

MISSION STATEMENT

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

MISSION

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

VISION

A Corruption free Kenyan society that upholds integrity and the rule of law

CORE VALUES

Integrity

Professionalism

Fidelity to the law

Courage

Teamwork

Innovation



FOREWORD

Corruption in Public administration is typically in the form of “petty” and administration corruption. This is manifested as bribery, abuse of office, conflict of interest, nepotism, favoritism, absenteeism etc. Increased concern of corruption in County Governments and looking for solutions to the problem have opened up new avenues of inquiry. The sharing of corruption experiences in County Governments will help combat and prevent corruption in devolved Government.

To address this need, the Ethics and Anti-Corruption Commission (EACC) conducted a Survey on Corruption and Ethics in Devolved Services 2015, between April and June 2015. The primary objective of the Survey was to map out corruption prone areas and unethical practices in the County public service delivery. This will in turn support a more targeted and systematic intervention to address these vices in County public service delivery.

The Study reveals that corruption level is moderately high in County Governments. Procurement Department, finance, public service board, road and public works are the County Departments where corruption is most prevalent. The specific forms of corruption are procurement irregularities (bid rigging, inflation of prices, splitting of tenders to meet the threshold, tampering with clients documents, conflict of interest in awarding tenders, bribery, political influence in tendering & hiring of unqualified procurement staff), theft in revenue collected at the counties (slaughter fees, parking fees etc.), shoddy construction of roads and bridges, forgery of documents (vouchers, employment forms, cheques forgery to ensure payments for non-existing goods and services), nepotism and bribery in recruitment process and general embezzlement of public funds meant for development.

Corruption has resulted in County underdevelopment, poor service delivery at the counties, poor road construction, budget deficits, denial of public participation in project selection and budgeting process, unfair recruitment process, hampering service delivery as public funds are embezzled, widened gap between the rich and the poor and enormous loss of Government funds.

This Report calls to attention all actors in the County public service to put in place adequate measures to stem corruption and unethical conduct in counties. It also requires counties to strengthen their systems, policies and procedures of work that are corruption free and that inculcate and mainstream integrity and ethics in the conduct of public affairs. I hope this report inspires all stakeholders to take appropriate action to make our dream of a corruption free society.

Tukomeshe Ufisadi, Tuijenge Kenya!



PHILLIP K. B. KINISU
CHAIRMAN
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ACRONYMS

CDF	-	Constituency Development Fund
CPC	-	Corruption Prevention Plan
CRA	-	Corruption Risk Assessment
CSPRO	-	Census and Survey Processing System
EACC	-	Ethics and Anti-Corruption Commission
HR	-	Human Resources
IAOs	-	Integrity Assurance Officers
ICT	-	Information and Communications Technology
IEC	-	Information Education and Communication
IFMIS	-	Integrated Financial Management Information System
MCA's	-	Members of County Assembly
PPOA	-	Public Procurement Oversight Authority
SPSS	-	Statistical Package for Social Scientists



EXECUTIVE SUMMARY

Ancedotal evidence based on media reports suggests that corruption, unethical practices and other malpractices are taking root and increasing with the uptake and spread of devolved services and devolved functions at the County level in Kenya. In order to have a better understanding of corruption, unethical practices and other malpractices in devolved services, the Ethics and Anti-Corruption Commission (EACC) conducted Corruption and Ethics Survey in Devolved Services between April and June 2015.

The overall objective of the Survey was to map out corruption prone areas and unethical practices in the County public service delivery. The Survey focused on corruption and unethical practices in County Government Departments. The target respondents for the Survey were county employees. A total of 4,965 County employees were interviewed in the various Departments.

The Study findings show that corruption levels are perceived to be moderately high in County Governments. Procurement, finance, public service board, roads and public works are the County Government Departments that are mostly prone to corruption. The most prevalent forms of corruption include bribery, theft of revenue collected, procurement irregularities (bid rigging, inflation of prices, splitting of tenders to meet threshold, tampering with clients documents), favoritism and nepotism during recruitment, shoddy roads/bridges construction and conflict of interest in awarding of County tenders and employment.

The highlights of the Survey Findings are as follows:-

a) Status of Corruption

- i. County Governments are perceived to be highly corrupt by 20% of the respondents, moderately corrupt by 36.3% while 35.5% perceived counties as being lowly corrupt. This is a positive perception coming from County employee respondents as most perceived corruption levels to be moderate in the County Governments.
- ii. Procurement, finance and economic planning, Public service board, Roads and public works are the County Departments that are most prone to corruption. This was as reported by 30%, 28%, 27% and 13% of the respondents respectively.

- iii. Procurement process (46%), employment or promotion process (31%), allocation of funds (11%), revenue collection process (11%), road construction and infrastructure development (11%) are the services areas perceived to be most prone to corruption in counties.
- iv. Bribery, theft in County revenue, procurement irregularities, nepotism, shoddy roads and bridges construction, forgery of documents, conflict of interest in awarding of tenders and recruitment of staff are the most prevalent forms of corruption experienced in counties.
- v. Fear of victimization, lack of proper organizational structure and corruption being a culture are the three major challenges faced in an attempt to fight corruption in County Governments. This was as reported by 60.2 %, 28.7% and 18.1% respectively.

b) Bribery Situation

- i. The Report indicates that on average, County employees received the largest amount of bribe in Roads and public works services amounting to Ksh. 150,000 followed by housing and building services at an average amount of Kshs. 113,750, recruitment at Kshs. 112,275 and procurement processes at Kshs. 107,059 respectively.
- ii. When asked why County employees ask or accept bribes, 31% of the respondents said they did so because of poor remuneration. Twenty three percent (23%) said it was lack of professional ethics while 16% of the respondents reported that bribery before service delivery was a culture.

c) Status of ethics

- i. A majority of public officials (65.9%) reported that most of the County employees comply with the code of conduct
- ii. Most respondents (56.1%) reported to have signed a code of conduct commitment form while a significant number (43.2%) reported not to have signed the commitment form.
- iii. The common forms of misconduct witnessed in County Government offices include; unprofessionalism, lateness, absenteeism and use of abusive behavior and language. This was as reported by 39.5 per cent, 21.4 per cent, 20.3 per cent and 14.9 per cent of the respondents respectively.



d) Effectiveness of EACC in the fight against Corruption

- i. Most respondents (56.4%) believe the Commission is effective in the fight against corruption. The three main reasons cited were: The Commissions' presence is felt, public assets have been recovered and the Commission has arrested and is investigating senior officials.
- ii. Incomplete corruption cases, inconclusive investigation and lack of prosecution for corrupt individuals are the three main reasons cited by respondents who perceived the Commission not to be effective in the fight against corruption.

The Report recommends the following:-

- i. Development and implementation of anti-bribery compliance policy to curb incidences of bribery in County public service delivery.
- ii. Put up a policy framework to guide public participation forum so as to ensure the public contributes effectively to the budget formulation process and counties should also strive to implement the views of the public that were shared in the budgeting process in order to sustain public trust.
- iii. Ensure Transparency and accountability in Public Procurement
- iv. Ensure Value for Money in Road construction and other infrastructure development
- v. Enhancement of anti-corruption mechanisms in County Governments

CHAPTER ONE: BACKGROUND

1.1 Introduction

Devolution in Kenya is the pillar of the Constitution that sought to bring Government closer to the people. The County Governments act as the center for dispersing political power and economic resources to Kenyans at the grassroots. Devolution is advocated as a political response to the ills plaguing fragile and plural societies, such as conflicts, inequalities, rent seeking, economic stagnation, corruption and inefficient use of public resources (Institute of Economic Affairs, 2010). Consequently, devolution was advocated in Kenya as an alternative to address the administrative inefficiencies, corruption and misuse of public resources that have characterized centralized Government (Barret et al, 2007).

Empirical evidence on the effect of devolution depicts mixed results and in some cases it is inconclusive. Study findings in Kenya have revealed that some devolved funds have enhanced service delivery. However, optimal service uptake is eroded by poor governance frameworks. Evidence based on media reports and Kenya National Audit Office reports suggests that corruption, unethical practices and other malpractices are taking root and increasing with the uptake and spread of devolved services and functions at the County level in the country. The key areas marred with corruption include procurement process, passing of bills by Members of County Assembly and recruitment of County employees.

Devolution, including other forms of decentralization therefore may not always lead to improved governance and economic performance. For instance, devolution may reduce the ability of the national Government to redistribute resources and therefore the ability to assist the less developed sub-national units. In addition, devolution may lead to the capture of local Governments by the political elites, especially if devolution rules and systems are not well designed, and hence allow the local politicians to use the local resources to consolidate their hold on to political power through patronage (Institute of Economic Affairs, 2010). The presence of challenges suggests that devolved services are not without their shortcomings. The aim of the Survey was therefore, to identify corruption and ethical challenges of devolving public services in Kenya. This will enable the Ethics and Anti-Corruption Commission and other stakeholders to identify intervention measures to prevent



and combat corruption at the County level.

1.2 Problem Statement

Apart from the current concerns about the spread of corruption in the newly created devolved units, Kenya's fiscal decentralization has in the past faced conceptual and implementation challenges such as inadequate accountability mechanisms, corruption and poor planning (Institute of Economic Affairs, 2010). For instance, decentralization of power in Constituency Development Funds (CDF) saw devolution of corruption, nepotism, conflicts and misappropriation of funds (Kiprorir 2009). In addition, devolution may also lead to a transfer of such challenges experienced at the central system of Government as corruption and misappropriation of funds to devolved systems, especially when devolved units inherit structures, policies systems, procedures, practices and workforce of the previous central Government.

So far there is no empirical data on the status of corruption and unethical practices in the devolved system of Government. Anecdotal evidence based on media reports suggests that corruption, unethical practices and other malpractices are taking root and increasing with the uptake and spread of devolved services and functions at the County level in the country. These concerns are confirmed by the increasing number of reports made to the Commission relating to malpractices in procurement, recruitment and rampant unethical practices within the counties.

Informed understanding of corruption, unethical practices and other malpractices by the Commission at the County level will support a more targeted and systematic intervention to address these vices. The Survey sought to point out service delivery areas that are prone to corruption and unethical practices in the County Governments. This will help readers and policy makers to better understand the prevalence and forms of corruption in the devolved system of Government; causes, magnitude, nature, approaches and solutions needed to eradicate corruption and unethical conduct in County Governments.

1.3 Objectives of the Survey

1.3.1 Main Objective

The overall objective of the Survey was to map out corruption prone areas and unethical practices in the Counties. The information obtained will act as a baseline against which future achievements attained as a result of anti-corruption

interventions shall be measured.

1.3.2 Specific Objectives

More specifically, the Survey sought to:

- i. Establish the perceived level of corruption and unethical conduct in County Governments.
- ii. Find out services and processes most prone to corruption and unethical practice at the County Governments
- iii. Find out corruption and ethical challenges facing County Governments
- iv. Establish measures/initiatives put in place to combat corruption and unethical practices at the counties.
- v. Make recommendations to counter corruption and ethical challenges in County Government

1.4 Scope of Work

The survey focused on County Government Departments. A total of 39 counties were targeted excluding Garissa, Wajir, Mandera, Lamu, Tana River, Samburu, Marsabit and Turkana counties. The target respondents were County public officers including County assemblies, County Executive committees and County public service staff. Further, there were key informants to complement the quantitative data in the Survey.

1.5 Organization of the Report

This Report is structured into four parts. Part one, the background, lays the foundational basis of the Survey. Part two details the methodology applied in collecting data for the Survey. Part three presents the Survey findings, including perceived level of corruption, prevalence of corruption, service areas prone to corruption, anti-corruption initiatives initiated at the County Governments, unethical conduct in the County Governments and effectiveness of EACC in the fight against corruption in County Governments. Part four provides conclusions and recommendations. Distribution of respondents by various categories and counties are provided in the appendices.



CHAPTER TWO: METHODOLOGY

This chapter details the methods used in data collection, analysis and reporting. It explains both the qualitative and quantitative methods applied in the Survey.

2.1 Research Design

The research design comprised of two data collection methods including administration of structured questionnaires and key informant interviews. The Survey collected and analyzed both quantitative and qualitative data. The Survey also benefited from existing literature including previous Surveys by the Commission.

2.2 Sampling

The sampling frame for the existing County Departments in each of the 39 counties was derived from the Report on Assessment of the Implementation of the System of Devolved Government, 2014 conducted by the Commission for the Implementation of the Constitution (CIC). Target respondents, who were County employees, were then randomly selected from the County Departments. Purposive sampling was also done for key informant participants in each County to get information regarding the management of County Governments.

The sample Survey was aimed at gathering information from various cadres of County employees so as to find out how they perceived level of corruption in various service delivery points of the County Government. Data collection was carried out between April and June 2015. A total of 4,965 County employees' respondents were interviewed.

The distribution of respondents per County is as indicated in Appendix 1.

2.3 Research Instruments

There were two sets of data collection instruments which included a discussion guide for the key informants and a structured questionnaire to be administered to County employees. The research instruments were reviewed to ensure the questions achieved the objectives of the Study. The information solicited comprised of respondents' personal background, perception and experiences on the status of

corruption in County Governments, knowledge on the anti-corruption initiatives at the County Governments, level of awareness of ethics in the public services and perception on the effectiveness of the Commission in the discharge of its mandate.

2.4 Data Processing and Analysis

Once data collection was complete, the open ended questions were extracted and coded before entry. The data was then entered into the computer using the Census and Survey Processing System (CSPRO) software. Data processing and analysis was then undertaken using the Statistical Package for Social Scientists (SPSS) software.

For the qualitative data, transcription was carried out. Content analysis was then used to analyze the transcripts through gridding. Content analysis entailed examining qualitative responses from individuals to establish cross cutting themes and attributes that were not dependent on absolute numbers.



CHAPTER THREE: SURVEY FINDINGS

This chapter discusses the Survey findings focusing on respondent's perception and experience on corruption and unethical conduct in County Governments. Specifically, the Report exhibits the perception of respondents on the level of corruption in the County Governments, spread of corruption, services areas prone to corruption and unethical conduct, anti-corruption initiatives in the County Government, awareness of ethics by the County employees and perception on the Commission effectiveness in the fight against corruption.

3.1 Status of Corruption

The Survey sought to establish respondents' perception towards corruption in the County Government and below is the Survey findings.

3.1.1 Perceived Level of Corruption in County Governments

County Governments are perceived to be highly corrupt by 20% of the respondents, moderately corrupt by 36.3% while 35.5% perceived counties as being lowly corrupt. This is a positive perception coming from County employee respondents as most perceived corruption levels to be moderate in the County Governments. This is as illustrated in Figure 1.

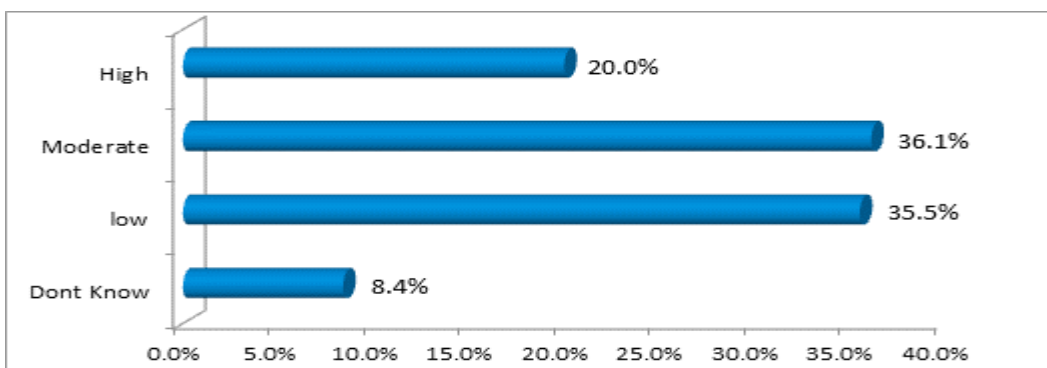


Figure 1: Perceived Level of Corruption

3.1.2 Reasons for High Level of Corruption

Respondents cited various reasons for high level of corruption. The most cited reasons were increase in high profile cases involving corruption as mentioned by 14.8% and existence of back door deals in public offices as mentioned by 10.8% of the respondents. Other reasons are as presented in Table 1.

Table 1: Reasons for High Level of Corruption

Reasons for High Level of Corruption	Percent(%)
Increase in high profile cases involving corruption	14.8
Existence of back door deals	10.8
Lack of accountability on public funds	8.2
A bribe has to be offered for one to receive services	4.6
Conflict of interest while hiring staff	2.2
Practice of nepotism & tribalism	1.9
Recruitment and appointment not based on merit	1.4
Delayed salaries	1.4
Media reports indicate corruption is high	0.8
Increase in arrest of a corrupt official	0.5
Political interference	0.5
Most employers are paid on contractual terms	0.3
Nothing is done to the corrupt individuals	0.3
Don't Know	0.2
No Comment	52.1

3.1.3 Forms of Corruption Experienced in County Government

In general, participants mentioned the most prevalent forms of corruption in counties as bribery, theft in revenue, procurement irregularities, nepotism, shoddy road and bridge construction, forgery of documents and conflict of interest in awarding of tenders and recruitment of staff. Table 2 gives a breakdown of forms of corruption and service areas experienced in various County Governments.

Table 2: Forms of Corruption Experienced in County Governments

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Uasin Gishu	<ul style="list-style-type: none"> • Loss of document in land record management Department • Theft of revenue in ticketing of motorbikes and taxis as revenue collectors receive money and not receipt the same • Loss of revenue in slaughter houses as money paid in slaughter houses cannot be accounted 	<ul style="list-style-type: none"> • County under development • public resentment thus political instability • Poor service delivery • Widened gap between the rich and the poor 	<ul style="list-style-type: none"> • Corruption fights back • Whistle blowers are threatened 	<ul style="list-style-type: none"> • Conducting Surveys on corruption • Conducting training • Sting operations • Prosecutorial partnership i.e. provide lawyers during charging of corruption cases
West Pokot	<ul style="list-style-type: none"> • Procurement irregularities • Bid Rigging which involves bribery during tendering process • Theft in revenue collected as parking attendants don't give receipts which results in attendant stealing over Kshs.2,0000 per day 	<ul style="list-style-type: none"> • Shoddy Implementation of Projects which can cause collapse of building • Bid Rigging leading to procurement of substandard equipment and unfair competition • Poor Service delivery due to abuse of office • Loss of trust to the governor 	<ul style="list-style-type: none"> • Entrenched culture of corruption • Threats on those who try to address land grabbing issues • Political interference where one fears impeachment 	<ul style="list-style-type: none"> • Staff recruitment • Procurement process • Establish an EACC office • Campaigns and education to promote ethical conduct to improve service delivery
Migori	<ul style="list-style-type: none"> • Non-Adherence to procurement procedures which involves:- • Splitting of tenders to meet threshold • Lack of proper authorization • Inflation of prices • Tampering with documents of clients • Providing wrong information • Nepotism and political interference in recruitment • Shoddy implementation of projects due to collusion between contractors and County employees • Use of firm machinery for personal gain 	<ul style="list-style-type: none"> • Loss of public funds • Low output • Lack of confidence in County leadership • Bad influence among staff 	<ul style="list-style-type: none"> • Resistance from staff and political leaders • Policies not developed yet • Lack of goodwill from leadership • Lack of capacity building on effect of corruption 	<ul style="list-style-type: none"> • Training • Policy development • System reviews to seal corruption loopholes

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Homa Bay	<ul style="list-style-type: none"> • Procurement process is prone to lobbying, vested interest by management and non-compliance to procedures • Bribery in payment processing to avoid delay in payment and due to limited funds 	<ul style="list-style-type: none"> • Inequality in job opportunity • Lack of transparency and accountability in service delivery • Not delivering services to the public 	<ul style="list-style-type: none"> • Not Stated 	<ul style="list-style-type: none"> • Training on Corruption • System reviews to identify corruption loopholes
Kericho	<ul style="list-style-type: none"> • Procurement irregularities • Misuse of Government vehicles • Nepotism in employment 	<ul style="list-style-type: none"> • Loss and wastage of public money • Inequitable development due to nepotism resulting in a section of the society benefiting • Underdevelopment as public priorities are relegated due to personal interest 	<ul style="list-style-type: none"> • Poor leadership • It is culture that is being propagated by employees inherited from the local Governments • Penalties of corruption aren't stiff • Policies not enforced 	<ul style="list-style-type: none"> • Public awareness Barazas
Vihiga	<ul style="list-style-type: none"> • Procurement Process • Employment 	<ul style="list-style-type: none"> • Poor Roads Constructed • Bad Image of the County 	<ul style="list-style-type: none"> • Lack of knowledge on what is a corrupt act • Policies not documented, inaccessible and thus not enforced • Non-sensitization and enforcement of laws. 	<ul style="list-style-type: none"> • Training • County procurement process so as to point out tendering errors
Bomet	<ul style="list-style-type: none"> • Conflict of interest in awarding of contracts • Fraud in finance i.e.: - • - Forgery of employment form • Forgery of vouchers • Employing people without interviews • Embezzlement of tea factory and youth funds • Contractors get contracts without due process • Bribery in recruitment of security officers 	<ul style="list-style-type: none"> • Nepotism in awarding of tenders • shoddy projects implemented • Budget deficits • Denial of public participation in project selection and budgeting process • Unequal distribution of resources • Unfair recruitment process • Supply of defective equipment 	<ul style="list-style-type: none"> • Lack of teamwork between the governor and MCA's • Political influence and interference • Increased nepotism • Fear of the governor thus end up accepting wrong budgets and using MCA's to award contracts 	<ul style="list-style-type: none"> • Capacity building • Staff recruitment • Procurement process • Encourage public participation • Decentralize EACC services • Public education on corruption and its consequences



County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Tans Nzoia	<ul style="list-style-type: none"> • Conflict of interest in awarding of tenders • Nepotism in employment • Shoddy road construction • Embezzlement of public funds and they end up purchasing personal vehicles 	<ul style="list-style-type: none"> • Hampering service delivery when public funds are embezzled • Less allocation of funds for development • No value for money • Ethnicity influence due to employment of people from the same tribe • Tribal discrimination at work place and use of mother tongue to gossip at work place 	<ul style="list-style-type: none"> • Lack of cooperation between EACC and County Government • Threats when you want to fight corruption • Failure of staff to comply to the laid laws on corruption • Corrupt leaders • Rigidity to change by staff 	<ul style="list-style-type: none"> • Training on anti-corruption measures • Recovery of grabbed Land • Systems review in HR, procurement and finance. • Recruitment process • Awarding of tenders to ensure contractor meet all requirement and fairness of the process
Kisumu	<ul style="list-style-type: none"> • In procurement there is:- • Favoritism • Clanism • Political influence in tendering • In employment we have:- • Favoritism & clanism • Political influence 	<ul style="list-style-type: none"> • Poor service delivery • Bad Image of the County • Entrenched clanism thus causing conflict 	<ul style="list-style-type: none"> • Corruption is viewed as a societal culture • A lot of clanism and favoritism among employees • Weak laws 	<ul style="list-style-type: none"> • Not Stated
Nyamira	<ul style="list-style-type: none"> • Theft of revenue as the collectors:- • fail to give receipts • forge receipts • Undercharge • Fail to collect revenue at all • In procurement :- • Documents disappear during tendering • Overcharging of services • Nepotism • Acquisition of substandard goods and services • Payments of meetings not attended 	<ul style="list-style-type: none"> • Loss of revenue due to undercharging and embezzlement of funds • Disparity in distribution of wealth due to nepotism • Ineffective service delivery due to embezzlement of resources • Diversion of resources to unintended use 	<ul style="list-style-type: none"> • Lack of awareness on corruption and ethics thus encouraging the vice • Lack of understanding of roles and functions by County employees- • Misuse of power to solicit for bribes • Public are not aware it is their right to receive services • Departments not fully established 	<ul style="list-style-type: none"> • Civic education to sensitize staff and public on effects of corruption • Procurement procedures • Project Implementation

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Nandi	<ul style="list-style-type: none"> • Shoddy project implementation due to interference by MCA's • Tendering process where one person is allowed to supply the County continuously • Conflict of interest in emkwen ward where MCA's oversee road construction instead of ward administrators 	<ul style="list-style-type: none"> • Conflict between MCA's and County wards over procurement irregularities • Poverty • Erosion of accountability • Misuse of political powers • Authoritarian ruling 	<ul style="list-style-type: none"> • Political interference & moral decadence by MCA's • Inadequate resource allocation • Inadequate formulation and implementation of policies 	<ul style="list-style-type: none"> • Procurement i.e. in inspection of deliveries • Recruitment to curb bribery • System reviews
Kisii	<ul style="list-style-type: none"> • Shoddy road construction for faster payments • Political interference in recruitment • Corruption in quotations • In public health:- • Health workers selling drugs • Employees Receive payment for free services • MCA's allocating themselves land and reacquisition becomes politicized 	<ul style="list-style-type: none"> • Bribery in parking services • Reduction of County revenue as collectors fail to collect revenue 	<ul style="list-style-type: none"> • Misuse of power while making employment decisions • Limited funding to develop policies • Laws not adhered to 	<ul style="list-style-type: none"> • Administration of integrity and ethical conduct • Vetting of officers
Kakamega	<ul style="list-style-type: none"> • Goods of low quality are procured at exorbitant prices to ensure kickbacks are offered • Fraud in forging of cheques to ensure payment for non-existing goods or services • Poor building of bridges and culverts which are substandard • Bribery during award of contracts ranging from Kshs. 10,000 to 1 million depending on the magnitude of contract awarded 	<ul style="list-style-type: none"> • Leads to customer dissatisfaction • Loss of money by fraud • Limited funds allocation for development 	<ul style="list-style-type: none"> • Politicization of corruption cases • Blackmail of investigating officers 	<ul style="list-style-type: none"> • Recruitment • Formulation and execution of anti-corruption policies • Training on corruption and ethical conduct at work place
Kirinyaga	<ul style="list-style-type: none"> • Procurement process • Embezzlement of funds during project implementation 	<ul style="list-style-type: none"> • Misuse of public funds • Infringement of human rights • Abuse of office by public officers 	<ul style="list-style-type: none"> • Moral decay in society • Favoritism among service seekers 	<ul style="list-style-type: none"> • Not stated



County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Kirinyaga	<ul style="list-style-type: none"> Recruitment process where corrupt people get jobs Revenue collection in the finance Department is prone to bribery Bribery in procurement to award tenders between Kshs 15,000 to Kshs. 1 million 	<ul style="list-style-type: none"> Loss of quality services Substandard goods provided 	<ul style="list-style-type: none"> Management not familiar with Government procedures and systems No policy developed on anti-corruption initiatives 	<ul style="list-style-type: none"> Not stated
Taita Taveta	<ul style="list-style-type: none"> In lands Department hiring of surveying machines Favoritism in revenue collection 	<ul style="list-style-type: none"> Influencing decisions Reduced and delayed services Hiding of vouchers thus delaying service delivery or project implementation 	<ul style="list-style-type: none"> Intimidation when trying to fight the vice Unsupportive MCA's 	<ul style="list-style-type: none"> System reviews
Kilifi	<ul style="list-style-type: none"> MCA'S draw allowances not worked for in the finance Department MCA's influence recruitment process Conflict of interest in awarding tenders 	<ul style="list-style-type: none"> Loss of quality services 	<ul style="list-style-type: none"> No bills passed on anti-corruption 	<ul style="list-style-type: none"> Not stated
Mombasa	<ul style="list-style-type: none"> Bribery in procurement with amounts ranging from Kshs. 1,000 up to Kshs. 1 million 	<ul style="list-style-type: none"> Poor service delivery Low quality goods being supplied Loss of revenue 	<ul style="list-style-type: none"> No capacity to conduct corruption risk assessment No relevant policies or legislations in place 	<ul style="list-style-type: none"> Procurement and implementation of projects Capacity building on anti-corruption initiatives
Makueni	<ul style="list-style-type: none"> MCA's and manager interference in procurement Coercion of MCA's to pass bill in favor of the Government 	<ul style="list-style-type: none"> Influencing on contractors that win tenders Unqualified person contracted Substandard workmanship 	<ul style="list-style-type: none"> Lack of leadership commitment Organization structure doesn't support anti-corruption No policy on anti-corruption No legislative bills to support anti-corruption 	<ul style="list-style-type: none"> Staff recruitment Procurement System review Citizen participation

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Nairobi	<ul style="list-style-type: none"> Bribery in procurement process with amounts ranging from Kshs. 5,000 to Kshs. 500,000 	<ul style="list-style-type: none"> Loss of goods Shoddy jobs Misuse of County vehicles Delayed service delivery to the public 	<ul style="list-style-type: none"> Internal Audit reporting to finance instead of the County Assembly No Policy on anti-corruption No Legislation by MCA's 	<ul style="list-style-type: none"> System reviews of operations
Machakos	<ul style="list-style-type: none"> In Procurement: we have:- Bribery Undue influence In human Resource we have:- Undue influence 	<ul style="list-style-type: none"> Non provision of services Delivery of substandard goods Loss of revenue 	<ul style="list-style-type: none"> No Policy on anti-corruption No legislative bills to address anti-corruption 	<ul style="list-style-type: none"> Not Stated
Siaya	<ul style="list-style-type: none"> Preparation of bill of quantities during contracting of works and services is prone to corruption Unqualified staff in procurement Department 	<ul style="list-style-type: none"> Loss of money Delayed services Bad Image resulting in controller of budget not releasing funds Hindrance of public participation through concealing activities in the County offices Delayed release of funds by national Government 	<ul style="list-style-type: none"> Not Stated 	<ul style="list-style-type: none"> Training procurement staff on effects of corruption During recruitment
Busia	<ul style="list-style-type: none"> Procurement irregularities in tendering process 	<ul style="list-style-type: none"> Not Stated 	<ul style="list-style-type: none"> Political interference Investigations take long to be concluded 	<ul style="list-style-type: none"> Decentralize EACC to counties Recruitment Procurement committee Corruption prevention
Bungoma	<ul style="list-style-type: none"> Misappropriation of funds while funding imprests Payment of bribe to the finance Department before release of imprest e.g Ksh 10,000 for every imprest of Kshs. 100,000 Bid Rigging 	<ul style="list-style-type: none"> Under development in the County Resource waste Bribery result in poor workmanship Shoddy implementation of projects Poor roads constructed 	<ul style="list-style-type: none"> Fear of victimization when you report External influence of the evaluation committee Low literacy levels. 	<ul style="list-style-type: none"> Training System reviews especially in finance and procurement Department Recruitment of staff.



County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Elgeyo Marakwet	<ul style="list-style-type: none"> Public service board is characterized by:- Nepotism Unprocedural hiring of staff Procedures not followed during tendering In finance we have fraud, bribery and delayed payments to suppliers Shoddy project implementation due to lack of monitoring by public works 	<ul style="list-style-type: none"> Shoddily done buildings and bridges Delivery of substandard items Bias in recruitment of staff 	<ul style="list-style-type: none"> Greedy on some legislative members Inherited the rot from local authorities 	<ul style="list-style-type: none"> Policy development Train and create awareness on corruption Oversee the recruitment process Approve code of ethics
Isiolo	<ul style="list-style-type: none"> Fraud in the finance Department 	<ul style="list-style-type: none"> Underdevelopment Loss of trust by general public 	<ul style="list-style-type: none"> Ignorance Politicization of corruption 	<ul style="list-style-type: none"> Corruption prevention Public awareness
Narok	<ul style="list-style-type: none"> Lateness among 70% of the staff Misuse of County vehicles for personal gain In the Finance Department contractors offer bribes of up to Ksh 100,000 so that payment can be processed faster Side stepping of IFMIS so as to forge cheques Collusion between contractors and supervisors resulting in poor road construction Public Service Board get bribed and employ unqualified personnel 	<ul style="list-style-type: none"> Poorly done road network Loss of money through fraudulent dealings No value for money on projects implemented Poor service delivery to the public 	<ul style="list-style-type: none"> Corruption is a deep rooted culture Resistance while trying to fight the vice Lack of anti-corruption Policy Interference from the legislative arm to protect one of their own thus frustrating the Executive from fighting the vice 	<ul style="list-style-type: none"> To ensure CPC are working efficiently Recruitment process System review
Embu	<ul style="list-style-type: none"> Procurement of the stadium, water projects & roads Loss of funds in level 5 hospital in Embu Recruitment where there are no adverts nor interviews done (As per auditors report) Fraud where Kshs. 70 Million was lost in Finance and accounting Department Misappropriation of County Executive funds 	<ul style="list-style-type: none"> Poor service delivery Patients suffering in hospitals 	<ul style="list-style-type: none"> Those fighting the vices are bought cars to silence them Impeachment motion are interfered with by politicians The corrupt are rich and well-connected so no action is taken 	<ul style="list-style-type: none"> In Recruitment Procurement Given powers to prosecute

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Meru	<ul style="list-style-type: none"> • Car parking fees • Bribery of the Public service and administration in recruitment • Shoddy implementation of projects roads included 	<ul style="list-style-type: none"> • Dents public image • Loss of money and resources meant for development • Quality and standards of projects are compromised • Poor service delivery to citizens 	<ul style="list-style-type: none"> • Employees still learning procedures • Corruption is an acceptable culture • No funds allocated to fight the vice 	<ul style="list-style-type: none"> • Decentralize EACC services • Vet County public service board • Sensitizing of staff on the vice and regularly monitor County activities
Kitui	<ul style="list-style-type: none"> • Bribery in tendering process • Bribery in finance Department in allocation of allowances • Favoritism in allocation of plots by lands Department 	<ul style="list-style-type: none"> • Brings tribal differences • Poor quality goods 	<ul style="list-style-type: none"> • Resistance • Political interference 	<ul style="list-style-type: none"> • Training and sensitization of staff • Procurement • Recruitment
Tharaka Nithi	<ul style="list-style-type: none"> • Revenue collection • Tendering process is prone to favoritism, nepotism and political influence • Misappropriation of public funds 	<ul style="list-style-type: none"> • Misuse of public funds resulting in inadequate service delivery to the general public • Legal process take long resulting in public suffering 	<ul style="list-style-type: none"> • Corrupt leaders • Inherited systems and personnel with a culture of corruption • EACC lacks prosecutorial powers and is politically interfered with 	<ul style="list-style-type: none"> • System reviews • Regular sensitization of staff on corruption issues
Laikipia	<ul style="list-style-type: none"> • Tendering process is prone to bribery, • Procurement procedures aren't followed as stipulated in PPOA especially in recruitment of procurement staff • No receipts given nor automation on revenue collected 	<ul style="list-style-type: none"> • Increased gap between the rich and the poor • Tax evasion by the affluent in the society 	<ul style="list-style-type: none"> • No legislative framework to fight the vice • Corrupt top leaders 	<ul style="list-style-type: none"> • Initiate seminars • To educate public • Presence should be felt in the County
Nakuru	<ul style="list-style-type: none"> • Favoritism in awarding tender • Lands Department is prone to bribery, poor road construction and shoddy implementation of projects • Bribery in revenue collection e.g parking services 	<ul style="list-style-type: none"> • Shoddy project implementation • Misuse of public office • Poor service delivery • Poor image of the County 	<ul style="list-style-type: none"> • Bribery is a culture before service is delivered • No definite anti-corruption policy and legislative structures to fight the vice in the County 	<ul style="list-style-type: none"> • Undertake sensitization programmes

County	Forms of Corruption & Services prone to corruption	Consequences	Challenges faced	Type of partnership to establish with EACC
Kiambu	<ul style="list-style-type: none"> • Bid rigging and bribery in the tender process • Bribery in revenue collection i.e. in markets, license fees, parking fees • Nepotism and favoritism in recruitment • Bribery in the health sector 	<ul style="list-style-type: none"> • Revenue collection targets not being met due to undercharging and bribery • Jeopardizes devolved functions • Poor perception about County Governments 	<ul style="list-style-type: none"> • Corruption fights back thus people fear consequences after reporting • Powerful corruption networks making it hard to close loopholes 	<ul style="list-style-type: none"> • Staff training • Recruitment • Procurement procedures

3.1.4 Spread of Corruption

Respondents were asked to state how widespread corruption is among County employees. A majority, 61.4 percent, stated that only a few officials are involved in corruption. Fifteen per cent (15%) of the respondents reported that hardly any officials are involved in corruption while 10.2 per cent stated that most officials are involved in corruption (see Figure 2).

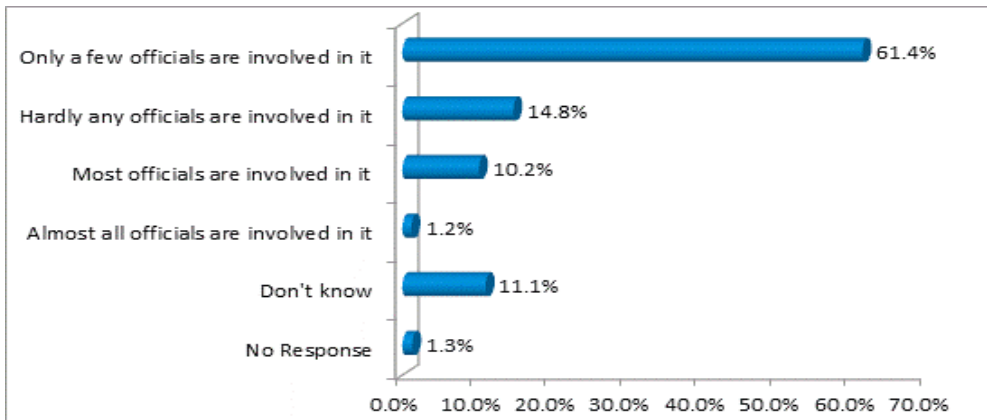


Figure 2: Spread of Corruption Among County Employees

Reasons why most County Officials are involved in Corruption

Respondents cited various reasons why most County officials are involved in corruption. The three most cited reasons included lack of transparency in service delivery, misuse of power by top officials and corruption being a culture. This is as reported by 26%, 21% and 9% of the respondents respectively. Other reasons are as presented in Figure 3.

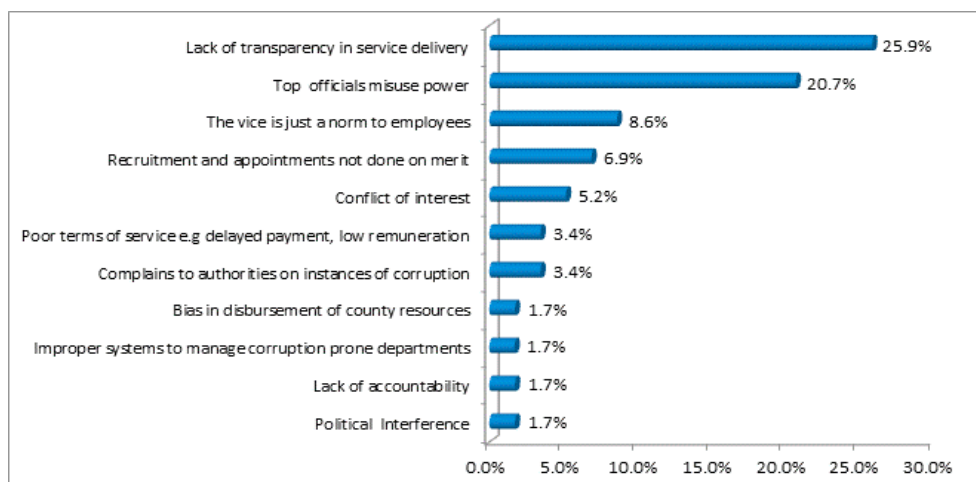


Figure 3: Reasons why County Officials are involved in Corruption

3.1.5 Reasons that lead to Corruption in County Governments

Greed for wealth, poor remuneration, unaffordable service and delay in service provision are the main reasons cited for corruption in County service delivery. This was reported by 40%, 31%, 10% and 9% of the respondents respectively. Other reasons cited in the Survey included low staff morale, lack of proper systems to curb corruption and lack of accountability among others as presented in Figure 4.

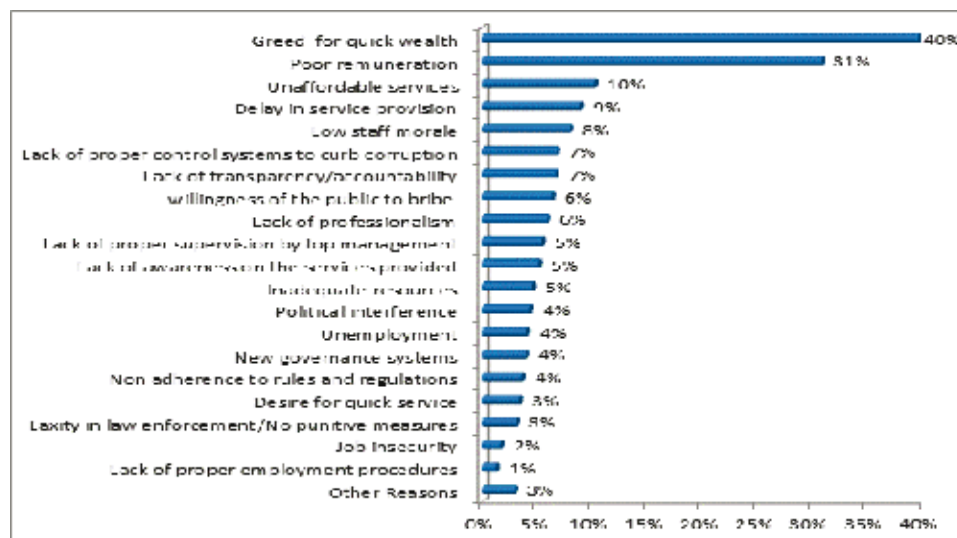


Figure 4: Reasons for Corruption in County Governments



3.2 County Government Departments and Service Areas Prone to Corruption

3.2.1 Prevalent Forms of Corruption in County Governments

Bribery (47%), favoritism (30%) and procurement irregularities (26%) are the three most prevalent forms of corruption in County Governments. Other forms of corruption include embezzlement of public funds, shoddy implementation of projects and abuse of office among others. This is as presented in Figure 5.

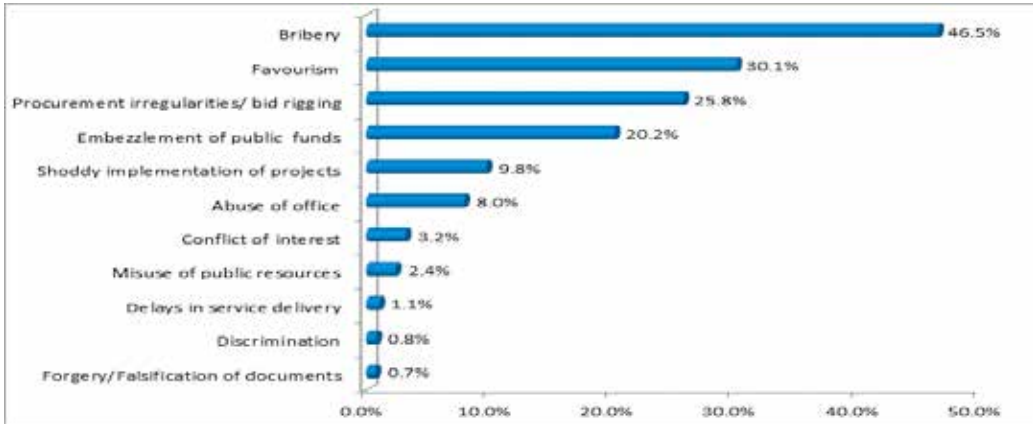


Figure 5: Prevalent Forms of Corruption in County Governments

3.2.2 Departments Most Prone to Corruption in County Governments

The Departments that are most prone to corruption include Procurement (30%), finance and economic planning (28%), Public service board (27%) and Roads public works and infrastructure (13%). Other departments are as presented in Figure 6.

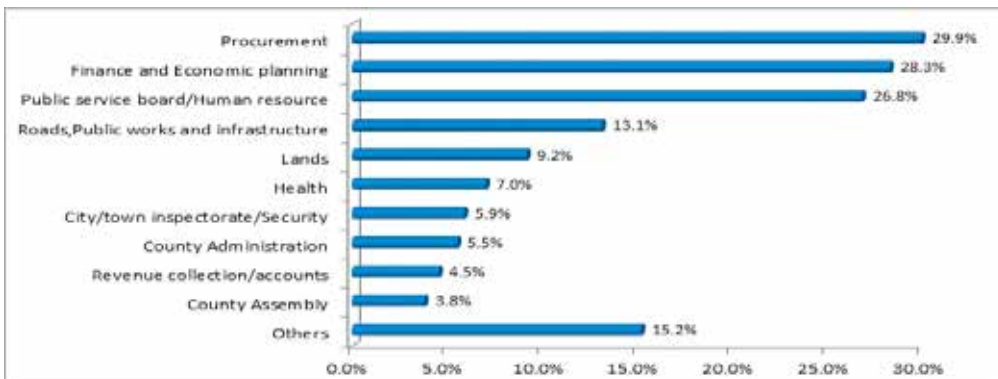


Figure 6: Department Most prone to Corruption in County Governments

3.2.3 Service Area Most Prone to Corruption in County Governments

The service areas perceived to be most prone to corruption include: Procurement process (46%), employment or promotion process (31%), allocation of funds (11%), revenue collection process (11%) and road construction and infrastructure development (11%). This is as presented in Figure 7

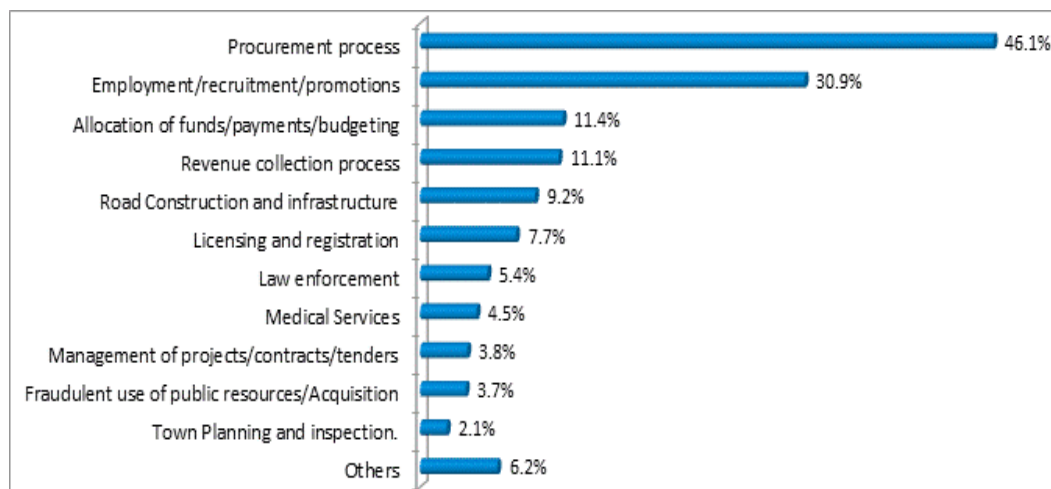


Figure 7: Service Areas Most Prone to Corruption in County Governments

3.2.4 Specific County Departments and Service Areas Most Prone to Corruption

Table 3 presents specific County Departments and services areas that are most prone to corruption and the prevalent forms of corruption in those service areas.



Table 3: County Departments and Service Areas Most prone to Corruption

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Kiambu	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ County Administration ✓ Procurement ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure Lands 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Revenue collection process, ✓ Procurement process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Abuse of office ✓ Embezzlement of funds
Kakamega	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Finance and Economic planning ✓ County Administration ✓ Roads, Public works and infrastructure ✓ Lands ✓ Health ✓ Revenue collection/accounts 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Procurement process, ✓ Allocation of funds ✓ Fraudulent use/ Acquisition of public resources ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds ✓ Abuse of office ✓ Shoddy implementation of projects
Nakuru	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board /Human resource ✓ Roads, Public works and infrastructure ✓ Lands ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Licensing and registration ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Embezzlement of funds

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Kilifi	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Public service board /Human resource ✓ Procurement ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Allocation of funds ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Embezzlement of funds
Mombasa	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Lands ✓ City/town inspectorate / Security 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds
Uasin Gishu	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Lands ✓ Procurement ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Licensing and registration 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Embezzlement of funds ✓ Procurement irregularities
Kisii	<ul style="list-style-type: none"> ✓ Procurement ✓ Public service board/Human resource ✓ Finance and Economic planning ✓ Revenue collection/accounts ✓ County Assembly 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Allocation of funds 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds



County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Trans Nzoia	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Finance and Economic planning ✓ Procurement ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Procurement process ✓ Allocation of funds ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Embezzlement of funds ✓ Favoritism ✓ Procurement irregularities ✓ Bribery
Kisumu	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ County Assembly ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Allocation of funds ✓ Employment/recruitment/promotions ✓ Revenue collection process ✓ Medical Services 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds
Nandi	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Finance and Economic planning ✓ County Administrators ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Road Construction and infrastructure ✓ Revenue collection process ✓ Management of projects 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Procurement irregularities ✓ Bribery ✓ Shoddy implementation of projects ✓ Embezzlement of funds
Kericho	<ul style="list-style-type: none"> ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Road Construction and infrastructure ✓ Allocation of funds 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Shoddy implementation of projects

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Kwale	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Lands 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds
Kajiado	<ul style="list-style-type: none"> ✓ Lands ✓ Procurement ✓ Finance and Economic planning ✓ Public service board/Human resource 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Licensing and registration ✓ Employment/recruitment/promotions ✓ Revenue collection process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Abuse of office
Nyeri	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ Lands ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Licensing and registration ✓ Revenue collection process ✓ Road Construction and infrastructure ✓ Employment/recruitment/promotions 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Embezzlement of funds ✓ Shoddy implementation of projects
Machakos	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Finance and Economic planning 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Procurement irregularities ✓ Embezzlement of funds



County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
West Pokot	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Finance and Economic planning 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Procurement process ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Procurement irregularities ✓ Bribery ✓ Embezzlement of funds ✓ Shoddy implementation of projects
Vihiga	<ul style="list-style-type: none"> ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Health ✓ Finance and Economic planning 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Road Construction and infrastructure ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Abuse of office
Taita Taveta	<ul style="list-style-type: none"> ✓ Procurement ✓ Public service board/Human resource 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Conflict of Interest ✓ Abuse of office
Laikipia	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ Lands ✓ Health ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Revenue collection process ✓ Licensing and registration ✓ Medical services 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Embezzlement of funds

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Nairobi	<ul style="list-style-type: none"> ✓ City/town inspectorate/Security ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Physical Planning 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Law enforcement ✓ Revenue Collection Process ✓ Town Planning and inspection. ✓ Employment/recruitment/promotions ✓ Licensing and registration ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Favoritism ✓ Abuse of office
Embu	<ul style="list-style-type: none"> ✓ Procurement ✓ Lands ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure ✓ City/town inspectorate/Security ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Road Construction and infrastructure ✓ Revenue Collection Process ✓ Licensing and registration 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Abuse of office ✓ Shoddy implementation of projects
Narok	<ul style="list-style-type: none"> ✓ Procurement ✓ Public service board/Human resource ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure ✓ County Administration 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Allocation of Funds ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds ✓ Bribery ✓ Shoddy implementation of projects ✓ Abuse of office
Makueni	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Finance and Economic planning ✓ Procurement ✓ Health ✓ City/town inspectorate/Security 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Law enforcement 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Shoddy implementation of projects



County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Bomet	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Procurement irregularities ✓ Embezzlement of funds ✓ Bribery ✓ Shoddy implementation of projects
Siaya	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Road Construction and infrastructure ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Shoddy implementation of projects ✓ Bribery ✓ Procurement irregularities ✓ Embezzlement of funds
Bungoma	<ul style="list-style-type: none"> ✓ Public service board/ Human resource ✓ Procurement ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Procurement process ✓ Road Construction and infrastructure ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Procurement irregularities ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Shoddy implementation of projects
HomaBay	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure ✓ County Assembly 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotions ✓ Procurement process ✓ Road Construction and infrastructure ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Isiolo	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure ✓ County Administration ✓ Lands 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Road Construction and infrastructure ✓ Allocation of Funds ✓ Employment/recruitment/promotions 	<ul style="list-style-type: none"> ✓ Bribery ✓ Favoritism ✓ Procurement irregularities ✓ Shoddy implementation of projects ✓ Abuse of office
Tharaka Nithi	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Embezzlement of funds
Meru	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Lands 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotions ✓ Licensing and registration 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism
Murang'a	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Procurement ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotion ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Procurement irregularities ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds
Kitui	<ul style="list-style-type: none"> ✓ Procurement ✓ Finance and Economic planning ✓ Public service board/Human resource ✓ Lands 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotion ✓ Road Construction and infrastructure ✓ Allocation of Funds ✓ Revenue Collection Process 	<ul style="list-style-type: none"> ✓ Bribery ✓ Procurement irregularities ✓ Favoritism ✓ Embezzlement of funds ✓ Abuse of office



County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Kirinyaga	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Procurement ✓ Public service board/Human resource ✓ Lands ✓ Health 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotion ✓ Licensing and registration 	<ul style="list-style-type: none"> ✓ Procurement irregularities ✓ Bribery ✓ Embezzlement of funds ✓ Favoritism
Busia	<ul style="list-style-type: none"> ✓ Finance and Economic planning ✓ Roads, Public works and infrastructure ✓ Procurement ✓ Public service board/Human resource 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Employment/recruitment/promotion ✓ Allocation of Funds ✓ Revenue Collection Process ✓ Road Construction and infrastructure 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Embezzlement of funds ✓ Procurement irregularities ✓ Shoddy implementation of projects
Baringo	<ul style="list-style-type: none"> ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Public service board/Human resource 	<ul style="list-style-type: none"> ✓ Procurement process ✓ Road Construction and infrastructure ✓ Employment/recruitment/promotion ✓ Management of projects ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Shoddy implementation of projects ✓ Favoritism ✓ Procurement irregularities ✓ Bribery ✓ Embezzlement of funds
Elgeyo Marakwet	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Procurement ✓ Roads, Public works and infrastructure ✓ Finance and Economic planning 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotion ✓ Procurement process ✓ Road Construction and infrastructure ✓ Allocation of Funds 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Procurement irregularities ✓ Bribery ✓ Shoddy implementation of projects ✓ Embezzlement of funds

County	Department	Service Areas Most prone to Corruption	Prevalent Forms of Corruption
Nyandarua	<ul style="list-style-type: none"> ✓ Public service board/Human resource ✓ Finance and Economic planning ✓ Procurement ✓ Roads, Public works and infrastructure 	<ul style="list-style-type: none"> ✓ Employment/recruitment/promotion ✓ Procurement process ✓ Revenue Collection Process ✓ Management of projects 	<ul style="list-style-type: none"> ✓ Favoritism ✓ Bribery ✓ Procurement irregularities ✓ Embezzlement of funds ✓ Shoddy implementation of projects

3.3 Bribery as the Most Prevalent Form of Corruption in County Governments

3.3.1 Incidence of Bribery

Respondents in the Survey were asked if they had witnessed County employees receiving bribes so as to deliver particular services. Six percent (6%) of the respondents reported to have witnessed employees receiving bribes while a majority, (93%), reported not to have witnessed. This is as presented in Figure 8.

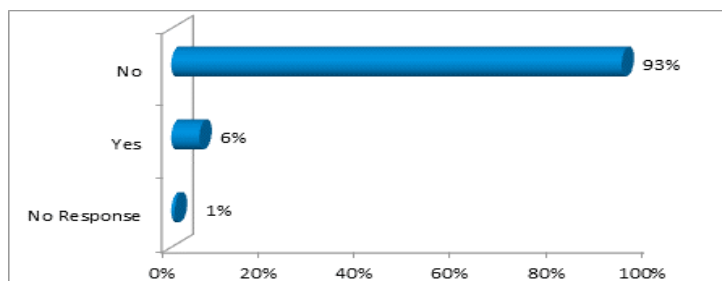


Figure 8: Witness on Incidence of Bribery by County Employees



3.3.2 Average Size of Bribe in Service Delivery

Six percent of the respondents who had reported to have witnessed County employees receiving bribes, the Report indicates that on average, County employees received the largest amount of bribe in Roads and public works services amounting to Ksh. 150,000 followed by housing and building services at an average amount of Kshs. 113,750, recruitment at Kshs. 112,275 and procurement processes at Kshs. 107,059 respectively. This is as presented in Table 4.

Table 4: Average Size of Bribe in Service Delivery Points

S/NO.	County Service/Process	Average bribe size (Kshs)
1	Roads and Public Works Construction Process	150,000
2	Housing and Building Services	113,750
3	Recruitment	112,275
4	Procurement	107,059
5	Remuneration And Human Resource Service	43,250
6	Issuing of Tittle Deeds	32,100
7	Inspection Services	20,188
8	Licensing	20,143
9	Transportation And Traffic Control Services	15,750
10	Health Services	14,992
11	Requisition And Processing of Imprest.	10,333
12	Revenue Collection	10,076
13	Water Supply	2,400
14	Parking Services	1,900

3.3.3 Reasons for Asking/Accepting Bribes

When asked why County employees ask or accept bribes, 31% of the respondents said they did so because of poor remuneration. Twenty three percent (23%) said it was lack of professional ethics while 16% of the respondents reported that bribery before service delivery is a culture. Other reasons cited are as presented in Figure 9.

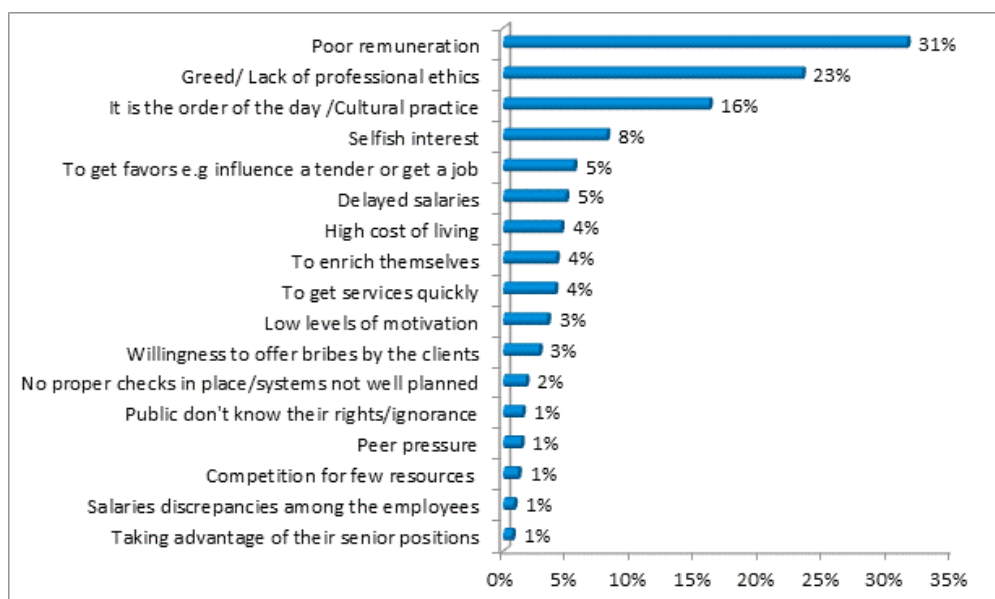


Figure 9: Reasons for Asking/Accepting Bribes

3.4 Anti-Corruption Initiatives in County Government

3.4.1 Awareness on Anti-Corruption Initiatives Established in Counties

Respondents were asked of the measures they were aware of that have been put in place to fight corruption in the County Governments. Most of the respondents (55.5%) said that they had established vigilant committee to oversee the fight against corruption. Other initiatives cited included training and sensitization of staff on corruption issues (36.9%), automated revenue collection systems (18.6%) and availing corruption reporting systems like corruption reporting boxes (18.2%) among others. Other measures are outlined in Figure 10. However, it is worth noting that 19.3% were not aware of anti-corruption initiatives established in the counties.

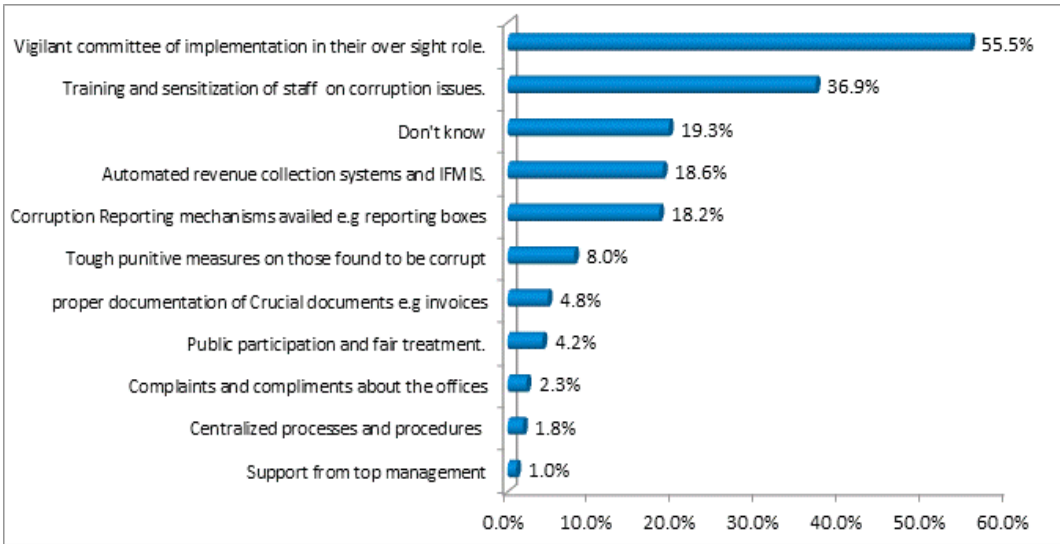


Figure 10: Awareness of Anti-Corruption Initiatives Established in County Governments

3.4.2 Sensitization on Anti-Corruption Initiatives in County Government

Respondents were asked if they had been sensitized on the various anti-corruption initiatives in their institutions. As noted in Figure 11, most of the respondents have been sensitized on issues of integrity at work place, they have a code of ethics in place and are also aware of corruption risk areas in their institutions. This is as reported by 59%, 61% and 58% of the respondents respectively. However, a majority of the respondents reported not to have established various anti-corruption initiatives. These include a whistle blowing channel, ICT based corruption reporting box, conflict of interest declaration box, gift declaration register, corruption prevention plan, Integrity Assurance Officers and Corruption prevention Committee. This is as reported by over six out of ten respondents in the Survey.

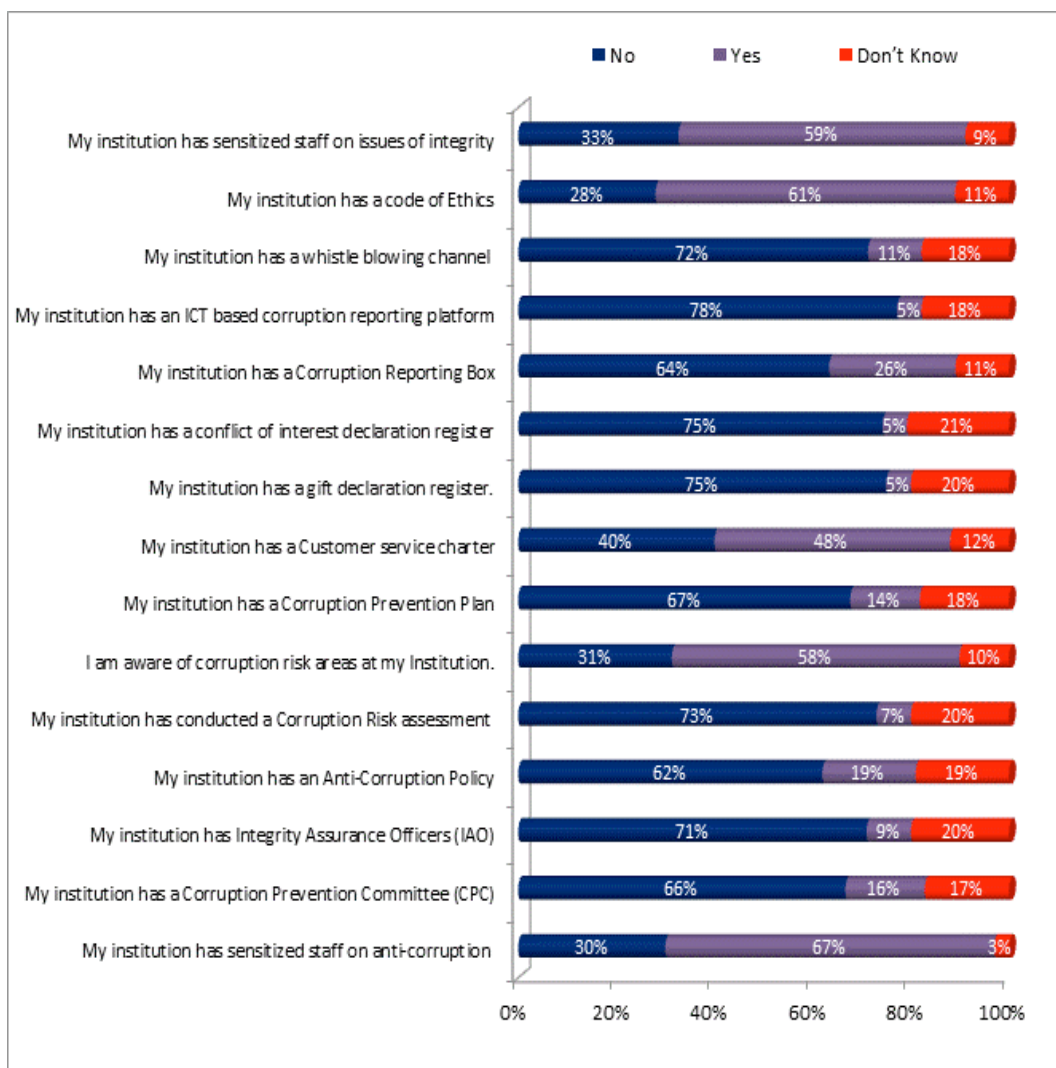


Figure 11: Sensitization on Anti-Corruption Initiatives Established in Counties

3.4.3 Effectiveness of Anti-Corruption Initiatives in County Government

Respondents were asked if the various anti-corruption initiatives in County Governments were effective. However, it is worth noting that over 60 per cent of the respondents reported the initiatives not to be present in their respective institutions. These initiatives included whistle blowers protection policy, corruption reporting box, a conflict of interest declaration register, gifts declaration registers, corruption prevention plan, corruption risk assessment, anticorruption policy, Integrity Assurance Officers (IAOs) and a corruption prevention committee. Figure 12 presents the findings on effectiveness of other anti-corruption initiatives.

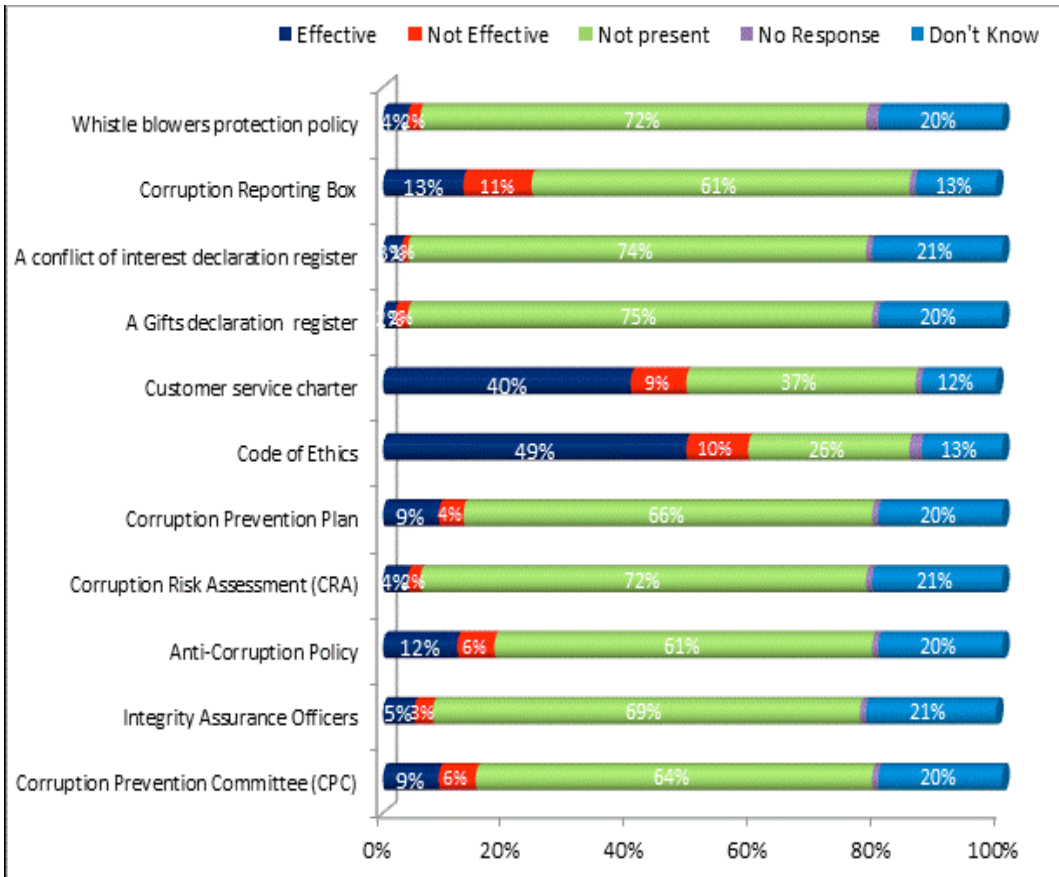


Figure 12: Effectiveness of Anti-Corruption Initiatives in Counties

3.5 Challenges in Fighting Corruption in County Governments

3.5.1 Challenges Encountered in Fighting Corruption in Counties

Fear of victimization, lack of proper organizational structure and corruption being a culture are the three major challenges cited by respondents that they face in an attempt to fight corruption in County Governments. This is as reported by 60.2%, 28.7% and 18.1% respectively. Other challenges are as presented in Figure 13 below.

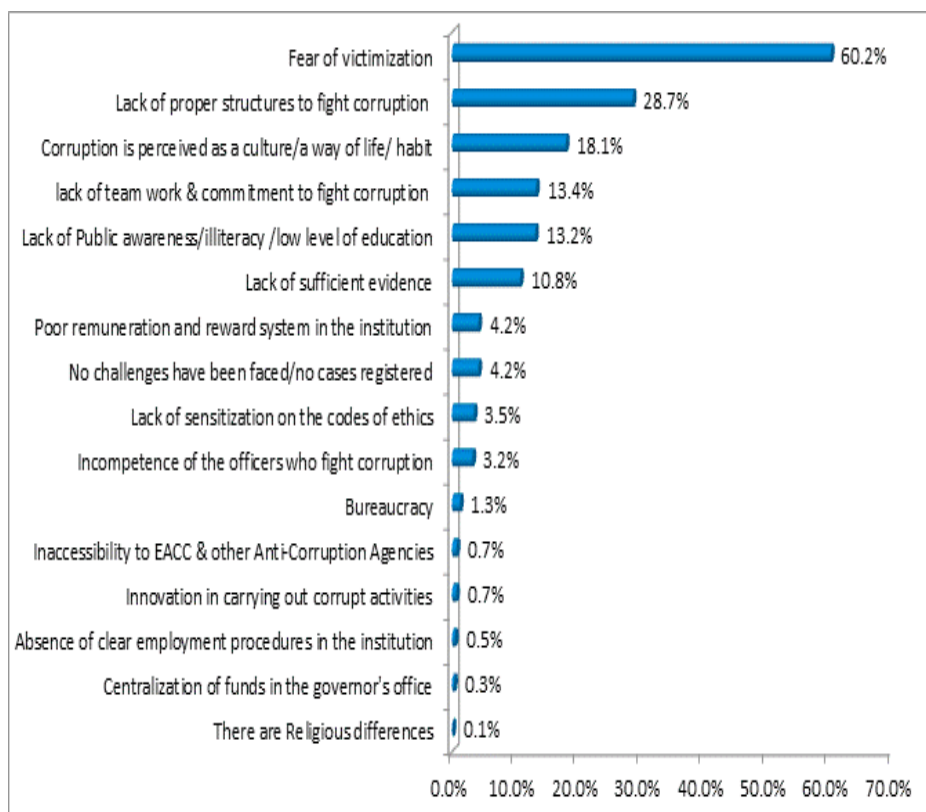


Figure 13: Challenges Encountered in Fighting Corruption in Counties

3.6 Suggestions on what needs to Change to Enhance the Fight against Corruption

3.6.1 Suggestions on Changes to be Implemented to Enhance the Fight against Corruption

To enhance the fight against corruption there is need for public awareness about the vice, improved remuneration and working conditions for County employees and decentralization of powers, resources and Departments. This is as reported by 33.6%, 22% and 14.1% respectively. Other suggestions are as reported in Figure 14.

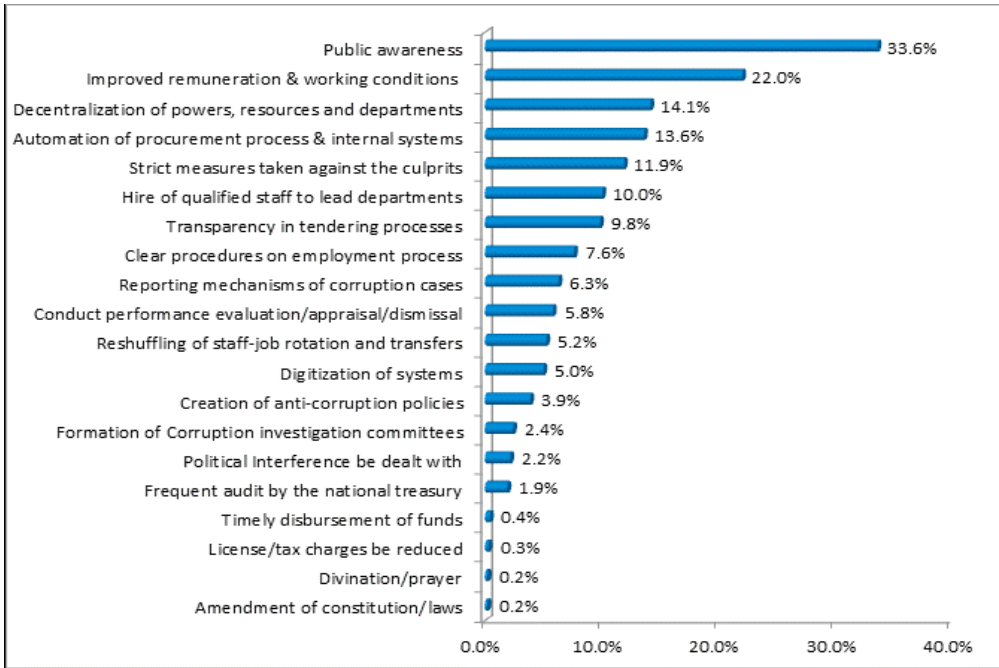


Figure 14: Suggestions to Enhance the Fight against Corruption in Counties

3.7 Awareness of Ethics by County Public officers

3.7.1 Awareness of the Law that Regulates Ethics in Public Service

Most of the respondents (55%) reported to be aware of the laws that regulate ethics in the public service compared to 45 per cent who reported not to be aware. This is as presented in Figure 15.

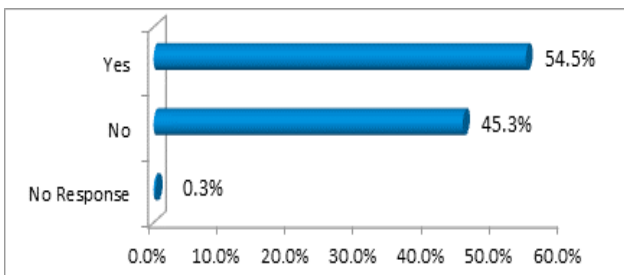


Figure 15: Awareness of the Laws that Regulate Ethics in Public Service

Respondents mentioned various laws that regulate ethics in public service. The three most mentioned laws include constitution of Kenya 2010, Public Officers Ethics Act 2003 and Leadership and Integrity Act. This is as cited by 41%, 21.4% and 13.5% of the respondents respectively (See Figure 16).

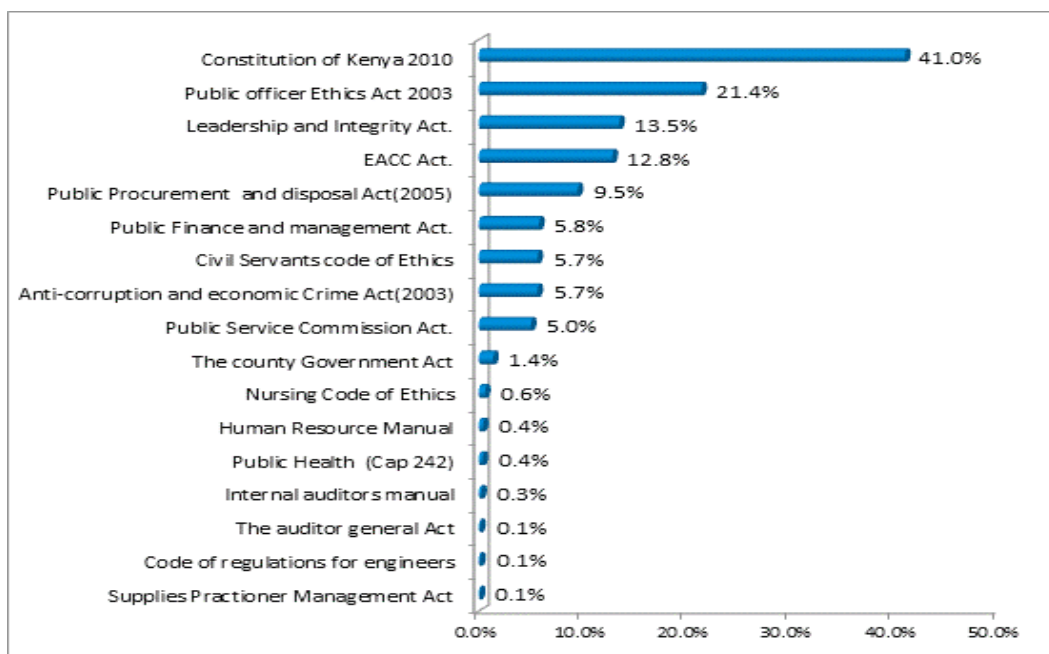


Figure 16: Laws that Regulate Ethics in the Public Service

3.7.2 Presence of an Institutional Code of Conduct

A majority of the respondents (59%) reported to have a code of ethics in their institution while 30.9 per cent reported not to have. However, 10% did not know whether their institution had a code of ethics.

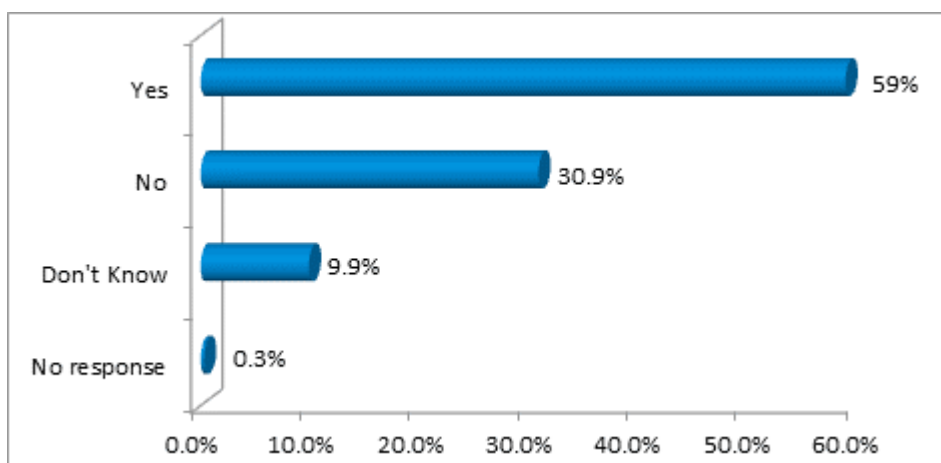


Figure 17: Presence of Institutional Code of Conduct



Respondents were asked to state what is included in the code. A majority 74.5% stated values and principles followed by guiding principles of behavior and conduct at 71.1% and specific rules of conduct at 68.7% respectively. Other inclusions are presented in Figure 18.

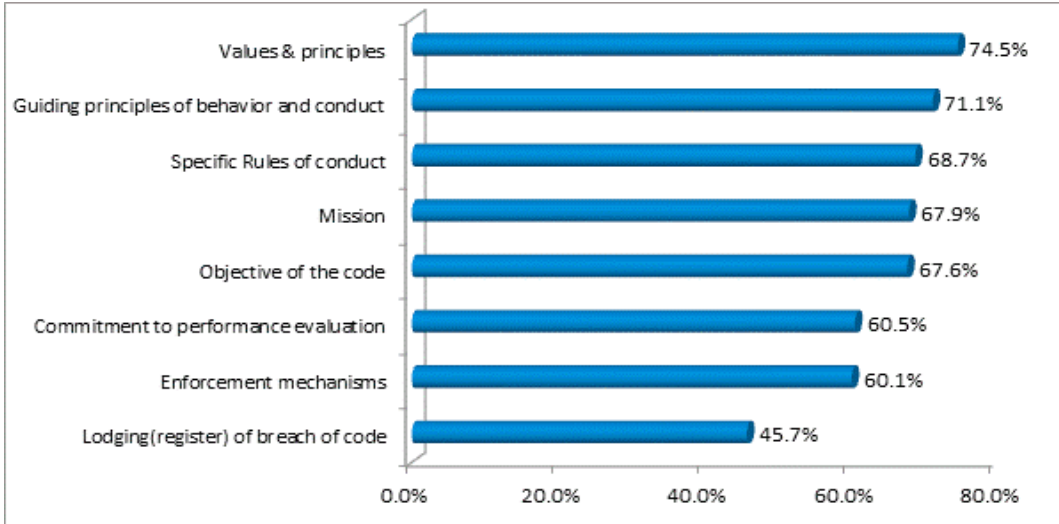


Figure 18: Content in the Code of Ethics

3.7.3 Department Charged with Responsibility of Enforcing the Code in Counties

Human Resource Department, Administration and Public Service board are the three Departments that are mostly charged with the responsibility of enforcing the code of ethics in County Governments. Other Departments include County secretary's office, heads of various Departments and investigations Department among others. This is as presented in Figure 19.

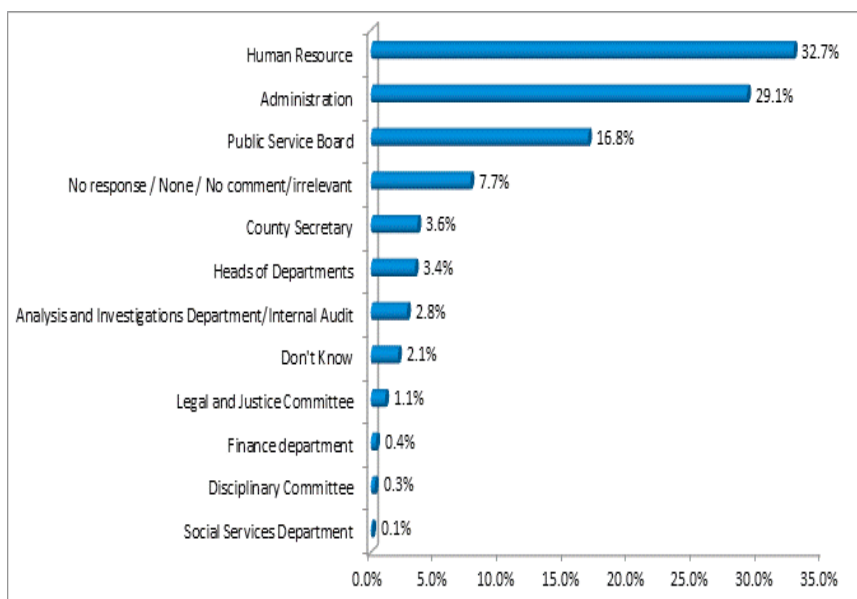


Figure 19: Departments Assigned the Responsibility of Enforcing the Code of Conduct

3.7.4 Whether Respondents Had Signed a Code of Conduct Commitment Form

Respondents were asked if they have signed a code of conduct commitment form. Most of them (56.1%) reported to have signed while a significant number (43.2%) reported not to have signed the commitment form. This is as presented in Figure 20

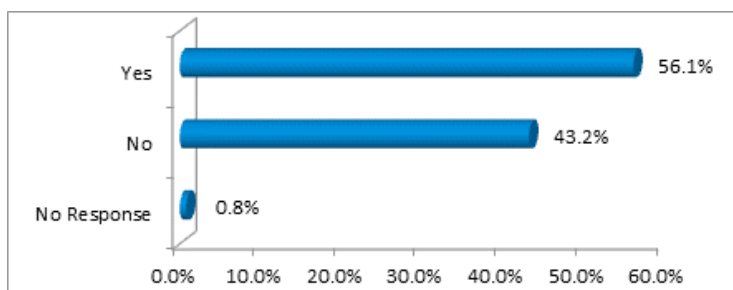


Figure 20: Respondents Who Have Signed a Code of Conduct Commitment Form

Reasons Cited not signing the Code of Conduct Commitment Form

The major reason for not signing the code of conduct commitment form as cited by respondents was that the form has not been availed to them. This is as reported by (67.5%) of the respondents. Other reasons included lack of awareness on the existence of the form, others signed it under the national Government and the form



was not issued to them after the services they were offering were devolved. This is as reported by 16.3%, 1.7% and 0.6% of the respondents respectively (See Figure 21).

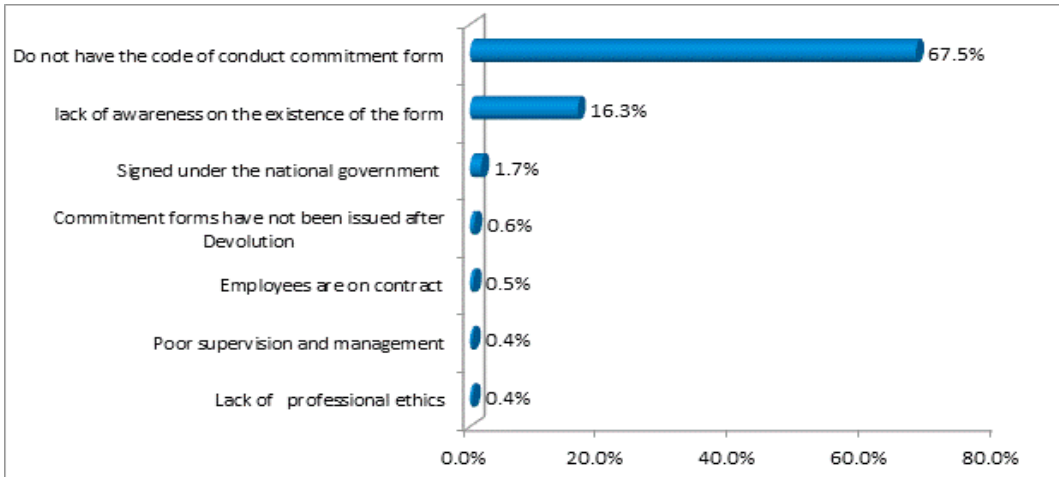


Figure 21: Reasons Cited for Not Signing the Code of Conduct Commitment Form

3.8 Compliance with Code of Conduct

3.8.1 Compliance Level to Code of Conduct

A majority of public officials (65.9%) reported that most of the County employees comply with the code of conduct while 11.3% reported that all County employees comply with the code of conduct. Figure 22 presents perception on level of compliance to codes of conduct by respondents in County Government.

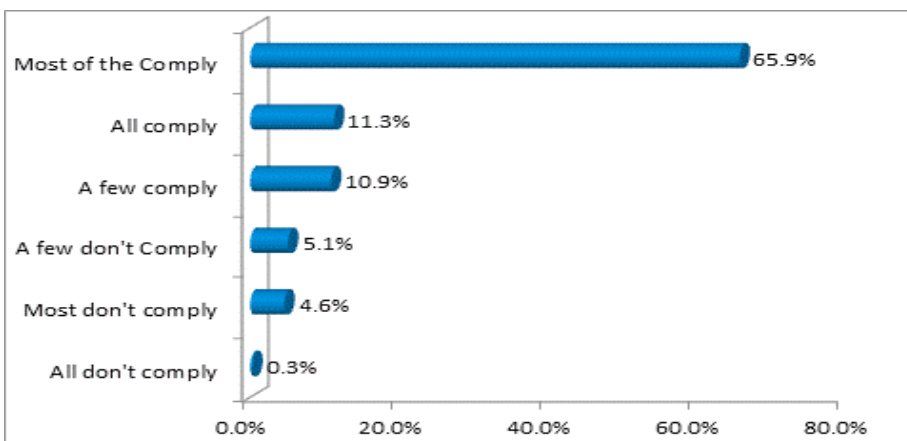


Figure 22: Level of Compliance to Code of Conduct

3.8.2 Witness on Violation of Code of Conduct by County Employees

Most of the respondents (80.1%) reported not to have witnessed violation of code of conduct while 18.3% reported to have witnessed a violation of code of conduct by County employees. The findings are presented in Figure 23.

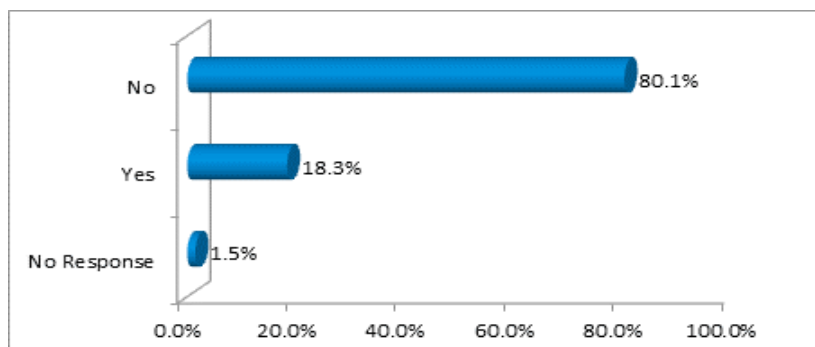


Figure 23: Witness on Violation of Code of Conduct

3.8.3 Prevalent Form of Misconduct Witnessed by County Employees

The common forms of misconduct witnessed in County Government offices include; Unprofessionalism, Lateness, Absenteeism and use of abusive behavior and language. This was as reported by 39.5 per cent, 21.4 per cent, 20.3 per cent and 14.9 per cent of the respondents respectively. Other forms of misconduct witnessed in County public offices are; embezzlement of funds, bribery, fraud, poor dressing and no adherence to laid down rules and procedures among others. Figure 24 presents forms of misconduct witnessed in public offices.

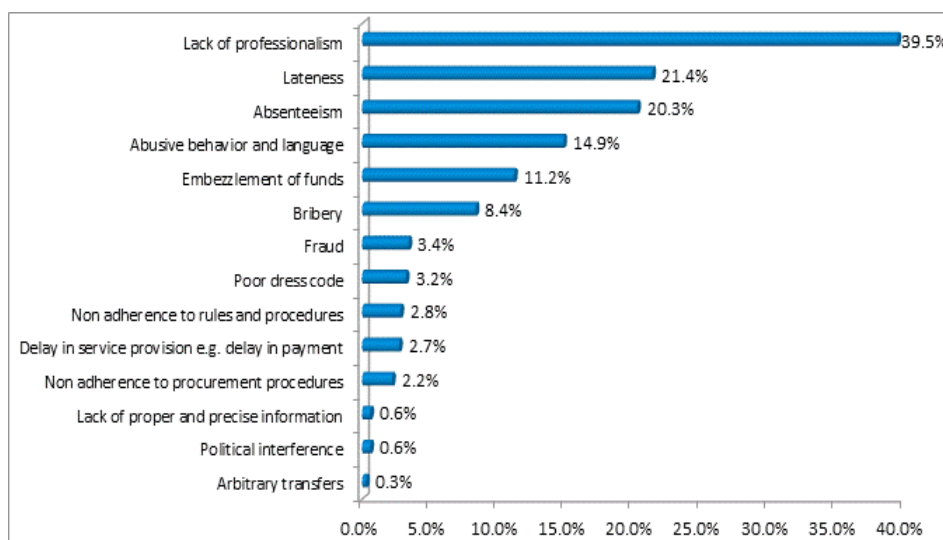


Figure 24: Prevalent Forms of Misconduct in County Offices



3.8.4 Service Areas Most Prone to Misconduct in Counties

Extension services, Administrative services, medical services and revenue collection are the four services areas most prone to unethical conduct among County employees. This is as cited by 37.5 per cent, 22.7 per cent, 10.3 per cent and 7.5 per cent respectively. Other service areas prone to unethical conduct are as presented in Figure 25.

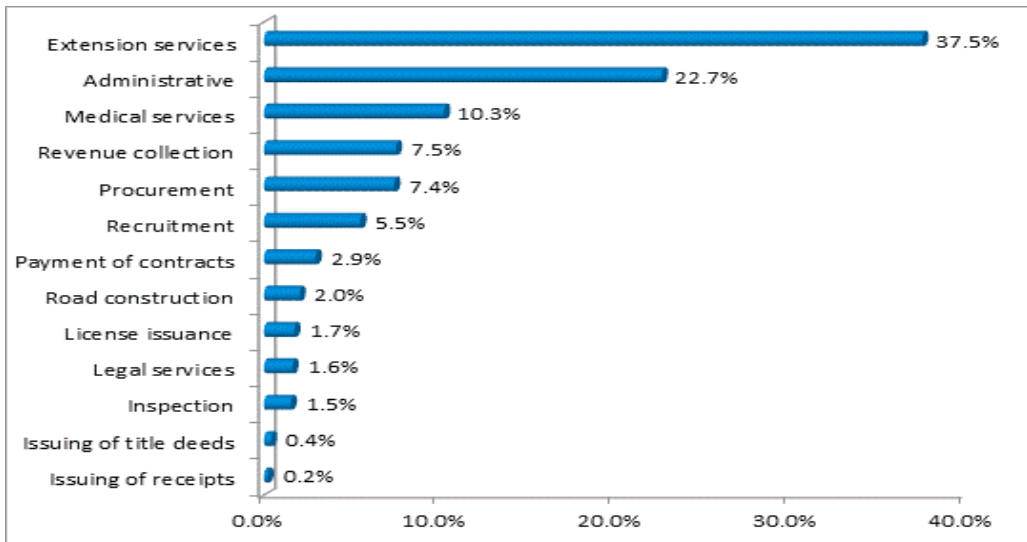


Figure 25: Service Areas Most Prone to Misconduct

Reasons for Unethical Conduct by County Employees

Ignorance on existence of code of conduct, culture, poor terms of employment and lack of professionalism are the major reasons cited for unethical behavior by County employees. This is as reported by 19.8 per cent, 19.7 per cent, 13.9 per cent and 10.2 per cent respectively. Figure 26 presents varied reasons in order of the most to the least mentioned reason.

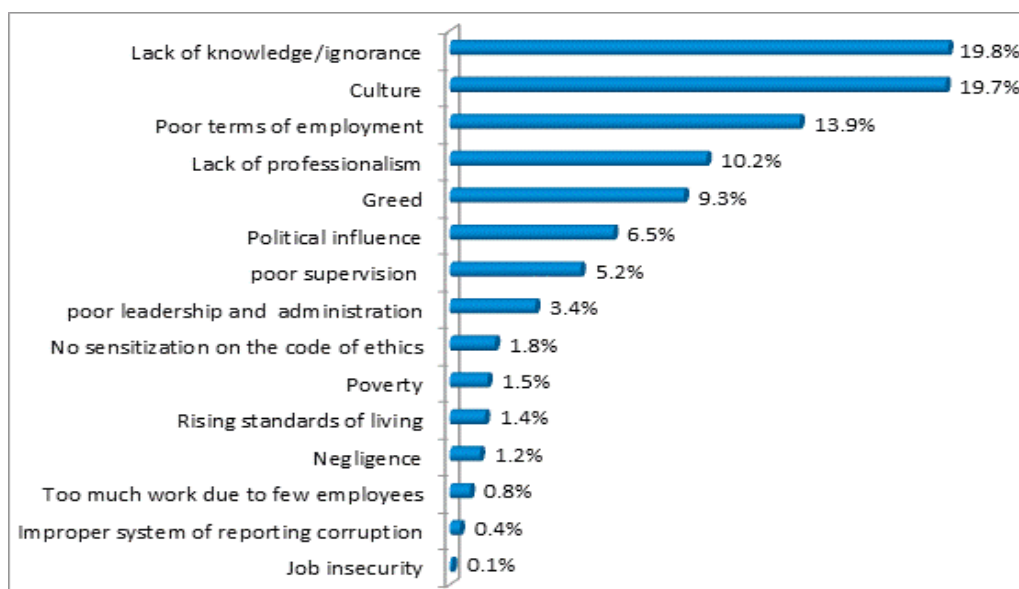


Figure 26: Reasons behind Unethical Behavior by County Employees

3.8.5 Challenges Encountered while Promoting Ethical Conduct Among County Staff

Unprofessionalism, poor remuneration, lack of financial facilitation for sensitization are the three key challenges facing the promotion of ethical conduct in County Governments. This was as reported by 37 per cent, 33.4 per cent and 20 per cent of the respondents respectively. Other challenges cited by respondents in the Survey include victimization of the people who report, weak enforcement of the codes by leaders in the County and political interference among others. This is as presented in Figure 27.

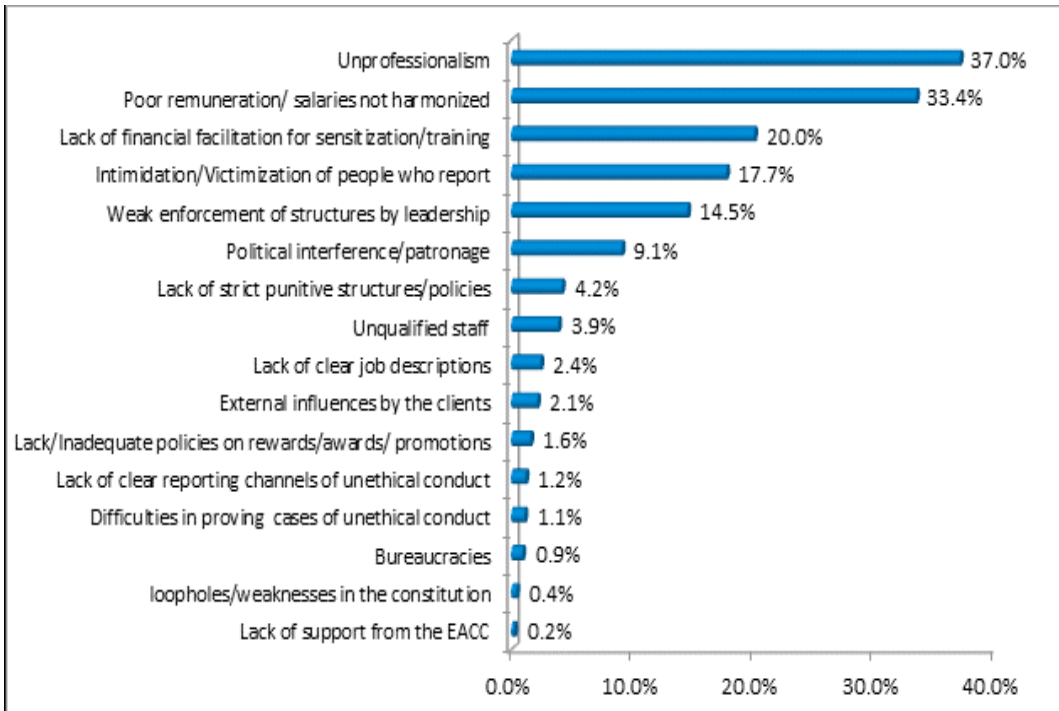


Figure 27: Challenges encountered in Promoting Ethics among County Employees

3.9 Effectiveness of the Commission

3.9.1 Awareness of EACC

Out of 4,965 respondents interviewed in the Survey, a majority, 95.1 per cent were aware of EACC. Investigation of Corruption cases and creation of awareness on corruption are the two services that most of the respondents are aware of. This was as reported by 95.5 per cent and 61.1 per cent of the respondents respectively (See Figures 28 and 29)

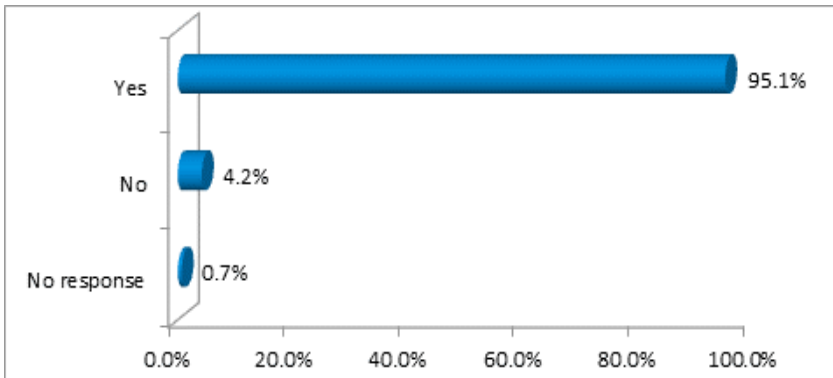


Figure 28: Awareness of EACC

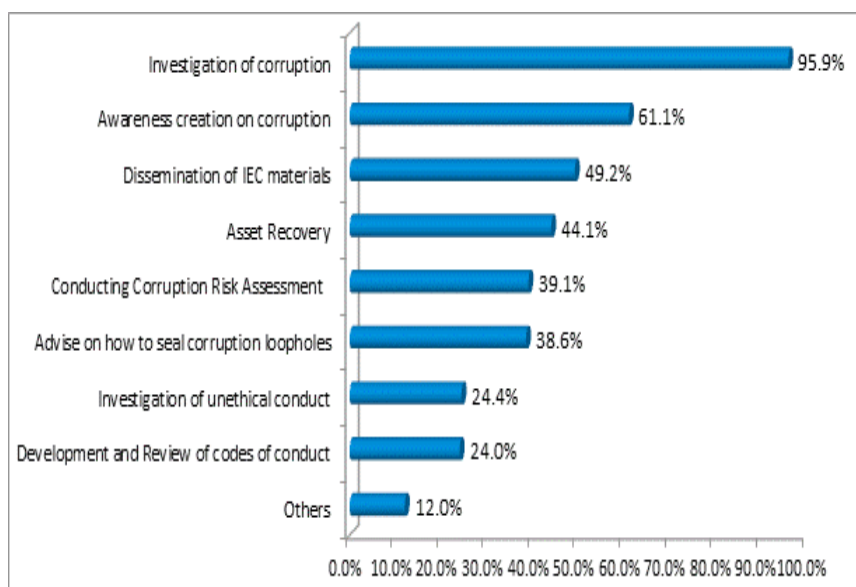


Figure 29: Level of Awareness of EACC Services

3.9.2 Utilization of EACC Services

The three services that most of the respondents reported to have utilized include awareness creation on corruption, dissemination of Information Education and Communication (IEC) materials and conducting of Corruption Risk Assessment (CRA) to identify corruption loopholes in various County institutions. This was as reported by 34.9%, 29.9% and 17.1% respectively. Other Commission services the respondents reported to have utilized are as presented in Figure 30.

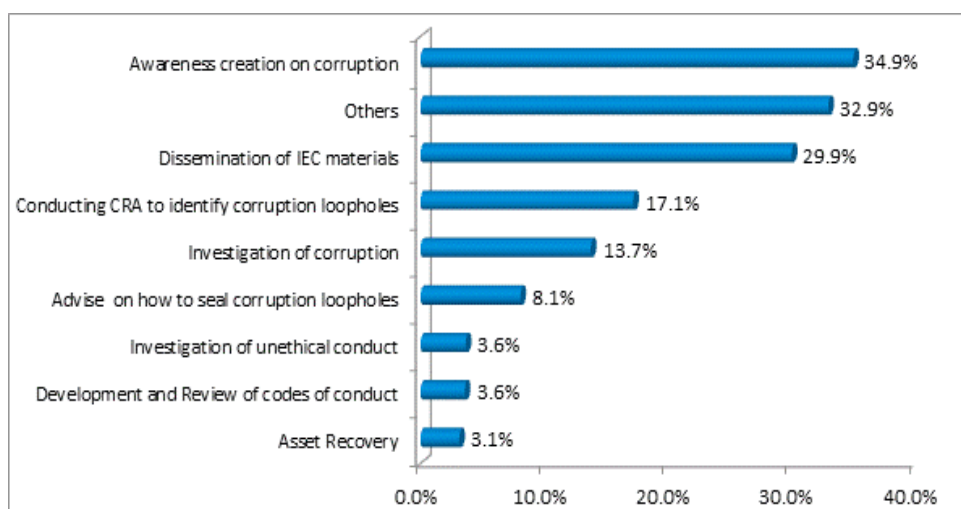


Figure 30: Level of Utilization of EACC Services

3.9.3 Effectiveness of the Commission in the Fight Against Corruption

Most respondents (56.4%) believe the Commission is effective in the fight against corruption. The three main reasons cited were: The Commission presence is felt, public asset have been recovered and the Commission has arrested and is investigating senior officials. This is as reported by 17.5%, 14.8% and 14.4% respectively. These findings are as presented in Figure 31 and Figure 32.

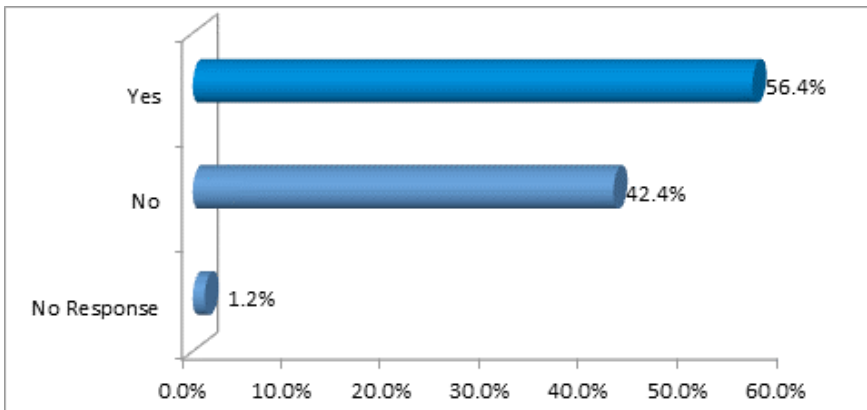


Figure 31: Effectiveness of EACC in the Fight against Corruption

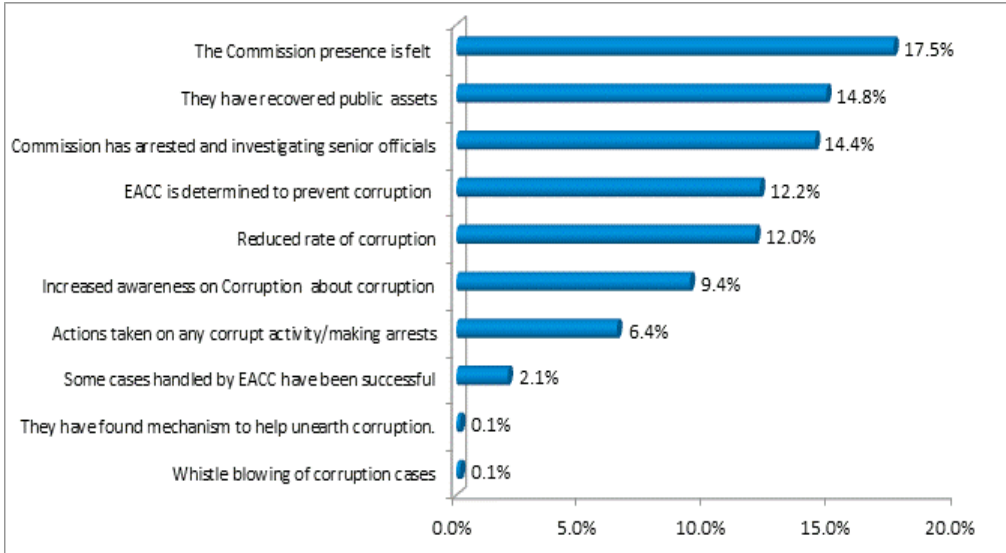


Figure 32: Reasons the Commission is Effective in the Fight against Corruption

Reason Cited Why the Commission is Ineffective

Incomplete corruption cases, inconclusive investigation and lack of prosecution for corrupt individuals are the three main reasons cited by respondents why the

Commission is ineffective in the fight against corruption. This is as reported by 16%, 13.3% and 12.9% of the respondents respectively (See Figure 33).

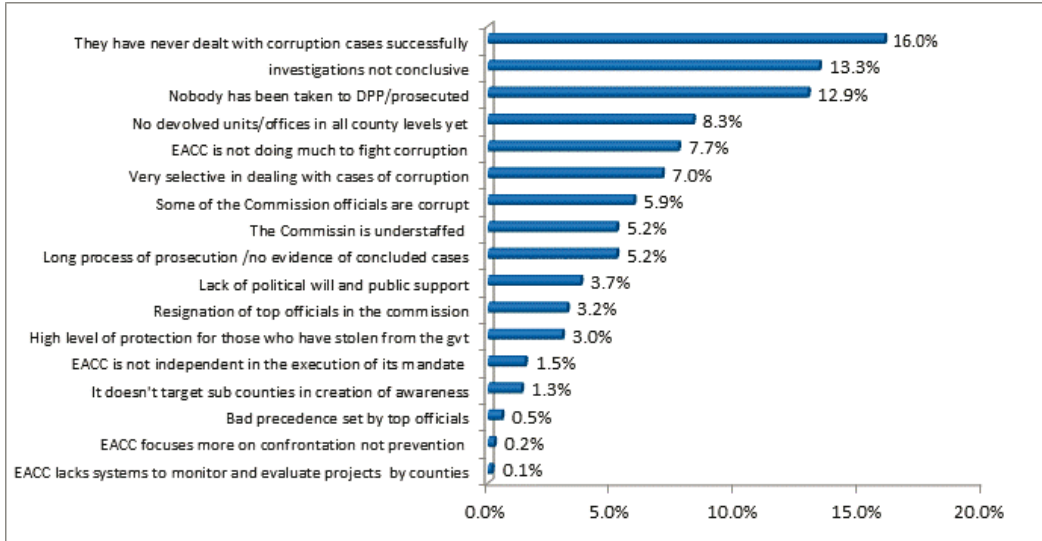


Figure 33: Reasons the Commission is Ineffective in the Fight against Corruption

3.9.4 Respondents Unmet Expectations by EACC

Response to alarms on corruption, inadequate awareness creation, slowness in investigation of cases and impartiality in service delivery were the key unmet expectations cited by County employees that need to be addressed by the Commission. This was as reported by 11%, 10%, 8% and 5% of the respondents respectively. This is as presented in Figure 34.

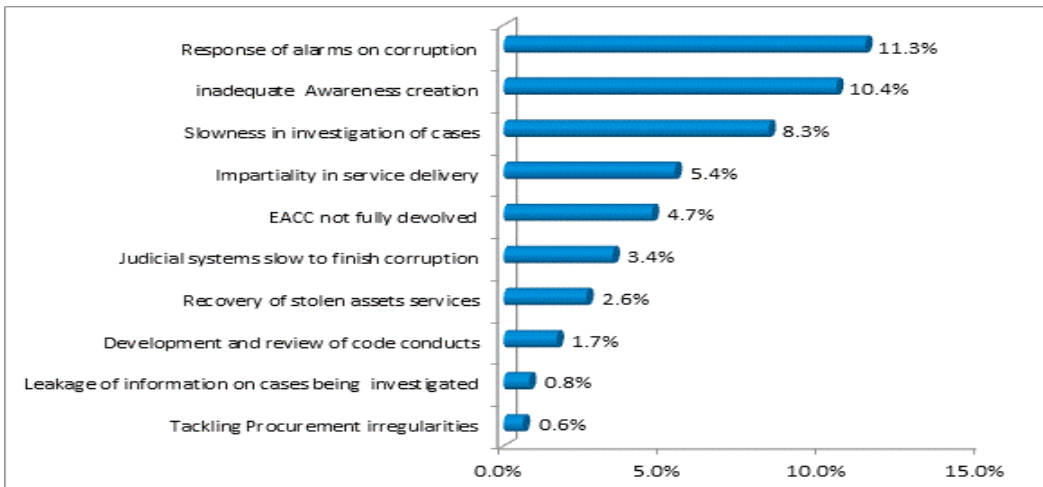


Figure 34: Respondents Unmet Expectation by the Commission

3.9.5 Suggestions to Combat Corruption

Enhanced public awareness, institutional reforms and decentralization of EACC services to all the counties were the key suggestions made to enhance the fight against corruption in County Governments. This was as reported by 58.5%, 47.1% and 30.8% of the respondents respectively. Other suggestions included tough penalties for corrupt persons, public officers' salary harmonization and increased transparency and accountability by County employees among others (See Figure 35).

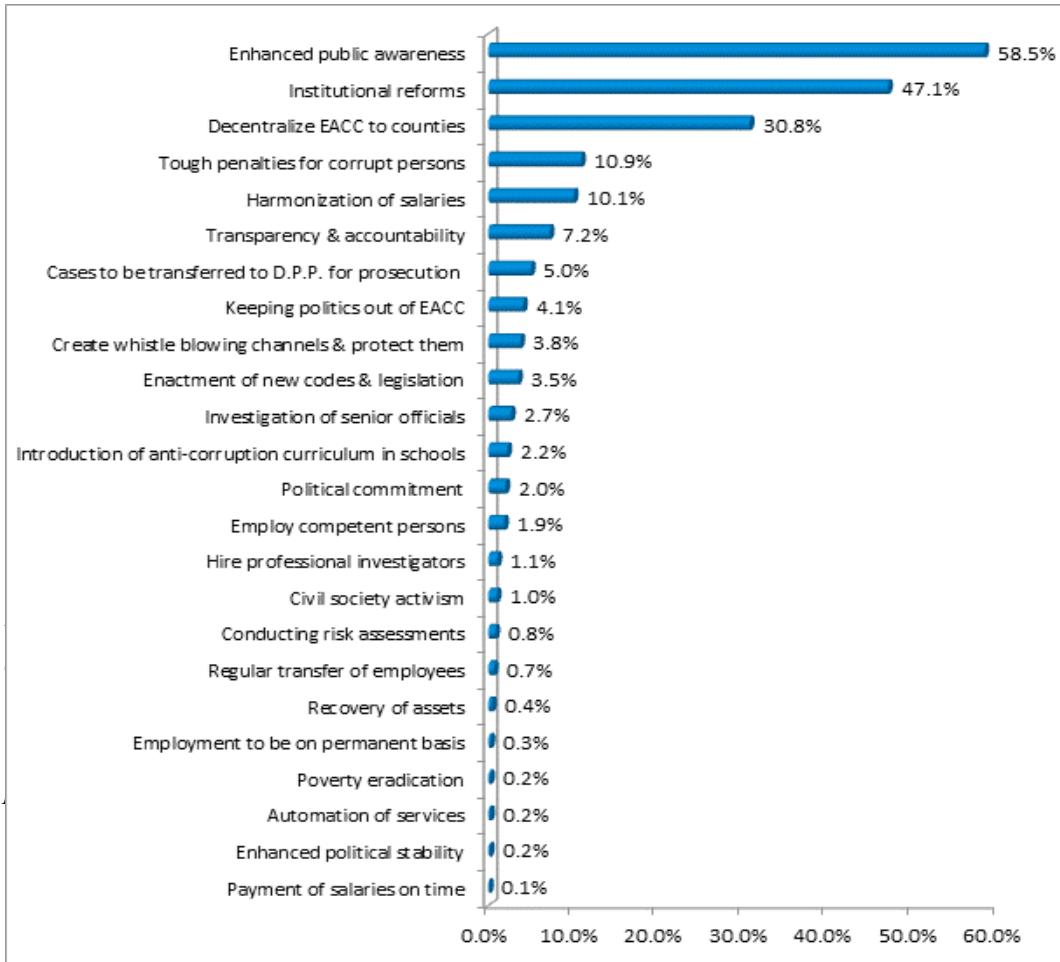


Figure 35: Suggestions on How to Improve Commissions Services

CHAPTER FOUR:

CONCLUSION AND RECOMMENDATIONS

This chapter summarizes the Survey findings, gives conclusions derived from the Study and finally comes up with recommendations based on these findings.

4.1 Conclusion

The Survey findings established that corruption is moderately high in County Governments due to increase in high profile cases involving corruption, increase in back door deals and lack of accountability on public funds.

The County Government Departments most prone to corruption include procurement, finance, public service board, roads and public works. The most prevalent forms of corruption include bribery, theft of revenue collected, procurement irregularities (bid rigging, inflation of prices, splitting of tenders to meet threshold, tampering with clients documents), favoritism and nepotism especially during recruitment, shoddy road and bridges construction and conflict of interest in awarding of County tenders and employment. County employees received the largest amount of bribe in roads and public works services followed by housing and building services, recruitment services and procurement processes respectively. Poor remuneration, lack of professional ethics and bribery being a culture were the main reasons cited for County employees asking or receiving bribes.

Corruption has resulted in County underdevelopment, poor service delivery at the counties, poor road construction, budget deficits, denial of public participation in project selection and budgeting process, unfair recruitment process, hampering service delivery as public funds are embezzled, widened gap between the rich and the poor and enormous loss of Government funds.

Most respondents reported to be aware of the anti-corruption initiatives established in County Governments and they had been sensitized about the same. However, when asked if the various anti-corruption initiatives were effective, over sixty per cent of the respondents reported that the anti-corruption initiatives were not present in their respective institutions. Fear of victimization, lack of proper organizational structure and corruption being a culture poses a great challenge in the fight against



corruption in County Governments.

A majority of County public officers reported to comply with the laid down code of conduct in their various institutions. Though not common, the most prevalent forms of misconduct witnessed in County Governments' offices include unprofessionalism, lateness, absenteeism and use of abusive language and behavior. Extension services, administrative services, medical services and revenue collection services are most prone to unethical conduct. Ignorance on existence of a code of conduct, culture, poor terms of employment and lack of professionalism are major reasons cited for unethical behavior by County employees.

Most respondents believe the Commission is effective in the fight against corruption since the Commission presence is felt, public assets have been recovered and the Commission has arrested and is investigation senior Government officials. For the few that believe the Commission is ineffective the reasons cited included inconclusive investigations and lack of prosecution for corrupt individuals. Response to alarms on corruption, inadequate awareness creation, slowness in investigation of cases and impartiality in service delivery were the key unmet expectations cited by County employees that need to be addressed by the Commission.

4.2 Recommendations

In this regard, the Study recommends the following:-

Develop and implement anti-bribery compliance policy

- i. There is need to develop and implement a clear and unambiguous anti-bribery compliance policy and ensure adequate training of County staff.
- ii. There is need to develop adequate systems, procedures and controls intended to prevent bribery and identify it when it occurs. This is critical in reducing incidence of bribery in County public service offering.
- iii. A top-down approach should be adopted to curb incidences of bribery. County Executives need to take responsibility for establishing a culture which makes it clear that bribery and corruption is unacceptable. These message needs to be communicated down to the lowest levels of the County Departments.

Enhance Public Participation in budgeting and project Implementation process

- i. County Governments should put a policy framework that will guide public participation forum so as to ensure that the public contributes effectively to the process of budget formulation. This will help in identifying budget priorities based on their felt needs. This will also give them an opportunity to make decisions and negotiate for tradeoffs in the budgeting process. This should also involve establishing a system of receiving and analyzing public views before and during the budget preparation process.
- ii. County Governments should strive to implement the views of the public that were shared in the budgeting process in order to sustain public trust.

Ensure Transparency and accountability in Public Procurement

- i. Procurement positions should be adequately remunerated to attract a well-qualified staff, while training and other avenues for career progression should be available
- ii. Procurement positions should be filled and duties assigned on the basis of abilities and not on family connection, political influence or on tribal lines
- iii. The following information should be made public except when the information is legally protected to ensure transparency in public procurement process:-
 - a) Activities prior initiating the contracting process e.g needs assessment, procurement plan and budget allocation
 - b) Tender opportunities, selection criteria
 - c) Key elements of bid evaluation process
 - d) The award decision and its justifications
 - e) The contracts including any amendments
 - f) Implementation, evaluation, oversight and auditors report
 - g) Dispute settlement mechanisms and procedures
- iv. Sanctions upon a determination of fraud, bribery or collusion should be effective, proportionate and dissuasive and include monetary and criminal penalties against companies and individuals. These should include confiscation of illicitly gained profits and debarment from tendering for a particular period of time. The Government should also respect the debarment list and information about the sanctions imposed should be publicly available.



- v. No bidders should be given access to privileged information at any stage of the contracting process, and bidding opportunities should be widely published
- vi. Open competitive bidding should be the norm for procurement above a certain value. This will ensure efficiency and avoid the difficulties inherent in selection the process on a case by case basis
- vii. The participation of civil society organizations as independent monitors overseeing all stages of procurements process should be promoted
- viii. A robust, independent and effective appeals process should be put in place for aggrieved bidders and accessible at any time during procurement process. The appeal process should not be time consuming or expensive and should be capable of suspending the procurement until judgment is made

Promote Fairness in recruitment Process

- i. All stages of recruitment process must be conducted impartially and objectively
- ii. Those involved in recruitment process must be accountable for their decisions and must ensure proper records are kept to support those decisions
- iii. Factors impacting on recruitment and selection decisions must be clear to those involved. The process by which decisions are made must be transparent while maintaining confidentiality in regard to individuals
- iv. Recruitment and selection practices must be carried out in accordance with relevant guidelines, codes and rules

Ensure Value for Money in Road construction and other infrastructure

- i. County Governments should conduct regular technical audits. This will improve fiduciary standards of the roads under construction and address weaknesses in the potential poor quality of the constructed roads or bridges. Financial audits should take place during each stage of the project cycle that is during the construction phase and at the completion of the built infrastructure. The County Government should then use the findings of the Report to drive improvements in the infrastructure under question.
- ii. County should embrace a Construction Sector Transparency initiative with the aim of addressing weaknesses in transparency and accountability within publicly financed construction projects. This should draw representatives from the Government, business community and civil society. The team will be liable

of disclosing information from each stage of the project cycle in a format that is accessible to all stakeholders. This will help stakeholders identify main issues in a project and then use the information to hold the procuring entity and the contractors accountable.

- iii. Community monitoring should be enhanced in both the procurement and construction process. This will be useful in mobilizing the public against corruption. This can be done by identifying incentives for communities to monitor the project and training community groups and other stakeholders to observe the progress of construction of small-scale infrastructure like County roads, bridges. Schools and hospitals

Enhance anti-corruption mechanisms

- i. The Commission needs to adopt a more intelligence led anti-corruption initiative to combat corruption and unethical conduct in the counties.
- ii. There is need for the Commission to partner with counties in various mentioned services areas so as to prevent corruption in counties. These areas include staff recruitment process, capacity building on anti-corruption initiatives, procurement process, system reviews to seal corruption loopholes, formulation and execution of anti-corruption policies. This is as per the request of various respondents in the Survey
- iii. Fear of victimization is the key challenge experienced by those who endeavor to support the fight against corruption in the counties. The Commission should thus develop and implement a whistle blowers protection policy to avoid them being victimized once they report corrupt activities in the County.



REFERENCES

Barret, C.B, Mude A.G. and Omiti J.M., 2007. Decentralization and the Social Economics of Development: Lessons from Kenya. Nairobi: CAB international

Commission for the Implementation of the Constitution, 2014: Assessment of the Implementation of the System of Devolved Government.

Constitution of Kenya, 2010.

Institute of Economic Affairs, 2010: Devolution in Kenya; Prospects, Challenges and the Future, IEA Research Paper Series No. 24, Nairobi. Kenya

Kipkorir, B. E. (2009). Descent from Cherangani Hills; memoirs of a reluctant academic, Macmillan, Kenya.

APPENDIX

Appendix 1: Distribution of Respondents by Counties

County	Total County Employees Interviewed
Nairobi	518
Kiambu	245
Kakamega	218
Nakuru	209
Kilifi	195
Machakos	189
Mombasa	165
Bungoma	164
Meru	164
Kitui	151
Makueni	150
Trans Nzoia	143
Kirinyaga	142
Kisii	138
Nyandarua	136
Kericho	131
Bomet	131
Uasin Gishu	128
Nandi	116
Kisumu	112
Kwale	111
Narok	110
Kajiado	107
Migori	100
Nyeri	93
West Pokot	90
HomaBay	90
Embu	85
Vihiga	74
Siaya	74
Baringo	73
Busia	65
Elgeyo Marakwet	64
Laikipia	59
Nyamira	59
Tharaka Nithi	56
Taita Taveta	48
Murang'a	37
Isiolo	25
Total	4965

