



## **GUIDELINE ON CORRUPTION RISK ASSESSMENT AND MANAGEMENT - INPUT FROM THE STAKEHOLDERS VALIDATION WORKSHOP**

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### **Introduction**

Section 9 (1) of the Anti-Bribery Act No.19 of 2023, requires every public and private entity to put in place procedures appropriate to its size, and the scale and the nature of its operations, for the prevention of bribery and corruption. When developing the procedures, the entities are required to assess and map out bribery and corruption risks and develop a Corruption mitigation plan.

In fulfilment of its responsibility under section 9(3) of the Anti-Bribery Act to assist public entities, private entities and any interested person to comply with the law, the Commission developed a draft Guideline for Corruption Risk Assessment and Management. In the month of November, 2024, the Commission invited stakeholders from both the private and public sectors to review and provide input/comments on the guideline. This culminated in an engagement and validation workshop that was held on 7<sup>th</sup> November, 2024 at Sarova Panafric, Nairobi (see Appendix I for the list of institutions that participated in the workshop).

During the workshop, it was agreed that:

- 1) Institutions to send additional input/comments to EACC.
- 2) The CRA guideline is to be shared with the stakeholders upon incorporating the input/comments.

The summary of inputs/comments received from stakeholders and action taken are provided in the template below:

**I. RESPONSES RECEIVED ON THE FLOOR DURING THE VALIDATION WORKSHOP**

<b>NO.</b>	<b>SECTION</b>	<b>SECTION</b>	<b>COMMENTS</b>	<b>PROPOSAL</b>	<b>INSTITUTION</b>	<b>ACTION TAKEN</b>
1.	-	Cover Page	Guidelines for Corruption Risk Assessment and Management for Public and Private Entities	A Practical Guide for Corruption Risk Assessment and Management by Public and Private Entities	EACC and State Law Office	Adopted
2.	-	Preface	Chief Executive Officer/Secretary	Secretary/Chief Executive Officer	EACC	Adopted
3.	-	List of Abbreviations	<ul style="list-style-type: none"> <li>• MDAC</li> <li>• UNDOC</li> <li>• UNCAC</li> <li>• GJLOS</li> </ul>	<ul style="list-style-type: none"> <li>• MDCA's - County Governments</li> <li>• UNODC</li> <li>• UNCAC (Nations)</li> <li>• GJLOS – (re-order)</li> </ul>	EACC	Adopted
4.	1.0	Introduction	Clause 1	Understanding Corruption - List of offences is not exhaustive – include Section 41 of ACECA	State Law Office	Adopted

NO.	SECTION	SECTION	COMMENTS	PROPOSAL	INSTITUTION	ACTION TAKEN
			Clause 1.3 Background to Corruption Prevention in Kenya	Consider revising Public Service Performance Management Unit (PSPMU) to Public Service Performance Management and Monitoring Unit (PSPMMU)	State Department for Public Service	Adopted
5.	2.0	Policy, Legal and Regulatory Framework for Corruption Prevention	<ul style="list-style-type: none"> <li>• Clause 2.0</li> <li>• Numbering Clause (d)</li> </ul>	<p>Policy - consider other strategic policy documents such as the Kenya Integrity Plan</p> <p>Revise numbering of clause d</p>	State Office Law	Adopted
6.	4.0	Corruption Risk Assessment and Management	<ul style="list-style-type: none"> <li>• Paragraph on Corruption Risk ...Management</li> </ul>	<ul style="list-style-type: none"> <li>• insert the word "Assessment" on paragraph 1.</li> </ul>	EACC	Inserted

NO.	SECTION	SECTION	COMMENTS	PROPOSAL	INSTITUTION	ACTION TAKEN
			<ul style="list-style-type: none"> <li>• Clause 4.1</li>   <li>• Clause 4.4</li> </ul>	<ul style="list-style-type: none"> <li>• Objective iv Consider revising it to Monitor &amp; Report on the implementation of the recommended strategies and measures.</li> <li>• The process does not recognize contributions by external agencies such as Transparency International, Office of the Auditor General among others that champion Good Governance. Their reports are critical in identifying loopholes.</li> </ul>	State Dept for Public Service	<p>Adopted</p> <p>Adopted. Included under step 4 under the steps for Corruption Risk and Management</p>
7.	5.0	Responsibility for Corruption Risk Management	<ul style="list-style-type: none"> <li>• Clause 6.0</li> </ul>	<ul style="list-style-type: none"> <li>• Under 6.0, consider numbering the various institutions and throughout the document</li>   <li>• Under the Entity, consider adding Maintenance of Risk Register among functions</li>   <li>• Under EACC, consider adding the follow up role on reports from institutions or the publics</li> </ul>	State Dept for Public Service	Adopted

<b>NO.</b>	<b>SECTION</b>	<b>SECTION</b>	<b>COMMENTS</b>	<b>PROPOSAL</b>	<b>INSTITUTION</b>	<b>ACTION TAKEN</b>
8.	6.0	Preparing for Corruption Risk Assessment and Management	<ul style="list-style-type: none"> <li>• Clause 6.0 Top Level commitment and oversight</li> <li>• Clause 6 (b)</li> </ul>	<ul style="list-style-type: none"> <li>• It should be clear what level of Leadership is being referred to.... Board Level, CEO/ Accounting Officer, Executive Management/ Directors</li> <li>• Overall Responsibility lies with top management i.e the Accounting Officer and the Executive Management. Implementation of CRA&amp;M can then be assigned to a senior executive.</li> </ul>	EACC	<p>Adopted.</p> <p>Top leadership defined in the glossary of terms</p>
9.	7.0	Steps for Corruption Risk Assessment and Management	<ul style="list-style-type: none"> <li>• Clause 8.0</li> </ul>	It should be noted that corruption risk assessment is just identifying risks related to corruption from the bigger risk assessment that organizations undertake. Thus, should be more of an enhancement as most organizations already have risks identified thus its more of singling out the corruption risks.	EACC	Noted. The Risk Assessment enhances Corruption Prevention.

NO.	SECTION	SECTION	COMMENTS	PROPOSAL	INSTITUTION	ACTION TAKEN
				Steps Risk Mitigation – Consider List General role Mitigation Measures – standardization, digitization of services, clear allocation of duties, mitigation measures that cut across	State Office Law	Adopted. See appendix ii
10	8.0	Monitoring Evaluation and Reporting	• Clause 9	<ul style="list-style-type: none"> <li>• Suggested –periodic review of bribe and corruption risks.</li> <li>• Include the aspect of “Learning”</li> </ul>	State Office Law  Transparency International (K)	Adopted under 8.0 (2)  Adopted under 8.0 (2)
11		Control mechanisms in an entity	Appendix ii	<ul style="list-style-type: none"> <li>• Include issues of Data Quality Assurance – DQA</li> </ul>	Transparency International (K)	Adopted under Appendix ii

## **Other comments from Plenary**

1. How do we ensure that counties develop their own CRA's, now that EACC is developing guidelines. How do we ensure implementation?

EACC will address this through technical support such as empowerment programs.

2. No mention of enforcement part being elaborated in terms of timelines i.e. encouraging institutions to develop their own CRA's.

Addressed under Section 8; Monitoring, Evaluation, Reporting and Learning.

EACC may conduct spot checks to assess the progress made on the implementation of the CRAMP by an Entity. Where it is established during the assessment that the entity has not put in place procedures for prevention of bribery and corruption, the Commission shall take appropriate action in line with its mandate to remedy the situation. This may include providing technical support or recommending alternative action by the regulator, appointing authority or the enforcement unit of the Commission)

### **State Law Office**

3. Statutory Instrument – A guideline is a statutory instrument – consider public participation  
This is a practical guide on Corruption Risk Management. The stakeholders were involved during the engagement and validation process.

### **Transparency International Kenya**

4. Include interventions, targets, milestones, budgeting at the end of document – included under Appendix iii

### **Nairobi City County**

1. Best practices and bench-marking – A good practice for consideration by Institutions. Adopted under section 5
2. Definition of Terms: System Review – addressed under monitoring by EACC

### **Nairobi Hospital**

1. Under HR - Performance monitoring for staff
2. Ghost workers

3. Accountability of hospital equipment and inventory

Captured under clause 7, step 3 - steps for corruption risk assessment and management

### **MP – Shah Hospital**

1. Reporting time-lines - 24 hours reporting – Was concerned on the practicability of reporting corruption within 24 hours – (Anti-Bribery Act) – to be considered over time.

### **Global Impact network**

1. EACC reaching out to companies not part of associations/ defragmented entities a great population. Share mechanisms for reaching out to such. – to be reached through the respective sector lead agencies. More mechanisms to be explored.

### **Office of the Auditor General**

1. Page 20 – ranking of corruption risk – concerned that customer dissatisfaction as low risk  
Matrix on risk ranking is a sample. Ranking of risk will vary with nature of institutions.



## II. COMMENTS SUBMITTED TO EACC BY INSTITUTIONS

### 1. COMMENTS RECEIVED FROM THE DIRECTOR OF PUBLIC PROSECUTION

Clause No.	Provision of the Draft Corruption Risk Assessment and Management Guidelines	Comment/Input /Proposal	Rationale/Justification (where applicable)	Action
2.2	Legal and Regulatory Framework for Corruption Prevention	<p>The statutes indicated to form part of the legal framework for Corruption prevention to be renamed to reflected the current description as per the Kenya Law Reports website as follows: -</p> <ul style="list-style-type: none"> <li>➤ The Anti-Corruption and Economic Crimes Act, Cap 65;</li> <li>➤ The Public Officers Ethics Act, Cap 185B;</li> <li>➤ The Ethics and AntiCorruption Commission Act, Cap 7H;</li> <li>➤ The Leadership and Integrity Act, Cap 185C;</li> <li>➤ The Anti-Bribery Act Cap 79B</li> </ul>	<p>With law reform leading to continuous amendments and updates to existing statutes the numbering of statutes has now being standardized as per the new website for Kenya Law Reports. These changes have factored existing and future amendments to avoid confusion when referencing the statutes.</p>	Adopted

<p><b>4.2</b></p>	<p>Importance and justification of Corruption Risk Assessment and Management.</p>	<ul style="list-style-type: none"> <li>➤ Clause 4.2 (v) and (vi) are similar only captured in different words and (vi) could be retained with addition of the word "high" before productivity.</li> <li>➤ Clause 4.2 should include justification - to include the action to be taken, the processes and procedures laid down in an entity in case of detection of corruption or corruption related activities.</li> </ul>	<p>Prudent and optimal use of resources translates to efficiency and the outcome is high productivity in an entity.</p> <p>There is need for action to be taken in scenarios where an entity establishes that there is corruption both internal processes involving disciplinary action and external processes that involve the investigative and law enforcement agencies.</p>	<p>Adopted</p> <p>To be included in the institutional anti-corruption policy</p>
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<p><b>4.4</b></p>	<p>Methodology for Undertaking corruption risk assessment and management</p>	<p>In conducting corruption risk assessment, it is important to factor in members of the public and their experiences which can illuminate on gauging the degree of corruption in the different categories under which inform the scope of Corruption Risk Assessment and Management for instance National, Sectoral, Institutional and Functional.</p>	<p>In conducting corruption risk assessment, Clause 4.4 focuses more on the entity and stakeholders leaving out members of the public who hold a lot of information especially experiences from entities.</p>	<p>Adopted</p>
<p><b>6.0 (v)</b></p>	<p>The Entity - The leadership of the entity will be responsible for corruption risk management in the entity. The various functions to be undertaken by the entity includes ... (v) submission of necessary reports to EACC or other oversight agencies (where applicable)</p>	<p>The reports and to be submitted to Investigative agencies should be specified and the circumstances and time frame within which entities should submit such reports.</p>	<p>It is crucial to specify the circumstances that call for an entity to submit reports to EACC or other oversight agencies and the period within which such reports should be submitted rather than leaving it open for entities or oversight agencies to interpret the submission of reports to their own advantage.</p>	<p>Adopted under section 5(a)(v))</p>

<p><b>6.0</b></p>	<p>Stakeholders</p> <p>Stakeholders may be engaged to provide information necessary to facilitate corruption risk management.</p> <p>The Top-level management has a responsibility of ensuring continuous engagement with stakeholders and create a safe environment and safeguards that enable such stakeholders voluntarily share information useful to curb corruption in the organization.</p>	<p>Change the word 'may' to shall</p> <p>All employees should demonstrate their commitment in observing integrity and ethical behavior by signing the Code of Ethics document in each organization.</p> <p>Feedback from stakeholders is critical for an entity to measure their efforts in combating corruption.</p>	<p>It should be mandatory that the advisories to be provided to institutions on corruption risk mitigation takes into account information from the stakeholders of such entities who are essentially the consumers of the services provided by the different organizations/entities.</p>	<p>adopted under section 5 (c)</p>
<p><b>7.0</b></p>	<p>The Role of the Commission</p> <p>The commission may provide technical committee to support to assist and guide the group or Team of an entity undertaking a self-assessment.</p>	<p>Clarity needs to be shed on the approach of engagement between the Commission and the entity that needs technical guidance. For instance will it be on request basis after the entity realizes the need for support or will the</p>	<p>It is important to define when and how the Commission will offer technical support so that there is a balance in having an entity's staff managing their own vulnerability and the Commission's input in empowering an entity in identifying corruption risk exposure.</p>	<p>Adopted Under Section 6 b</p>

		reports that are submitted to Commission under Clause 6.0(v) inform the need for the commission to intervene.		
<b>9.0</b>	<p>Implementing the Corruption Assessment and Mitigation (CRAMP)</p> <p>Monitoring by EACC...</p> <ol style="list-style-type: none"> <li>1) EACC may conduct spot checks assess the progress made on the implementation of the CRAMP by an Entity.</li> <li>2) EACC may also undertake a system review to provide quality assurance on an institutional risk management programme.</li> </ol>	<p>The intervention by EACC is a good proposal however the outcome of the intervention should specify possible solutions for Entities that have failed to comply with the implementation of CRAMP.</p>	<p>Whilst some entities will implement CRAMP to the core, other entities may experience difficulty or be unable to implement it, which calls for possible foreseen solutions which should be included in the Guidelines.</p>	<p>Adopted under Sec 8</p>

## 2. COMMENTS FROM STATE DEPARTMENT FOR IMMIGRATION AND CITIZEN SERVICES

<b>COMMENTS AND INPUTS ON THE DRAFT CORRUPTION RISK ASSESSMENT AND MANAGEMENT GUIDELINES STATE DEPARTMENT FOR IMMIGRATION AND CITIZEN SERVICES</b>				
<b>Clause No.</b>	<b>Provision of the Draft Corruption Risk Assessment and Management Guidelines</b>	<b>Comment / Input / Proposal</b>	<b>Rationale / Justification</b>	<b>Action</b>
No. 2	Policy Framework for Corruption Prevention	i. The Proceeds of Crime and Anti-Money Laundering Act (POCAMLA)	<p>The Proceeds of Crime and Anti-Money Laundering Act (POCAMLA) is Kenya's primary legislation for combating money laundering and terrorist financing. The Act was enacted in 2009 and established a legal framework for:</p> <ul style="list-style-type: none"> <li>• Preventing money laundering and terrorist financing</li> </ul> <p>POCAMLA aims to deter and prevent these activities. Identifying and seizing proceeds of crime, the Act allows for the identification, tracing,</p>	Adopted

			<p>freezing, seizure, and confiscation of proceeds of crime;</p> <ul style="list-style-type: none"><li>• Enhancing cooperation between law enforcement and financial institutions;</li><li>• POCAMLA aims to improve cooperation between these two groups in the fight against financial crime;</li><li>• Creating reporting requirements;</li><li>• POCAMLA requires reporting institutions to report suspicious or unusual transactions, targeted financial sanctions, and other related activities to the Financial Reporting Centre (FRC);</li><li>• Establishing bodies for compliance and enforcement;</li><li>• POCAMLA established the FRC and other bodies to ensure</li></ul>	
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			compliance and enforcement.	
		ii. Public Procurement and Disposal Act	The Public Procurement and Disposal Act regulates public procurement processes to ensure fairness, transparency, and accountability. This law is essential for reducing opportunities for corruption, especially in the awarding of government contracts and tenders.	Adopted
		iii. Whistleblower Protection	Several laws, including the Witness Protection Act, protect whistleblowers who report corruption or economic crimes. This encourages individuals to come forward with information without fear of retaliation. The Whistleblower Protection Policy further supports those who expose corrupt practices.	Adopted
		iv. National Strategy on Anti-Corruption	Kenya has developed a National Anti-Corruption Strategy (NACS), which outlines the government's	Adopted



			<p>comprehensive approach to combating corruption. The strategy involves:</p> <ul style="list-style-type: none"> <li>• Strengthening anti-corruption institutions.</li> <li>• Enhancing public participation in governance.</li> <li>• Ensuring that anti-corruption laws are effectively enforced.</li> <li>• Encouraging citizens to take an active role in preventing corruption at all levels of society.</li> </ul>	
		v. Public Financial Management Reform	<p>The government has implemented reforms in public financial management (PFM) to ensure that public resources are used efficiently and transparently. These reforms aim to minimize the opportunities for mismanagement, fraud, and corruption, particularly in the allocation and use of public funds.</p>	Adopted

	<p>Legal and Regulatory Framework for Corruption Prevention</p>	<p>The Legal and Regulatory Framework for Corruption Prevention in Kenya encompasses a range of laws, policies, institutions, and international agreements aimed at preventing, detecting, and punishing corruption. These frameworks are designed to promote good governance, accountability, transparency, and integrity within both public and private sectors. The comprehensive legal structure is reinforced by regulatory and institutional mechanisms to ensure that corruption is tackled at all levels.</p>		
		<p>i. Anti-Corruption and Economic Crimes Act (ACECA) (2003)</p>	<p>The Anti-Corruption and Economic Crimes Act (ACECA) is the primary legal instrument for combating corruption in Kenya. Key provisions under ACECA include:</p> <ul style="list-style-type: none"> <li>• Section 4: Criminalizes corruption, offering penalties such as imprisonment and fines for those convicted of engaging in corrupt practices.</li> <li>• Section 6: Provides for the forfeiture of property obtained through corrupt means.</li> </ul>	<p>Adopted as the sections were repealed</p>

			<ul style="list-style-type: none"> <li>• Section 11: Establishes a framework for investigating economic crimes and corruption.</li> <li>• Section 44: Provides for the forfeiture of proceeds from corruption and economic crime, aiming to strip offenders of any illicitly acquired wealth.</li> </ul>	
		<p>ii. The Proceeds of Crime and Anti-Money Laundering Act 2008</p>	<p>POCAMLA provides legal measures for combating money laundering, particularly with respect to proceeds from corruption and other economic crimes. The law:</p> <ul style="list-style-type: none"> <li>• Requires institutions to report suspicious financial transactions that may involve the proceeds of crime.</li> <li>• Establishes the Financial Reporting Centre (FRC), which monitors and analyzes financial transactions to identify</li> </ul>	

			<p>money laundering activities.</p> <ul style="list-style-type: none"> <li>• Provides for the freezing, seizure, and confiscation of assets believed to be derived from criminal activities, including corruption.</li> </ul>	
		<p>iii. The Witness Protection Act (2006)</p>	<p>The Witness Protection Act is an important tool for encouraging the reporting of corruption by protecting whistleblowers and witnesses who are at risk of harm due to their involvement in corruption investigations. The Act ensures the safety and security of individuals who provide testimony in corruption cases.</p>	

### 3.0 FRAMEWORK FOR CORRUPTION PREVENTION

Clause No.	Provision of the Draft Corruption Risk Assessment and Management Guidelines	Comment / Input / Proposal	Rationale / Justification	Action
No. 3	Framework for Corruption Prevention	<p>The framework for corruption prevention in Kenya is a combination of legal, institutional, and policy mechanisms aimed at preventing, detecting, and punishing corruption within both the public and private sectors. This multi-faceted approach is designed to ensure that Kenya upholds principles of good governance, transparency, accountability, and integrity in the management of public resources. The framework is anchored in both national legislation and international commitments.</p> <p>The framework for corruption prevention in Kenya is a complex and</p>	<ul style="list-style-type: none"> <li>• Constitutional Framework;</li> <li>• <b>The Constitution of Kenya, 2010 provides the highest legal framework for corruption prevention. Key provisions related to corruption and integrity;</b></li> <li>• Key Laws for Corruption Prevention;</li> <li>• <b>Several national laws form the basis for tackling corruption in Kenya;</b></li> <li>• Key Institutions for Corruption Prevention;</li> <li>• <b>Several institutions play a central role in Kenya's fight against corruption;</b></li> <li>• <b>Preventive Measures and Strategies;</b></li> <li>• <b>International Frameworks and Regional Cooperation</b></li> </ul>	Incorporated

		<p>multi-dimensional approach that includes a combination of constitutional principles, anti-corruption laws, institutional mechanisms, and international commitments. However, its effectiveness depends on continued efforts to strengthen enforcement, enhance institutional capacity, reduce political interference, and promote public participation in the fight against corruption. The success of these measures will ultimately depend on the political will and the commitment of all actors in Kenyan society</p>		
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#### **4.0 CORRUPTION RISK ASSESSMENT AND MANAGEMENT**

**Comment:** The guideline has spelt out CRM but CRA has been left out.

Adopted under the section on glossary of terms

#### **6.0 INSTITUTIONAL ARRANGEMENT FOR CORRUPTION RISK MANAGEMENT**

**Comment:** *Stakeholders* involved in the corruption risk management process and their roles:

- **Internal Stakeholders**

Internal stakeholders are individuals or groups within the organization who are directly involved in or impacted by the corruption risk management activities.

- **External Stakeholders**

External stakeholders are individuals or organizations outside of the organization but who have a vested interest in the organization's anti-corruption efforts. They can include government agencies, regulatory bodies, and the public.

- **Public Stakeholders**

The general public can also be seen as an important external stakeholder group, especially in public sector corruption risk management.

Adopted under Responsibility for Corruption Risk Management

### 3. COMMENTS FROM THE STATE DEPARTMENT OF PUBLIC SERVICE

S/NO	Page	Comment	Action
1.	Pg 4	Consider revising Public Service Performance Management Unit (PSPMU) to Public Service Performance Management and Monitoring Unit (PSPMMU)	Adopted
2.	P9	Objective iv Consider revising it to Monitor & Report on the implementation of the recommended strategies and measures.	Adopted
3.	P11	4.4 The process does not recognize contributions by external agencies such as Transparency International, Office of the Auditor General among others that champion Good Governance. Their reports are critical in identifying loopholes.	Adopted
4.	P12	Under 6.0, consider numbering the various institutions and throughout the document	Adopted
5.	P12	Under the Entity, consider adding Maintenance of Risk Register among functions	Adopted
6.	P12	Under EACC, consider adding the Follow up role on reports from institutions or the publics	Adopted



#### 4. COMMENTS FROM BLUE COMPANY

Clause No.	Provision of the Draft Corruption Risk Assessment and Management Guidelines.	Comment/ Input/ Proposal	Action
Section 41	Knowingly using or giving a statement or a document that contains anything that is false or misleading.	This definition of corruption is similar to misinformation ultimately stating that misinformation is corruption. As such most of our politicians including the president are culpable	
4.3	Institutional, where the assessment seeks to identify systemic weaknesses in a given institution; and	Institutional, where the assessment seeks to identify systemic weaknesses in a given institution or entity; and	Adopted
		Cross-sectoral, where the assessment seeks to identify systemic weaknesses between/across sectors (for example the traffic police department in the public sector and the transport private sector or county government officers (Kanjus) as the public sector and SMEs as the private sector. It focusses on the interrelationship the public and the private sector;	Adopted
4.4	4.4 Methodology for Undertaking corruption risk	Please include an audit of measures put in place especially those touching on relationships with the public sector	Adopted (Clause 7.0 step1)

	assessment and management		
6.0	Institutional Arrangement for Corruption Risk Management	Add inclusion of financial corruption risk assessment and report in businesses annual financial Audit reports.	Adopted (clause 7 step 3)
8.0	Steps for Corruption Risk Assessment and Management	Include one on entrenching counter corruption specific KPIs in staff performance KPIs so it becomes culture	Adopted (clause 7 step 3)
9.0	Monitoring, Evaluation and Reporting	<p>What about cross-checking and unifying industry/sector-wise processes and mitigation measures?</p> <p>The provision leaves a lot of room for gaps on how entities in the same sector apply the measures. There should be sector implementing M&amp;E at sector/industry.</p>	Adopted

**5. COMMISSION ON ADMINISTRATIVE JUSTICE**

<b>COMMENTS ON THE DRAFT CORRUPTION RISK ASSESSMENT AND MANAGEMENT GUIDELINES.</b>				
Name of Entity / Person: <b>COMMISSION ON ADMINISTRATIVE JUSTICE</b>				
Date: 2024				
	Provision of the Draft Corruption Risk Assessment and Management Guidelines	Comment/ Input/ Proposal	Rationale/ Justification (where applicable)	Action
3.0	Framework for Corruption Prevention	<p>Develop a standardized template for corruption prevention policies, adaptable across different entities but with sector-specific guidance for high-risk sectors like procurement.</p> <p>Expand the scope to require Committees at the departmental level in large institutions, particularly for departments with greater exposure to corruption risks.</p> <p>Provide legal and financial protection for whistle-blowers and informants and reward mechanisms.</p>	<p>This ensures consistency and addresses industry specific corruption activities.</p> <p>Departmental Committees can focus on the unique corruption risks within each department, hence more effective. Protection and incentives would encourage more individuals to report corruption and reduce fear of retaliation</p>	Noted

4.0	Corruption Risk assessment & Management	This can be strengthened by implementing a standardized risk matrix to prioritize resources, integrating risk assessment into strategic planning, and providing a self-assessment toolkit for sector specific guidance.	This creates a proactive, structured approach to identifying and mitigating corruption risks, enhancing the organization's resilience against corruption.	Noted
4.4	Methodology for Understanding Corruption Risk Assessment and Management	<p>Incorporate Digital Data Collection Tools for administering questionnaires and surveys.</p> <p>Develop risk indicators tailored to specific sectors</p> <p>Continuous Feedback Loops where employees and stakeholders can continually report emerging risks or insights.</p>	<p>Digital data collection allows for more efficient data collection, analysis and anonymity which encourages honest response from employees.</p> <p>Sector specific risk indicators help in accurately accessing corruption risks within specific areas of an organization.</p> <p>Continuous feedback loops allow organizations to adjust risk mitigation strategies</p>	Adopted under 7.0

7.0	Initiation of Corruption Risk Assessment and Management process	Define specific roles and responsibilities within the technical team  Periodic review of team composition	To ensure clarity and accountability  To align with evolving organizational needs and potential shift in risk areas.	Noted
7.0	Creating Feedback Mechanisms	Introduce secure, anonymous feedback channels.	To enable stakeholders to report concerns or suggestions without fear of reprisal.	Adopted

## **ANNEXTURE I**

### **CRA GUIDELINES STAKEHOLDERS ATTENDANCE LIST, PANAFRIC HOTEL ON 7/11/24**

1. Ethics and Anti-Corruption Commission
2. Global Compact Network Kenya
3. Auditor General
4. Judicial Service Commission
5. Commission on Administrative Justice
6. The Senate
7. The Council of Governors
8. The Controller of Budget
9. The County Assemblies Forum
10. The Commission on Revenue Allocation
11. Director of Public Prosecution
12. Ministry of Defense
13. Nairobi City County Government
14. State Department for Blue Economy and Fisheries
15. State Department for Energy
16. State Department for Environment and Climate Change
17. State Department for Immigration and Citizen Service
18. State Department for Lands and Physical Planning
19. State Department for Public Service
20. State Department for Tourism
21. State Department for Trade.
22. State Department for Transport
23. Ministry of Agriculture and Livestock Development
24. Association of Professional Societies in East Africa
25. Inter-Religious Council Kenya
26. Kenya Electricity Generating Company PLC (KenGen)
27. The Nairobi Hospital
28. MP Shah Hospital
29. Gertrude's Children Hospital
30. Transparency International Kenya
31. Demic Tours Africa
32. Kenbright
33. Media Council of Kenya
34. Broadband Communications Network Ltd
35. The Association of Media Women in Kenya
36. Kenya Mortgage Refinance Company
37. The Supreme Council of Kenya Muslims

38. National Council on the Administration of Justice
39. DaleAgro
40. Agriflex
41. Sanlam Kenya Plc
42. ABSA Bank