ETHICS AND ANTI-CORRUPTION COMMISSION

REPORT ON IMPACT ASSESSMENT OF THE CORRUPTION ERADICATION INDICATOR UNDER THE PERFORMANCE CONTRACTING FRAMEWORK IN KENYA FOR THE PERIOD 2007- 2014

DIRECTORATE OF PREVENTIVE SERVICES

JUNE 2016

MANDATE

To combat and prevent corruption and economic crime in Kenya through law enforcement, preventive measures, public education and promotion of standards and practices of integrity, ethics and anti-corruption

VISION

A Corruption free Kenyan Society that upholds integrity and rule of law

MISSION

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

CORE VALUES

Integrity

Professionalism

Fidelity to the law

Courage

Teamwork

Innovation

FOREWORD

This evaluation serves as an input to provide policy makers with knowledge and evidence about effectiveness of the corruption eradication indicator in performance contracting in Kenya. It is based on credible, objective and evidence-based information that gives an assurance of accountability by the institutions involved in the evaluation. It provides objective and up to date evidence of what the corruption eradication indicator has achieved and what impact has been produced over time. The evaluation drew wider participation and consultation of internal and external stakeholders during the planning, design and data collection but ensured strict impartiality and independence to the research process.

The Commission is pleased to present this Report to the public, decision makers, who need information on program results; program managers, who want to know how other service programs are operating and how performance can be improved; and the community of researchers and practitioners, who will use the program information and evaluation tools.

The objective of the corruption eradication indicator is to enhance corruption prevention and detection by putting in place systems, policies and procedures to limit loopholes that permit unethical conduct to flourish. Institutions have brought to the fore the need for prompt response to correspondence to EACC. To address this grievance going forward, EACC has established a team of officers to attend to all reports and enquiries from institutions on the spot to ensure timely response and action.

Since this is a partnership arrangement between the Commission, participating agencies and the Performance Contracting Secretariat, I want to increasingly call upon Kenyans to support the fight against corruption by demanding for efficient services from the government and in turn provide feedback to these agencies so that there is a continuous

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improvement of systems and processes in service delivery.

We hope that you will find this Report useful and informative.

PHILIP K.B KINISU
CHAIRPERSON
ETHICS AND ANTI-CORRUPTION COMMISSION

AKNOWLEDGEMENT

The Evaluation Report on impact assessment of the corruption eradication indicator in performance contracting in Kenya describes the continuous efforts of various agencies to prevent and detect corruption in their institutions. The planning, development, and coordination of those anti-corruption prevention activities are largely the responsibility of the Corruption Prevention Committees chaired by Heads of Institutions and supported by the Integrity Assurance Officers. The Commission is grateful to the team for the commitment shown in implementing the corruption eradication indicator.

Tukomeshe Ufisadi, Tuijenge Kenya!

HALAKHE WAQO, ACIArb
SECRETARY/CHIEF EXECUTIVE OFFICER

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LIST OF ABBREVIATIONS AND ACRONYMS

APPAM	Association of Public Policy Analysis and Management
CDF	Constituency Development Fund
CEI	Corruption Eradication Indicator
CEO	Chief Executive Officer
COC	Codes of Conduct
CPC	Corruption Prevention Committee
CRA	Corruption Risk Assessment
CSPRO	Census and Survey Processing System
EACC	Ethics and Anti-Corruption Commission
ERS	Economic Recovery Strategy
GIZ	Deutsche Gesellschaft fuer Internationale Zusammenarbeit
GoK	Government of Kenya
IAO	Integrity Assurance Officer
IBM	International Business Machines
KENAO	Kenya National Audit Office
LTD	Limited
MOU	Memorandum of Understanding
OECD	Organization for Economic Cooperation and Development
PC	Performance Contracting
PCD	Performance Contracting Division
PSR	Public Sector Reform
RAs	Research Assistants
SPSS	Statistical Product and Services Solution
UNDESA	United Nations Department of Economic and Social Affairs
UNPSA	United Nations Public Service Awards
SMART	Specific, Measurable, Attainable, Realistic and Time Bound

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EXECUTIVE SUMMARY

The Commission entered into a partnership programme with the Performance Contracting Division in 2007/2008 FY to entrench corruption prevention strategies in the public service. This framework introduced six (6) performance targets on corruption prevention and detection aimed at improving systems to minimize opportunities and loopholes for corruption. All participating institutions were required to set up and operationalize a corruption prevention committee that will guide the development of an anti-corruption policy, undertake corruption risk assessment, develop and implement a specific leadership and ethics code of conduct, develop an anti-corruption plan, conduct examinations and foster zero tolerance to corruption by vetting of staff on integrity and enhance internal controls and transparency and accountability in service delivery.

The Commission conducted an evaluation to ascertain the relevance and effectiveness of the implementation of the targets. The overall objective of this evaluation was to measure the impact of the corruption eradication indicators in performance contracting in order to establish whether there is a positive, negative or no change. Specifically, the evaluation assessed the extent of implementation, relevance and effectiveness, sustainability and challenges in the implementation of the corruption eradication indicator.

The evaluation covered about 300 public institutions under performance contracting in the 11th Cycle. The key respondents were responsible officers in the implementation namely the chairperson or in his/her absence the secretary to the corruption prevention committee. Other staff members not directly involved in the implementation and service seekers present at the time of the evaluation were also interviewed. The evaluation benefited from expert opinions from key informants. The Key highlights of the evaluation are as follows:

a) Extent of the Implementation of the Corruption Eradication Indicator

- Nearly all the institutions (94.3%) evaluated have set up a corruption prevention committee;
- Over 83.6 percent of the institutions hold quarterly corruption prevention committee meeting while 6.8 percent of the institutions conduct the meetings monthly;
- In the past one year, CPCs had forwarded 104 and 278 corruption related reports to the Police and EACC respectively;
- Nearly two thirds of members of CPC (2,019) in 196 institutions have been trained;
- Over 91 percent of the institutions have developed an anti-corruption policy while 8.5 percent have not. Of those who have developed a policy, 89.6 percent indicated that the policy is operational and has been distributed to staff (83.2%);
- Over 73 percent of the institutions have developed a specific code of conduct out of which 58 percent forwarded to EACC for approval while 7.9 percent have gazetted the specific code;
- Over 81 percent of the institutions have conducted a corruption risk assessment in their institutions;
- The corruption risk assessment conducted revealed poor record keeping including loss of records (27.3%), misuse of property (26%), procurement malpractices such as bid rigging (26%), bribery (24.3%), delay in service delivery (15.3%) recruitment malpractices such as nepotism, favoritism etc (14%) and loss of revenue through fraud (10.3%);
- The implementation of the corruption risk assessment recommendations has helped mitigate corruption risks in the fight against corruption in institution by reducing corruption loopholes (18.5%) and increased awareness on risk areas (11.5%); and
- Over 79 percent of institutions have Integrity Assurance Officers.

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b) Institutionalized Corruption Prevention

- Over 80 percent of the institutions forward progress reports to EACC quarterly;
- The progress reports forwarded to EACC include tenders above Kshs. 500,000, vetting reports, corruption risk assessments reports, anti-corruption policy, minutes of CPC meetings, corruption prevention plan implementation reports, disciplinary case reports and workplans;
- About a third of the institutions evaluated have carried out an evaluation of their anti-corruption initiative;
- Over 90 percent of the institutions have sensitized staff on various anti-corruption measures compared to 9.4 percent who have not carried out sensitization; and
- From inception, over 100,000 staff members have been sensitized on anti-corruption measures. In the year 2014/2015, institutions indicated that they sensitized about 20,000 staff members.

c) Corruption Control

- Breaches of codes of conduct were reported in 160 institutions out of the total 300 evaluated equivalent to 53.3 percent.
- Absenteeism and theft with an identical proportion of 12.2 percent were the main breaches documented. They were followed by misuse of property (7%), being drunk while on duty (6.3%), fraud (5.2%), lateness (4.8%) and bribery (4.4%); and
- In terms of action taken on those who breach codes of conduct, 24.5 percent of those involved had their terms of employment terminated, 18 percent of the cases received warning letters while 12.3 percent were suspended.

d) Zero Tolerance to Corruption

- Over 72 percent of the institutions (217) have forwarded names of Chief Executive Officer and Heads of Departments to EACC for integrity vetting;
- Over 27 percent of the institutions have vetted their staff while 14 percent are in the process of vetting staff. The majority (58.3%) have not vetted their staff; and
- However, of those who have vetted staff, only three institutions (3.6%)

indicated that their staff successfully passed the vetting. The other institutions are either still awaiting results (19.1%) of the vetting or do not know (77.1%) the outcome of their vetting.

e) Sustainability of the Corruption Eradication Indicator

- About 31 percent of the institutions have set aside some amount of money to implement anti-corruption programmes;
- About 42 percent of the institutions have a dedicated unit that coordinates all the anti-corruption programmes;
- Some of the planned activities to fight corruption and promote sound ethical standards in their institutions include sensitization on anti-corruption prevention measures to both staff and stakeholders (27.7%), timely action on reports (14%), enhanced internal controls (13.3%) and training of more integrity assurance officers (12.7%); and
- Institutions are planning to escalate advocacy and sensitization of staff and stakeholders (19.7%) in moving forward in the fight against corruption.

f) Impact of the implementation of the Corruption Eradication Indicator

- **Institutional Anti-Corruption Infrastructure**: Most of the public institutions have developed an anti-corruption infrastructure as a result of the indicator. This includes development of Corruption Prevention Policies and structures and governance tools such as the Corruption Prevention Committees (Integrity Committees), Codes of Conduct and Ethics and trained Integrity Assurance Officers;
- **Capacity Building**: The indicator has enabled public institutions to create knowledge about corruption, integrity and ethics through training of corruption prevention committee members and Integrity Assurance Officers and sensitization of staff. This is key in the anti-corruption process since it empowers staff to not only report acts of corruption, but also avoid engaging in such acts;
- **Redress Mechanism**: It has provided a channel for lodging and redressing

corrupt practices and unethical conduct at the institutional level. As a result, a number of acts of corruption and unethical practices which may not have been addressed have been acted upon at that level;

- **Corruption Detection**: Has created a channel for detecting, investigating and addressing corruption and malpractices through rapid corruption risk assessment, corruption reporting boxes and anonymous reporting systems;

- **Development of Institutional Anti-Corruption Interventions**: The requirement of the development a corruption prevention plan to implement corruption risk assessment findings has enabled public institutions to undertake a corruption diagnostic exercise to identify the risks of corruption and weak areas, and develop appropriate priority intervention strategies. Accordingly, the Indicator has enabled institutions to strengthen their anti-corruption framework, address institutional weaknesses thereby enhancing service delivery and governance;

- **Feedback Platform**: Enhanced public engagement through the redress platform and baseline survey thereby enabling the institutions to devise appropriate strategies to meet the needs of the stakeholders. The baseline survey on Corruption in 2006 helped public institutions to get feedback from stakeholders which informed their intervention strategies; and

- **Awareness:** The Corruption eradication indicator has created awareness about corruption and issues of good governance. The general public is more aware of corruption reporting structures and more cases are being reported. Indeed the ongoing heightened level of debate on corruption is an indication that the public is now more sensitized with regard to corruption issues.

g) Challenges experienced in the Implementation of Corruption Eradication Indicator

- The implementation of the corruption eradication indicator in performance contracting is shroud with many challenges ranging from structural to systemic that include inadequate financial and human resource provisions (20.3%) and entrenched corruption in the country (19%);

- There is no legal framework upon which PC is grounded which in turn affects the implementation of CEI since public institutions are not amenable

to PC requirements and hence creates enforcement challenges

- The score for the Indicator is 5% out of the overall weighting of 100% which can make institutions to ignore it since it may not substantively impact on the overall score and ranking.
- There are co-ordination challenges posed by continuous reorganization of government ministries and agencies
- There is weak monitoring and evaluation by PC secretariat and EACC and hence difficulty in verifying the information in the reports.
- There is staff resistance and bad attitude towards those implementing the indicator and in some situations, those implementing the Indicator (IAOs) are ostracized by colleagues.
- Administering disciplinary measures is a big problem since the promulgation of the new constitution. This is because there is a high likelihood that the disciplinary cases will land in court. As a result there is fear even by top management to issue disciplinary letters. There are loopholes in the disciplinary process that can be exploited.
- Corruption Prevention Committee mandates overlap with tradition disciplinary committee mandate hence duplication of duties.
- Training and retraining is a problem because EACC has no training calendar hence it is difficult to plan for trainings.

h) Recommendations

The evaluation brings out the following policy recommendations.

1) Performance contracting should be anchored in law and empower the PC Secretariat and the monitoring institutions to take appropriate action in situations of underperformance at any appropriate time in the course of the year;

2) Institutions should adjust administrative structures so that there is a dedicated unit/section or department and a budget line for anti-corruption initiatives;

3) There should be incentives to persons who implement the Indicator to motivate them to effectively do their work;

4) The corruption eradication indicator strategy should be community

driven to improve impact of anti-corruption activities by bring all the stakeholders associated with the institution together; and

5) The corruption eradication indicator should have an inbuilt mechanism of determining the net worth of staff regularly to detect any malpractices at the earliest.

CHAPTER ONE

INTRODUCTION AND BACKGROUND

1.0 Introduction

The primary development goal for any country is to achieve broad-based, sustainable improvement in the standards of the quality of life for its citizens. The Public Service and in particular the civil service plays an indispensable role in the effective delivery of public services that are key to the functioning of a state economy. When the delivery of services is constrained or becomes ineffective, it affects the quality of life of the people and the nation's development process.

Performance Contracting (PC) is one of the tools under the broad concept of Results Based Management. Performance Contracting ensures that the public sector is transformed into being more focused and responsive to the needs of those it serves. The result will be a sector directing its energies towards delivering targeted results and utilizing resources more productively. The quality and productivity of expenditures and investment will be improved to ensure cost effectiveness and value-for-money.

PC originated in France in the late 1960s. It was later developed with a great deal of elaboration in Pakistan and South Korea and thereafter introduced to India (OECD, 1997). It has been adopted in developing countries in Africa, including Nigeria, Gambia, Ghana and now Kenya. Suresh Kumar (1994) defines a performance contract as a Memorandum of Understanding (MOU). MOU is rooted in an assessment system, which not only looks at performance comprehensively but also ensures improvement of performance management by making the autonomy and accountability aspect clearer and more transparent. OECD (1999) defines a Performance Contract as a range of management instruments used to define responsibility and expectations between parties to achieve mutually agreed results. While Smith (1999) argues that a common definition of PC can be found, there are a considerable variety of uses and forms for quasi-contractual arrangements.

Public services in many African countries are confronted with many challenges, which constrain their delivery capacities (Lienert, 2003). They include the human resource factor, relating to shortages of manpower in terms of numbers and key competencies, lack of appropriate mindsets, and socio-psychological dispositions. There is also the perennial problem of shortage of financial and material logistics that are necessary to support effective service delivery. On the other hand, the gradual erosion of ethics and accountability has continued to bedevil the public sector in delivering public services to the people effectively. Public sector reforms meant to address these challenges have achieved minimal results (APPAM, 2005).

The Kenyan Government responded to public service delivery challenges by formulating and implementing Public Sector Reforms (PSR) programs in 1993. One of the key elements of the PSR was the concept of PC which had been first introduced in Kenya in the management of state corporations in 1989. A Parastatal Reform Strategy Paper, which was approved by cabinet in 1991, was the first official recognition of the concept of PC. The PC was one of the policies recommended for streamlining and improving the performance of State Corporations. Performance Contracts, where applicable, would be used to make transparent the cost of social services and to compensate the parastatals for their net costs. The other policies were:

 i)   Divestiture or Liquidation of non-strategic Parastatals;
 ii)   Contracting out Commercial activities to the private sector;
 iii)   Permitting private sector competition for existing state monopolies; and
 iv)   Improvements in the enabling environment of all strategic parastatals including removal of potentially conflicting objectives.

The first two parastatals to be placed under PC were Kenya Railways Corporation (April 1989) and the National Cereals and Produce Board (November 1990). The PC's of Kenya Railways Corporation and the National Cereals and Produce Board eventually failed due to the following:

 i)   Lack of political goodwill to drive this process since it was perceived as donor-driven;
 ii)   The PC's did not conform to the requirements of the three subsystems of

PC's as they lacked the performance incentive system; and

iii)   There was no provision for the impact of external factors such as changes in GoK policy, inflation and exchange rate fluctuations that would have made assessment fair.

In the Economic Recovery Strategy for Wealth and Employment Creation (ERS) 2003-2007 policy document, the government accords high priority to economic recovery and improving the performance of public service to deliver results to the people. Up to this point, the goal of public sector reform was the restoration of the public service so as to equip it well in order to play a pivotal role in national development. This called for fundamental changes in the way the sector operates in institutional organization and relationships, and in the individual and collective behavior of those serving in the sector. The aim was to enhance efficiency and effectiveness together with probity and integrity. In an effort to achieve the objectives and targets of ERS and to manage performance challenges in public service, the Government revived Performance Contracting (PC) which had been earlier adopted in State Corporations in 1989 but failed. The Performance Contract was re-introduced as one element of the broader public sector reforms aimed at improving efficiency and effectiveness, while reducing total costs.

In August 2003, the government appointed a committee to spearhead the re-introduction and implementation of PC namely the Performance Contracts Steering Committee. The government made a decision to introduce PC in state corporations on a pilot basis in 2004. Sixteen State Corporations signed the PC's by December 2004. The criteria for selecting the pilot institutions included representation of diverse sectors and corporations with Strategic plans. Following the success in implementing PC in state corporations, the government extended the process to Public Service beginning with Permanent Secretaries and Accounting Officers. Thereafter, an extensive system of performance-based contracting was introduced in 2004 to ensure a style of public sector management which emphasizes results over process compliance and hence foster greater responsiveness and accountability in the civil service. The PC framework was introduced as part of the Government's broader public sector reforms. The system which is in its 11th cycle, involves government institutions signing bargained performance contracts of which the set target are assessed every financial year to ascertain compliance.

Kenya's PCs was awarded by The United Nations Department of Economic and Social Affairs (UNDESA) in June 2007 for innovations in governance and public administration through the United Nations Public Service Awards (UNPSA) Programme. This was an international award during the 7th Global Forum at a high-level ceremony during the plenary session. The 2007 UNPSA was awarded in three categories improving transparency, accountability and responsiveness in the public service.

1.2   The Objectives of Performance Contracts in Kenya

PC is one of Kenya's key initiatives towards the realization of vision 2030. The PC flagship projects are geared towards deepening the institutionalization of RBM and building the capacity of public servants and institutions to meet citizen needs and expectations. The PC and other reforms are aimed towards achievement of vision 2030 which seeks to make Kenya a middle income country that guarantees improved quality life for all.

Specifically, performance contracting framework was intended to:
  i)   Improve service delivery to the public by ensuring that top-level managers are accountable for results;
  ii)   Reverse the decline in efficiency and ensuring that resources are focused on attainment of key national policy priorities of the government (Parachuted projects);
  iii) Institutionalize performance oriented culture in the public Service through introduction of an objective performance appraisal system;
  iv)   Measure and evaluate performance;
  v)   Link reward to measurable performance;
  vi)   Facilitate the attainment of desired results;
  vii) Instill accountability for results at the highest level in the government;
  viii) Ensure that the culture of accountability pervades all levels of the government machinery; and
  ix)   Strengthen and clarify the obligation required of the government and its employees in order to achieve agreed target.

1.3   The Corruption Eradication Indicator (CEI) in Performance Contracting (PC)

The Kenya Anti-Corruption Commission, predecessor of Ethics and Anti-corruption commision (EACC) entered into a partnership programme with the Performance Contracting Division (PCD) in 2007/2008 finacial year to enhance the implementation of its integrity and anti-corruption programmes in the public service. This framework provided the Commission with the opportunity to mainstream a corruption prevention framework in public institutions. The PCD therefore introduced six (6) performance targets as outlined in "Corruption Eradication Indicators" for 2007/2008 and revised over the subsequent financial years. The Commission, being the lead agency in the fight against corruption, collaborates with PCD in providing oversight in implementation of CEI in PC by public institutions.

The following are the five (5) performance targets also comprehensively referenced in Appendix 2:

i.   Formulate anti-corruption framework which entails setting up and operationalizing a Corruption Prevention Committee, develop an anti-corruption policy, undertake Corruption Risk Assessment (CRA) and develop and implement a Code Of Conduct and Ethics aligned to the Leadership and Integrity Act, 2012;

ii. Institutionalize a corruption prevention framework specifically CRA and an anti-corruption plan and implement integrity, ethics and anti-corruption capacity building programmes;

iii. Enhance corruption control by conducting systems review, enhancing ethical organizational culture and taking disciplinary action against officials involved in corruption and unethical conduct;

iv. Foster zero tolerance to corruption by vetting staff on integrity, enhancing internal controls, transparency and accountability in service delivery

v.   Attain certification by the Commission upon fulfillment of obligations i, ii. iii and iv

As part of implementing the CEI, MDAs are expected to submit to the Commission

the following:

 i). A work plan on the implementation of the sub-indicator in the first quarter;

 ii). Procurement plans;

iii). Quarterly reports in a prescribed format indicating corruption prevention strategies implemented; and

iv). Information on all tenders and contracts awarded which are above the threshold of Ksh.500,000.00 in a prescribed manner.

1.4   Rationale for the Assessment

The Commission has been evaluating public institutions under PC and advising them on the levels of implementation of the CEI for the past eight (8) years. The Commission has continued to receive returns from public institutions implementing the CEI. Despite this, corruption remains high as evidenced by the National Survey on Corruption and Ethics Report, 2012. There has been no empirical data on the impact of CEI in PC since its inception in 2007.

It is against this background that the Commission carried out a comprehensive assessment of the programme to establish its impact in corruption prevention in the public service. The findings are expected to inform the development of appropriate indicators and a policy framework for further implementation of the programme.

1.5   Objectives of the Assessment

The overall objective of this assessment is to measure the impact of the CEI in PC. That is, to establish whether there is a positive, negative or no change as a result of the CEI in PC activities. This then will be used to set appropriate benchmarks for further implementation. The specific objectives of this assessment are therefore:

- To assess the extent of the implementation of the CEI in PC;
- To establish the relevance and effectiveness of the CEI in PC;
- To assess the sustainability of the CEI in PC;
- To assess the challenges experienced in the implementation of the CEI in PC;
- Propose best practices in the implementation process of the CEI in PC; and
- To make recommendations and advise on the way forward in respect to the CEI in PC.

1.6   Scope

The assessment covered all public institutions which were under the PC from

2007/2008 to 2013/2014 financial year.

The assessment relied on the 11th cycle corruption eradication indicator under performance contracting guidelines. In the assessment, expected outputs and results following the implementation were reviewed so as to determine their actual impact on general service delivery.

1.7   Organization of the Report

This Report is organized into Five Chapters. Whereas Chapter One gives a broad background of the PC programme, Chapter Two explains the situational analysis of CEI. Chapter Three discusses the methodology adopted to collect the data that is presented in this Report, Chapter Four presents the findings of the evaluation while

CHAPTER TWO

SITUATIONAL ANALYSIS OF THE CORRUPTION ERADICATION INDICATOR

2.0   Introduction

This Chapter provides an overview of the CEI in Performance Contracting (PC) from its inception in the FY 2007/2008 to the FY 2013/14 when the impact assessment study was carried out. CEI is one of the performance criteria categories under the performance contracting framework with a preset weight.

2.1   Performance Contracting

PC is part of the broader public sector reforms aimed at improving efficiency and effectiveness in the management of the public service. It is implemented through a performance contract which is a freely negotiated agreement between the Government, acting as the owner of a Government Agency, and the Management of the Agency. It clearly specifies the intentions, obligations and responsibilities of the two contracting parties. The Commission is the lead agency in the implementation of the CEI.

A model PC with a performance matrix for each PC criteria category is issued by the PCD at the beginning of each financial year providing weights.

Table I: Performance criteria weights for various criteria categories for the FY

Performance criteria category	Ministry/ dept.	Tertiary institutions	Local authority	State corporations		
Finance and stewardship	15	15	15	15	15	45
Service delivery	25	25	25	25	25	-
Non financial	15	15	15	15	15	10
Operations	30	30	30	30	40	30
Dynamic/qualitative	10	10	10	10	10	10
Corruption eradication	5	5	5	5	5	5

Source: Performance Contracting Guidelines 9th Edition

2.2   Corruption Eradication Indicator

CEI was first introduced in PC Framework in the FY 2007/2008. It was intended to help public institutions mainstream anti-corruption strategies, ethics and integrity thereby reducing wastage of public resources through corruption.

The weighting of the indicator has evolved over time since inception. The weight was initially 10% of the overall PC score and was later reduced to 5% where it stagnated for several years. With the introduction of the Mwongozo Code in the current FY (2015/2016) the weight was further reduced to 4%.

The indicator was implemented in a set of sub-indicators that uniformly apply to public institutions on PC. Later, the performance levels (1-5) of the CEI were introduced where Institutions were required to select the levels to implement progressively till the final level.

2.2.1   Anti-Corruption Framework

The first sets of indicators were aimed at enabling public institutions put in place the necessary infrastructure that would enable them fight corruption within its systems. The indicator sought to establish a solid foundation that institutions would build on in the fight against corruption in the subsequent years. In the FY 2007/2008 the indicator required the institutions to form and operationalize a Corruption Prevention Committee, develop and implement Anti-Corruption Policy and Code of Conduct and develop a Corruption Prevention Plan (CPP). In the FY 2009/2010, a baseline survey was introduced as a sub-indicator and was operationalized for two financial years, until 2010/2011 when it was dropped. In the FY 2012/2013 a new set of sub-indicators were added to the framework for training of CPC members and sensitization of staff.

i.   Corruption Prevention Committee

Under this sub-indicator, public institutions were required to constitute and operationalize Corruption Prevention Committees or Integrity Committees in accordance with the guidelines that were provided by the Public Service Integrity Programme (PSIP). The Committee is composed of the Head of the Institution as the Chair and Heads of Departments as Members. The sub-indicator has not changed over the years but in the FY 2012/2013 institutions were required to

enhance the capacity of CPC through training. The Committee's role is to coordinate Anti-Corruption strategies in the organization.

Specifically, the CPC is responsible for:

a) Setting priorities in the prevention of corruption within the institution;

b) Planning and coordinating corruption prevention strategies;

c) Integrating all corruption prevention initiatives in their organizations;

d) Receiving and reviewing reports on corruption prevention initiatives and recommending appropriate action;

e) Receiving and taking action on corruption reports made by staff and other stakeholders. Evidence of concrete measures taken must be made available and any referral to other agencies well documented;

f) Spearheading anti-corruption campaigns within their jurisdictions;

g) Monitoring and evaluating the impact of corruption prevention initiatives; and

h) Preparing and submitting quarterly progress reports.

The committee was expected to hold quarterly meetings and maintain accurate records of minutes for purposes of evaluation.

ii. Development of Institutional Anti-Corruption Policy

In this sub-indicator, institutions were required to formulate and implement anti-corruption prevention policy to address issues of corruption and inform the strategies to be put in place. The policy generally addressed the following:

i. Statement of recognition of corruption risk in the organization and acknowledgement that corruption can occur;

ii. Statement confirming that the responsibility of addressing corruption rests with management, staff and stakeholders;

iii. Structures put in place to prevent, detect and investigate corrupt officers;

iv. A summary of possible corrupt practices in an institution to guide public servants;

v. A breakdown of corruption risky areas and corrupt practices in the institution;

vi. Composition of Corruption Prevention Committee members, its mandate and operations;

vii. How to report corruption internally and externally; and

viii. Confidentiality of information and protection of informers and whistle blowers.

iii. Development of Corruption Prevention Plans

In this sub-indicator, public institutions were required to develop and implement a Corruption Prevention Plan (CPP). The CPP incorporated clearly set SMART objectives and targets to be met, activities and sub activities to be implemented, desired outputs/outcomes to be achieved, clear and objectively verifiable indicators for monitoring progress and evaluating results, clear responsibilities for implementation and resource requirements.

One of the key activities to be undertaken under the CPP was to carry out Corruption Risk Assessment and Management to identify loopholes in the systems, policies, procedures and practices that facilitate corruption and recommend ways of sealing them. This involved institutions looking at their own systems and operations with a view to understand the motives, opportunities, discretionary powers and monopolistic tendencies that encourage corruption to occur. This is done through detection and assessment of the organization systems to determine corruption risk exposures within each functional area and assess the impact of such exposures. The next step involved developing appropriate strategies to mitigate on the risks identified.

iv. Development of a Code of Conduct

The sub-indicator required public institutions to develop specific Codes of Conduct and Ethics for their employees to ensure that staff are committed in the discharge of their duties and responsibilities. This was pursuant to the Public Officers Ethics Act, 2003. The Commission had provided a guideline to help institutions formulate their Codes. The Codes were expected to be binding to Management and Staff. In the FY 2012/2013, the sub-indicator required staff to sign an integrity pact.

v. Integrity Training

The sub-indicator required public institutions to train Integrity Assurance Officers (IAOs). The IAOs were officers selected, trained and assigned duties to offer technical expertise on the implementation of corruption prevention activities. The IAOs training was done in consultation with the Commission and the Ministry of State for Public Service and other stakeholders in line with Public Service Integrity Programme. One qualified to be an IAO after successfully completing an intensive

five day training provided by the Commission and issued with a certificate.

The training modules included the concept of corruption, the legal framework of anti-corruption in Kenya, corruption loopholes in Financial Management, Procurement, Human Resources Management, Information and Communication Technology, Project Management and Records Management. Other modules encompassed fostering a positive organizational culture and Carrying out Corruption Risk Assessment and developing Corruption Prevention Plans. Specific duties of IAOs were to assist Heads of Institutions and CPCs to:

  i. Carry out Corruption Risk Assessments;
  ii. Initiate actions in response to Corruption Risk Assessments;
  iii. Prepare Corruption Prevention Plans;
  iv. Establish timetables for implementing Corruption Prevention Plans;
  v. Develop and implement organizational Codes of Conduct and Ethics;
  vi. Coordinate and facilitate implementation of corruption prevention programmes;
  vii. Monitor, evaluate and review the implementation of PSIP activities;
  viii. Compile progress reports and present to the Heads of Departments, CPCs and to PSIP Secretariat; and
  ix. Implement anti-corruption education and awareness programmes.

vi. Baseline Survey

This sub-indicator was introduced in the FY 2009/2010 and was implemented for two years. It required public institutions to conduct a survey on corruption perception. The findings of the first survey were to inform the strategies to be put in place in order to mitigate corrupt and unethical practices in the institutions. The findings of the second survey were to evaluate the impact of the corruption prevention strategies implemented.

vii. Integrity Testing Programme

This sub-indicator was introduced in the FY 2010/2011. It required public institutions to train programme officers to liaise with the Commission to undertake integrity testing. Integrity Testing Programme (ITP) was a proactive method of robustly dealing with corruption and misconduct, a tool for encouraging integrity

and a mechanism that verified organization's professional integrity in a typical work set up. The objectives of ITP were to identify particular officers who engage in corruption or misconduct and determine appropriate courses of action, to increase actual and perceived risk of corruption by creating an aura of omnipresence thereby deterring corrupt behavior and encouraging officials to report when offered bribes. It also helped to identify officers who were honest and trustworthy, and therefore likely to be suitable for assignments in sensitive areas of the organization. Due to capacity challenges on the part of the Commission and the numerous public institutions on PC integrity testing programme was dropped from the CEI.

2.2.2   Institutionalization of Corruption Prevention
This was the second level of the CEI and was introduced in the FY 2013/2014. It required all public institutions to enhance the implementation of the provisions of Anti-corruption framework in Level 1. Specifically, the sub-indicator focused on the implementation of CRA and anti-Corruption Plan, evaluation of outcomes and impact of the anti-corruption framework, monitoring progress reports submitted by public institutions to the commission and enhancing institutional capacity on integrity, ethics and anti-Corruption.

2.2.3   Corruption Control
The sub-indicator was introduced in the FY 2013/2014 as the third level of CEI in the 11th cycle performance contracting guidelines. It required public institutions to enhance systems, policies, procedures and practices of work by reporting on specific corruption control measures implemented indicating the level and depth of corruption control. It was also intended to enhance organizational culture and ethics through reports of institutional advisory or disciplinary committees on breach of codes and report on the number of public officers suspected of corrupt practices who were suspended by providing specific details of the actions taken.

2.2.4   Zero Tolerance to Corruption
The sub-indicator was introduced in the FY 2013/2014 as the fourth level of CEI in the 11th cycle performance contracting guidelines. It required public institutions to vet all staff on integrity and submit a report of vetting including actions taken on those found to lack integrity. It also required institutions to continuously enhance internal controls to mitigate against corruption and unethical practices. They were

also required to report on specific internal control measures implemented indicating the level and depth of corruption control. Further, public institutions were required to maintain high standards of ethical culture through institutional advisory/disciplinary committees on breach of codes and enhancing transparency, accountability and service delivery.

2.2.5   Integrity Certification

The sub-indicator was introduced in the FY 2013/2014 as the fifth/final level of CEI in the 11th cycle performance contracting guidelines. It required public institutions that had successfully implemented the first four levels to apply for integrity certification. Upon application the commission would assess the systems of the institutions and award certification depending on the outcome. However, there was no institution that applied for the integrity certification.

2.3   Impact Assessment

In the FY 2013/2014, the Commission carried out an impact assessment of the CEI after seven years of its implementation by public institutions. The next chapter presents the methodology used to carry out the assessment.

CHAPTER THREE

METHODOLOGY

3.0   Introduction

This Chapter describes data collection and data processing methods that is presented in this Assessment Report. In data collection, it explores the questionnaires and the case study approaches. In data analysis it describes data entry, cleaning and analysis processes. The assessment was carried out with the aid of 12 Research Assistants, eight in data collection and 4 in data processing. Data collection was carried out between 9th February and 28th March 2015.

3.1   Research Design

This assessment followed a descriptive design methodology that employed questionnaires and a case study.

3.1.1   Face to Face Interviews

There were three questionnaires and a discussion guide developed for the assessment that targeted the implementers, other staff, service seekers and key informants. The implementers' questionnaires contained information on all the process based sub- indicators presented in Appendix 2. The other staff questionnaire sought information on awareness levels and effectiveness of the CEI. The service seekers questionnaire sought information on improvement in service delivery, awareness of CEI and possibilities of engaging in corruption while seeking services. The Key informant discussion guide focused on bringing to the fore the impact of CEI in corruption prevention, key achievements, challenges and the best way forward.

3.1.2   Case Study

A case study is an in depth study of a particular situation in order to obtain affluent data that can be used for replication in other similar scenarios. In this evaluation, four institutions were selected for case study based on the level of implementation of the CEI. Selection was based on existence of a dynamic and effervescent CPC, success in formulation and implementation of an anti-corruption policy, CRA, resource

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allocation to implement anti-corruption measures and success in vetting of top managers. For that reason, Moi University, Kenya Revenue Authority, Constituency Development Fund Board and Kenya Ports Authority were chosen. The case study was conducted from 14th February to 3rd March 2016.

3.2   Data Collection

The assessment targeted implementing officers specifically the integrity assurance officers (IAOs) and in their absence any member of the corruption prevention committee (CPC). These interviews were aimed at determining the level of implementation of the CEI. Appendix 1 provides a list of all the organizations targeted in which only one implementing officer was interviewed per institution giving a total of 300 respondents.

The assessment also covered other staff members from the same institutions not directly involved in the execution of the CEI. In interviewing other staff, the assessment aimed at complementing responses from the implementing officers to ascertain the awareness, support and practices. Under this category, a total of 1,373 staff members were interviewed.

Service seekers present at the institutions during the time of the assessment were also targeted. This was preferred since it enabled collection of brisk information that gives an organization a unique perspective on its performance and level of customer satisfaction. Service seekers, suppliers and stakeholders present at the institutions' offices totaling 1,296 were interviewed.

The purpose of the key informant interviews was to collect data from a wide range of experts who have first-hand knowledge about CEI in PC in Kenya. These experts, with their particular knowledge and understanding, provided insight on the nature of problems and proffered suggestions to mitigate the impediments identified in the interviews. A total of 10 key informants working in various public sector institutions were interviewed in the assessment between 13th - 31st July 2015.

3.3   Data entry, Cleaning and analysis

Data processing started on 16th March until 17th April, 2015, by four (4) research assistants and one system developer.

With the help of experienced researchers, correctly completed questionnaires were coded and checked using a code sheet. For quality control, 10 percent of the coded data was double-checked.

Data entry was done in Census and Survey Processing System (CSPRO) version 6.1 software. The entered data were then analysed using the International Business Machines Statistical Product and Services Solutions (IBM SPSS) version 23. The results of the analysis are contained in the sections of the Report that follows. Experienced data entry clerks entered the data into the computers. During data entry, ranges and skip rules were defined appropriately to check entry of invalid data. At the end of each day, each data entry personnel performed checks on the data entered with respect to ranges. About 10 percent of the correctly completed questionnaires were validated and consistency test done so as to ensure quality control. After merging files from all the data entry terminals, final data cleaning was done before analysis was started. This was facilitated by the editing manual, which provided cleaning specifications. Invalid entries detected were checked from the questionnaires and corrections made.

CHAPTER FOUR

FINDINGS

This Chapter presents the results of the assessment. The assessment sought to find out the existing anti-corruption framework in various institutions under PC. As discussed in Chapter 3, institutions were expected to set up corruption prevention committees, develop an anti-corruption policy, develop a specific leadership and integrity code for state officers or align the code of conduct and ethics with the Leadership and Integrity Act, 2012, conduct CRA, train IAOs and forward progress and adverse reports to EACC at regular intervals for further action.

The Chapter is divided into four sections covering the extent of implementation, relevance and effectiveness, sustainability and the challenges experienced in carrying out CEI in PC. The findings of the assessment on these indicators are discussed hereunder.

4.1 Anti-Corruption Framework

Under the anti-corruption framework, the assessment covered formation and operationalization of the CPC, integrity testing of Chief Executive Officers and Heads of Department, anti-corruption policy, implementation of specific leadership and ethics code of conduct in line with Leadership and Integrity Act 2012 and corruption risk assessment.

4.1.1 Establishment of Corruption Prevention Committees (CPCs)

Out of the 300 public institutions assessed, 283 of them (94.3%) had established CPCs. Of the 283 institutions 88.7 percent were chaired by the Heads of the institutions. Other members of the CPC are heads of departments, sections and units. In 47.3 percent of the institutions with CPCs, the Secretaries are trained IAOs.

1373 members of staff who were not directly involved in implementation of CEI were asked to state whether they were aware of the existence of CPCs in their institutions for which 19.7% stated that they are not aware. On the other hand, 35.9% indicated that they were not consulted on the CEI implementation in their institution.

4.1.2 Operationalization of Corruption Prevention Committees

From Figure A1, over 83.6 percent of the institutions had operationalized their CPCs through quarterly meetings while 6.8 percent of the institutions conduct the meetings monthly. A noteworthy 3.6 percent of the institutions have never held a meeting.
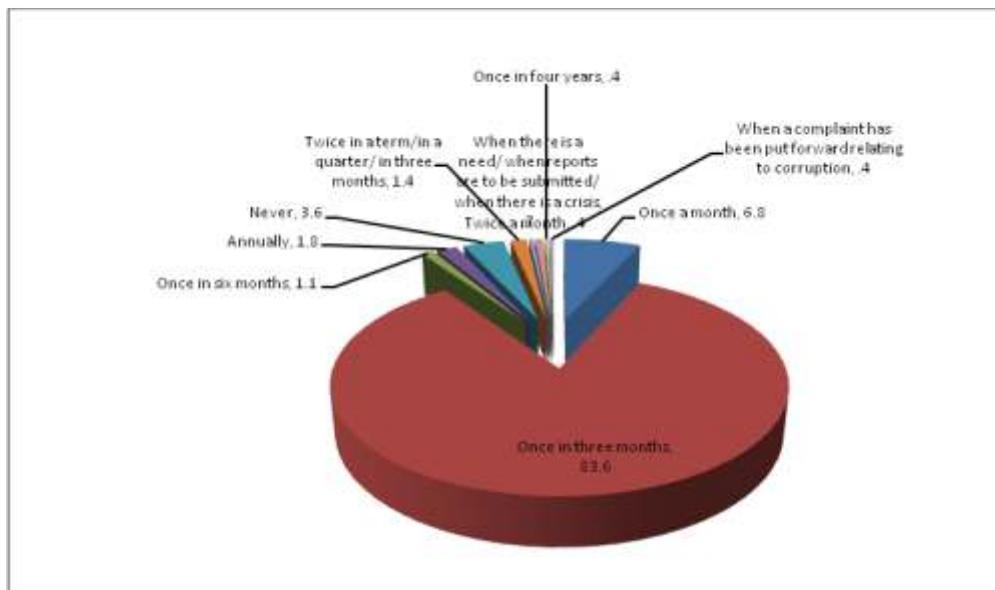

Figure A1: Frequency of CPC Meetings

Further, 59.3 percent of the institutions provided a copy of the duly signed minutes of the most recent meetings during the assessment as compared to 40.5 who never provided the minutes
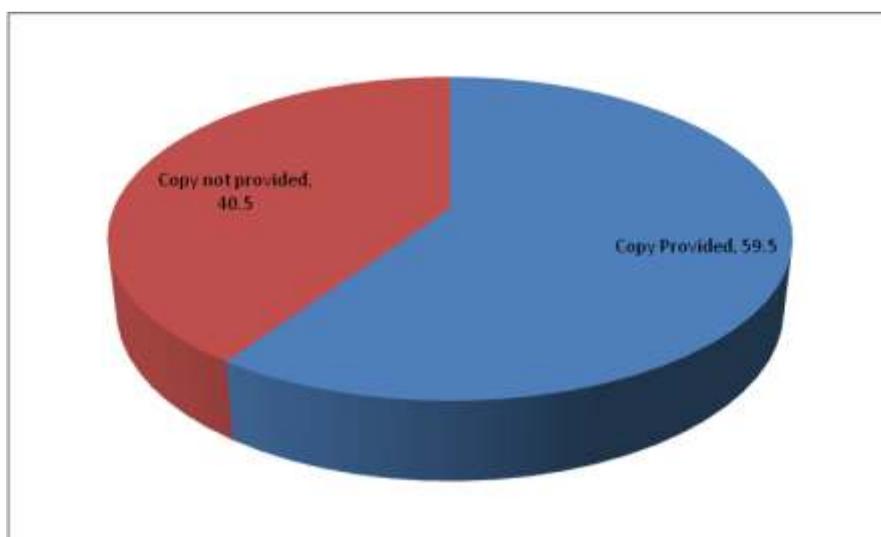

Figure A2: Evidence of signed CPC Meetings

Some institutions have cascaded the committees to lower divisions, departments, regions, schools and campuses in order to ensure that the CEI is implemented at all critical levels of the institutions.

> *Kenya Revenue Authority has a total of 13 Integrity Committees, with eight at the Headquarters and five in the regional offices namely Rift Valley (Eldoret), Central (Nyeri), Northern (Embu), Western (Kisumu) and Southern (Mombasa)*
>
> *Moi University has twenty one (21) Integrity Committees, comprising the Apex Committee which has 32 members and twenty (20) committees in the schools and campuses.*
>
> *The Kenya Ports Authority has 30 departmental Integrity Committees spread over seven (7) divisions. The CPCs meet once every quarter and their quarterly reports submitted to the Apex Committee for compilation by the CPC secretary and forwarded to EACC as required.*

4.1.3 Referral of Reports on Corruption and Unethical Conduct to EACC and Other Agencies

In the past one year, CPCs had forwarded 104 and 278 corruption related reports to the Police and EACC respectively. In single incidences, the CPC had also forwarded a report to the Parliamentary Public Investment Committee, Public Procurement Oversight Authority, handled internally through the disciplinary committee and 11 other incidences were not dealt with at all.

Of the reports forwarded to the police, twenty (20) are still under investigation, twelve (12) are pending in Court, six (6) Officers were interdicted while another six (6) Officers were terminated. In fifty two (52) of the reports, the CPC had not been advised on the status of the matter as further presented in Table 2.

Table 2: Number and Action Taken on Reports Forwarded to the Police

Action taken	Number of reports
Convicted in Court	2
Matter pending in Court	12
No action was taken	3
Officer is interdicted	6
Officer resigned and investigation	1
Surcharged	2
Terminated employment	6
Under Police investigation	20
No feedback	52
Total	**104**

Of the matters reported to EACC, eighteen (18) are still under investigation, no action was taken on eight (8) reports, four (4) matters are pending in court while in another four (4) Officers were suspended and are under investigation. It is also important to mention that in two hundred and twenty six (226) incidences, CPCs have not received feedback from EACC as presented in Table 3.

Table 3: Number and Action Taken on Reports Forwarded to EACC

Action taken	Number of reports
Controls increased	1
Corrective Measure taken	1
Discussed the staff number	1
EACC investigated and gave a report on the same	1
No evidence for any action	1
Faced disciplinary committee	1
Suspended and later dismissed	1
Wrote a report on the land to be repossessed	1
Made recommendation to management	1
Referred us to Police	2
Cleared by EACC and reinstated	3
Matter Pending in Court	4
Suspended and under investigation	4
Terminated employment	4
No action taken	8
Under Investigation	18
No feedback	226
Total	**278**

4.1.4   Corruption Reporting Methods

From Figure A3, corruption reporting boxes (43.6%) is the leading mode of making corruption and unethical conduct reports in institutions. This is followed by Hotline Numbers (14.2%), Emails (13.6%), reports to senior officers (5.8%), Websites (5.8%) and complaints desk (3.1%). The other category includes social network forums, internal audit reports, meetings with staff and assessment form feedback among others.
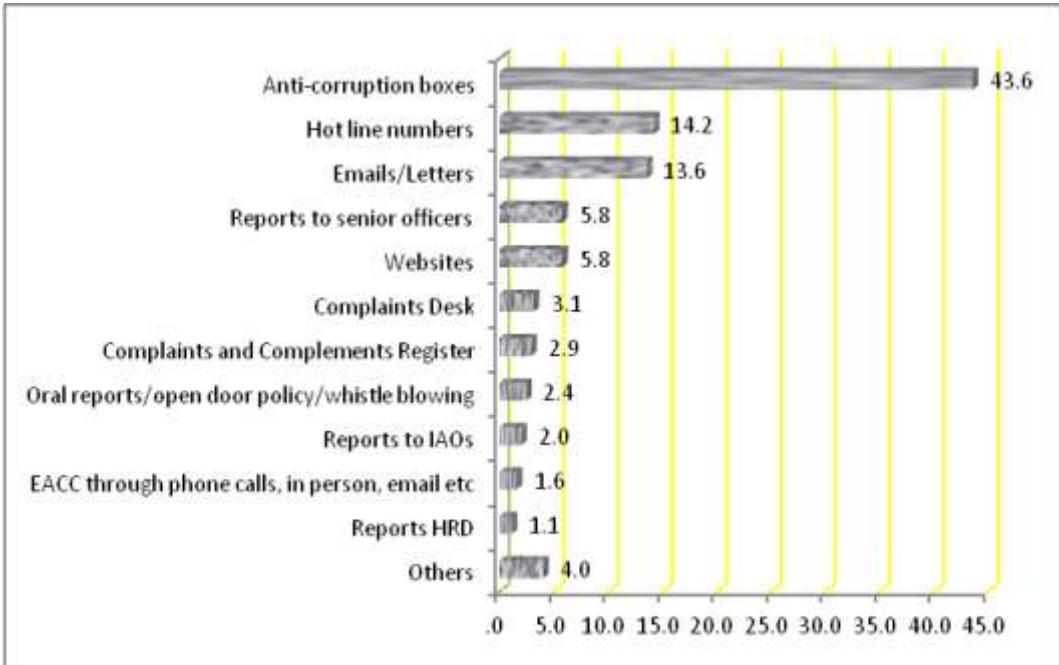
Figure A3: Mode of Making Reports to CPC

4.1.5 Handling of Corruption Reports by CPCs

The reports are analyzed by the CPC (45.6%), IAO (18.8%) an adhoc committee (8.5%), internal auditors (4.2%), Human Resource Manager (2.1%), public complaints Officer (2.1%), Head of Department (1.8%) and legal officer (1.4%).

Corruption prevention committee records are normally filed (54.8%), kept in record book (16.7%), database saved on the server (13.4%) and locked cabinets and desks (1.3%).

The Integrity Committee is responsible for managing the reporting channels. The Kenya Revenue Authority for example is in the process of acquiring an online complaints management system that encourages anonymous reporting thereby raising the confidence of the stakeholders to report malpractices without fear of intimidation and victimization.

4.1.6   Implementation of CPCs Recommendations and Resolutions

Over 91 percent of the respondents indicated that recommendations of the CPC are implemented while 8.7 percent indicated that they are not implemented.
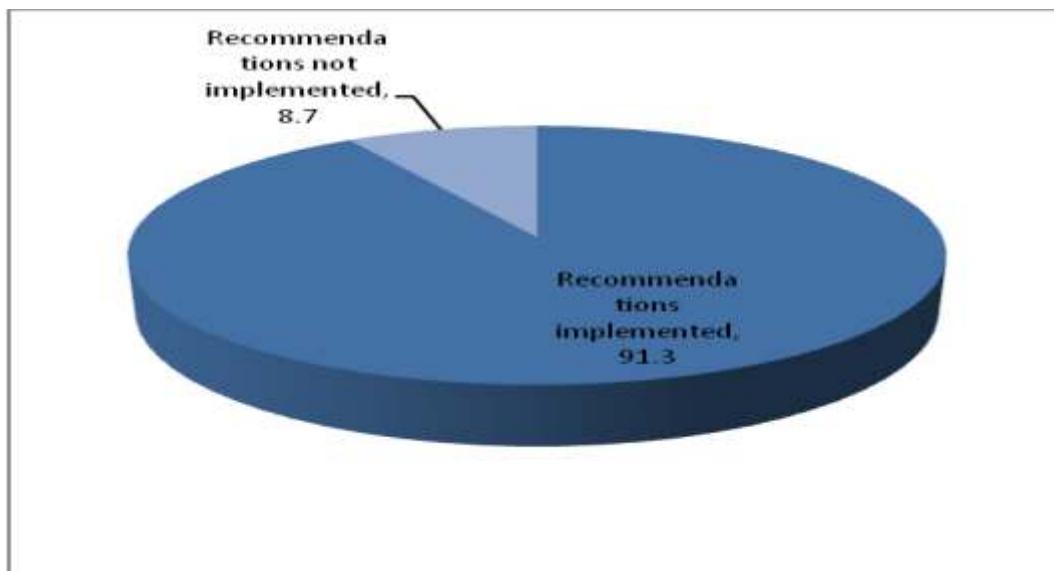
Figure A4: Implementation of CPC Recommendations

Figure A5 presents the various CPC recommendations that have been implemented in institutions that include the establishment of guidelines such as anti-corruption policy, gift registers, codes of conduct among others (13.6%), establishment of committees such as procurement (11.4%), disciplinary procedures against staff (9.3%) and submission of quarterly reports to EACC (8.5%).
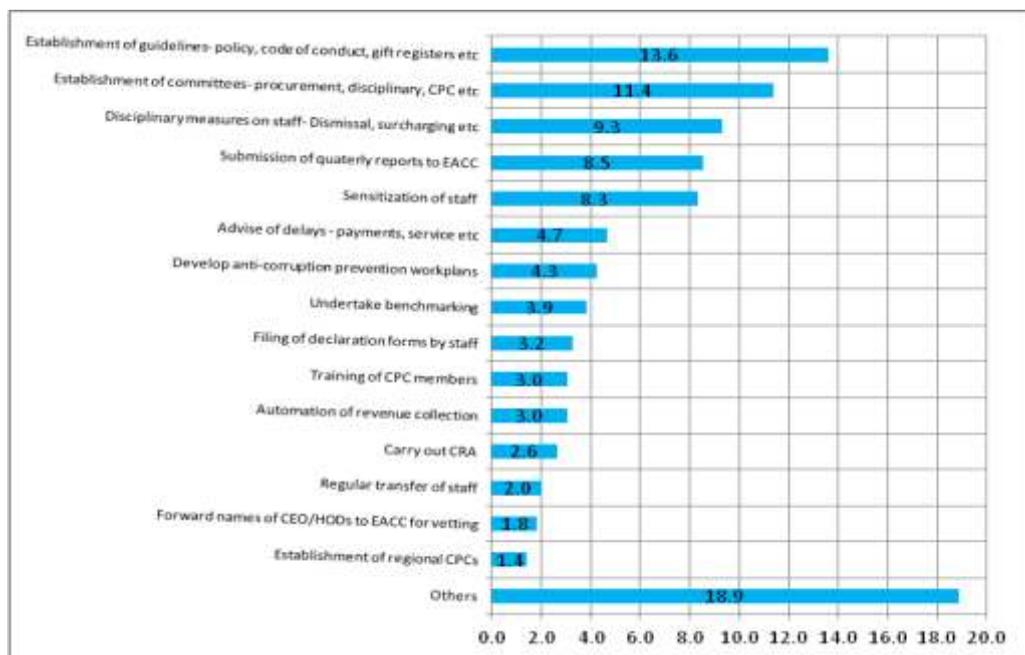
Figure A5: CPC Recommendations

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Conversely, those who indicated that CPC recommendations are not implemented cited lack of pressing issues to address (23%), formative stage of CPC (21%), no meeting has been called in the last four years (19%) and CPC is yet to be reconstituted (11%) among other reasons.

4.1.7 Training of CPC Members

The assessment also sought to find out if members of the CPC have been trained on anti-corruption, ethics and integrity. From Figure A6, 64 percent of the respondents indicated that members of their CPC have been trained as opposed to 36 percent who indicated that their members are yet to be trained.
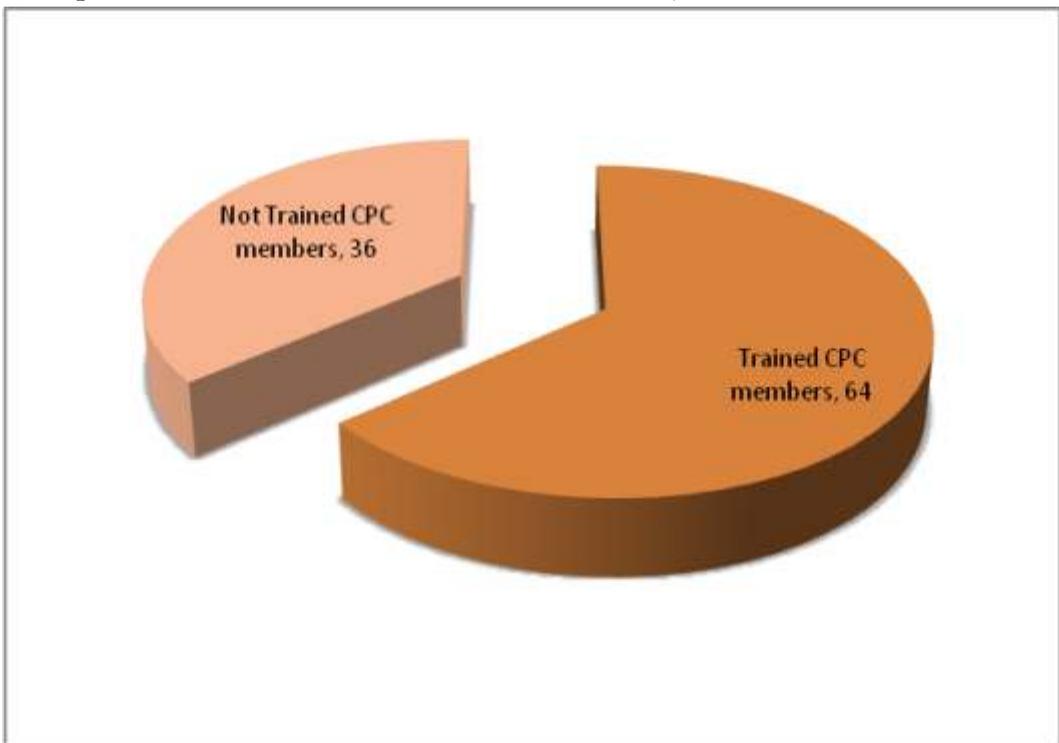
Figure A6: Training of CPC Members

Further, a total of 2,019 CPC members in 196 institutions have been trained giving an average of 11.34. Figure A7 presents the some of the institutions that have had their CPC members trained in which Kenya Revenue Authority has trained 180 members followed by Chuka University (40), Kenya Marine and Fisheries Research Institute (37) and Ministry of Education (36).
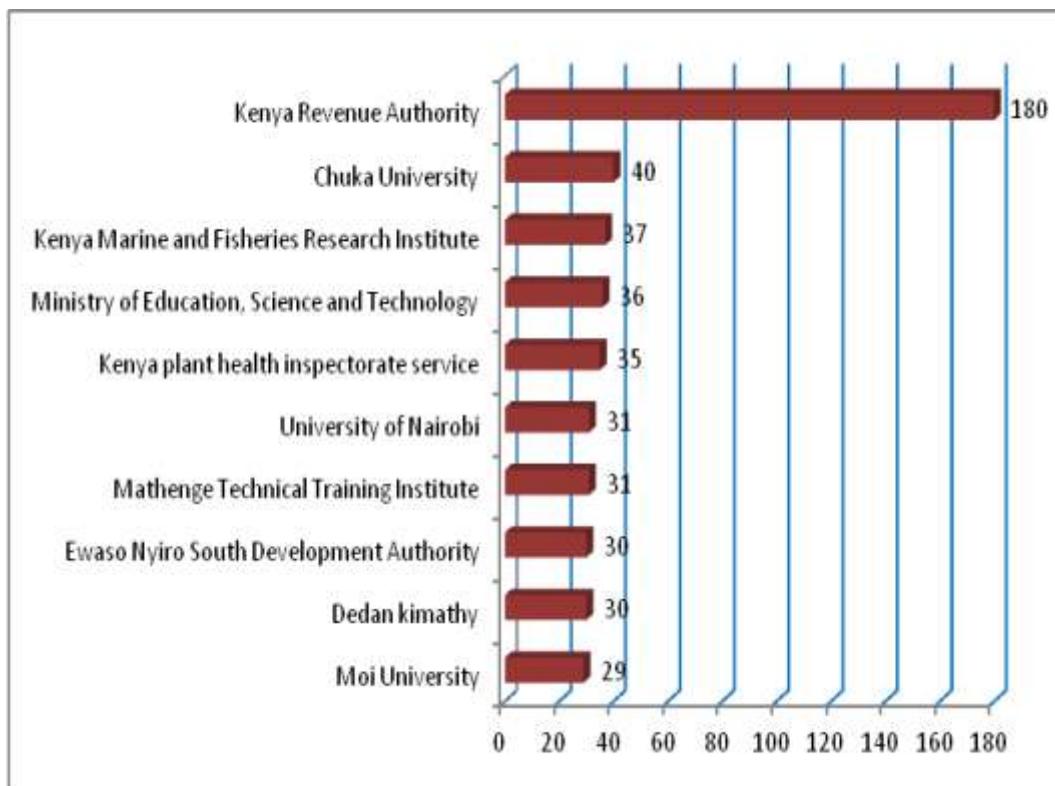
Figure A7: Top 10 Institutions by Training of CPC Members

EACC was cited by 94.4 percent of the respondents as the one that provided training in 185 institutions. Other providers of training cited were:- Kenya School of Government (4), Africa Institute of Ethics (2) and Pan –Africa Institute of Governance (1). In four institutions, an IAO provided the training.

4.1.8   Proposals for Enhancing the CPC Training Content

Those who had attended CPC training were asked to suggest modules or areas for further training. In order of priority, respondents suggested the following;- CRA and risk management (14.2%), vetting and integrity testing (14.2%), refresher training (12.3%), corruption prevention strategies (11.3%), cyber crime (9.9%), trends of corruption (8.5%) and protection of whistle blowers (4.7%). Other modules suggested are presented in Figure A8.

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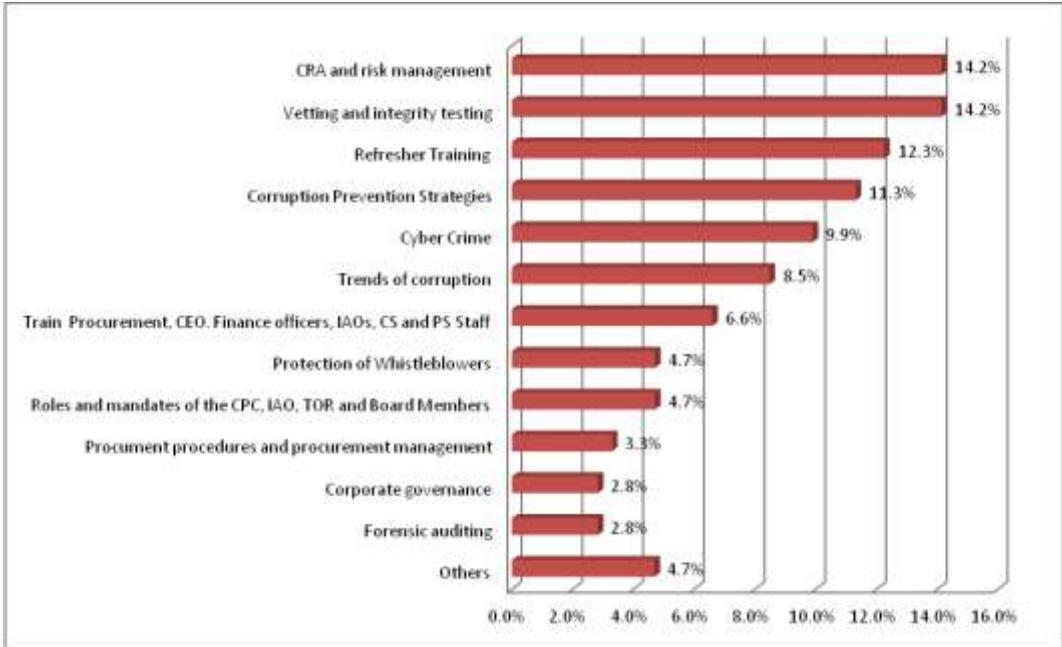
Figure A8: Modules and areas for CPC Training

4.1.9 Integrity Vetting of Heads of Institutions and Departments

Over 72 percent of the institutions (217) have forwarded names of Chief Executive Officer and Heads of Departments to EACC for integrity vetting while 27.7 (83) percent have not forwarded as shown in Figure A9.
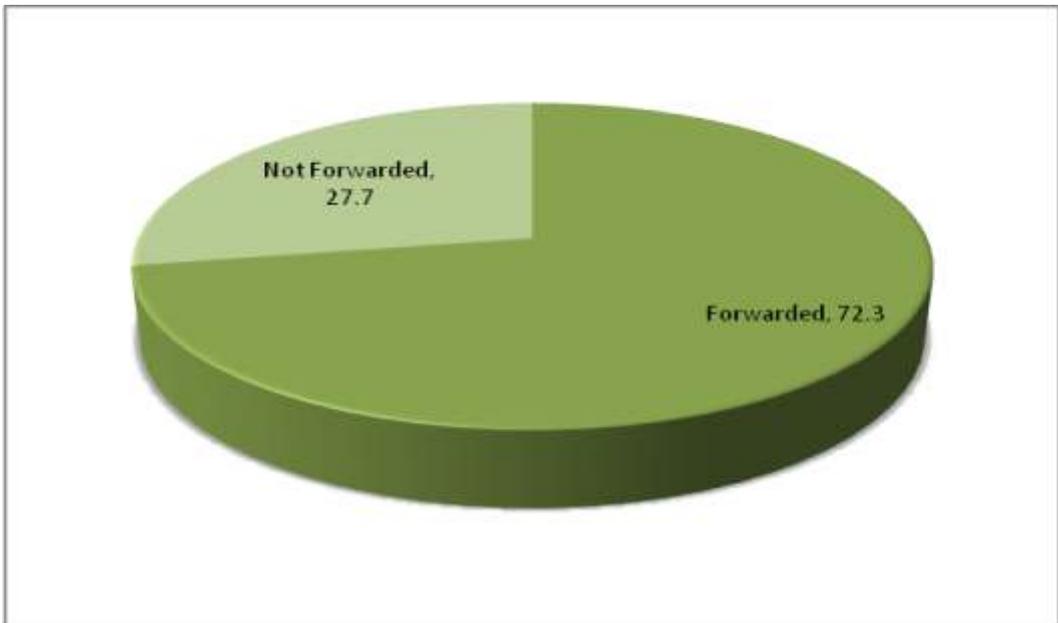
Figure A9: Integrity clearance of Heads of Institution and Departments

Among those who have forwarded the names, 32.1 percent indicated that EACC had no adverse reports against them while the majority, 56.9 percent are waiting for feedback. A paltry 1.4 percent indicated that their Heads of Institutions and Departments had adverse reports against them
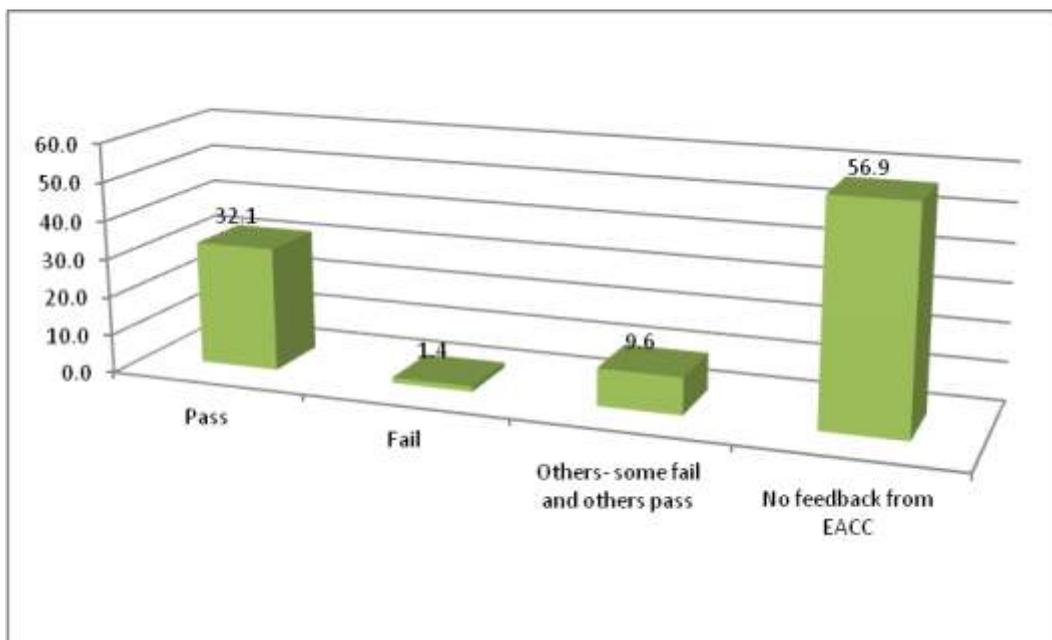
Figure A10: Integrity clearance for CEO and Heads of Departments

In terms of action taken on those who failed the integrity vetting, 58.3 percent are awaiting advice from EACC on what to do with the officers, 29.2 percent are still under investigation by EACC while 4.2 percent have had their contracts terminated. An identical 4.2 percent do not know what to do with the Officers and no action has been taken on them respectively as shown in Figure A11.
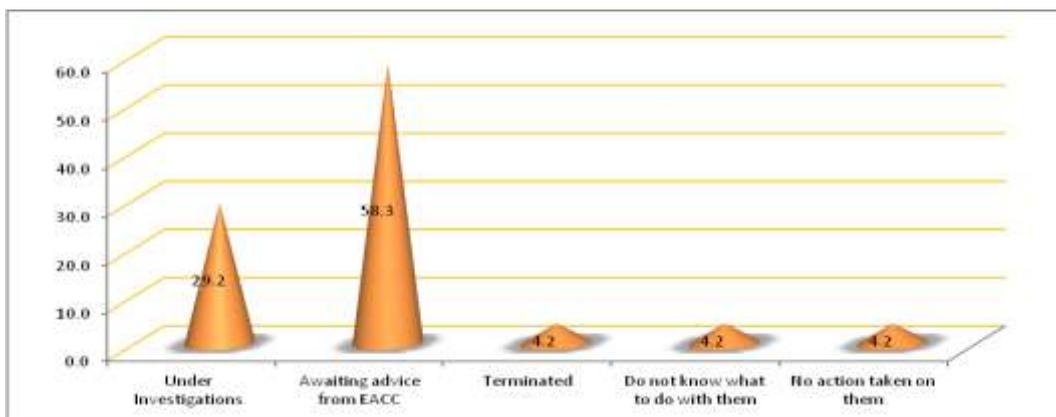
Figure A11: Action Taken on those who Failed Integrity Vetting

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4.1.10 Development of Anti-Corruption Policies

Institutions were required to develop a corruption prevention policy to guide the implementation of various initiatives including strategies to address the targeted issues such as the composition and operations of the CPC and handling of corruption and unethical conduct.

Over 91 percent of the institutions have developed corruption prevention policies while 8.5 percent have not. Of those that have developed policies, 89.6 percent indicated that the policy is operational and has been distributed to staff (83.2%) as shown in Figure A12.
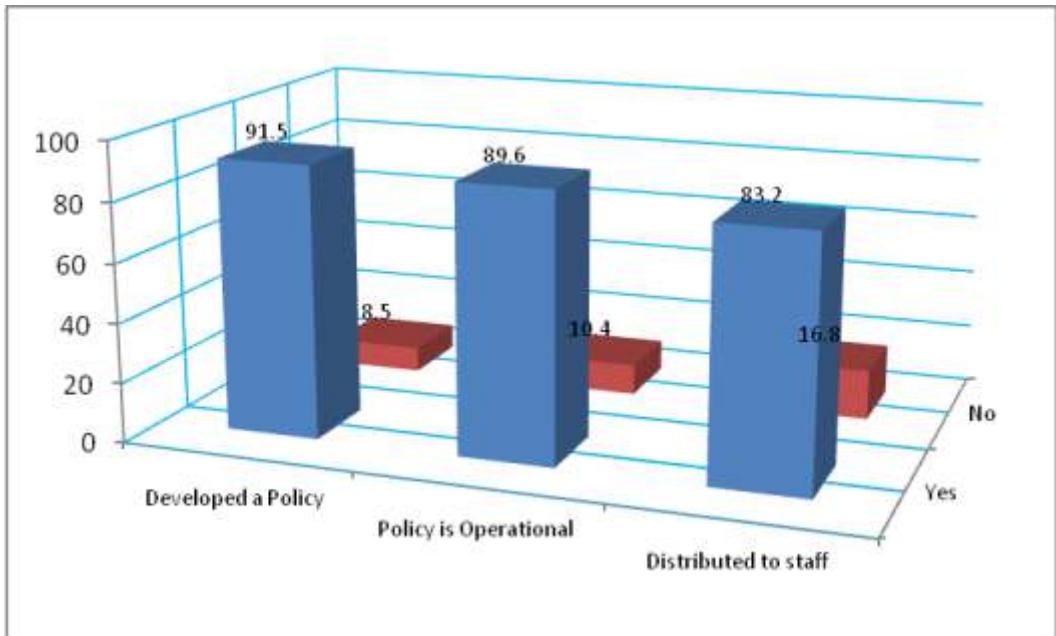
Figure A12: Development, Operationalization and Distribution to staff of the Anti-Corruption Policy

4.1.11 Achievements of the Anti-Corruption Policy

Increased awareness of the effects and consequences of corruption (90.1%) is the key achievement of the enactment of the anti-corruption policies in institutions. This is followed by change in attitude and perceptions about corruption (3.1%), improved service delivery (2.1%), adherence to code of conduct (1.6%), transparency and accountability (1.2%) and less audit queries both internally and from the Office of the Auditor General (0.9%) as shown in Figure A13.
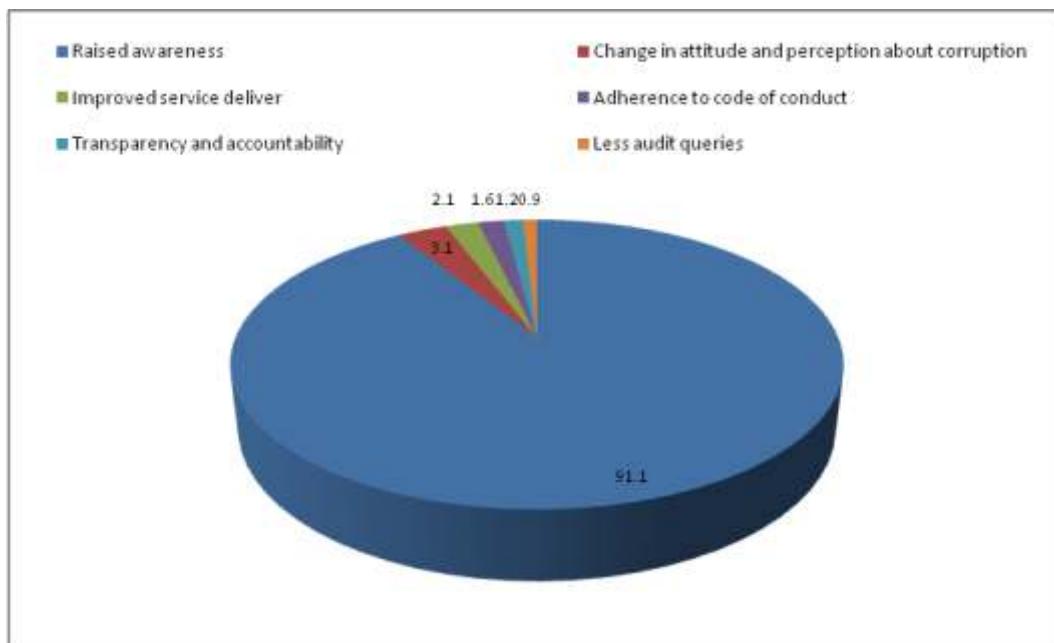
Figure A13: Achievements of the Anti-Corruption Policy

Accordingly, the training and sensitization of staff, formulation of corruption prevention plans, formulation of codes of conduct, disciplinary proceedings and action, against the violators of the policy, improved service delivery, corruption reporting boxes, utilization of resources and accountability and improved revenue collection are attributed to the implementation of the anti-corruption policy

4.1.12 Specific Leadership and Integrity Code for State Officers

Figure A14 presents responses on development, gazettement and signing of the specific leadership and integrity code for state officers in line with sections 37, 39 and 40 of the Leadership and Integrity Act, 2012. Out of all the institutions assessed 10 percent had state officers. Of these institutions, 73.3 percent had developed a specific leadership and integrity code for state officers out of which 58 percent forwarded to EACC for approval while only 7.9 percent have gazetted the specific code. Further, of those who have gazzetted the specific code of conduct, only 28.4 percent have had their state officer's sign.

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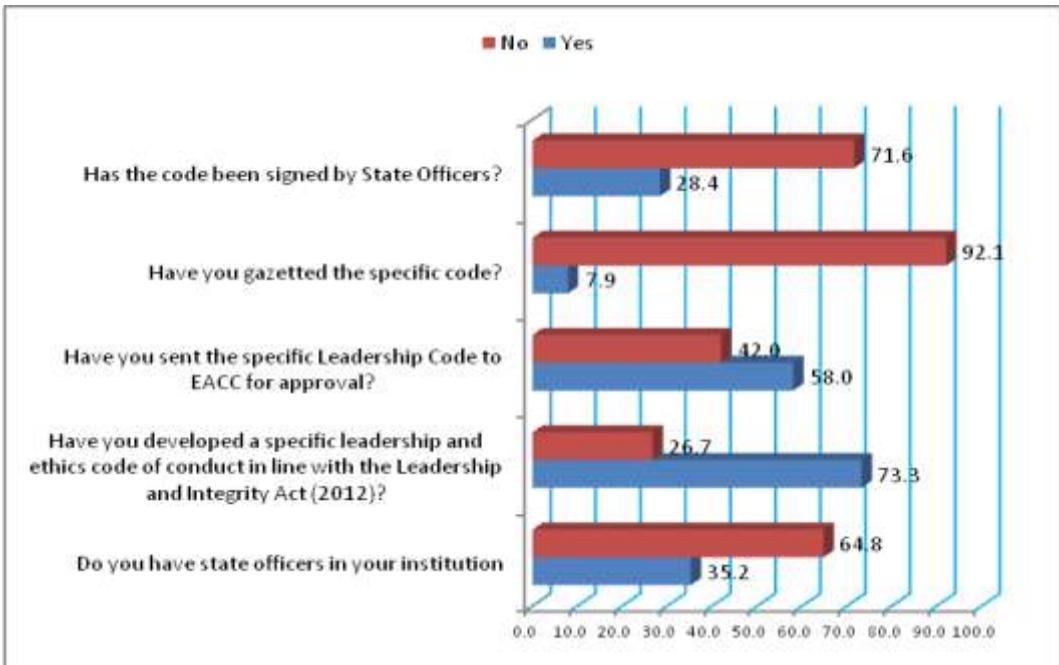
Figure A14: *Development, Operationalization and Gazetteement of Specific Leadership and Itegrity Code for State Officers*

4.1.13 Review of Specific Leadership and Ethics Code of Conduct

Further, of those institutions with a specific leadership and integrity code for state officers 64.8 percent have reviewed it in line with Leadership and Integrity Act, 2012 as opposed to 33.5 percent who indicated that they are yet to realign it. It's important to note that 1.7 percent developed their code of conduct after 2012 and hence it's in line with the Leadership and Integrity Act, 2012 as shown in Figure A15.
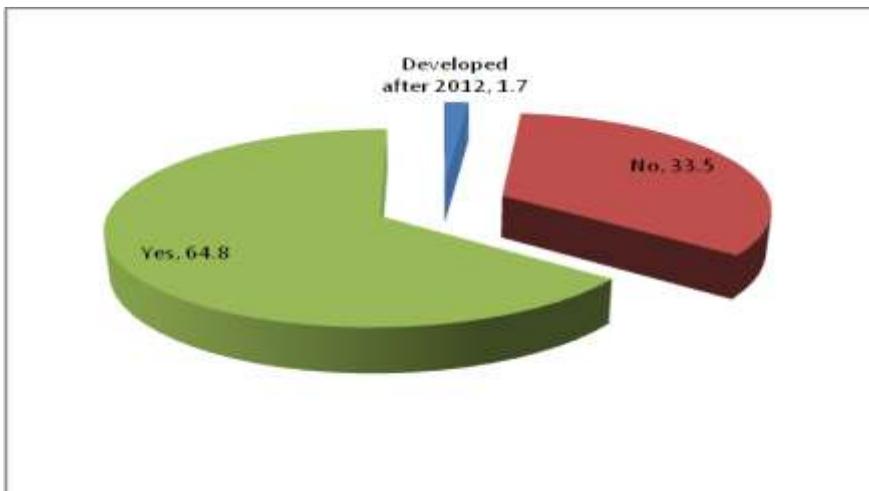
Figure A15: *Review of the Specific Leadership and Code for State Officers*

4.1.14 Corruption Risk Assessment (CRA)

The Evaluation revealed that institutions have carried out CRAs in their core and support areas. The CRA is critical in formulating corruption prevention strategies to mitigate on the identified corruption risks. Consequently the institutions report on implementation of the strategies in the CPPs as part of the quarterly submissions to the Commission.

As shown in Figure A16, 81.3 percent of the institutions have conducted a CRA in their institutions while 18.7 indicated that they have not.
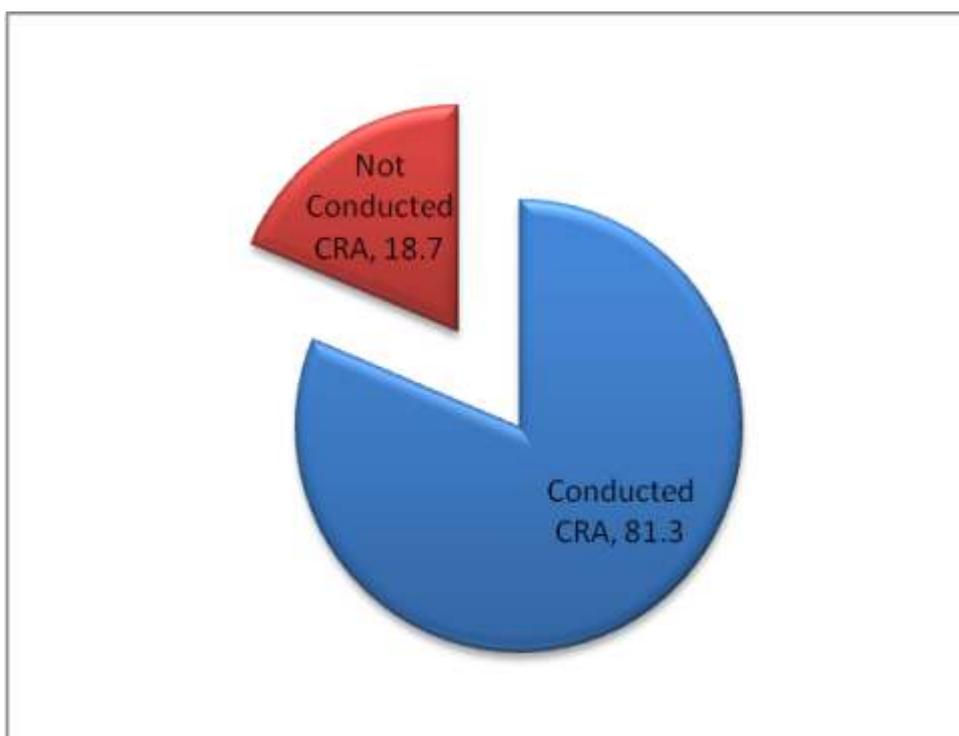
Figure A16: Corruption Risk Assessment

Over 34 percent of the institutions targeted supply chain management for their CRA followed by finance (32.2%) and human resource management (23.7%). A further 16.3 percent targeted all the operational areas when conducting the CRA as shown in Figure A17.
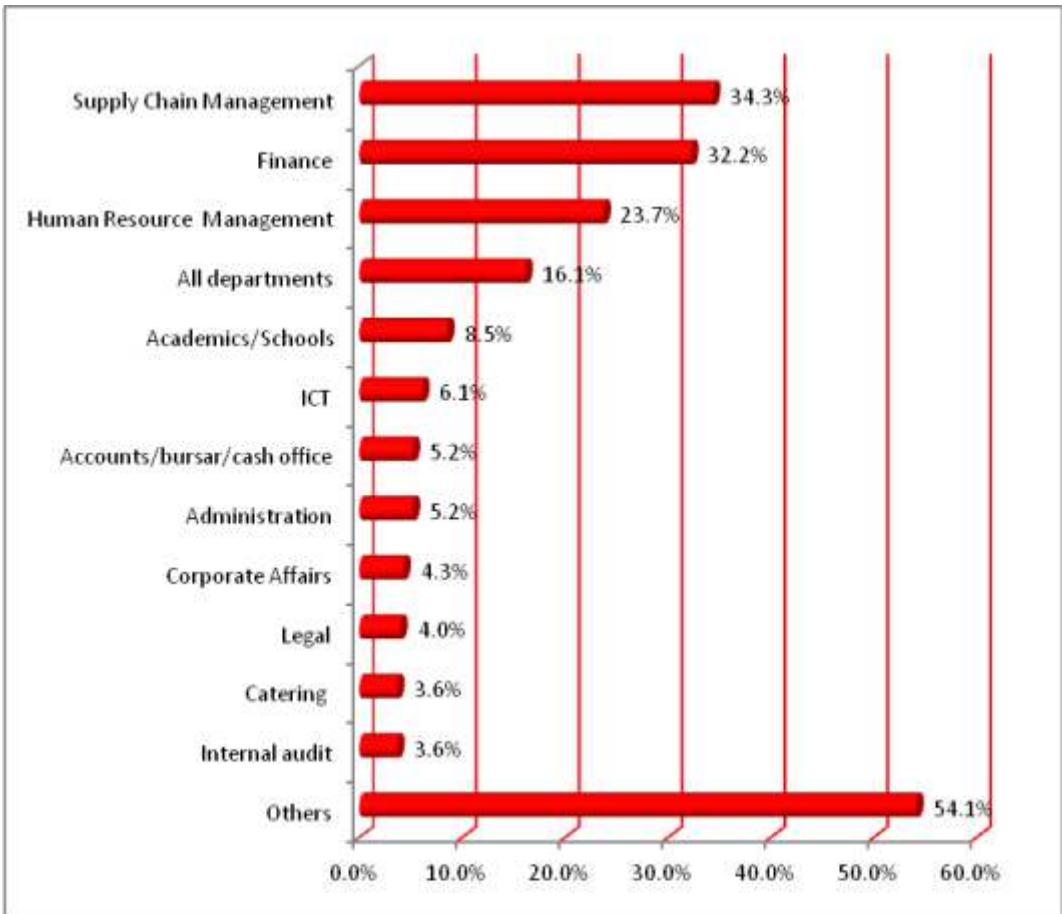
Figure A17: Target operational Areas in Corruption Risk Assessment

The CRA conducted revealed poor record keeping including loss of records (27.3%), misuse of property (26%), procurement malpractices such as bid rigging (26%), bribery (24.3%), delay in service delivery (15.3%) recruitment malpractices such as nepotism, favoritism etc (14%) and loss of revenue through fraud (10.3%) among others as shown in Figure A18.

At Kenya Ports Authority the main malpractices are bribery in identification of trainers, late removal of terminated staff in the system, unplanned recruitment, and submission of fake certificates by new staff, inflation oadvocates' fees, and outright theft of cargo by even owners leading to focus claims, illegal alienation of land among others.

At Moi University the major malpractices revolves around fees collection, allocation of rooms and staff taking leave and not reporting back on time due to poor record keepings.
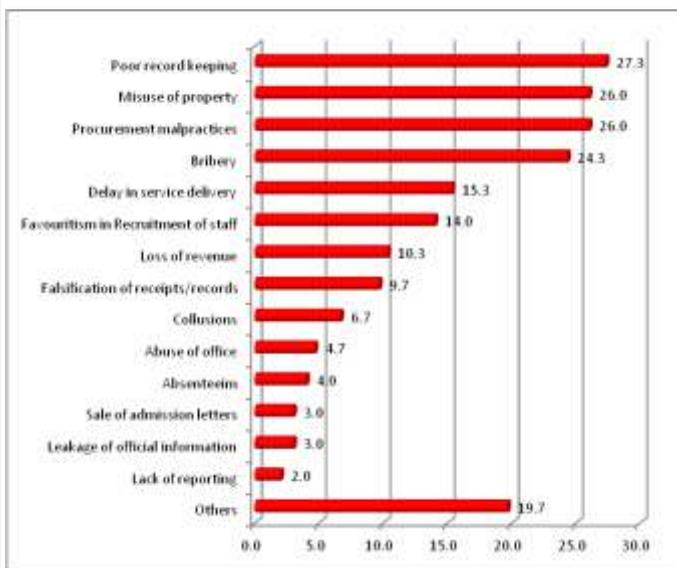
Figure A18: Findings of CRA

4.1.15 Mitigation of Corruption Risks Through CRA

The implementation of CRA recommendations has helped mitigate corruption risks in the fight against corruption in institutions. From Figure A19, it has mainly led to reduced corruption loopholes (18.5) and increased awareness on risk areas (11.5%). Other benefits include implementation of corruption prevention plans (10.5%), adherence to procedures (8%), reduced customer complaints (7%), improved supervision and oversight (7%) and improved office attendance (6%).
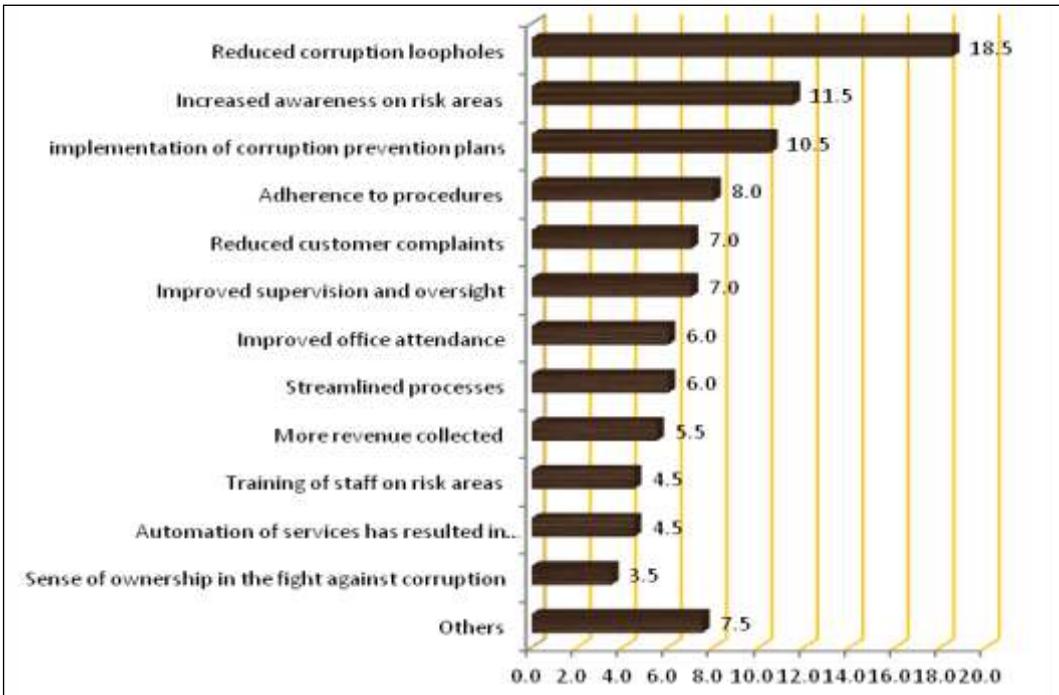
Figure 19: Mitigation of Corruption Risks through CRA

To tame corruption risks identified in the CRA, Kenya Ports Authority developed a databank of prequalified trainers and relevant Terms of Reference (TORs) for guidance; monthly data verification and reconciliation; reviewed and implemented recruitment policy; Enhanced security of cargo and documentation arising from cargo to be secured for use as evidence in cargo claims cases; and development of land policy documentation.

The Kenya Revenue Authority has developed a corporate risk plan and focuses on most recurring and most risky. Every department therefore identifies five key complaints to be addressed to the logical conclusion. The Authority then undertakes quarterly monitoring and conducts annual audits to check if all the departments implemented their corruption prevention plans. Corruption perception surveys are also undertaken to gauge service satisfaction levels and effectiveness of the implementation of CPP.

In order to address the fees collection problem at Moi University, it is the Vice Chancellor who can allow students sit for examinations without paying full fee. Room allocation has been automated so as to make it easy to detect cases of double allocation while leave registers have been opened in all campus for managing leave days.

4.1.16 Who conducted the CRA?

The assessments indicate that CRA is mainly conducted by the CPC. Figure A20 shows that 33.7 percent of the respondents indicated that their CRA was conducted by the CPC followed by 20.2 percent who said it was conducted by a constituted committee from in house staff while 13.5 percent said that it was conducted by internal audit unit. It is also important to note that in 4.8 percent of the respondents indicated they hired an external consultant.
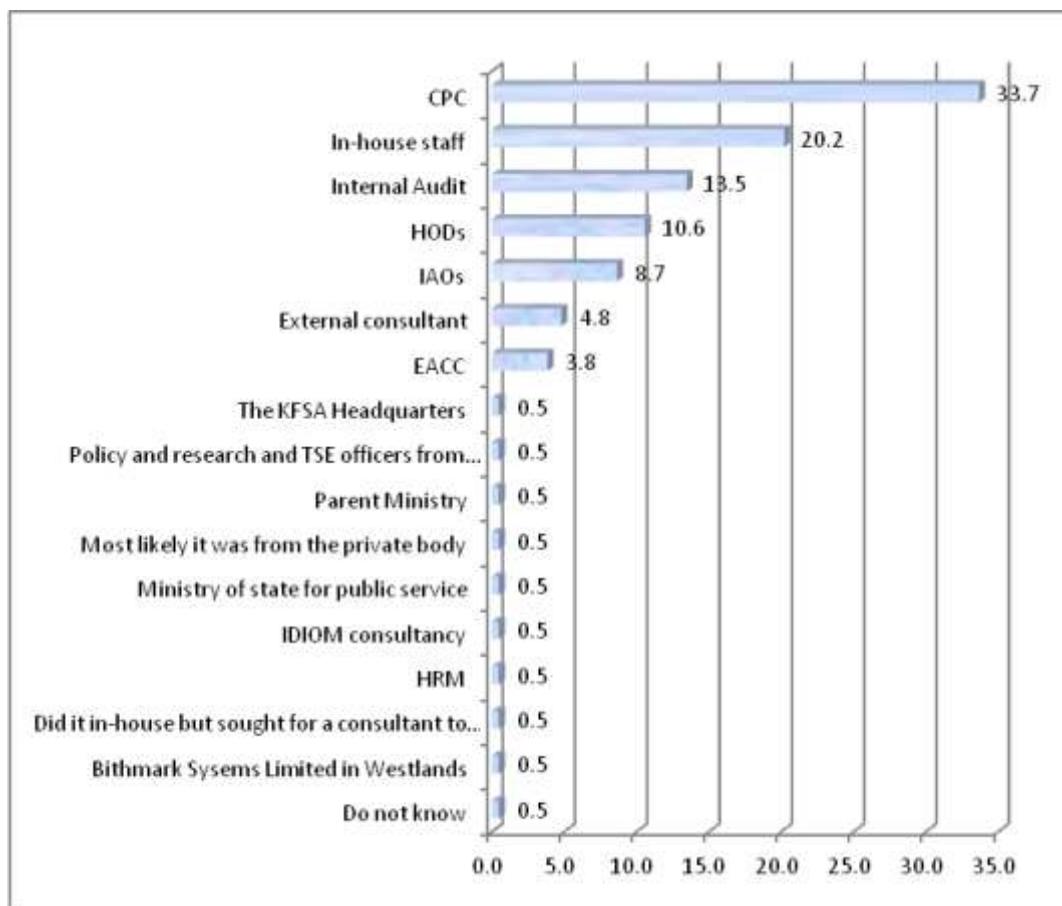
Figure A20: Who conducted the Corruption Risk Assessment

4.1.17 Reasons Cited for Not Conducting a CRA

The predominant reason cited for those institutions who have not conducted a CRA is lack of skills and knowledge (28.3%) followed by those who are currently planning to conduct the assessment. Other reasons cited include waiting for EACC to respond on the training of the CPC in order to equip them with the necessary skills to conduct the assessment as shown in Figure A21.

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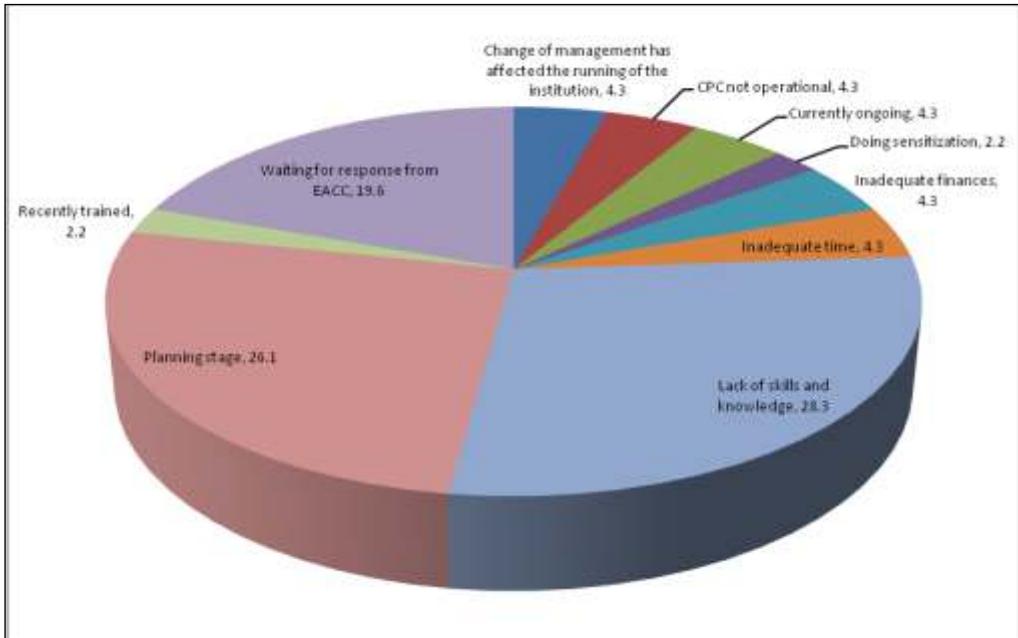
Figure A21: Reasons Cited for not conducting a Corruption Risk Assessment

4.1.18 Integrity Assurance Officers (IAO)

Integrity Assurance Officers serve as Secretaries of the CPCs in their Institutions and hence compile the quarterly reports for submission to EACC. They act as technical persons and assist the CPCs in undertaking CRAs and formulating CPPs. They also sensitize staff in their institutions on matters of ethics, integrity and anti-corruption in order to increase the awareness levels among staff.

Over 79 percent of institutions have IAO compared to 20.8 percent who indicated that they do not have any IAO in their institution as shown in Figure A23.
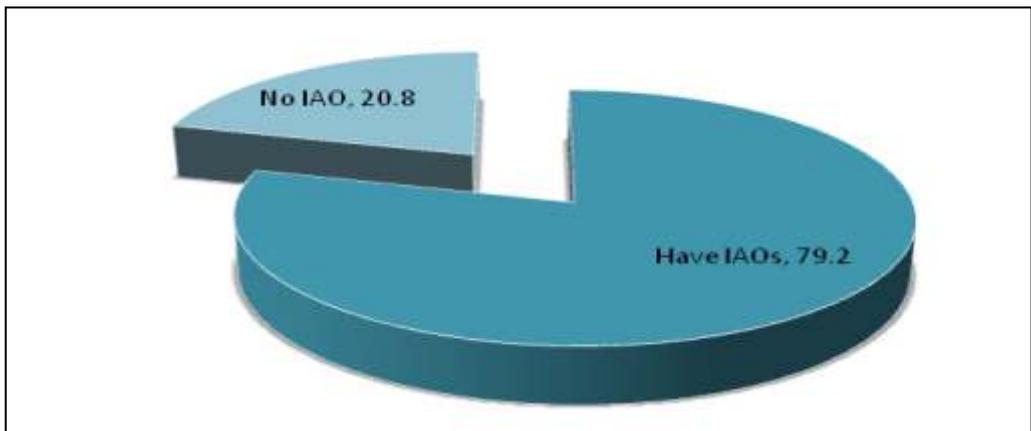
Figure A22: Existence of Integrity Assurance Officers

Overall, the average number of IAOs is 11.06 with a minimum of 1 and a maximum of 583 while the total IAOs is 2,355 from 212 institutions. Additionally, the IAOs were trained by EACC (98.1%), in house by an IAO (0.9%) and Pan African Institute of Governance (0.9%). Figure A23 presents the top ten institutions by number of IAOs.
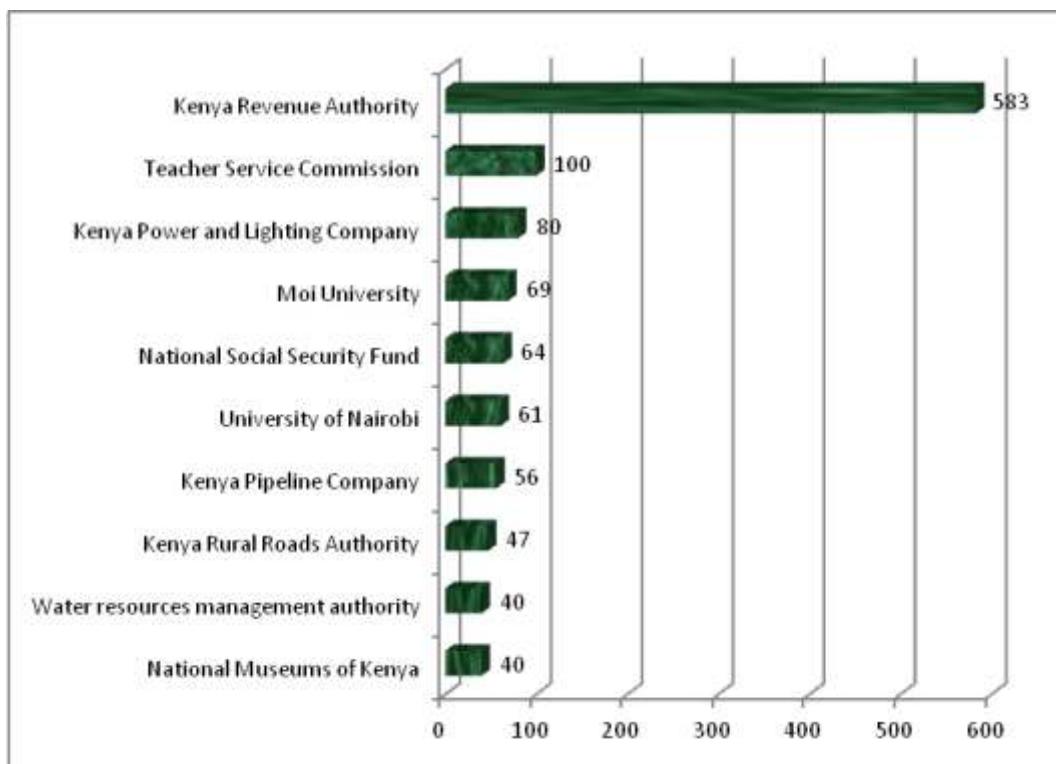
Figure A23: Sample Institutions by Number of Integrity Assurance Officers

4.1.19 Role of Integrity Assurance Officers

In Figure A24, being secretary to the CPC (47.3%) is the predominant role played by the IAO cited by respondents. Other roles mentioned include staff sensitization (27.7%), submitting quarterly reports to EACC (14%) and receiving and analyzing reports (10.7%).
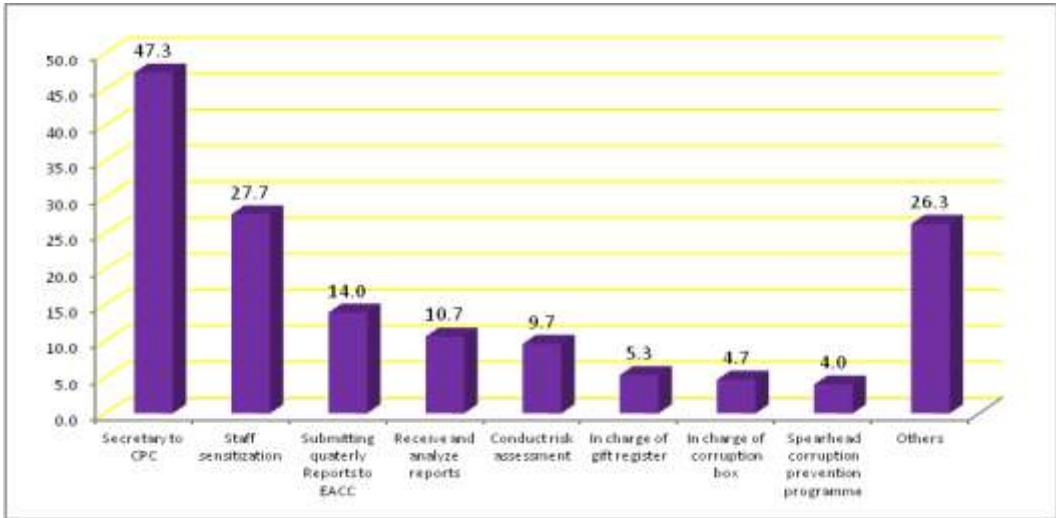
Figure A24: Role of Integrity Assurance Officers

4.1.20 Proposed Modules for Enhancing IAO Training

Figure A25 presents the various modules proposed by respondents to be considered for incorporation into the IAO training. From the figure, refresher courses on trained modules is proposed by 18.6 percent of the respondents followed by risk assessment (12.5%), preliminary investigations (10.4%), corruption detection and prevention (9.7%), integrity testing (9%) and integrity vetting (8.2%)
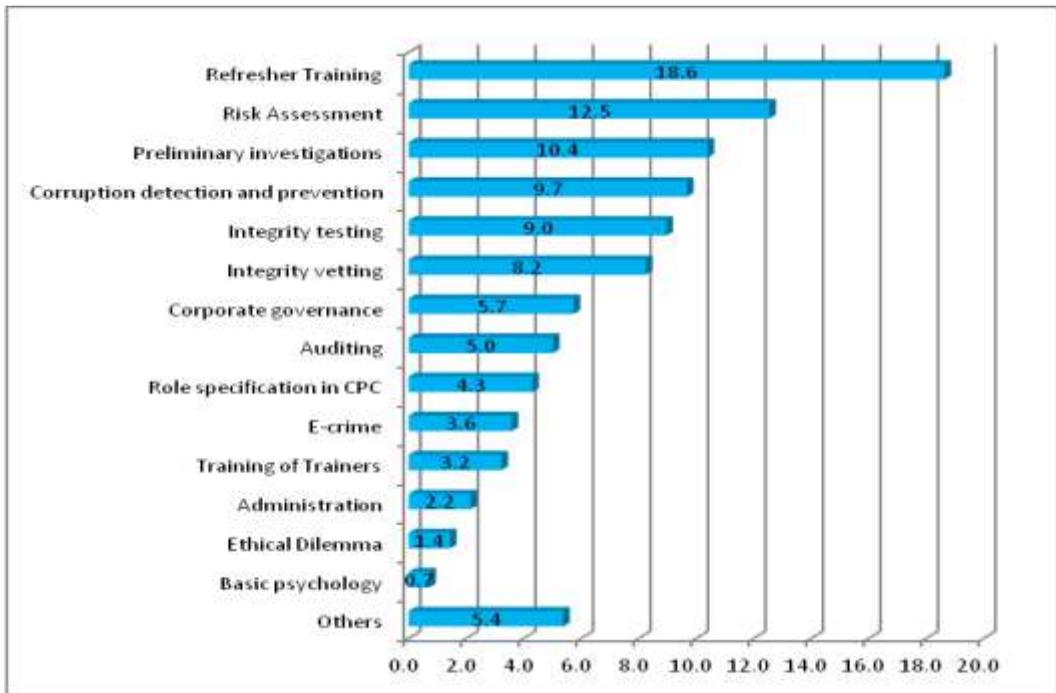
Figure A25: Proposed modules for IAO Training

4.1.21 Awareness of Anti-Corruption Measures by Other Staff Members

Table 3 presents the awareness levels of various anti-corruption measures by other staff members not directly involved in the implementation of the CEI. From the table, staff is aware of the existence of a CPCs (94.1%), codes of conduct (91.8%) and anti-corruption policy (83.3%). On the other hand, vetting of staff (42%), existence of gifts register (42%) and conflict of interest register (50.9%) are least known by staff.

Table 4: Awareness levels of anti-corruption measures by other staff

Anti-Corruption Measure	Aware (%)	Not Aware (%)
Corruption Prevention Committee	94.2	5.8
Codes of Conduct	91.8	8.2
Staff Sensitization on corruption and unethical conduct	88.5	11.5
Anti Corruption Policy	83.3	16.7
Corruption Risk Assessment	71.7	28.3
Vetting of staff	58.0	42.0
Gifts register	58.0	42.0
Conflict of Interest register	49.1	50.9

Table 4 presents the awareness levels of service seekers on various anti-corruption tools existent in the institutions evaluated. Corruption reporting box (56.9%), codes of conduct (55.8%) and service charter (55.4%) were singled out by majority of the respondents as existent. Email (78.4%), telephone hotlines (76.6%), corruption prevention committee (71.1%) and the anti-corruption policy were on the other hand least known by the service seekers.

Table 5: Awareness levels of anti-corruption tools by service seekers

Anti-Corruption Tools	Aware	Not Aware
Corruption Reporting box	56.9	43.1
Codes of conduct	55.8	44.2
Service Charter	55.4	44.6
Anti Corruption policy	36.2	63.8
Performance contracting	29.7	70.3
Corruption Prevention Committee	28.9	71.1
Telephone (Hotline)	23.4	76.6
Email	21.6	78.4

4.2   Institutionalization of Corruption Prevention

In order to entrench corruption prevention as a key component in their operations, institutions were required to conduct CRA and develop an anti-corruption plan,

present an annual evaluation report and train staff on integrity, ethics and anti-corruption.

The findings on the implementation of these sub-indicators are presented as follows.

4.2.1 Anti-corruption Progress Reports

Over 80 percent of the institutions forward progress reports to EACC quarterly while 6.7 percent have never forwarded these Reports. Another 2.3 percent forward annually while 2 percent forward monthly. It is critical to also note that some agencies (8.7%) forward their reports to the parent ministry for onward acquiescence to EACC as shown in Figure B1.
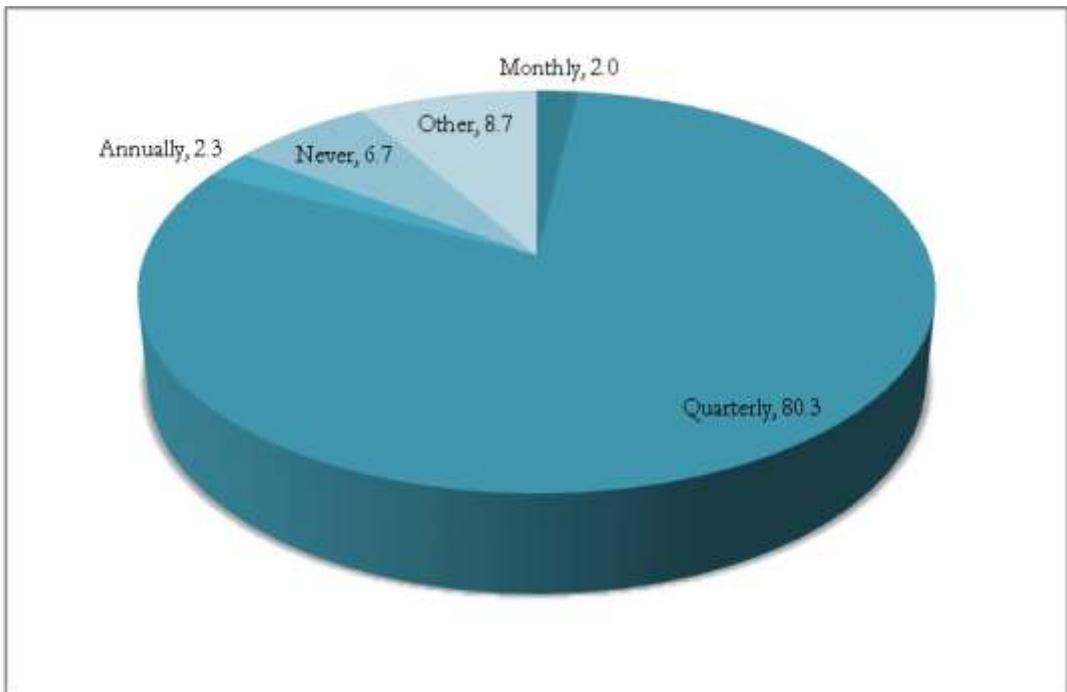
Figure B1: Progress Reports

The progress reports forwarded to EACC include tenders above Kshs. 500,000, staff integrity vetting reports, CRA Reports, anti-corruption policy, minutes of CPC meetings, CPP implementation reports and disciplinary case reports.

4.2.2   Feedback on Anti-corruption Progress Reports

Consequently, 56.9 percent of the respondents pointed out that they receive feedback from EACC on their progress reports while 37.6 percent indicated that they have never received any feedback. Another 5.5 percent of the respondents could not state whether they receive feedback or not since their reports are send to the parent ministry.
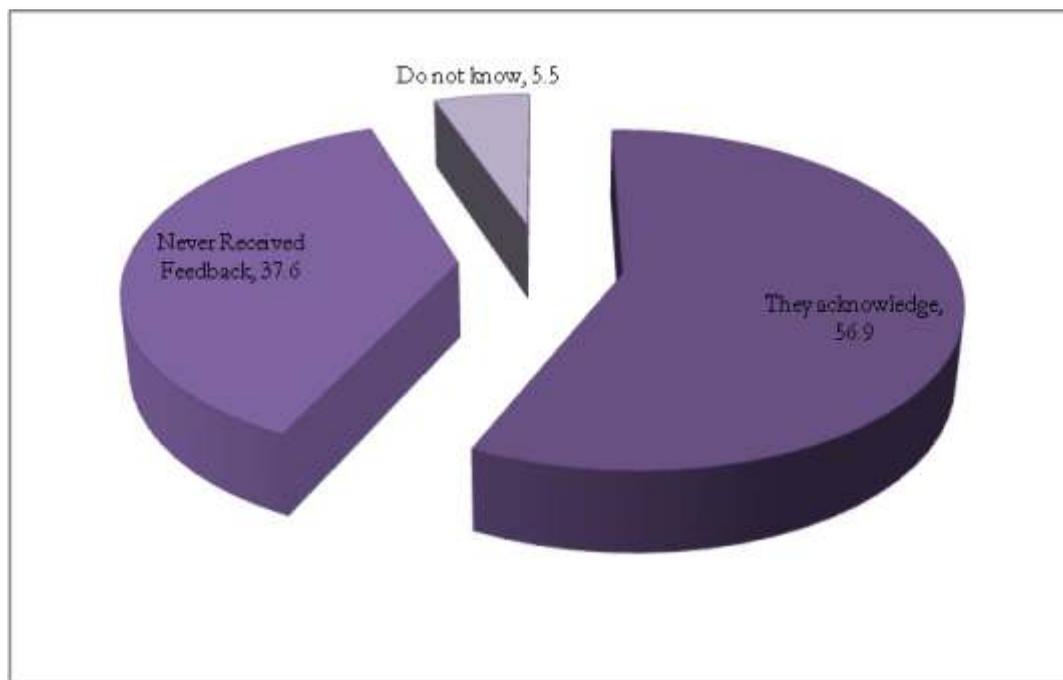
Figure B2: Feedback on Progress Reports

When further asked to state whether the feedback helped in implementing the corruption eradication criterion, 43 percent indicated that it has assisted in reporting the progress reports in the right format and template, 26 percent said the feedback highlights on areas they are not doing well and recommends remedial measures, 15 percent indicated that the reports are too general while 14.1 percent said it points out areas that require further attention.

4.2.3   Assessment of the Anti-Corruption Initiatives

About a third of the institutions evaluated have carried out an assessment of their anti-corruption initiatives. Whereas 2.6 percent indicated that they are planning or are in the process of doing the assessment, 63.9 percent strongly indicated that they have not carried out the assessment.

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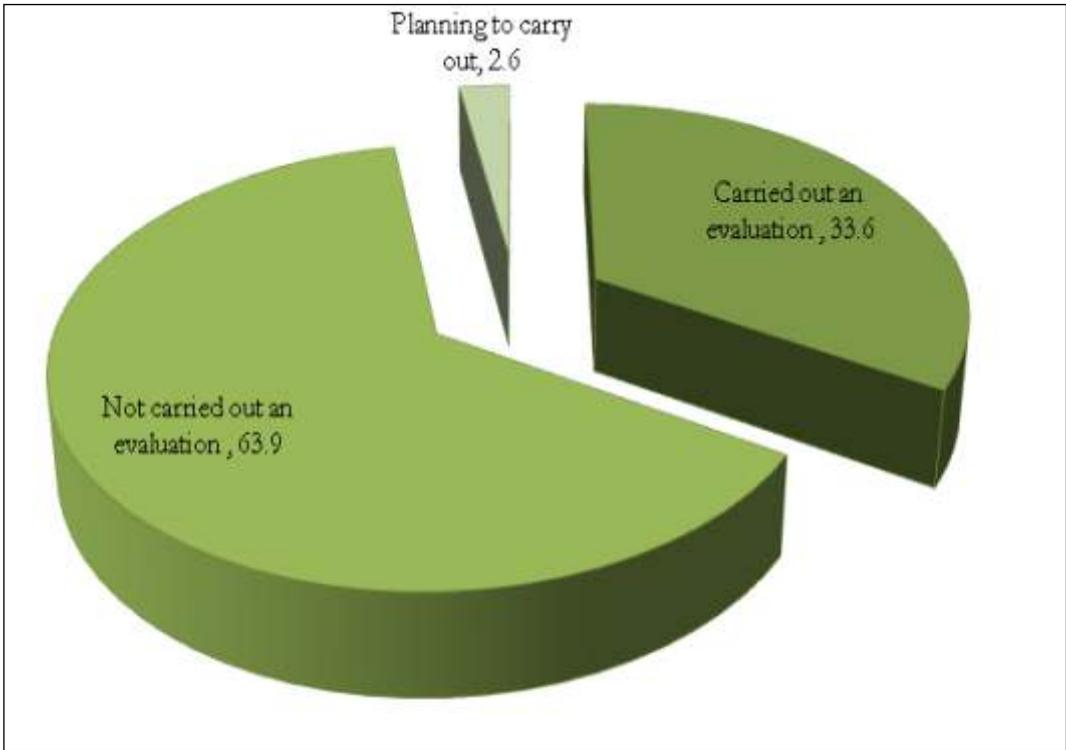
Figure B3: Assessment of Anti-Corruotion Initiatives

For those who have carried out the assessment, 40 percent indicated that surveys pointed out the areas that need improvement after identifying some gaps, 15.6 percent pointed out that the assessment guides them on the level of implementation and awareness of their corruption prevention work while 13.2 percent said it pointed out weaknesses in corruption reporting. The assessment findings have also been applied to develop strategies for training and sensitizing staff on systems and procedures, protection of whistleblowers, system automation to reduce risks and enhance controls, strengthen channels of reporting and prioritization of reforms.

4.2.4 Staff sensitization on Anti-Corruption Measures

Over 90 percent of the institutions have sensitized staff on various anti-corruption measures compared to 9.4 percent who have not carried out sensitization.
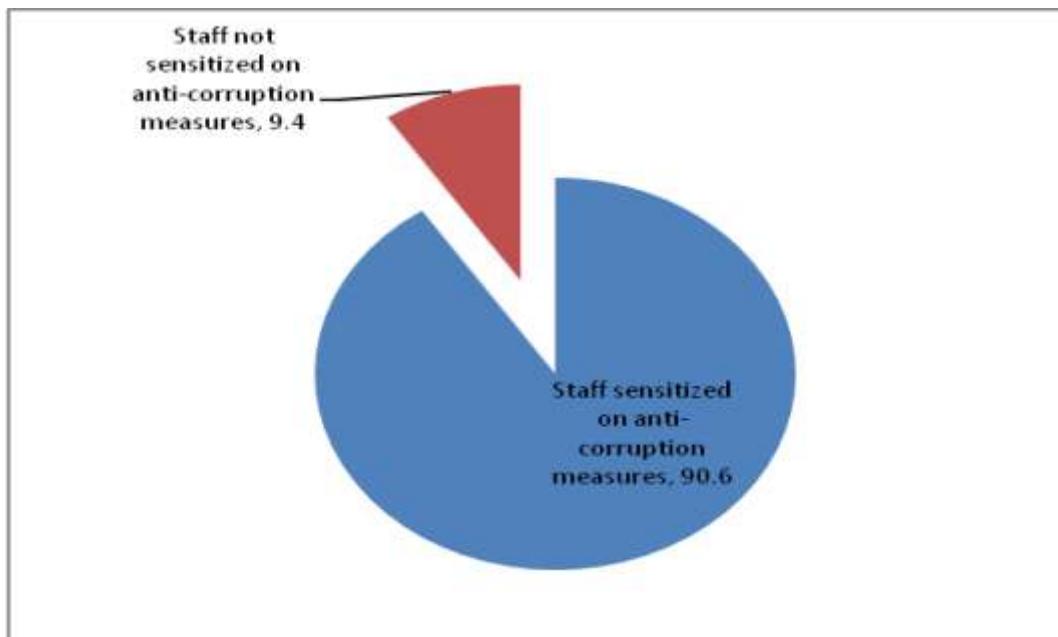
Figure B4: Sensitization on Anti-Corruption Measures

4.2.5　Frequency of Sensitization on Anti-Corruption Measures

Figure B5 presents the frequency of staff sensitization on anti-corruption measures. An identical 31 percent of the institutions sensitize staff quarterly and annually respectively followed by 8 percent who sensitizes staff monthly.
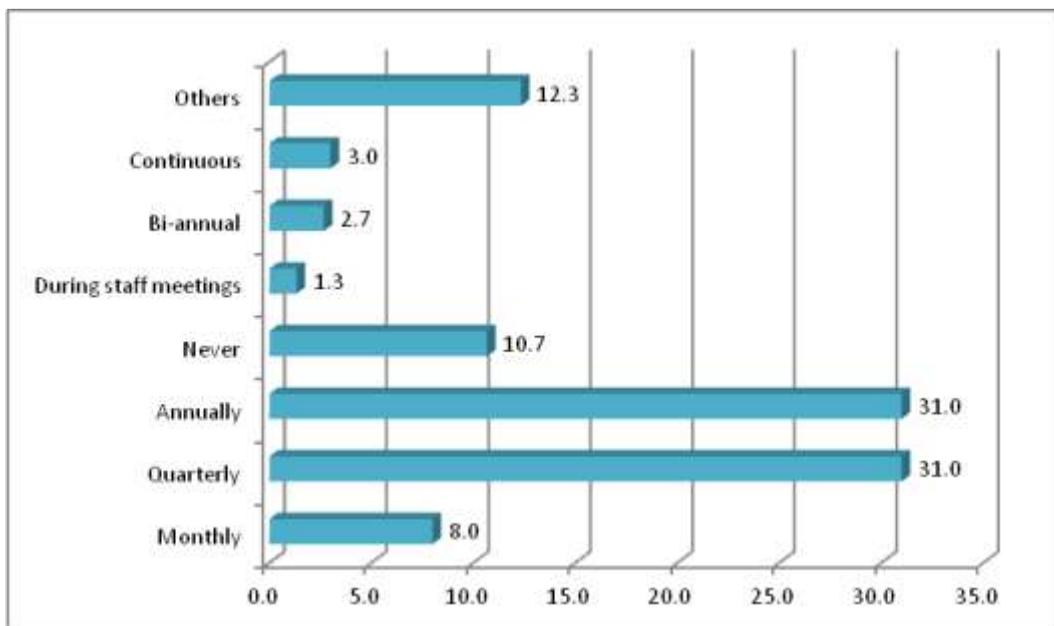
Figure B5: Frequency of sensitization on anti-corruption measures

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From inception, estimated 100,000 staff members have been sensitized on anti-corruption measures across institutions. In the year 2014/2015, institutions indicated that they have sensitized about 20,000 staff members.

4.2.6 Anti-corruption training content

The main measures and issues staff was sensitized about in the financial year 2014/2015 are presented in Figure B7. From the figure, corruption reporting (51.5%), legal framework on corruption and ethics (37.4%) and codes of conduct (35.6%) were predominant. Other measures include time management, anti-corruption policy, public procurement, organizational culture and service delivery.
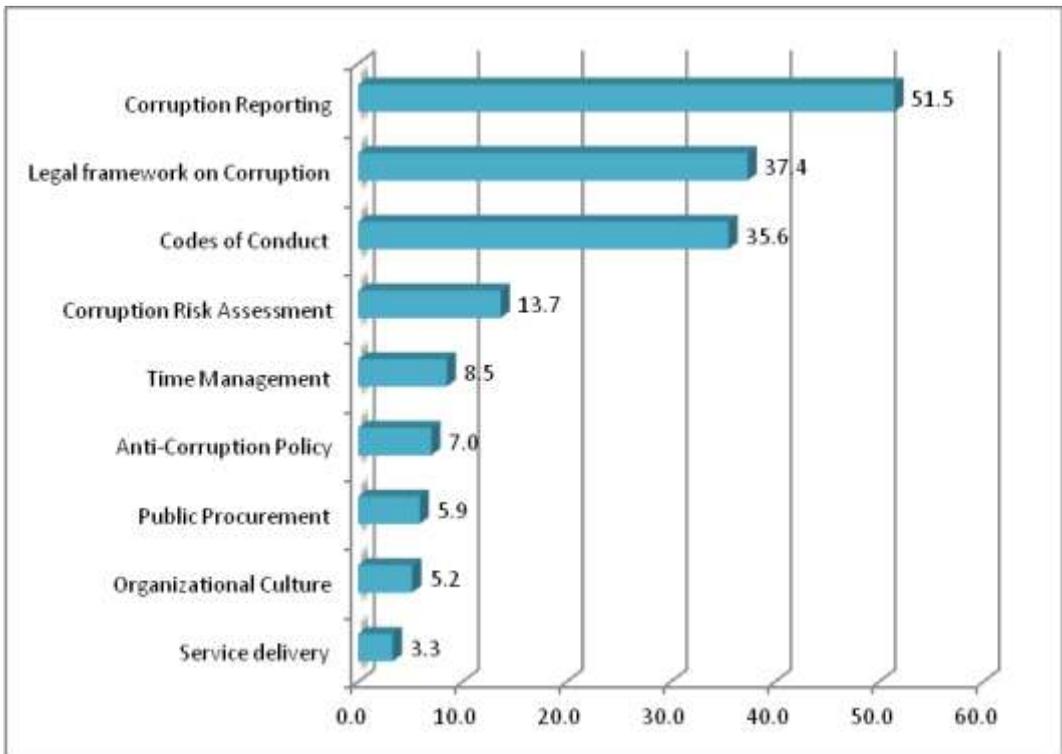
Figure B6: Sensitization Topics

4.2.7 Agencies or units conducting staff sensitization

Sensitization of staff on anti-corruption measures is mainly conducted in house by the CPC, IAOs and Heads of institutions (77.6%) and EACC (19.7%) as shown in Figure B7.
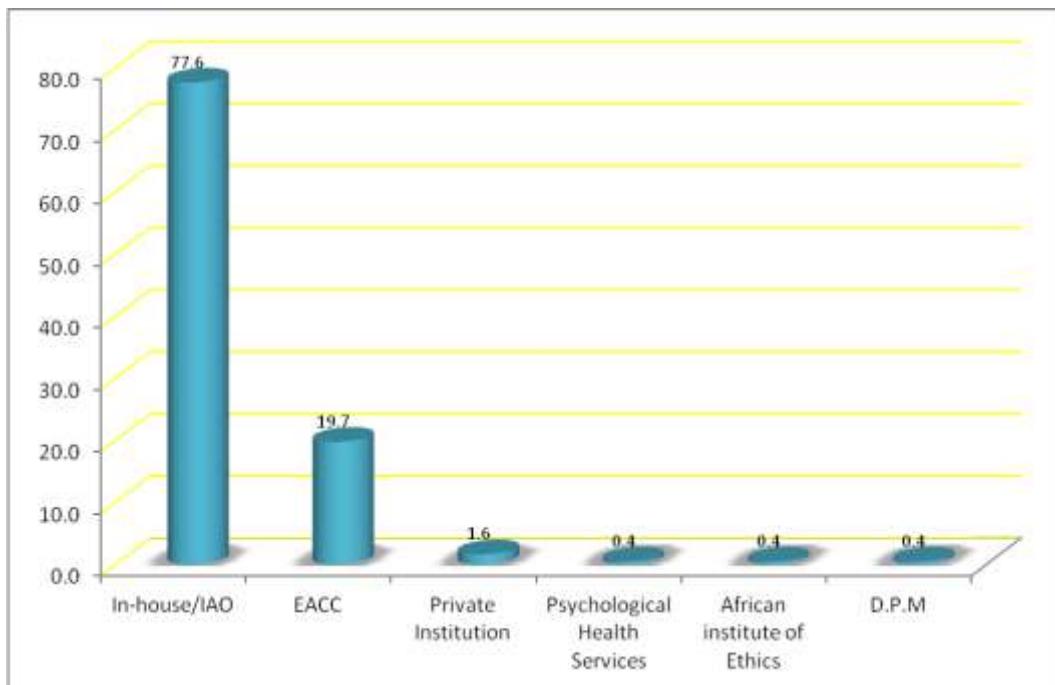
Figure B7: Who conducted the training?

4.2.8 Effects of Integrity and Anti-corruption Sensitization

Sensitization of staff has resulted in greater awareness (55.2%) about corruption and unethical conduct in institutions followed by increased reporting of administrative malpractices (16.3%) and inclusivity in the fight against corruption (11.5%) as shown in Figure B8.
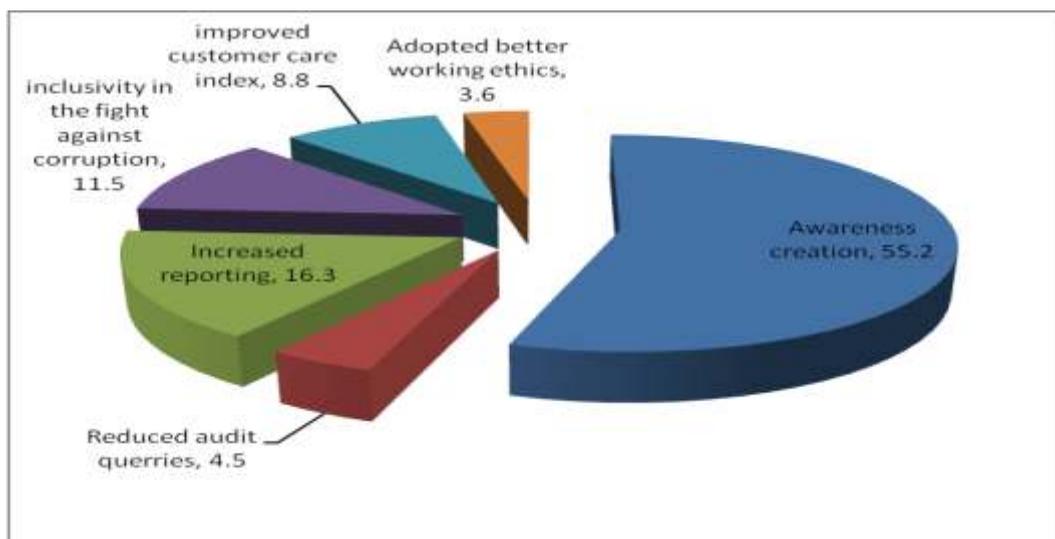
Figure B8: Has the sensitization helped in the fight against corruption in the institution

4.2.9   Reasons Cited for Not Sensitizing Staff

Lack of support either by EACC and top institution management are main reasons cited for not conducting sensitization of staff. In Figure B9, lack of trained IAO to facilitate sensitization was cited by 40 percent of the respondents as the reason behind lack of sensitization in their institutions.
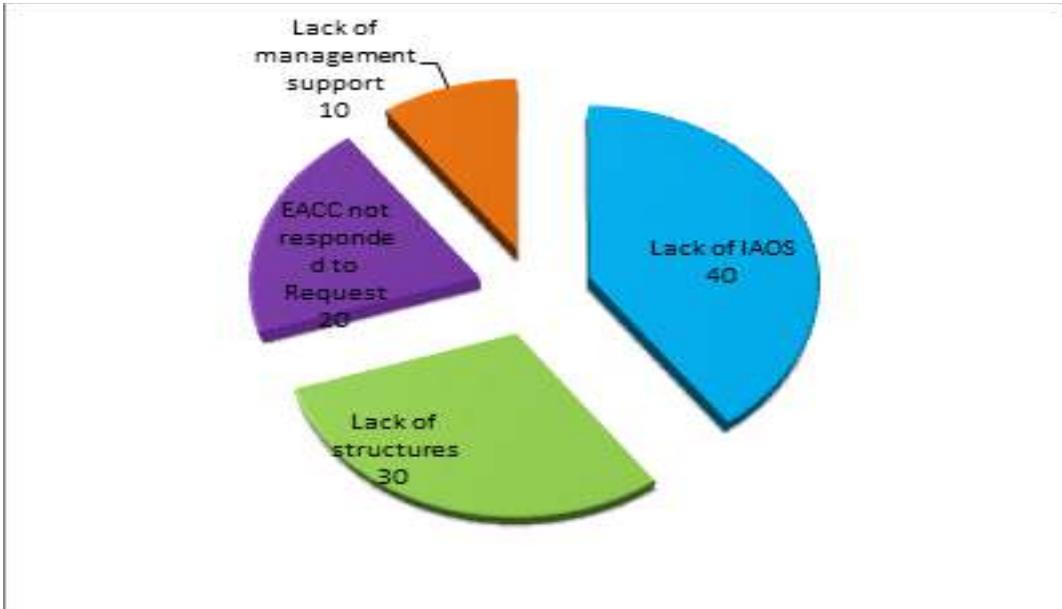
Figure B9: Why haven't you sensitized staff?

4.3   Corruption Control

This subsection discusses incidences of breaches of codes of conduct and action taken on those involved. It also addresses findings on incidences of adverse reports by the office of the Auditor General on lack of compliance with policies and procedures in the institutions assessed.

4.3.1   Breaches of Codes of Conduct

Breaches of codes of conduct were reported in 160 institutions out of the total 300 evaluated equivalent to 53.3 percent. The breaches were highest at Teachers Service Commission with 161 incidences followed by National Cereals and Produce Board (42), Moi University (29), Sony Sugar Company (26), Kenya Correctional Service (20), Kenyatta National Hospital (19), Kenya Pipeline Company (16), Lake Basin Development Authority (14), National Museums of Kenya (12) and Ministry of Labour (10) as shown in Figure C1.
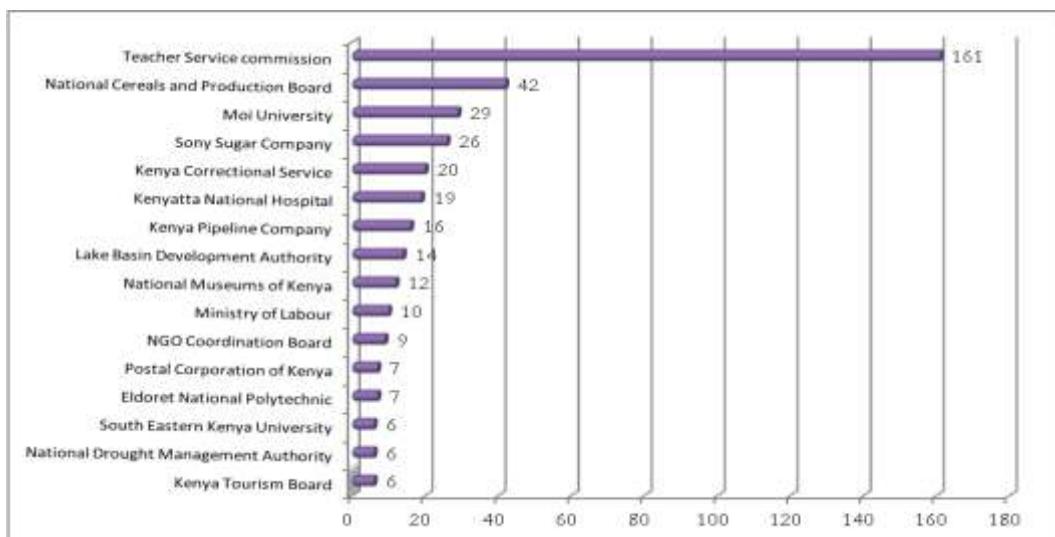
Figure C1: Number of Breaches of Codes of Conduct by Institution

4.3.2 Types of Breaches of Codes of conduct

Figure C2 presents the types of breaches recorded in various institutions assessed. From the figure, absenteeism and theft with an identical proportion of 12.2 percent were the main misdemeanors documented. They were followed by misuse of property (7%), being drunk while on duty (6.3%), fraud (5.2%), lateness (4.8%) and bribery (4.4) among others
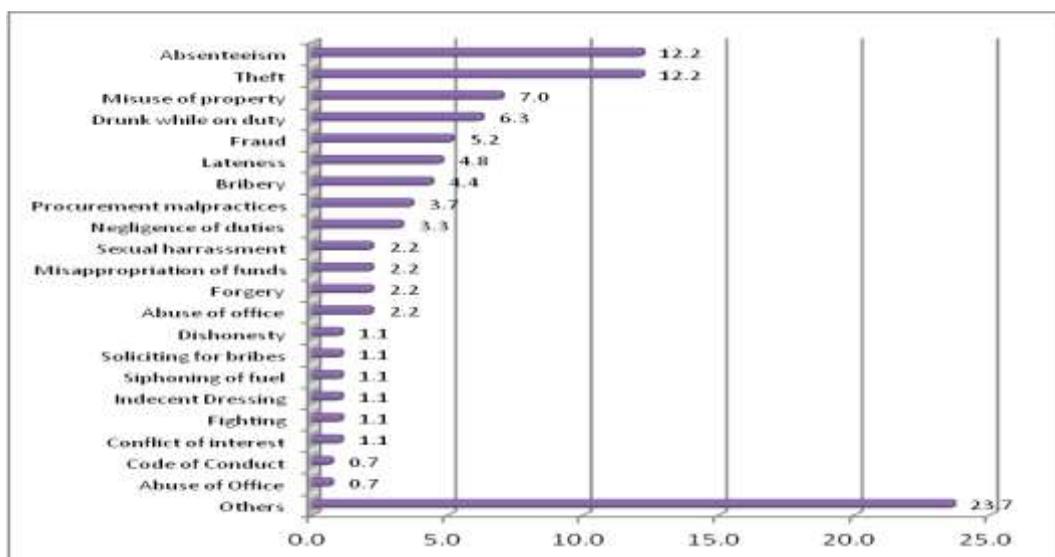
Figure C2: Types of Breaches of Code of Conduct

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4.3.3   Action Taken on Breaches of Codes of Conduct

Further, in terms of action taken on those who breach codes of conduct, 24.5 percent of those involved had their terms of employment terminated, 18 percent of the cases received warning letters, 12.3 percent were suspended, 10 percent are still under investigation, 5.4 percent interdicted, 4.2 percent were surcharged while 3.1 percent were transferred as shown in Figure C3.
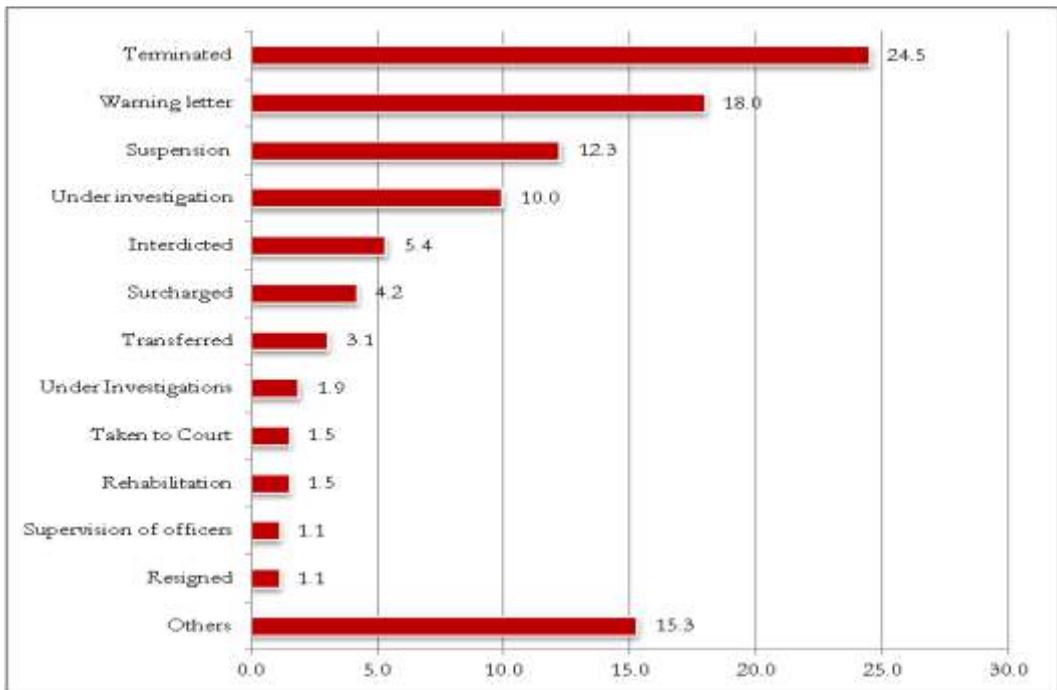
Figure C3: Action Taken for who Breach of Codes of Conduct

4.4   Zero Tolerance to Corruption

To measure levels of zero tolerance to corruption, the PC guidelines require that institutions vet their staff and take action against those found culpable of any malpractices. This section provides responses on institutions implementation of this target.

4.4.1   Vetting of Staff

Figure D1 presents responses on vetting of staff. Over 27 percent of the institutions have vetted their staff while 14 percent are in the process of vetting staff. The majority (58.3%) have not vetted their staff.
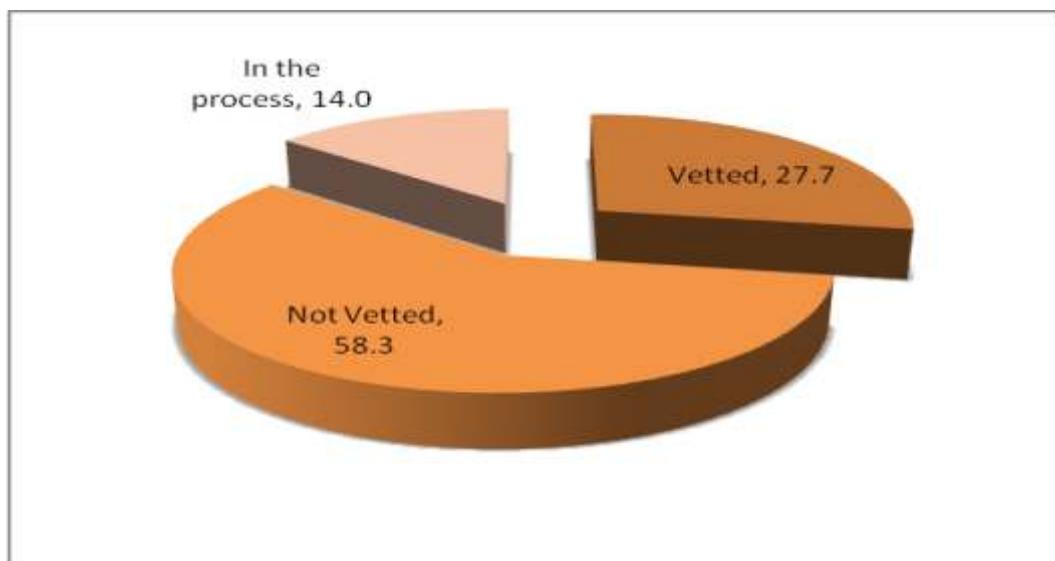
Figure D1: Vetting of Staff

However, of those who have vetted staff, only three institutions (3.6%) indicated that their staff successfully passed the vetting. The other institutions are either still awaiting results (19.1%) of the vetting or do not know (77.1%) the outcome of their vetting.

4.4.2   Effectiveness of Measures of CEI in Combating Corruption

Table 5 presents ratings on the effectiveness of measures provided under the CEI in PC aimed at combating corruption and promoting sound ethical standards in public institutions. From the table, ratings on action taken on officers found to be unethical (53.5%) and action on officers found to be corrupt (52.2%) were highly rated by respondents as very effective.

Table 6: Effectiveness of measures of corruption eradication indicator

Corruption Prevention Measures	Very effective	Moderately effective	Not effective	Do not know
Action on officers found to be unethical	53.5	33.2	3.1	10.2
Action on officers found to be corrupt	52.2	22.9	11.1	13.8
Codes of Conduct	47.7	42.2	3.5	6.5
Corruption Risk Assessment	42.5	37.9	8.0	11.5
Staff Sensitization on corruption and unethical conduct	40.8	48.5	5.0	5.7
Corruption Prevention Committee	38.0	54.6	5.9	1.5
Anti-Corruption Policy	36.7	50.8	7.0	5.5
Conflict of interest register	28.3	38.7	16.8	16.2
Gifts register	25.4	39.4	16.6	18.7
Vetting of staff	18.5	29.7	24.7	27.0

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From Table 7, action on officers found to be corrupt (48.9%), action on officers found to be unethical (48.4%), codes of conduct (45.2%) and staff sensitization on corruption and unethical conduct are rated very effective measures of corruption prevention by other staff members. On the other hand, vetting of staff (30.1%), gifts register (35.5%) and conflict of interest register (37.0%) are not known by staff and hence couldn't be evaluated adequately.

Table 7: Rating of effectiveness of Corruption Prevention Measures

Corruption Prevention Measures	Very effective	Moderately effective	Not effective	Do not know
Action on officers found to be corrupt	48.9	31.9	3.8	15.3
Action on officers found to be unethical	48.4	34.7	3.6	13.3
Codes of Conduct	45.2	42.4	4.3	8.1
Staff Sensitization on corruption and unethical conduct	42.4	43.0	6.3	8.3
Corruption Prevention Committee	32.7	54.0	5.6	7.7
Anti-Corruption Policy	31.5	46.1	8.1	14.3
Corruption Risk Assessment	31.2	40.6	9.2	19.0
Vetting of staff	22.2	29.6	18.1	30.1
Conflict of interest register	19.8	27.2	16.0	37.0
Gifts register	18.7	30.3	15.5	35.5

Further, 72.1 percent of the service seekers present at the time of interview indicated that they were satisfied with the services they received followed by 20 percent who were fairly satisfied while 7.7 indicated that they were not satisfied.

Over 40 percent of the service seekers rated the level of corruption to be low while 56.7 percent indicated that no pressure was exerted on them at all to engage in corruption in the institutions they sought services. Another 52.7 percent indicated that the institutions are transparent compared to the past two years and that service delivery has improved (59.4%).

4.5   Relevance and Effectiveness of the CEI

4.5.1   Outcome of the Implementation of the CEI

The implementation of the CEI in institutions has produced various positive results. The results are both system and knowledge based as presented in Figure E1. Raised awareness among staff is the leading tangible outcome of the implementation of the CEI cited by 27.7 percent of the respondents. This is followed by improved service

delivery reflected in customer satisfaction (24.3%), automation of services by computerization and installation of system controls such CCTV cameras (16.3%), increased revenue collection (13.7%) and improved compliance to codes of conduct (13%).
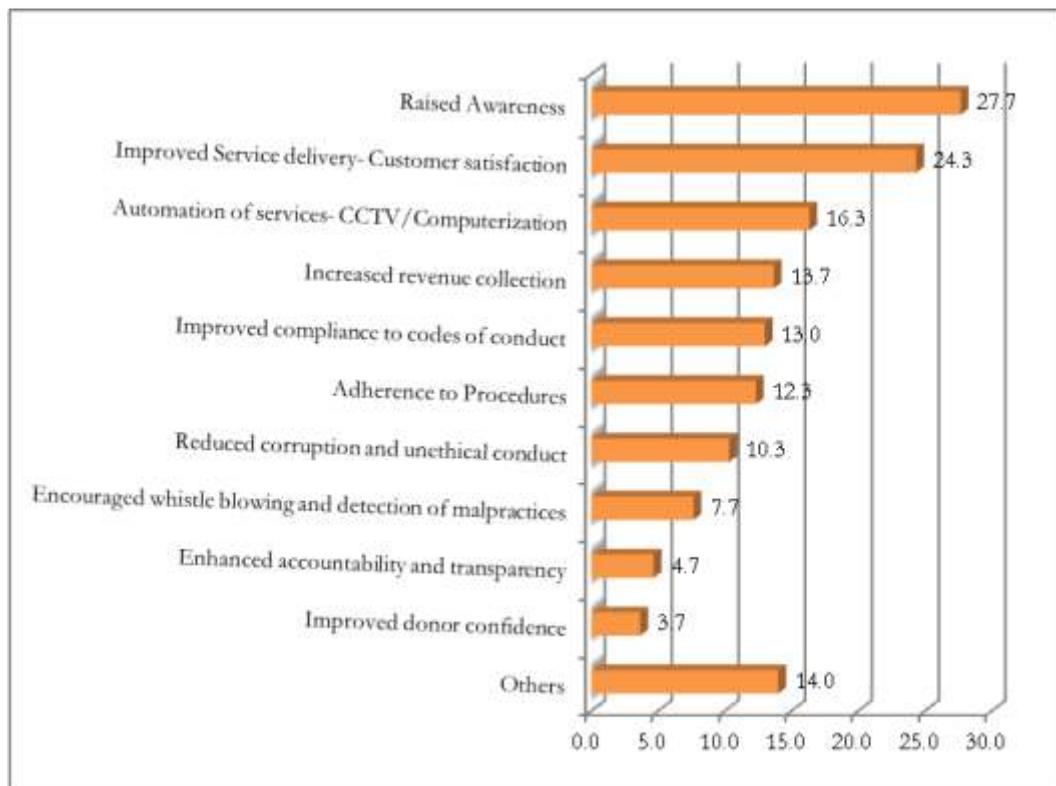
Figure E1: Outcome of Implementation of CEI

4.5.2   Specific Internal Controls to Deter Corruption and Unethical Practices

Establishment of auxiliary committees to advice management on day to day operations of an organization is one of the key achievements attributed to implementation of the CEI. It was cited by 40 percent of the respondents followed by anti-corruption policy and hotlines (34%), automation (25.7%), registers such as gift, conflict of interest, attendance among others, rotation of staff (21%) and documentation of operational documents (15.7%) as shown in Figure E2.
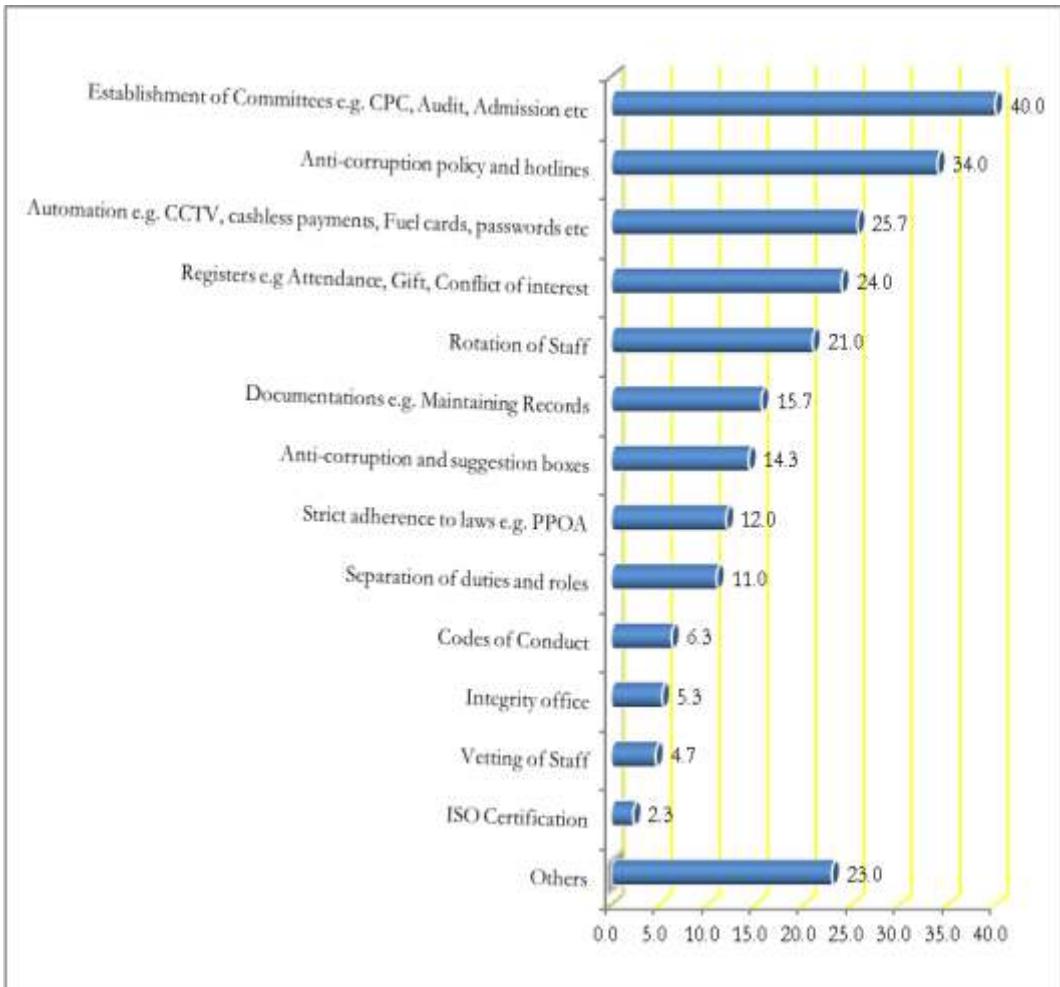
Figure E2:Specific internal controls to deter corruption and unethical practices

4.5.3 Examination into Institution's Policies, Systems, Procedures and Practices

About 17 percent of the institutions covered have had their institution's policies, systems, procedures and practices examined by EACC compared to 83 percent who indicated that they have not been examined. Further, only 13.7 percent of the examined institutions are not implementing the examination recommendations by EACC as shown in Figure E3.
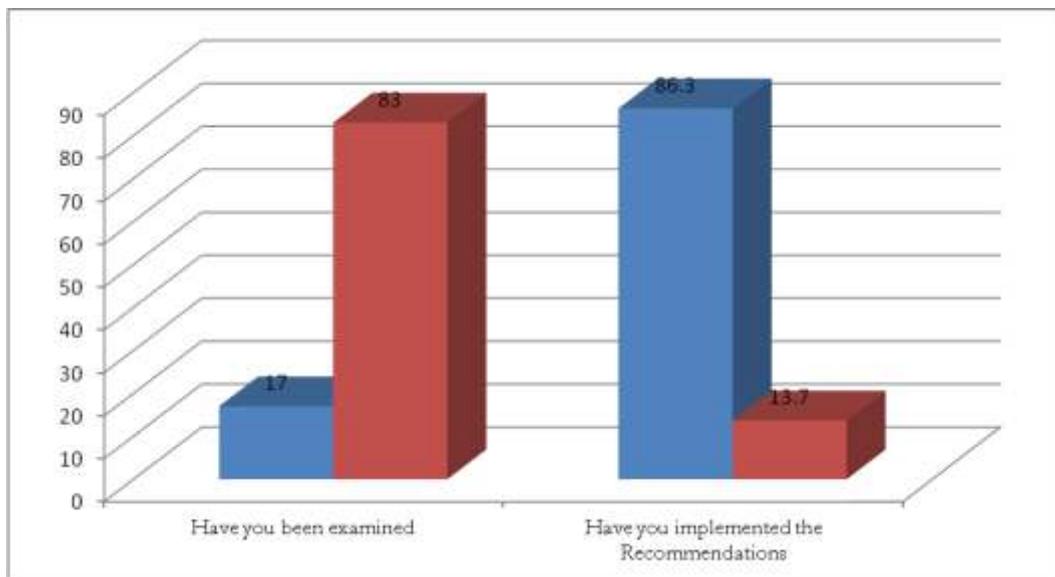
Figure E3: Examination of Systems and Procedures

4.5.4   Effects of Implementing EACC Examination Recommendations

Of those implementing examination recommendations by EACC, 17.6 percent said that they have led to clear job descriptions for every staff member, 15.7 percent said it has led to enhanced record management, 13.7 percent have trained IAOs, 9.8 percent have formed and operationalized a CPC as further shown in Figure E5.
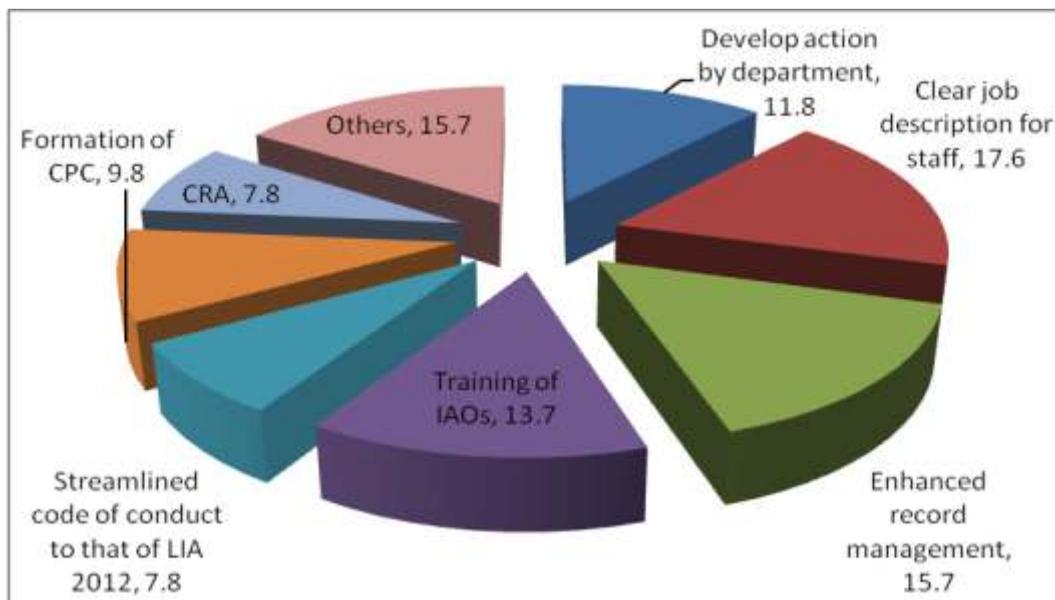
Figure E4: Effects of Implementing EACC Examination Recommendations

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4.6 Sustainability of the Corruption Eradication Indicator

4.6.1 Budget Allocation for Anti-Corruption Programmes

About 31 percent of the institutions have set aside money to implement anti-corruption prevention programmes.

4.6.2 Number of Staff Assigned to Anti-Corruption Programmes

Figure F1 presents the top ten institutions by the number of staff assigned to implement anti-corruption programmes. The highest number is recorded at the Kenya Revenue Authority (583) followed by 550 at Kenya Forest Services and 421 at the Kenya Plant Health Inspectorate Services.
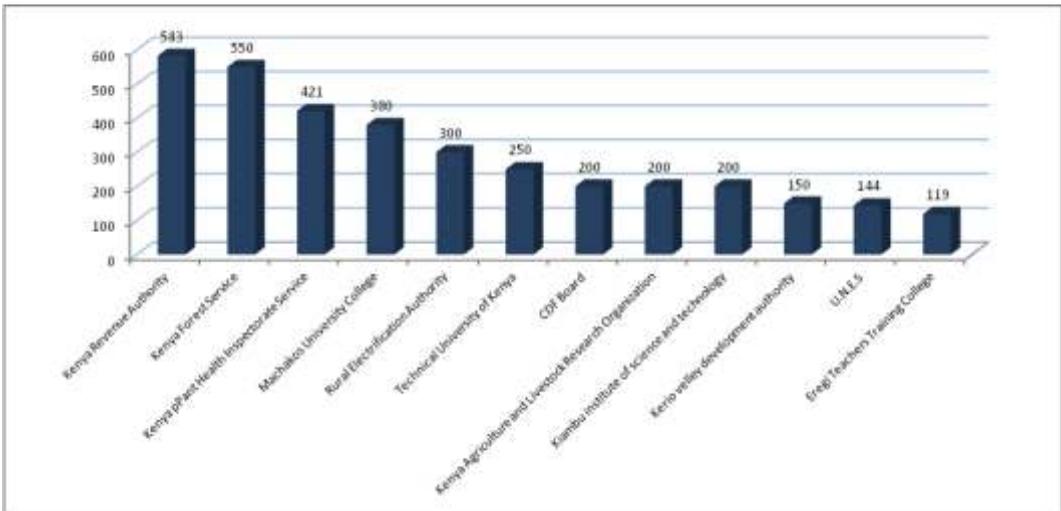
Figure F1: Staff assigned to anti-corruption programmes by institution

4.6.3 Unit Dedicated to Coordinate Anti-Corruption Programmes

About 42 percent of the institutions have a dedicated unit that coordinates all the anti-corruption programmes while 58 percent indicated that they do not have such a unit as shown in Figure F2.
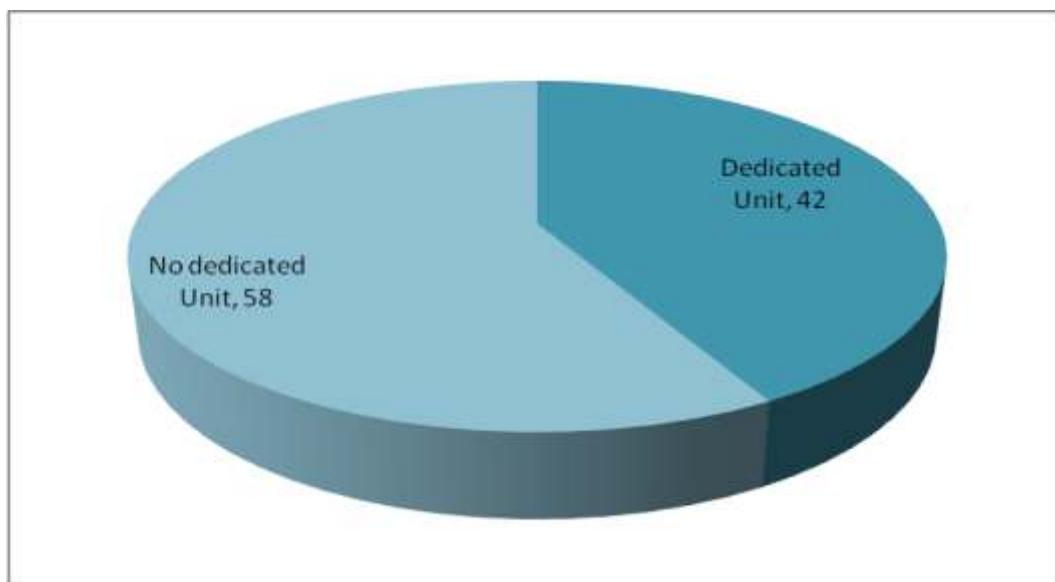
Figure F2: Dedicated Anti-Corruption Unit

Fully fledged Ethics and Integrity units had been established at Kenya Revenue Authority, Moi University and Kenya Ports Authority to coordinate the implementation of the anti-corruption initiatives in the Institutions. It is a testimony of commitment on the part of Management to ensure that corruption prevention and detection is entrenched in its systems. It is a practice that should be replicated in all the Ministries, Departments and Agencies as a way of strengthening corruption prevention.

Of those who have a dedicated unit, anti-corruption programmes are run by the corruption prevention committee, anti-corruption coordination unit, audit unit, compliance and integrity unit, complaints unit, anti-corruption unit, ethics and integrity unit, strategic planning and performance contracting unit, steering integrity committee and reforms and training unit.

4.6.4   Award for Outstanding Anti-corruption Crusaders

Respondents were also asked to indicate whether they have a criterion for recognizing staff contributions to anti-corruption and promotion of sound ethical standards. As shown in Figure F3, only 17.3 percent of the institutions covered were affirmative.
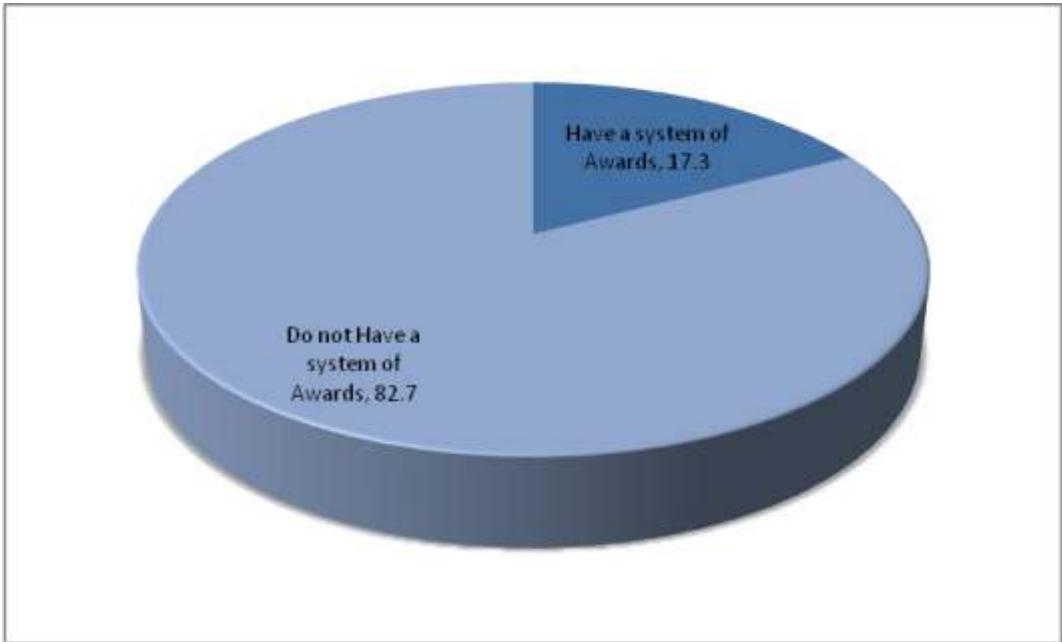
Figure F3: Award system for performers

Institutions recognize anti-corruption crusaders by awards in forms of gifts, monetary and trophies. Others recognize employees by promotions, written recommendation letters and training. These recognitions are normally recommended by a selected representative committee.

4.6.5 Local Sustainability Related Community and Suppliers Programmes

Institutions provided information on existing local sustainability related community and suppliers programmes on anti-corruption and promotion of sound ethical standards. From Figure F4, exhibition programmes such as open days, corporate social responsibility programmes, regional workshops and forums are mostly used to propagate anti-corruption messages to the community and suppliers. Other methods employed include customer satisfaction surveys for feedback on service delivery (19.6%), posters (15.3%) and strict compliance with the institution service charter provisions (11.5%).
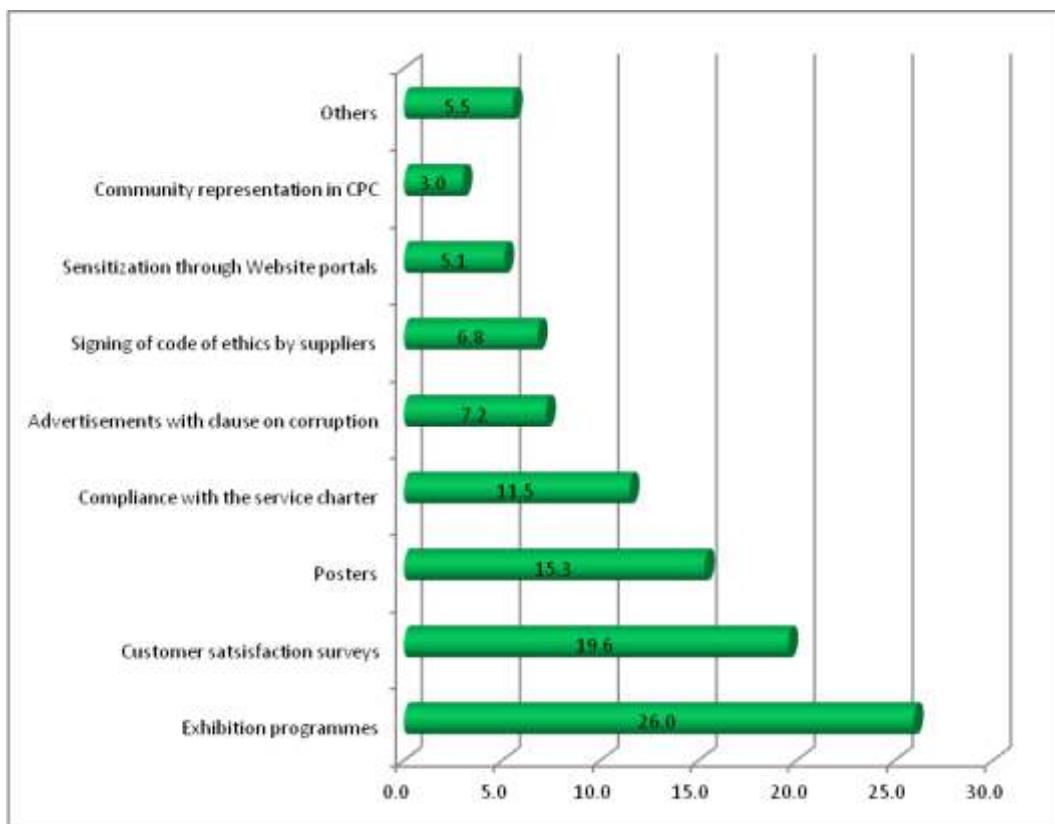
Figure F4: Community and Suppliers Anti-Corruption Programmes

4.6.6 Planned Activities to Fight Corruption and Promote Sound Ethical Standards

Respondents provided information on planned activities to fight corruption and promote sound ethical standards in their institutions. From Figure F5, sensitization on anti-corruption prevention measures to both staff and stakeholders is a preferred measure by 27.7 percent of the institutions followed by timely action on reports (14%), enhanced internal controls (13.3%) and training of more integrity assurance officers (12.7%).

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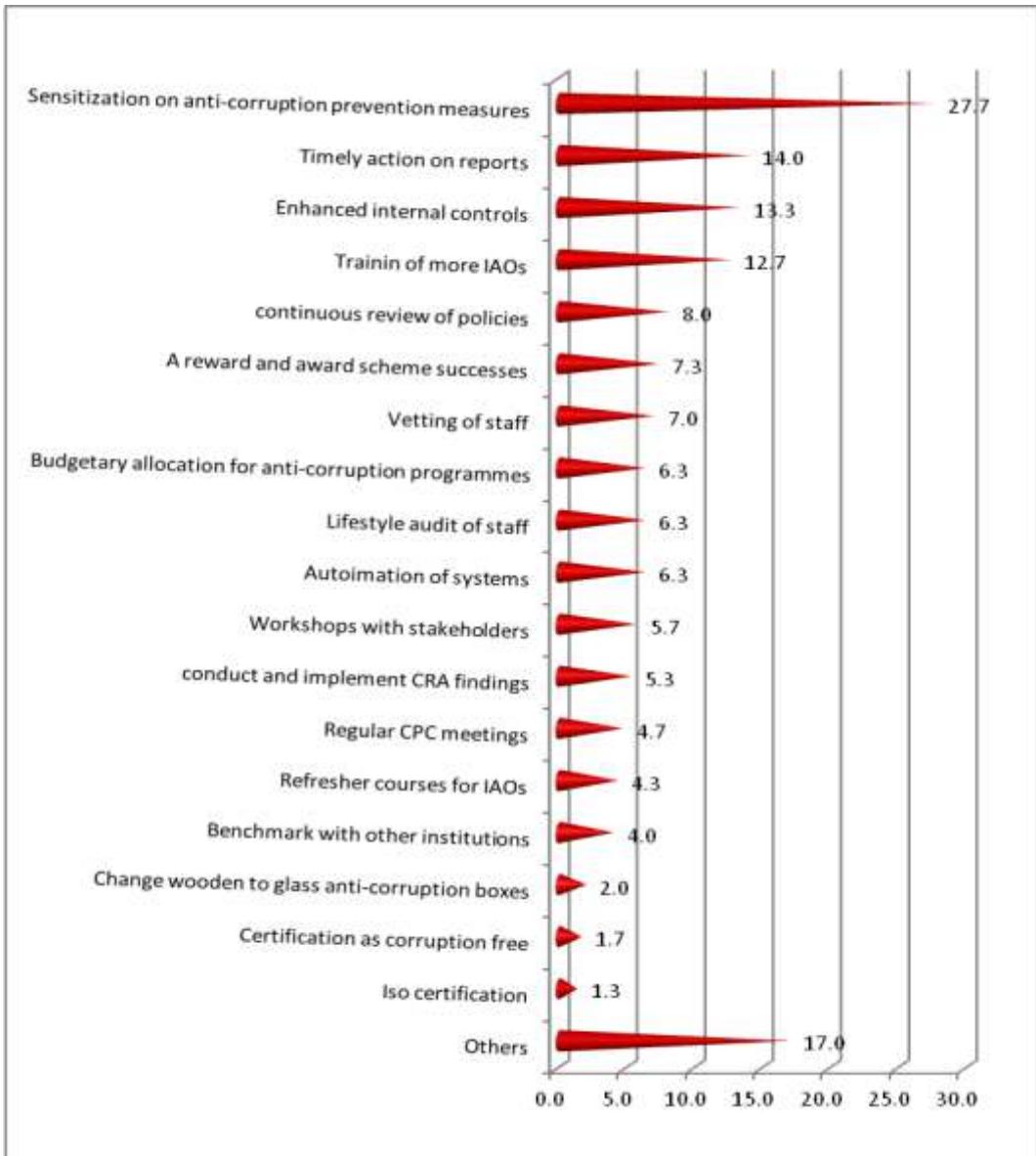
Figure F5: Planned activities to fight corruption and promote sound ethical standards

4.6.7 Steps to be Taken in the Fight Against Corruption and Promote Sound Ethical Standards

In terms of going forward in the fight against corruption and promotion of sound ethical standards in the institutions, 19.7 percent of the respondents suggested that advocacy and sensitization of stakeholders should be escalated, 14.3 percent suggested that EACC should intensify supervisions and monitoring of anti-corruption activities in institutions, 12.3 percent suggested that each institution should have a dedicated department of integrity while 10.3 percent suggested that

resources should be allocated for anti-corruption programmes in all the institutions as shown in Figure F6.
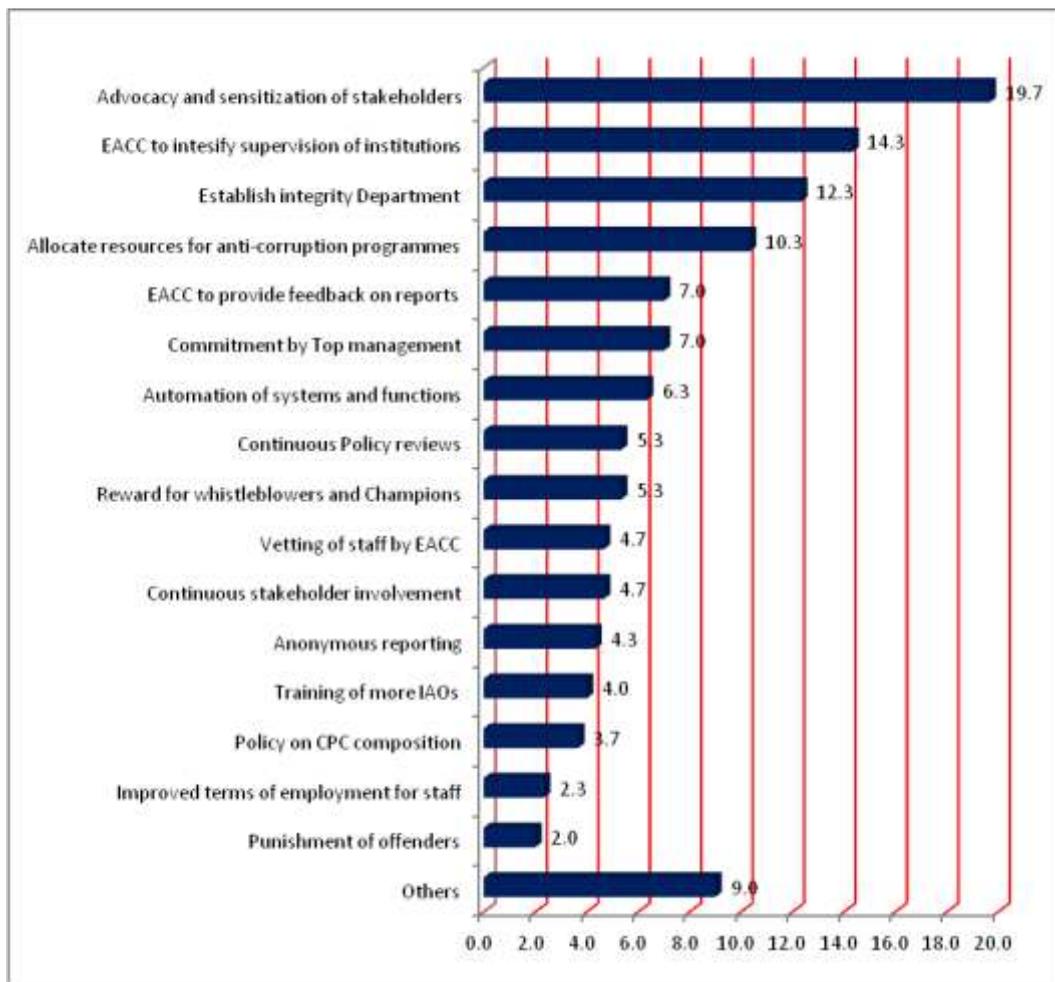
Figure F6: Steps to be taken in the fight against corruption and promote sound ethical standards

4.7   Challenges Experienced in the Implementation of CEI

4.7.1   Challenges in relation to CPCs

The CPCs are borne with various challenges that are both structural and functional. From Figure G1, inadequate capacity mainly financial and human resource (19.7%) is cited as a leading challenge for CPCs. This is followed by difficulty in raising a quorum for a meeting due to the busy schedules of members (8.7%), frequent transfers of staff (8.2%), inadequate support from EACC (7.8%), fear of reporting malpractices by staff (7.6%), delays in feedback from EACC (7%) and lack of cooperation from staff (7%) among others.
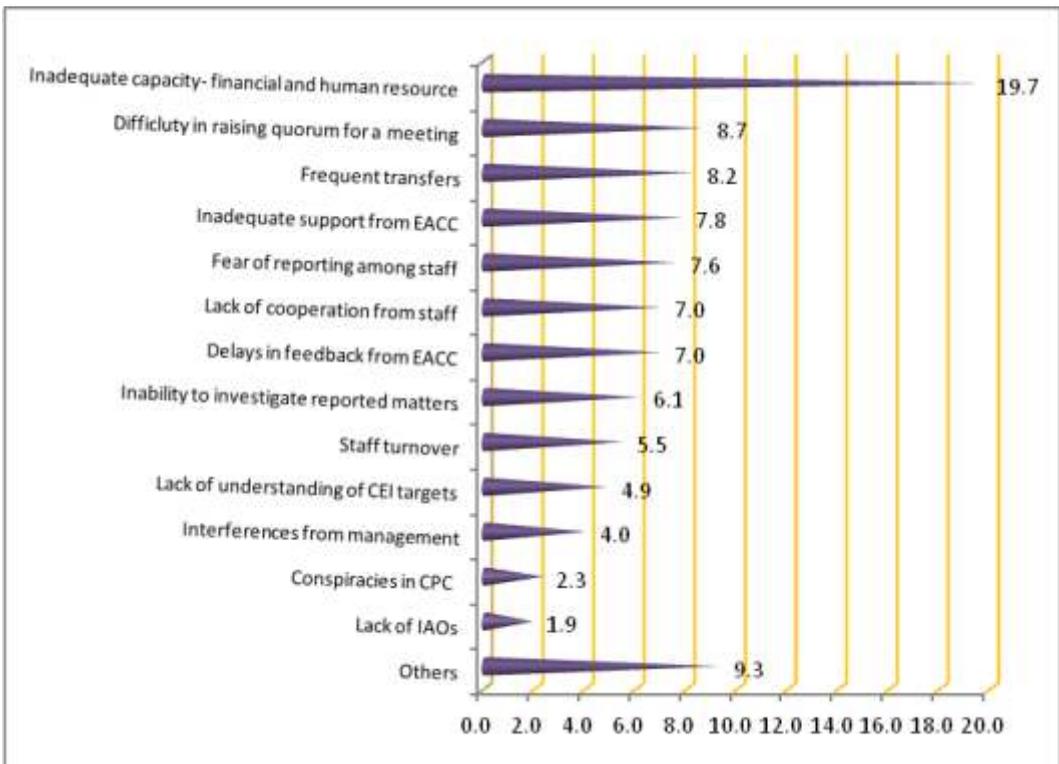
Figure G1: Structural and Functioning Challenges of CPCs

4.7.2   Challenges in Relation to Implementing EACC Recommendations on CRA

Inadequate finances to implement the recommendations of a CRA is the lead challenge most institutions face as shown in Figure G2. It was cited by 23.2 percent of the respondents followed by resistance from heads of department (18.7%), bad attitude and commitment from other staff members (13.2%) and inadequate staff to monitor the implementation of the recommendations (11.3%).
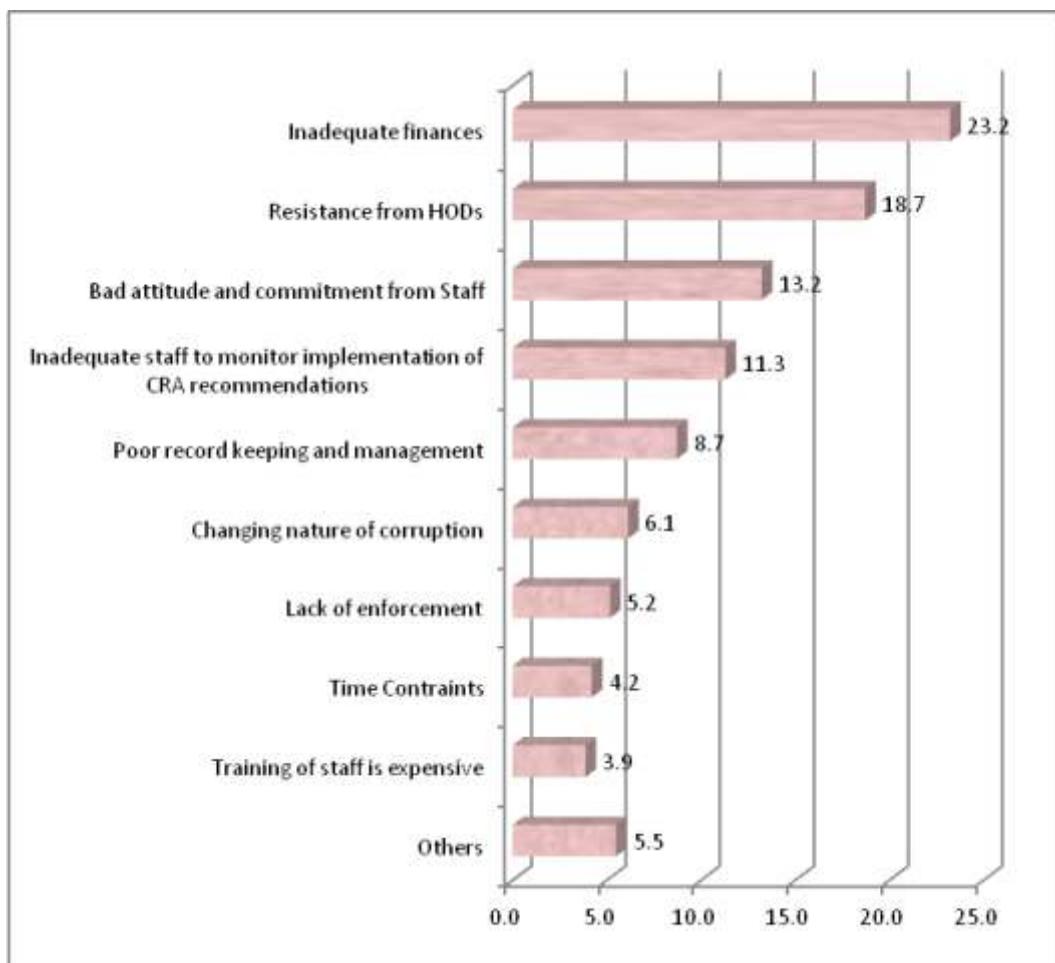
Figure G2: Challenges of Implementing Corruption Risk Assessment Recommendations

4.7.3 General Challenges

The implementation of the CEI in PC is shroud with many challenges ranging from structural to systemic. In Figure G3, inadequate financial and human resource provisions is cited by 20.3 percent of the respondents as an impediment followed by entrenched corruption in the country (19%) and poor coordination with EACC (17.7%). Other challenges cited include inadequate time (8.7%), resistance to change by staff (7.7%), lack of requisite skills by the implementers (7.3%), and apathy in reporting unethical conduct (7.3%).

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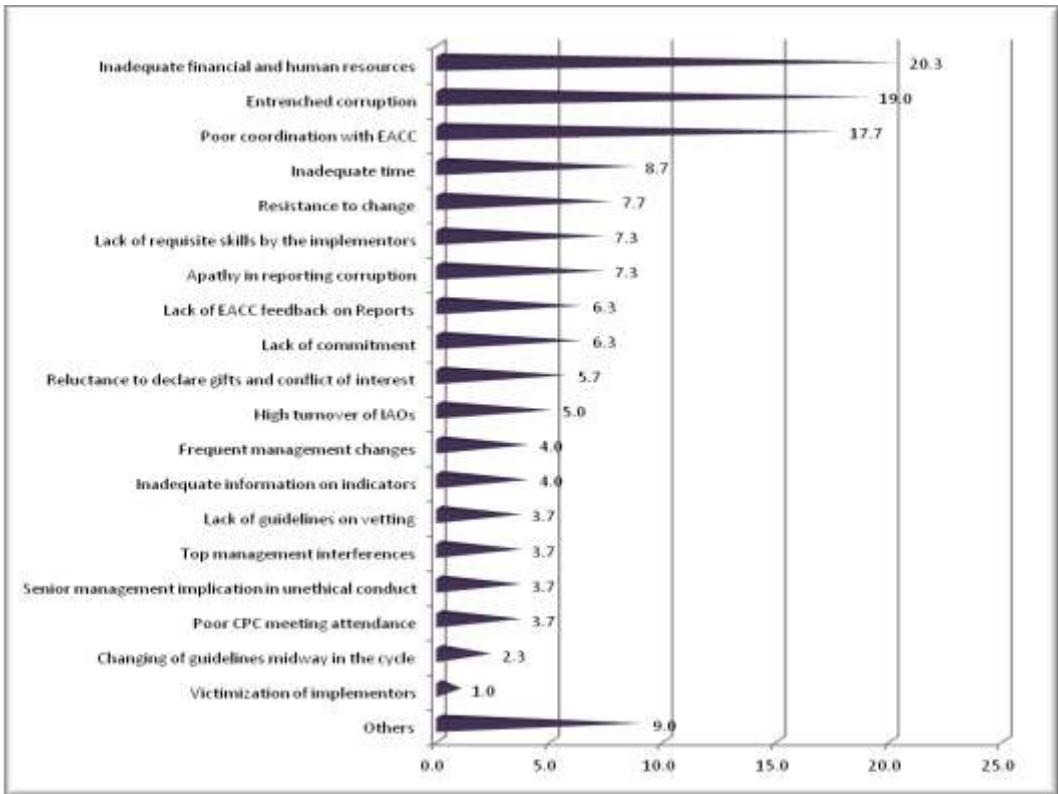
Figure G3: Challenges

The assessment also revealed the following challenges as well arising from interviews with key informants

- There is no legal framework upon which PC is grounded which in turn affects the implementation of CEI since public bodies are not amenable to PC requirements and hence creates two categories of public officers.
- The score for the Indicator is 5% out of the overall weighting of 100% which can make institutions to ignore it since it may not substantively impact on the overall score.
- There are co-ordination challenges posed by continuous reorganization of government ministries and agencies e.g. Ministry of Interior which comprise many State Departments (some formerly stand alone Ministries).
- There is lack of institutional support and commitment to implement the indicator in the form of financial and peripheral involvement of staff due to other duties. For instance, some institutions have had dysfunctional CPCs, sieving of complaints against management, IAOs transferred unreasonably with no replacement or proper handing over.

These have had an overall effect on the implementation of the indicator since focus is on the formal compliance (obsession with scores) instead of quality and meaningful compliance.

· There is weak monitoring and assessment by PC secretariat and EACC and hence difficulty in verifying the information in the Reports. They do not evaluate the scores or seek appropriate responses by public institutions where remarks have been made by the monitoring institutions. However, no action is taken to ensure meaningful engagement for an explanation of the scores by both the monitoring institution and the public institution in question

· There is staff resistance and attitude towards those implementing the indicator and in some situations, those implementing the indicator (IAOs) are ostracized and perceived negatively by colleagues.

· Administering disciplinary measures is poses a challenge since the promulgation of the new constitution due to a high likelihood that the disciplinary cases will end up in Court which has resulted in fear in dealing with disciplinary matters. There are loopholes in the disciplinary process that can be exploited.

· In some isolated incidences, the CPC mandates overlaps with the traditional disciplinary committee mandate hence duplication of duties.

· Training and retraining is a challenge since EACC has no training calendar hence it is difficult to plan in advance.

4.8   Impact of the Implementation of the Corruption Eradication Indicator

4.8.1   Institutional Anti-Corruption Infrastructure

Most of the public institutions have developed an anti-corruption infrastructure as a result of the indicator. This includes development of Corruption Prevention Policies and structures and governance tools such as the Corruption Prevention Committees (Integrity Committees), Codes of Conduct and Ethics and trained

Integrity Assurance Officers;

4.8.2 Capacity Building

The indicator has enabled public institutions to create knowledge about corruption, integrity and ethics through training of corruption prevention committee members and Integrity Assurance Officers and sensitization of staff. This is key in the anti-corruption process since it empowers staff to not only report acts of corruption, but also avoid engaging in such acts;

4.8.3 Redress Mechanism

It has provided a channel for lodging and redressing corrupt practices and unethical conduct at the institutional level. As a result, a number of acts of corruption and unethical practices which may not have been addressed have been acted upon at that level;

4.8.4 Corruption Detection

Has created a channel for detecting, investigating and addressing corruption and malpractices through rapid corruption risk assessment, corruption reporting boxes and anonymous reporting systems;

4.8.5 Development of Institutional Anti-Corruption Interventions

The requirement of the development a corruption prevention plan to implement corruption risk assessment findings has enabled public institutions to undertake a corruption diagnostic exercise to identify the risks of corruption and weak areas, and develop appropriate priority intervention strategies. Accordingly, the Indicator has enabled institutions to strengthen their anti-corruption framework, address institutional weaknesses thereby enhancing service delivery and governance;

4.8.6 Feedback Platform

Enhanced public engagement through the redress platform and baseline survey thereby enabling the institutions to devise appropriate strategies to meet the needs of the stakeholders. The baseline survey on Corruption in 2006 helped public institutions to get feedback from stakeholders which informed their intervention strategies

4.8.7 Awareness

The Corruption eradication indicator has created awareness about corruption and

issues of good governance. The general public is more aware of corruption reporting structures and more cases are being reported. Indeed the ongoing heightened level of debate on corruption is an indication that the public is now more sensitized with regard to corruption issues;

4.8.8   Community Driven Strategy

The strategy should be community driven to improve impact of anti-corruption activities. Community driven approach should be introduced but without interfering with the programs already in place.

CHAPTER FIVE

CONCLUSIONS AND RECOMMENDATIONS

5.1 Conclusions

The establishment of a CPC to be the centre of corruption prevention strategies in public institutions has resulted in controlled and structured implementation of the CEI in PC. Majority of the institutions regularly meet on quarterly basis to deliberate on corruption prevention strategies implemented in the past three months and direct their focus in the coming quarter activities. This system has progressed well and brought about the development and implementation of various strategies such as the anti-corruption policy, corruption risk assessment and training and sensitization of staff. The structure of the CPC allows for top management involvement in decision making on corruption prevention strategies and fully addresses the fear of insubordination in the event that lower cadre officers were to take charge. The interaction platform between EACC and Police on one part and the public institutions involved in implementation of CEI in PC has resulted in caution on the part of staff engaging in breaches of codes of conduct and criminal activities and hence minimized occurrence of corruption and unethical conduct.

Corruption risk assessments conducted by institutions internally have created an avenue for institutions to improve their processes to ensure efficient and effective services to the citizenry. Institutional failures such as poor record keeping, misuse of property, delays in service delivery, procurement malpractices and loss of revenue through fraud and bribery have been countered through automation and enhanced supervision of staff.

To ensure zero tolerance to corruption institutions have embraced the vetting of staff from the head of the institution to heads of departments. Though faced with challenges, the vetting of staff is a module that reign in hiring of errant officers or those with a checkered background and thus guarantee unblemished managers in the public service. In terms of relevance, efficiency and effectiveness in the implementation of the CEI in PC, there is increased awareness among staff on the

effects and consequences of corruption and unethical conduct improved service delivery reflected in customer satisfaction and automation of services by computerization

To ensure sustainability of the programme, some institutions have allocated resources both financial and human resource to established units within their structures for the purpose of coordination and implementation of CEI in PC. The establishment of a dedicated unit within the institutions structures ensures that prevention of corruption and unethical conduct is a sustainable venture.

However, the implementation of the CEI in PC is faced with various challenges including inadequate financial and human resource provisions, poor coordination with EACC, lack of a legal framework upon which PC is grounded, weak monitoring and evaluation by PC secretariat and EACC, staff resistance and bad attitude and lack of a training and retraining calendar by EACC.

5.2   Recommendations
From the findings presented above, the following recommendations can be made;

i. There is need to anchor PC in the law and empower the PC Secretariat and the monitoring institutions to take appropriate action in situations of underperformance. The PC Secretariat should be empowered to act even in the middle of the year and not wait for the end of the financial year to act on any acts of corruption. PC secretariat should be given powers to impose sanctions such as salary reduction, warning letters, surcharging etc.

ii. Adjust administrative structures so that there is a separate unit and budget item for anti-corruption activities in public institutions;

iii. There is need to increase the capacity of EACC to undertake audits to verify information in the quarterly reports and provide prompt coordinated response to queries from institutions

iv. EACC should liaise with training institutions and come up with an annual training program that is well publicized to the relevant institutions. The public institutions are then able to plan better and send their staff to this training institution for training on anti-corruption.

v. There is need to appreciate institutions that do well on integrity as it enhances motivation. This can be done through certifications, awards, among others. In addition, there is need to focus on the positive rather than the negative

vi. Have an internal mechanism of determining the net worth of staf and undertake net worth determination of staff regularly. Self-declaration forms should not be an end in themselves and hence an IT platform that links ministry of lands, central bank, registrar of motor vehicles and Kenya Revenue Authority should be developed to identify corrupt individuals and quicken action against them.

vii. Professionals should be highly remunerated so as to encourage retention and encourage the culture that hard work pays (In the UK and U.S.A, it is very difficult for professionals to be sourced as they must be insured and special allowances paid)

viii. Proposed indicators: Corruption prevention and detection requires national commitment to ensure a transparent and dignified country. EACC is committed to continuously strive for the fulfillment of this commitment of zero tolerance to corruption and sound ethical standards. Table 8 presents five themes from which Indicators can be derived regularly geared towards corruption eradication.

Table 8: Proposed Indicators

Theme	Sub -theme	Indicator
Institutional Capacity building on corruption prevention, ethics and anti-corruption	CPC Meetings and declarations Training of CPC members Training of Integrity Assurance Officers (IAOs). Sensitization of staff by IAO's Sensitization on Leadership and Integrity Act (LIA)	Number of IAOs trained No. of staff trained by IAO's. Existence and operationalization of Integrity Committee At least one Integrity Committee training undertaken after every 2 years Actions taken on corruption reports. Number of meetings held by Integrity Committee No. Of officers Sensitized on LIA

Corruption risks in all functional areas including core functions identified and documented. (CRA)	CRA report Risk Mitigation plan. Quarterly Implementation report.	CRA report 5 Risk mitigation plan Implementation report
High standard of ethical culture promoted and maintained (Enforcement of LIA under Section 52(2) of LIA	Gift registers: · Gift given · Gift received Conflict of interest register Codes of conduct and ethics for staff (public officers other than state officers) aligned to Part II of the Leadership and Integrity Act,2012	Gift register opened and maintained Conflict of interest register Code aligned to the Leadership and Integrity Code Number of officers sensitized on the codes. Reporting mechanisms on ethical breaches provided Action taken on ethical breaches Gift register opened and annual submission made Conflict of interest register opened and annual submission made
Zero Tolerance To Corruption	Record management platforms Integrity policy Enforcement of Codes of Conduct Staff Vetting Evaluation of CEI Activities	Staff vetted ITP Tests Declarations of income, assets and liabilities Outcomes Impact
Awards and Rewards	Whistle Blower protection Tools for Reporting corruption Dedicated Units and budget	Criteria for selecting winner Awards Innovations

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Appendix 1: List of Ministries and Institutions Evaluated

S/N	MDA	COUNTY	STATUS
1.	Kisumu Polytechic	Kisumu	On PC
2.	Sugar Research Institute (Formerly KESREF)	Kisumu	On PC but as a Directorate of Kenya Agricultural Research and Livestock Organization (KARLO)
3.	Maseno University	Kisumu	On PC
4.	Chemelil Sugar Company	Kisumu	On PC
5.	Muhoroni Sugar Company	Kisumu	Not on PC as it on receivership
6.	Agro-Chemical and Food Company	Kisumu	On PC
7.	Ramogi Institute of Applied Technology	Kisumu	On PC
8.	Lake Victoria South Water Services Board	Kisumu	On PC
9.	Lake Basin Development Authority	Kisumu	On PC
10.	Bondo Teachers Training College	Siaya	On PC
11.	Siaya Institute of Technology	Siaya	On PC
12.	St. Joseph's Nyang'oma Technical Institute for the deaf	Siaya	On PC
13.	JaramogiOgingaOdinga University	Siaya	On PC
14.	Bumbe Technical Training Institute	Busia	On PC
15.	Mawego Technical Training Institute	Homa Bay	On PC
16.	Asumbi Teachers Training College	Homa Bay	On PC
17.	South Nyanza Sugar Company	Migori	On PC
18.	Rongo University College	Migori	On PC
19.	Migori Teachers Training College	Migori	On PC
20.	Gusii Institute of Technology	Kisii	On PC
21.	Kisii University	Kisii	On PC
22.	Keroka Technical Training Institute	Nyamira	On PC
23.	University of Kabianga	Kericho	On PC
24.	Tea Research Institute	Kericho	On PC but as a Directorate of Kenya Agricultural Research and Livestock Organization (KARLO)
25.	Kericho Teachers Training College	Kericho	On PC
26.	Kenya Forestry College	Kericho	On PC but under the Kenya Forest Service
27.	Masai Mara University	Narok	On PC
28.	EwasoNg'iro South Development Authority	Narok	On PC
29.	Narok Teachers Training College	Narok	On PC
30.	Nyandarua Institute of Science and Technology	Nyandarua	On PC
31.	Laikipia University	Laikipia	On PC

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S/N	MDA	COUNTY	STATUS
32.	DedanKimathi University of Science and Technology	Nyeri	On PC
33.	Nyeri Technical Training Institute	Nyeri	On PC
34.	Tana Water Services Board	Nyeri	On PC
35.	Kamwenja Teachers College	Nyeri	On PC
36.	Kagumo Teachers College	Nyeri	On PC
37.	Mathenge Technical Training Institute	Nyeri	On PC
38.	KaratinaUnivesity	Nyeri	On PC
39.	Murang'a University College	Murang'a	On PC
40.	Michuki Technical Training Institute	Murang'a	On PC
41.	Murang'a Teachers Training College	Murang'a	On PC
42.	Thika Technical Training Institute	Kiambu	On PC
43.	Thogoto Teachers Training College	Kiambu	On PC
44.	Kirinyaga University College	Kirinyaga	On PC
45.	Embu University College	Embu	On PC
46.	Rwika Technical Training Institute	Embu	On PC
47.	St. Mark's Teachers Training College, Kigari	Embu	On PC
48.	Chuka University	TharakaNithi	On PC
49.	Egoji Teachers Training College	Meru	On PC
50.	Meru Teachers Training College	Meru	On PC
51.	Nkabune Technical Training Institute	Meru	On PC
52.	Kiirua Technical Training Institute	Meru	On PC
53.	Meru University of Science and Technology	Meru	On PC
54.	Meru Technical Training Institute	Meru	On PC
55.	EwasoNg'ro North Development Authority	Isiolo	On PC
56.	Garissa University College	Garissa	On PC
57.	Northern Water Services Board	Garissa	On PC
58.	Garissa Teachers Training College	Garissa	On PC
59.	North Eastern Province Technical Training Institute	Garissa	On PC
60.	Tanathi Water Services Board	Kitui	On PC
61.	Kitui Teachers Training College	Kitui	On PC
62.	South Eastern University	Kitui	On PC
63.	Kaimosi Teachers College	Vihiga	On PC
64.	Friends College Kaimosi Institute of Science and Technology	Vihiga	On PC
65.	Bushiangala Technical Training Institute	Kakamega	On PC

S/N	MDA	COUNTY	STATUS
66.	Eregi Teachers College	Kakamega	On PC
67.	Sigalagala Technical Training Institute	Kakamega	On PC
68.	Bukura Agricultural College	Kakamega	On PC
69.	Shamberere Technical Training Institute	Kakamega	On PC
70.	MasindeMuliro University of Science and Technology	Kakamega	On PC
71.	Nzoia Sugar Company	Bungoma	On PC
72.	Kisiwa Technical Training Institute	Bungoma	On PC
73.	Matili Technical Training Institute	Bungoma	On PC
74.	Kibabii University College	Bungoma	On PC
75.	Sang'alo Technical Training Institute	Bungoma	On PC
76.	Ol'lessos Technical Training Institute	Nandi	On PC
77.	Mosoriot Teachers Training College	Nandi	On PC
78.	Kaiboi Technical Training Institute	Nandi	On PC
79.	Moi University	UasinGishu	On PC
80.	University of Eldoret	UasinGishu	On PC
81.	Kerio Valley development Authority	UasinGishu	On PC
82.	Eldoret National Polytechnic	UasinGishu	On PC
83.	Tambach Teachers Training College	ElgeiyoMarakwet	On PC
84.	Kenya Seed Company	Transzoia	On PC
85.	Kitale Technical Training Institute	Transzoia	On PC
86.	Moi Teachers Training College - Baringo	Baringo	On PC
87.	Rift Valley Institute of Science and Technology	Nakuru	On PC
88.	Rift Valley Water Services Board	Nakuru	On PC
89.	Egerton University	Nakuru	On PC
90.	Pyrethrum Board of Kenya	Nakuru	On PC
91.	Machakos Teachers Training College	Machakos	On PC
92.	Kenya Meat Commission	Machakos	On PC
93.	Machakos University College	Machakos	On PC
94.	East African Portland Cement Company	Machakos	On PC
95.	Export Processing Zones Authority	Machakos	On PC
96.	Masai Technical Training Institute	Kajiado	On PC
97.	Wote Technical Training Institute	Makueni	On PC
98.	Taita University College	TaitaTaveta	On PC
99.	Coast Institute of Technology	TaitaTaveta	On PC

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S/N	MDA	COUNTY	STATUS
100.	Shanzu Teachers Training College	Mombasa	On PC
101.	Kenya Ports Authority	Mombasa	On PC
102.	Kenya Safari Lodges and Hotels	Mombasa	On PC
103.	Bandari College	Mombasa	On PC
104.	Kenya Coconut Development Authority (Nuts and Oils Crops Directorate)	Mombasa	On PC
105.	Technical University of Mombasa	Mombasa	On PC
106.	Kenya Ferry Services	Mombasa	On PC
107.	Kenya Marine and Fisheries Research Institute	Mombasa	On PC
108.	Privatization Commission	Nairobi	On PC
109.	Kenya Investment Authority	Nairobi	On PC
110.	National Housing Corporation	Nairobi	On PC
111.	National Museums of Kenya	Nairobi	On PC
112.	Industrial Development Bank	Nairobi	On PC
113.	Ministry of Sports	Nairobi	On PC
114.	Kenya Roads Board	Nairobi	On PC
115.	Kenya Education Management Institute	Nairobi	On PC
116.	Ministry of Education Science and Technology	Nairobi	On PC
117.	National Biosafety Authority	Nairobi	On PC
118.	Kenya Electricity Generating Company	Nairobi	On PC
119.	Kenya Law Reform Commission	Nairobi	On PC
120.	Kenya Institute of Curriculum Development	Nairobi	On PC
121.	Public Procurement Oversight Authority	Nairobi	On PC
122.	Kenya Institute of Business Training	Nairobi	On PC
123.	Konza Technopolis	Nairobi	Yet to set up PC as it is a new entity
124.	Central Bank of Kenya	Nairobi	Not on PC
125.	Anti-Counterfeit Agency	Nairobi	On PC
126.	National Commission for Science and Technology	Nairobi	On PC
127.	Coffee Research Institute	Nairobi	On PC
128.	Kenya Sugar Directorate (Formerly KSB)	Nairobi	On PC but as a Directorate of the Agricultural, Fisheries and Food Authority (AFFA)
129.	Kenya Bureau of Standards	Nairobi	On PC
130.	Kenya Water Institute	Nairobi	On PC
131.	Privatization Commission	Nairobi	On PC
132.	Kenya Accreditation Service	Nairobi	On PC
133.	Kenya Yearbook Editorial Board	Nairobi	On PC
134.	National Crime Research Centre	Nairobi	On PC
135.	Women Enterprise Fund	Nairobi	On PC

S/N	MDA	COUNTY	STATUS
136.	Nyayo Tea Zones Authority	Nairobi	On PC
137.	Agricultural Development Corporation	Nairobi	On PC
138.	New Kenya Co-operative Creameries	Nairobi	On PC
139.	Kenya Investment Authority	Nairobi	On PC
140.	Industrial Development Bank	Nairobi	On PC
141.	Bomas of Kenya	Nairobi	On PC
142.	Kenya Correctional Services	Nairobi	On PC
143.	National Construction Authority	Nairobi	On PC
144.	Agricultural Finance Corporation	Nairobi	On PC
145.	Kenya Civil Aviation Authority	Nairobi	On PC
146.	Ministry of Transport and Infrastructure	Nairobi	On PC
147.	Kenyatta International Convention Centre	Nairobi	On PC
148.	National Housing Corporation	Nairobi	On PC
149.	Kenya Law Reform Commission	Nairobi	On PC
150.	Kenya Institute of Curriculum Development	Nairobi	On PC
151.	Kenya National Trading Corporation	Nairobi	On PC
152.	Higher Education Loans Board	Nairobi	On PC
153.	Water Services Trust Fund	Nairobi	On PC
154.	Kenya National Library Services	Nairobi	On PC
155.	Kenya Airports Authority	Nairobi	On PC
156.	Kenya Industrial Research Development Institute	Nairobi	On PC
157.	Institute of Meteorological Training and Research	Nairobi	On PC
158.	Agricultural, Fisheries and Food Authority	Nairobi	On PC
159.	National Museums of Kenya	Nairobi	On PC
160.	Ministry of Foreign Affairs	Nairobi	On PC
161.	Co-operative University College	Nairobi	On PC
162.	Council of Legal Education	Nairobi	On PC
163.	National Environmental Trust Fund	Nairobi	
164.	Kenya Tourism Board	Nairobi	On PC
165.	Competition Authority of Kenya	Nairobi	On PC
166.	Technical University of Kenya	Nairobi	On PC
167.	Commodities Fund for Coffee Development (Formerly Coffee Development Fund)	Nairobi	On PC
168.	Kenya Animal Genetics Resource Centre	Nairobi	On PC
169.	Kenya School of Government	Nairobi	On PC
170.	Teachers Service Commission	Nairobi	On PC
171.	Kenyatta National Hospital	Nairobi	On PC
172.	Consolidated Bank of Kenya	Nairobi	On PC
173.	Tourism Finance Corporation / Fund	Nairobi	On PC
174.	Energy Regulatory Commission	Nairobi	On PC
175.	Water Resources Management Authority	Nairobi	On PC

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S/N	MDA	COUNTY	STATUS
176.	Kenya Agricultural Research and Livestock Organization	Nairobi	On PC
178.	National Council for Persons with Disabilities	Nairobi	On PC
179.	University of Nairobi Enterprise Services	Nairobi	On PC
180.	National Police Service Commission	Nairobi	On PC
181.	National Hospital Insurance Fund	Nairobi	On PC
182.	Capital Markets Authority	Nairobi	On PC
183.	Ministry of Labour, Social Security and Services	Nairobi	On PC
184.	National Campaign Against Drug Abuse Authority	Nairobi	On PC
185.	Nairobi Technical Training Institute	Nairobi	On PC
186.	Kenya National Bureau of Statistics	Nairobi	On PC
187.	Kenya Revenue Authority	Nairobi	On PC
188.	Kenya Educational management Institute	Nairobi	On PC
189.	Kenya Rural Roads Authority	Nairobi	On PC
190.	National Council for Population and Development	Nairobi	On PC
191.	CDF Board	Nairobi	On PC
192.	Deposit Protection Fund	Nairobi	Not on PC
193.	Communication Authority of Kenya	Nairobi	On PC
194.	Radiation Protection Board	Nairobi	On PC
195.	Pest Control Board	Nairobi	On PC
196.	Ministry of East African Affairs, Commerce and Tourism	Nairobi	On PC
197.	Ministry of Energy and Petroleum	Nairobi	On PC
198.	Ministry of Health	Nairobi	On PC
199.	KETRACO	Nairobi	On PC
200.	Kenya Railways Corporation	Nairobi	On PC
201.	Kenya Veterinary Vaccine Institute	Nairobi	On PC
202.	East African School of Aviation	Nairobi	On PC
203.	Kenya Wildlife Service	Nairobi	On PC
204.	Multimedia University	Nairobi	On PC
205.	Pharmacy and Poisons Board	Nairobi	On PC
206.	Kenya National Human Rights Commission	Nairobi	On PC
207.	Kenya Dairy Board	Nairobi	On PC
208.	Ministry of Water and Irrigation	Nairobi	On PC
209.	Witness Protection Agency	Nairobi	On PC
210.	Kenya Power and Lighting Company	Nairobi	On PC
211.	Biosafety Authority	Nairobi	On PC
212.	Betting Control and Licensing	Nairobi	On PC but under the NTSA
213.	Public Service Commission	Nairobi	On PC

S/N	MDA	COUNTY	STATUS
214.	Kenya Industrial Property Institute	Nairobi	On PC
215.	National Water Conservation and Pipeline Corporation	Nairobi	On PC
216.	Numerical Machining Complex	Nairobi	On PC
217.	Brand Kenya Board	Nairobi	On PC
218.	SACCO Services Regulatory Authority	Nairobi	On PC
219.	Kenya Railways Training Institute	Nairobi	On PC
220.	Ministry of National Treasury	Nairobi	On PC
221.	Kenya National Examination Council	Nairobi	On PC
222.	National Irrigation Board	Nairobi	On PC
223.	Kenya Medical Research Institute	Nairobi	On PC
224.	Kenya Water Towers Agency	Nairobi	On PC
225.	National Transport and Safety Authority	Nairobi	On PC
226.	Kenya Electricity Generating Company	Nairobi	On PC
227.	National Environment Management Authority	Nairobi	On PC
228.	Kenya Industrial Estates	Nairobi	On PC
229.	Ministry of Lands, Housing and Urban Development	Nairobi	On PC
230.	Kenya National Highways Authority	Nairobi	On PC
231.	Water Appeals Board	Nairobi	On PC
232.	National Industrial Training Authority	Nairobi	On PC
233.	Export Processing Zones Authority	Nairobi	On PC
234.	Public Procurement Oversight Authority	Nairobi	On PC
235.	Kenya Trade network Agency	Nairobi	On PC
236.	Kenya Copyright Board	Nairobi	On PC
237.	Ministry of Interior and Coordination of National Government	Nairobi	On PC
238.	National Cereals and Produce Board	Nairobi	On PC
239	Advocates Complaints Commission	Nairobi	Not on PC as it a division under the Office of the Attorney General and Department of Justice
240.	National Oil Corporation	Nairobi	On PC
241.	Youth Enterprise Development	Nairobi	On PC
242.	Kenya Accountants, Secretaries National Examination Board	Nairobi	On PC
243.	Kenya Medical Training College	Nairobi	On PC
244.	Coffee Board of Kenya	Nairobi	On PC
245.	University of Nairobi	Nairobi	On PC
246.	Tana and Athi Rivers Development Authority	Nairobi	On PC

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S/N	MDA	COUNTY	STATUS
247.	Ministry of Mining	Nairobi	On PC
248.	Kenya Film Commission	Nairobi	On PC
249.	Kenya Pipeline Company	Nairobi	On PC
250.	Centre for Mathematics, Science and Technology Education in Africa (CEMASTEA)	Nairobi	On PC
251.	Kenya Technical Teachers College	Nairobi	On PC
252.	Commission for University Education	Nairobi	On PC
253.	Kenya School of Law	Nairobi	On PC
254.	National Council for Children's Services	Nairobi	On PC
255.	Vision 2030 Delivery Secretariat	Nairobi	On PC
256.	Kenya Urban Roads Authority	Nairobi	On PC
257.	Insurance Regulatory Authority	Nairobi	On PC
258.	Kenya Leather Development Council	Nairobi	On PC
259.	Fibre Crops Directorate (Formerly Cotton Development Authority)	Nairobi	On PC but using structures of CDA
260.	Kenya Medical Supplies Agency	Nairobi	On PC
261.	Athi Water Services Board	Nairobi	On PC
262	Ministry of Agriculture, Livestock and Fisheries	Nairobi	On PC
263.	Kenya Institute of Public Policy Research and Analysis	Nairobi	On PC
264.	National Drought Management Authority	Nairobi	On PC
265.	Ministry of Planning and Devolution	Nairobi	On PC
266.	Kenya Institute of Business Training	Nairobi	On PC
267.	Kenya Literature Bureau	Nairobi	On PC
268.	Kenya Utalii College	Nairobi	On PC
269.	Kenya Citizens and Foreign Nationals Service	Nairobi	On PC
270.	Kenya Tourism Development Corporation	Nairobi	On PC
271.	Tourism Fund	Nairobi	On PC
272.	Kenya Plant Inspectorate (KEPHIS)	Nairobi	On PC
273.	Rural Electrification Authority	Nairobi	On PC
274.	National Aids Control Council	Nairobi	On PC
275.	Kabete Technical Training Institute	Kiambu	On PC
276.	Kiambu Institute of Science and Technology	Kiambu	On PC
277.	Jomo Kenyatta University of Agriculture and Technolgy	Kiambu	On PC
278.	Ministry of Defense	Nairobi	On PC
279.	National Disaster Operation Centre	Nairobi	Not on PC

S/N	MDA	COUNTY	STATUS
280.	Ethics and Anti-Corruption Commission	Nairobi	Not on PC
281.	National Cohesion and Integration Commission	Nairobi	Not on PC
282.	Commission on Administrative Justice	Nairobi	Not on PC
283.	Independent Electoral and Boundaries Commission	Nairobi	Not on PC
284.	Salaries and Remuneration Commission	Nairobi	Not on PC
285.	Mt. Kenya School of Leadership and Adventure	Nairobi	Not on PC
286.	LAPPSET Development Corridor	Nairobi	Not on PC
287.	Jomo Kenyatta Foundation	Nairobi	On PC
288.	Office of the Auditor General	Nairobi	Not on PC
289	Office of the Controller of Budget	Nairobi	Not on PC
290.	Performance Contracting Secretariat	Nairobi	Not on PC
291.	Inspectorate of State Corporations	Nairobi	Not on PC
292.	Kenya Building Research Center	Nairobi	Not on PC as it is a department of a Ministry
293.	National Communications Secretariat	Nairobi	Not on PC
294.	Kenya ICT Board	Nairobi	Have no Corruption Prevention Committee (CPC) as it is a new entity. Need guidelines on how to implement the CEI in PC
295.	Kenya Citizens and Foreign National Service (Formerly immigration Department)	Nairobi	On PC

Appendix 2: Corruption Eradication Indicators Evaluated

LEVEL	CATEGORY	SUB-INDICATORS	KEY DELIVERABLES	PERFORMANCE LEVELWEIGHT
1.	Anti-Corruption framework	Set up and operationalize Corruption Prevention Committee/Integrity Committee comprised of PSs/AOs/CEOs as Chair and HODs as members	Committee constituted and operational as evidenced by membership and minutes of quarterly meetings	10%
		Forward names of Chief Executive Officers and Heads of Departments names to EACC for integrity vetting	Names forwarded for vetting	
		Develop and implement an Anti-Corruption Policy	Anti-Corruption Policy	
		Develop/ review and Implement a specific leadership and ethics code of conduct in line with the Leadership and Integrity Act (2012)	Code of Conduct	
		Undertake Corruption Risk Mapping /Assessment, develop and submit a Report to EACC with effective measures to mitigate against the risks	Corruption Risk Assessment and Management Report	
2.	Institutionalized Corruption Prevention	Implementation of the provisions of the Anti-Corruption framework under Level 1 enhanced (specifically the CRA and anti-Corruption Plan)	Quarterly progress monitoring reports on implementation of the CRA and anti-corruption plan	20%
		Outcomes and impact of the anti-corruption framework implementation in Level 1 evaluated	Annual Evaluation Report	
		Institutional capacity on integrity, ethics and anti-corruption enhanced	Reports of training of staff on integrity, ethics and anti-corruption	
3.	Corruption Control	Systems, policies procedures and practices of work enhanced	Report on specific corruption control measures implemented indicating the level and depth of corruption control	20%
			External Auditors report and observations	
		Organizational culture and ethics enhanced	Reports of institutional advisory/disciplinary committees on breach of	

LEVEL	CATEGORY	SUB-INDICATORS	KEY DELIVERABLES	PERFORMANCE LEVELWEIGHT
			codes	
		Number of public officer(s) suspected of corrupt practices suspended	Report providing specific details of the actions taken	
4	Zero tolerance to corruption	All staff vetted on integrity	Report of vetting of staff including action taken on those found to lack integrity	20%
		Continuous enhancement of internal controls to mitigate against corruption and unethical practices	Report on specific internal control measures implemented indicating the level and depth of corruption control	
		High standard of ethical culture maintained	Reports of institutional advisory/disciplinary committees on breach of codes	
		Transparency, accountability and service delivery enhanced	Unqualified reports of external Auditor-General's Overall ranking on performance contracting Overall ranking on the corruption perception index	
5.	Integrity certification	Integrity certification	Report of EACC on integrity certification	30%