2. LEGAL AND REGULATORY FRAMEWORK**

Article 2 (5) and (6) of the constitution provide that the general rules of international law and any treaty or convention ratified by Kenya shall form part of the law of Kenya. United Nations Convention against Corruption (UNCAC), 2003 and the African Union Convention on Prevention and Combating Corruption (AUCPCC), 2003 obligate Kenya as a state party to put in place legislative, institutional and administrative measures to promote effective practices aimed at the prevention of corruption. The following provides for the prevention of corruption:

#### **2.2.1. The Constitution of Kenya, 2010**

The Constitution lays the foundation for preventing and combating corruption. The salient provisions among others are Article 10 (National values and principles of Governance), Article 232 (the values and principles of public service), Chapter Six outlines the values, guiding principles of leadership and integrity and Chapter 12 on Principles and Framework of Public Finance.



*“Corruption prevention is anchored on various policy and legal instruments”*

#### **2.2.2. The Ethics and Anti-Corruption Commission Act, 2011**

Section 11 of the EACC Act, empowers the Commission to put in place measures to advise, educate, raise public awareness, and detect and prevent corruption by undertaking, among others, the following:



- 
- 1) Work with other State and public offices in the development and promotion of standards and best practices in integrity and anticorruption;
  - 2) Raise public awareness on ethical issues, educate the public on the dangers of corruption, and enlist public support in combating corruption.
  - 3) Monitor the practices and procedures of public bodies to detect corrupt practices and to secure the revision of methods of work or procedures that may be conducive to corrupt practices; and
  - 4) Advise public entities on their initiative on any matter within its function.

||

*These guidelines apply to all public entities and private sector in prevention of corruption."*



### **2.2.3. The Leadership and Integrity Act, 2012**

This Act gives effect to and establishes the procedures and mechanisms for the effective administration of Chapter Six of the Constitution. The primary purpose of this Act is to ensure public officers respect the values, principles and requirements of the Constitution. Some of the salient provisions of the Act aim at instituting integrity in leadership include:

- 1) Provides the general leadership and integrity codes;
- 2) Sets out the specific leadership and Integrity codes for the State Officers;
- 3) Obligates every person with the responsibility of implementing provisions of the Act;
- 4) Empowers the Commission to monitor compliance with the integrity requirements;
- 5) Empowers the Commission to give advisory opinions to public entities upon request; and
- 6) Empowers the Commission to collaborate with public entities in the provision of education and training on leadership and integrity.

### **2.2.4. The Bribery Act, 2016**

The object of the Act is to provide for the prevention, investigation and punishment of bribery as outlined::

- 1) Obligates public and private entities to put in place appropriate procedures for the prevention of bribery and corruption;
- 2) Provides for publication of guidelines to assist private and public entities in the preparation of procedures for the prevention of bribery and corruption;
- 3) Empowers the Commission to assist public or private entities or any other person in the implementation of the procedures; and
- 4) Obligates every person in a position of authority to report bribery and corruption.

### **2.2.5. The Anti-Corruption and Economic Crimes Act, 2003**

The Act sets out the prevention, investigation and punishment of corruption and economic crimes.

### **2.2.6. The Public Officers Ethics Act, 2003.**

The Act seeks to advance the ethics of public officers by providing for a code of conduct and ethics and requiring financial declarations.



### 3. SCOPE AND APPLICATION

These guidelines apply to all public entities and the private sector in the prevention of corruption as envisaged in Section 9 of the Bribery Act, 2016 to include the governing bodies of these entities.

#### 3.1. DEFINITION OF TERMS

- (a) Accounting officer:** has the meaning and role assigned under the Public Finance Management Act, 2012 for a public entity or the Chief Executive Officer of a private entity.
- (b) Commission:** Refers to the Ethics and Anti-Corruption Commission.
- (c) Corruption Prevention Committee:** Refers to the committee that spearheads corruption prevention in an entity. This Committee may be referred to as Integrity Committee.
- (d) Integrity Assurance Officer:** An officer appointed by the accounting officer/Chief Executive Officer, trained and certified by the Commission.
- (e) Corruption Risk Assessment:** A diagnostic tool seeking to identify weaknesses within the policies, processes, procedures and practices which may present opportunities for bribery and corruption to occur in an entity.
- (f) Public Entity:** Includes all State organs and public bodies of the national government, county governments, constitutional commissions, independent offices, public-private arrangements or undertakings, and any entity that renders a service to the public.
- (g) Private Sector:** means the sector of the National economy under private ownership.

#### 3.2. CORRUPTION PREVENTION COMMITTEE

Corruption Prevention Committee (CPC) is established to spearhead anti-corruption and integrity initiatives in an entity. The Accounting Officer of the public entity formally appoints members to the CPC. The EACC provides training to the CPC to ensure that it can discharge its responsibilities.



*The Accounting  
Officer of the  
public entity  
formally  
appoints  
members to the  
CPC."*

##### 3.2.1. Roles and Responsibilities of the Corruption Prevention Committee

The responsibilities of the CPC are:

- i) Develop, implement, review and monitor corruption prevention framework (corruption prevention policy, whistle-blowing protection mechanism, gifts and conflict of interest registers, codes of conduct and ethics and reporting mechanisms);

- 
- ii) Prepare annual corruption prevention plan (resource mobilization and responsibilities);
  - iii) Coordinate bribery and corruption risk assessment and management;
  - iv) Handle complaints on alleged corruption and unethical conduct;
  - v) Coordinate preparation and submission of quarterly reports to the Commission;
  - vi) Identify and recommend training needs on ethics, integrity and anti-corruption;
  - vii) Collaborate and cooperate with anti-corruption stakeholders;
  - viii) Supervise activities of the Integrity Assurance Officers; and
  - ix) Monitor and evaluate the effectiveness of anti-corruption initiatives.

### **3.2.2. Composition of Corruption Prevention Committee**

The CPC shall comprise of the following members;

- Chairperson – Accounting officer.
- Members – Heads of Department/Directorates.
- Secretary – Chairperson of IAO Committee.

### **3.2.3. The Structure of the Corruption Prevention Committee**

Where appropriate an entity can also form regional and departmental CPCs that will feed into the apex CPC depending on the size and circumstances of the institution. The departmental head becomes the chair of the CPC and the various heads of sections become members of the committee.

## **A. National Government**

### **i) National Government Apex CPC**

The Apex CPC shall comprise of the following;

- Chairperson – Principal Secretary.
- Members – Heads of department/Directorates.
- Secretary – Chairperson of IAO Committee.

### **ii) Departmental CPC**

The Departmental CPC at the headquarter shall comprise of the following;

- Chairperson – Head of Department/Directorate  
Regional Coordinator
- Members – Heads of Sections/Units
- Secretary – Trained Integrity Assurance Officer



### iii) Regional CPCs

The CPC at the regional level shall be comprise of the following;

### iv) County CPCs

National Government agencies at the County levels shall establish County CPC comprising of the following;

- ▶ Chairperson – County Commissioner
- ▶ Members – Heads of Sections/Units
- ▶ Secretary – Trained Integrity Assurance Officer

### v) Sub - County CPCs

National Government agencies at the sub-county levels shall establish County CPC comprising of the following;

- ▶ Chairperson – Deputy County Commissioner
- ▶ Members – Heads of Sections/Units/  
Assistant County Commissioner
- ▶ Secretary – Trained Integrity Assurance Officer.

This structure can be replicated at ward/ lower administrative levels. Below is an illustration of a CPC organogram from the apex to regional level.

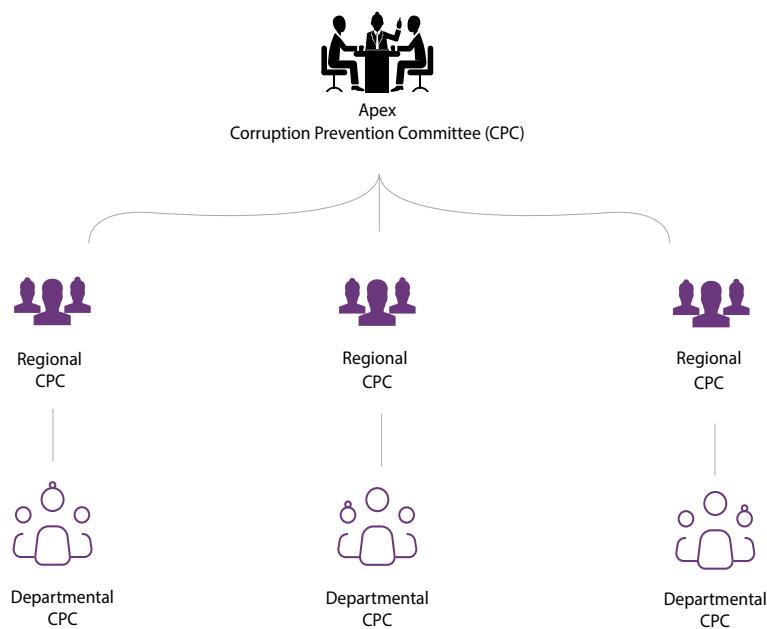


Figure 1: Organogram for Corruption Prevention Committees (CPC)

## **B. National Government Agencies, Constitutional Commissions and Independent Offices**

### **i) Parastatals, Constitutional Commissions, Independent Offices and Agencies**

The CPC for parastatals, Constitutional Commissions, Independent Offices and Agencies shall comprise of the following;

- ▶ Chairperson – Accounting Officer
- ▶ Members – Heads of Directorate/Department
- ▶ Secretary – Chairperson of Integrity Assurance Officers

### **ii) Educational Institutions**

- ▶ Chairperson – Principal/Vice Chancellor/Chief Executive Officer
- ▶ Members – Heads of Directorate/Department
- ▶ Secretary – Trained Integrity Assurance Officer

## **C. County Government**

### **i) County Executive Apex CPC**

At the County Executive level, the Corruption Prevention Committee shall comprise of the following;

- ▶ Chairperson – Governor
- ▶ Members – Deputy Governor, County Executive Committee Members (CECMs) – County Secretary
- ▶ Secretary – Chairperson of IAOs



### **ii) County Departmental CPC**

The County departmental CPC shall comprise of the following;

- ▶ Chairperson – Chief Officer
- ▶ Members – Heads of Department
- ▶ Secretary – Trained IAO

*The CPC shall encourage use of interactive social media platforms for reporting corruption and sensitize staff accordingly."*

### **iii) County Public Service Board CPC**

The County Public Service Board CPC shall comprise of the following;

- ▶ Chairperson – Chief Executive Officer of the board
- ▶ Members – Heads of Sections
- ▶ Secretary – Trained IAO

This structure will be replicated in the CPCs for other boards in the Counties.



#### iv) Sub-County CPC

The sub- County CPC, shall comprise of the following;

- ▶ Chairperson – Sub-county Administrator
- ▶ Members – Heads of Sections
- ▶ Secretary – Trained Integrity Assurance Officer

This structure will be replicated in the CPCs for other boards in the Counties.

#### v) County Assembly CPC

At the County Assembly level, the Corruption Prevention Committee shall comprise of the following;

- ▶ Chairperson – Clerk of the County Assembly
- ▶ Members – Heads of Department
- ▶ Secretary – Trained IAO

#### 3.2.4. Meetings of the Corruption Prevention Committee

The CPC shall hold at least one meeting in every quarter to deliberate on ethics, integrity and anti-corruption matters. The following procedures shall guide the conduct of the meetings:

- ▶ The agenda of the meeting shall be to discuss progress on the implementation of anti-corruption initiatives and outcomes of prevention measures.
- ▶ A calendar of meetings shall be issued at the beginning of every Financial Year.
- ▶ Accurate records of minutes of meetings shall be maintained at all times. Members present should append their signatures to authenticate the confirmed minutes.

### 3.3. INTEGRITY ASSURANCE OFFICERS (IAOS)

An IAO must be an officer in middle-level management who is honest, incorruptible, loyal, ethical and trustworthy. The Accounting Officer shall appoint the IAOs.

#### 3.3.1. Roles and Responsibilities of Integrity Assurance Officers

An IAO shall provide technical support to the CPC and is charged with the following responsibilities;

- i) Provide secretariat services to the CPC.
- ii) Conduct Bribery and Corruption Risk Assessments and develop Risk Mitigation Plans.
- iii) Develop and implement action plan for the Corruption Prevention Plan.



*The Integrity  
Assurance  
Officers are  
required to  
meet before the  
CPC meeting at  
least once every  
quarter."*

- 
- iv) Train and sensitize staff on integrity and anti-corruption.
  - v) Prepare and submit progress reports to CPC.
  - vi) Record and present to the CPC reports on corruption and unethical conduct.

### **3.3.2. Meetings of the Integrity Assurance Officers (IAOs)**

A public entity can have more than one IAO and they shall form an IAO committee. The Integrity Assurance Officers are required to meet before the CPC meeting at least once every quarter. The committee will prepare a progress report of anti-corruption initiatives to be presented to the CPC. The chairperson of the IAO committee shall be elected by the IAOs and hold the position for a single term of two years. The chairperson of the IAOs Committee shall serve as the Secretary to the CPC.

## **3.4. HANDLING OF REPORTS**

The CPC shall establish reporting channels that may include but are not limited to conspicuously displayed corruption reporting boxes; written reports; dedicated hotlines; email; and reporting/complaints desk. The CPC shall encourage the use of interactive social media platforms for reporting corruption and sensitize staff accordingly.

The secretary to the CPC shall compile the reports to be processed during the CPC meetings. Reports shall attract internal administrative action and where the entity cannot handle them then the reports will be referred to EACC for appropriate action. External referrals shall be sent to the EACC Secretary/Chief Executive Officer marked CPC referral.

The following is a flow chart of processing corruption reports.



*The CPC shall encourage the use of interactive social media platforms for reporting corruption and sensitize staff accordingly."*

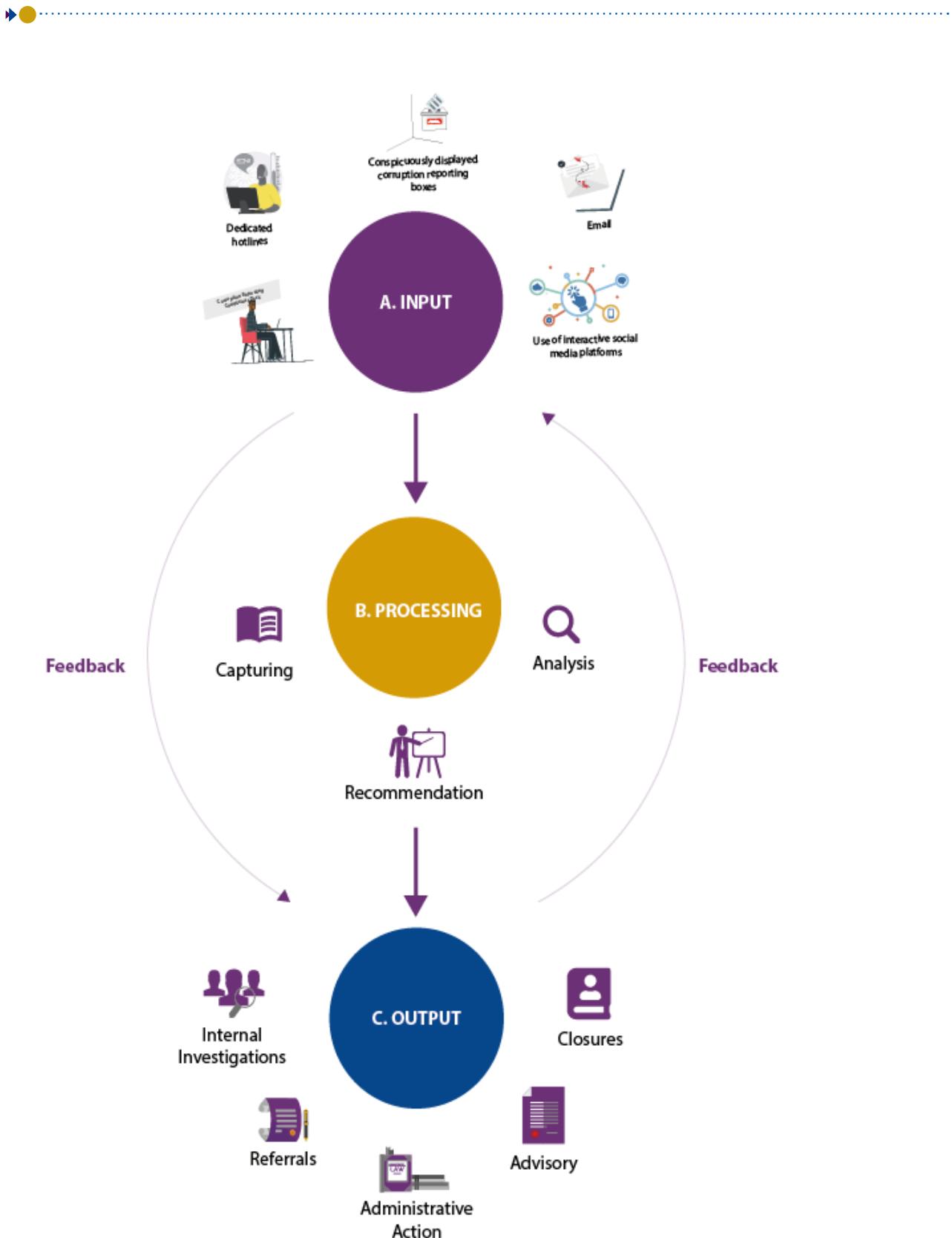


Figure 2: Process of Handling Corruption Report.

Suspected bribery cases still need to be reported to EACC within a period of 24 hours as provided in Section 14(1) of the Bribery Act, 2016. The CPC shall sensitize employees/staff of the institution on Anonymous Reporting to EACC in cases that require the protection of the reporter/whistleblower.

### **3.5. CAPACITY BUILDING**

As part of building the capacity of the CPCs and IAOs, the following initiatives are to be undertaken:

- a) The Commission shall;
  - i) Build capacity of the CPCs and IAOs through training, sensitization and advisories to enable them effectively discharge their mandates.
  - ii) Provide and disseminate relevant Information Education and Communication (IEC) materials.
  - iii) Coordinate sector-based fora for experience sharing among CPCs and IAOs.
  - iv) Support the CPC in staff sensitization.
  
- b) A Public entity shall;
  - i) Facilitate the CPC with resources (finances and equipment) to implement anti-corruption programmes.
  - ii) Carry out sensitization of staff on anti-corruption, ethics and integrity.
  - iii) Facilitate effective and timely information and records management.
  - iv) Embed the concept of CPCs in the organizational structure by identifying a directorate or department such as Human Resource Management, Audit or set up an independent Ethics Office subject to availability of funds to support implementation of anti-corruption initiatives
  - v) Coordinate and evaluate anti- corruption activities in collaboration with the Commission.

### **3.6. MONITORING, EVALUATION, REPORTING AND LEARNING**

The CPC shall monitor and evaluate anti-corruption activities in collaboration with the Commission. The indicators shall be disaggregated based on gender, age, ethnicity and people with disabilities. The monitoring and evaluation indicators include:

1. CPC established and operational.
2. Number of IAOs trained and appointed.
3. Number of meetings held annually by CPCs and IAOs Committees.
4. Corruption prevention policy, CRA, CPP and Code of conduct developed, implemented and progress reports submitted to the Commission.
5. Level of implementation of CPP and CRA.
6. Number of reports handled by CPC – internally resolved and external
7. Referrals.
8. Level of compliance to CPC guidelines, Corruption prevention policy, CRA, CPP Code of Conduct.
9. Quarterly reports submitted to the Commission.
10. The number of employees and stakeholders sensitized.

The guidelines may be reviewed after three years or depending on emerging issues.



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## **12. APPENDIX 1: GENERIC ANTI-CORRUPTION POLICY FOR PUBLIC ENTITIES**



### **KEY HIGHLIGHTS OF THE GUIDELINES FOR THE DEVELOPMENT OF AN ANTI-CORRUPTION POLICY FOR PUBLIC ENTITIES**

The summarized features of guidelines are applicable by institutions to develop their Anti-Corruption Policy. These are the key components that should be included in the Anti-Corruption Policy. Institutions may customize the guidelines.

#### **1. FOREWORD**

Provide a brief introductory remark to the policy document by the Cabinet Secretary/ Principal Secretary/ Governor/ Speaker/ Board /Chief Executive Officer/ Accounting Officer.

#### **2. INTRODUCTION**

Provide the rationale for the Anti- Corruption Policy, Policy Objectives, Policy Outcomes and Policy Principles.

#### **3. POLICY STATEMENT**

Outline the plan of action to guide decisions and actions in fighting corruption in the Institution. The statement should confirm that the responsibility of addressing corruption rests with management, staff and stakeholders. It should also indicate the commitment of management to deal with corruption, bribery and unethical conduct decisively.

#### **4. LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS**

List the institutional policies, legal and administrative requirements that are applicable in the prevention of corruption, bribery and unethical conduct in Kenya. They shall include:-

- i. The Constitution of Kenya 2010
- ii. The National Ethics and Anti-Corruption Policy-Sessional Paper No. 2 of 2018.
- iii. Anti-Corruption and Economic Crimes Act, No. 3 of 2003
- iv. Public Officer Ethics Act, No. 4 of 2003
- v. Ethics and Anti-Corruption Commission Act, No. 22 of 2011
- vi. Leadership and Integrity Act, No. 19 of 2012
- vii. Bribery Act, No. 47 of 2016
- viii. Institutional and Legal framework relevant to the public entity



## 5. SCOPE AND APPLICATION

Identify the persons to be bound by the policy. It may be important to indicate that the policy applies to the members of the Board (or equivalent), management, staff and all the other relevant stakeholders that interact with the institution from time to time.

## 6. DEFINITION OF CORRUPTION, BRIBERY AND UNETHICAL CONDUCT

It is necessary that all persons within the scope of the policy understand what is deemed as corruption, bribery and unethical conduct and their responsibilities for preventing and detecting the same. For that reason, it is necessary to define the terms in line with the applicable anti- corruption laws and regulations.

## 7. INSTITUTIONAL FRAMEWORK FOR FIGHTING CORRUPTION

Outline the structures to be put in place to detect, prevent, and sanction corrupt and unethical conduct. These include;

- i. Corruption Prevention Committee.
- ii. Integrity Assurance Officers.

## 8. CORRUPTION PREVENTION COMMITTEE

The CPC is meant to spearhead anti-corruption strategies and initiatives to prevent corruption. The role and responsibility of CPC is provided in the guidelines for establishment and operationalization of Corruption Prevention Committee. The Corruption Prevention Committee shall comprise of the following members;

- Chairperson – Accounting Officer
- Members – Heads of Directorates/Departments
- Secretary – Chairperson of Integrity Assurance Officers

Where applicable, an entity can cascade the CPC downwards depending on the size and circumstances of the institution.

## 9. INTEGRITY ASSURANCE OFFICERS

This section should indicate that the Integrity Assurance Officers (IAOs) whose roles and responsibilities are described in the CPC guidelines will assist the committee in discharging its mandate by providing technical support.

State that the management and the CPC will provide necessary support to the IAOs to ensure that they play their roles effectively.

## 10. STRATEGIES FOR FIGHTING CORRUPTION

This section should state the strategies for prevention of corruption, bribery and unethical conduct which shall include:

- i) Conducting Bribery and Corruption Risk Assessments and developing Risk Mitigation Plans;

- ii) Conduct Training and Awareness creation;
- iii) Service charters in all the key areas of operations;
- iv) Enforcing provisions in the Code of Conduct and Ethics;
- v) Maintaining Gifts and Conflict of Interest registers;
- vi) Facilitate Declaration of Income, Assets and liabilities as provided in Public Officer Ethics Act, 2003 among others.

## **11. BRIBERY AND CORRUPTION RISK ASSESSMENTS AND MITIGATION**

This section should provide a statement that bribery and corruption risk assessments should be conducted to identify and profile risks within the policies, procedures, processes and practices in various functional areas of the institution and develop mitigation plans.

## **12. INTERNAL AUDIT**

This would outline the role of internal audit in prevention and detection of irregularities and malpractices within an institution.

## **13. CORRUPTION REPORTS**

Provide mechanisms for disclosure of suspected corrupt practice, bribery and unethical conduct. Reporting channels are outlined in the guidelines. It should further provide procedures for handling and processing reports.

## **14. PROTECTION OF WHISTLE BLOWERS**

This section should provide elaborate and effective measures for protection of whistle blowers in line with applicable laws.

## **15. DISCIPLINARY MEASURES**

This section should make provisions for handling disciplinary procedures for breaches of the policy by staff in line with institution's code of conduct and applicable laws.

## **16. IMPLEMENTATION FRAMEWORK**

Mechanism for implementation of the objectives, strategies and timeframe should be provided in this section. Also indicate the responsibility, reporting the outcome and impact of the policy.

## **17. MONITORING, EVALUATION, REPORTING AND LEARNING**

A public entity should set up a framework to ensure sustainability of the strategies and effective implementation focusing on the inputs, outputs, processes, outcomes and impact of the strategies.



## **18. POLICY REVIEW**

Indicate when the policy will be subjected to review as necessary but preferably every three years.

## **19. EFFECTIVE DATE**

Indicate the date that the policy comes into effect.

Issued this ..... day of ..... 20.....

Signed by the Chief Executive Officer / Chairperson of the Board (As the case may be)

Issued this ..... day of ..... 20.....

Signed by the Chairperson of the Board or the Governing body of the entity (As the case may be)



## NOTES

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