



ETHICS AND ANTI-CORRUPTION
COMMISSION

PERFORMANCE CONTRACTING FOR THE FY 2026/2027

**CORRUPTION PREVENTION GUIDELINES FOR
THE 23RD CYCLE**

The Presidential Directive on Corruption Prevention is a mandatory directive to be implemented by all MDAs under Performance Contracting.

The Government promotes “**Whole-of-Government Approach**” in the fight against corruption geared towards improving governance and entrenching zero tolerance to corruption in the public service. The Ethics and Anti-Corruption Commission pursuant to Anti- Bribery Act, CAP 79B supports public and private entities to develop and put in place procedures for Prevention of Bribery and Corruption.

Regulation 13(2) of the Bribery Regulations Legal Notice 88 of 2022 requires an entity to incorporate the guiding principles in developing the bribery and corruption prevention procedures. The bribery and corruption risk assessment and management is one of the guiding principles.

All MDAs are required to develop and implement the Bribery and Corruption Risk Assessment and Mitigation Plan as follows:-

	Sub-Indicator	Weight
1	Conduct Bribery and Corruption Risk Assessment	10%
2	Develop Anti-Bribery and Corruption Mitigation Plan	10%
3	Implement strategies in the Anti-Bribery and Corruption Mitigation Plan	80%
	Total	100%

1. Guidelines for Conducting Bribery and Corruption Risk Assessment

- i. Ministries, Departments, and Agencies (MDAs) are required to develop Procedures for the Prevention of Bribery and Corruption and submit to EACC by **30th September 2026** as a precondition to conducting Bribery and Corruption Risk Assessment. EACC has developed *Model Procedures for the Prevention of Bribery and Corruption* which can be customized by the Entities as appropriate. The Model Procedures can be downloaded from the Commission website via link: <https://eacc.go.ke/en/default/wp-content/uploads/2025/03/Model-Procedures-for-Prevention-of-Bribery-and-Corruption.pdf>.
- ii. MDAs that have developed the Procedures for the Prevention of Bribery and Corruption are required to submit the evidence of the developed and approved Procedures.
- iii. Having developed the Procedures and submitted to the Commission as required, all MDAs are required to conduct a comprehensive Bribery and Corruption Risk Assessment. The assessment should cover both the entity’s core mandate and all support services. MDAs are advised to use the Practical Guide for Corruption Risk Assessment and Management, which is readily accessible on EACC website via this link: <https://eacc.go.ke/en/default/wp-content/uploads/2025/05/EACC-CRA-GUIDELINE-.pdf>. The Comprehensive Bribery and Corruption Risk Assessment Report should be submitted to EACC by 30th September 2026 in a format provided in Appendix III (a) of the Practical Guide.

2. Guidelines for Developing Anti-Bribery and Corruption Mitigation Plan

Having carried out the Bribery and Corruption Risk Assessment as required under Note 1 above, all MDAs are required to develop an Anti-Bribery and Corruption Mitigation Plan and submit to the Commission by **30th September 2026**, using a template provided in **Appendix III (b)** of the Practical

Guide for Corruption Risk Assessment and Management. MDAs should ensure that the identified mitigation strategies prioritize digitizing high-risk services to address unnecessary human interaction and undue discretion among other issues.

3. Guidelines for Implementing strategies in the Anti-Bribery and Corruption Mitigation Plan

Having developed and approved the Anti-Bribery and Corruption Mitigation Plan, MDAs are required to implement the strategies which must include but not limited to:-

- i. Establish and operationalize Corruption Prevention Committee (CPC) and Integrity Assurance Officers (IAOs) Committee for MDAs that have not done so.
- ii. Train the CPCs and IAOs (where they have not been trained) in the first quarter and submit the evidence to the Commission. **Note** that training is provided by EACC upon request. The Commission has provided Guidelines for the Establishment and Operationalization of the Corruption Prevention Committee, which can be accessed on the EACC website via the link. <https://eacc.go.ke/default/wp-content/uploads/2023/06/CPC-GUIDELINES-6.06.2023.pdf>.
- iii. Conduct CPC quarterly meetings chaired by the Accounting Officer and a senior (management level) trained IAO appointed as the Secretary. Duly signed minutes of the quarterly meetings be submitted to the Commission on a timely basis.
- iv. MDAs are required to track the implementation of strategies detailed in their Anti-Bribery and Corruption Mitigation Plan using a template provided in **Appendix V** of the Practical Guide. The implementation progress reports submitted should be accompanied **ONLY** with signed minutes of both the CPC and IAO committee meetings, clearly demonstrating how the mitigation strategies and activities were implemented and results achieved.

4. Guidelines for Reporting and feedback

- i. MDAs are required to submit quarterly reports to the Commission on the implementation of this indicator via pcsubmissions@integrity.go.ke , within fifteen (15) days after the end of the quarter. Failure to submit within the stipulated timeline will attract a penalty during evaluation.
- ii. No hard copies or manual submissions are required in the spirit of saving our trees and the environment.
- iii. The Commission shall acknowledge and provide feedback on all the submissions.
- iv. In the Submission, it is required that MDAs provide the appropriate email address for the Accounting Officer of the Entity, and the email address for the focal point/contact person for ease and timeliness of replies and responses.

For any further information or advice, contact Secretary/Chief Executive Officer, Ethics and Anti- Corruption Commission, P.O. Box 61130-00200, Nairobi; or via email eacc@integrity.go.ke



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SECRETARY/CHIEF EXECUTIVE OFFICER

TEMPLATES

Appendix iii: a. Template for Developing Corruption Risk Assessment and Mitigation Plan

Name of InstitutionFY

...../..... Corruption Risk Assessment

S. No	Identified Corruption Risk (what could go wrong)	Risk source (why would the risk event occur)	Ranking		
			Probability (Pr)	Impact (Im)	Score (Pr X Im)
			Scale 1 to 5	Scale 1 to 5	Scale 1 to 25

Appendix iii: b. Template for Developing Corruption Risk Assessment and Mitigation Plan

Name of Institution FY

...../..... Corruption Risk Mitigation Plan

S.No	Identified Corruption Risk (what could go wrong)	Mitigation strategy (mechanisms, policies and procedures to address the risk)	Activities	Output	Indicators (KPI)	Resources (e.g. Budget)	Timeframe	Responsibility
			a. ...	a. ...	a. ...			
			b. ...	b. ...	b. ...			
			c. ...	c. ...	c. ...			

Appendix v. Template for submitting implementation progress reports

Name of Ministry/Institution: Quarter:FY /.....

S.No	Identified Corruption Risks – (as per the CRAMP)	Mitigation/ Prevention Measure - (as per the CRAMP)	Activities implemented – as per the CRAMP)	Outputs achieved	Emerging issues and challenges noted during implementation	Actions to address the issues and challenges
	Functional Area 1					
	Functional Area 2					