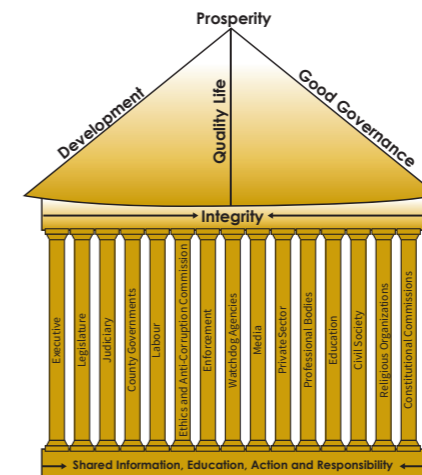


## Kenya Leadership and Integrity Forum

# KENYA INTEGRITY PLAN (2015-2019)



## NATIONAL ANTHEM OF KENYA

- |   |  |
|---|--|
| <p>1. Ee Mungu nguvu yetu<br/>Ilete baraka kwetu<br/>Haki iwe ngao na mlinzi<br/>Natukae na undugu<br/>Amani na uhuru<br/>Raha tupate na ustawi</p>     | <p>1. O God of all creation<br/>Bless this land and nation<br/>Justice be our shield and defender<br/>May we dwell in unity<br/>Peace and liberty<br/>Plenty be found within our borders</p>       |
| <p>2. Amkeni ndugu zetu<br/>Tufanye sote bidii<br/>Nasi tujitoe kwa nguvu<br/>Nchi yetu ya Kenya<br/>Tunayoipenda<br/>Tuwe tayari kuilinda</p>          | <p>2. Let one and all arise<br/>With hearts both strong and true<br/>Service be our earnest endeavour<br/>And our Homeland of Kenya<br/>Heritage of splendour,<br/>Firm may we stand to defend</p> |
| <p>3. Natujenge Taifa letu<br/>Ee, ndio wajibu wetu<br/>Kenya istahili heshima<br/>Tuungane mikono<br/>Pamoja kazini<br/>Kila siku tuwe na shukrani</p> | <p>3. Let all with one accord<br/>In common bond united<br/>Build this our nation together<br/>And the glory of Kenya<br/>The fruit of our labour<br/>Fill every heart with thanksgiving</p>       |

## INTEGRITY SONG: TUANGAMIZE UFISADI

- |   |  |
|---|--|
| <p>1. Kenya yangu, naipenda<br/>Nachukia ufishadi<br/>Waharibu nchi yetu<br/>Tuangamize ufishadi</p>          | <p>3. Ndugu yangu, mwananchi<br/>Tudumishe maadili<br/>Tufanyapo kazi zetu<br/>Tuangamize ufishadi</p> |
| <p>2. Kenya yangu, ngao yangu<br/>Naupinga ufishadi<br/>Hongo mbali, rushwa mbali<br/>Tuangamize ufishadi</p> | <p>4. Tuna nia, na sababu<br/>Na uwezo, nazo mbinu<br/>Tuungane sisi sote<br/>Tuangamize ufishadi</p>  |

## MISSION STATEMENT

### MANDATE

To provide a mechanism through which stakeholders design and implement anti-corruption initiatives in their sectors; creating partnerships and networks for greater impact

### VISION

A corruption-free, ethical and prosperous Kenya

### MISSION

To promote ethical conduct and integrity through partnerships and collaborative networks

### CORE VALUES

Integrity  
Innovation  
Rule of Law  
Inclusiveness  
Professionalism  
Transparency and Accountability

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## LIST OF ABBREVIATIONS AND ACRONYMS

ACECA	Anti-Corruption and Economic Crimes Act
AG&DOJ	Attorney General and Department of Justice
AIRC	Annual Integrity Review Conference
APSEA	Association of Professional Societies of East Africa
AUCPCC	African Union Convention for Preventing and Combating Corruption
CAJ	Commission on Administrative Justice
COG	Council of Governors
COTU	Central Organization of Trade Unions
CPC	Corruption Prevention Committees
CRA	Commission on Revenue Allocation
CUE	Commission for University Education
DPSM	Directorate of Public Service Management
EAAACA	East Africa Association of Anti-Corruption Authorities
EACC	Ethics and Anti-Corruption Commission
EACCA	Ethics and Anti-Corruption Commission Act
EAC	East African Community
EAK	Evangelical Alliance of Kenya
EMU	Efficiency Monitoring Unit
ERS	Economic Recovery Strategy
FKE	Federation of Kenya Employers
HELB	Higher Education Loans Board
ICK	Inter-Religious Conference of Kenya
ICPAK	Institute of Certified Public Accountants of Kenya
ICPSK	Institute of Certified Public Secretaries of Kenya
ICT	Information and Communications Technology
IEBC	Independent Electoral and Boundaries Commission
IEC	Information, Education and Communication
IPOA	Independent Policing Oversight Authority
JSC	Judicial Service Commission
KAM	Kenya Association of Manufacturers
KCCB	Kenya Conference of Catholic Bishops
KEBS	Kenya Bureau of Standards
KEPSA	Kenya Private Sector Alliance
KEPSHA	Kenya Primary Schools Heads Association
KESSHA	Kenya Secondary Schools Heads Association
KLB	Kenya Literature Bureau
KNCC	Kenya National Chamber of Commerce and Industry
KNHRC	Kenya National Human Rights Commission
KNEC	Kenya National Examinations Council
KICD	Kenya Institute of Curriculum Development
KIP	Kenya Integrity Plan
KISE	Kenya Institute of Special Education
KLIF	Kenya Leadership and Integrity Forum
KNCHR	Kenya National Commission on Human Rights
KNUT	Kenya National Union of Teachers
KRA	Kenya Revenue Authority
KUPPET	Kenya Union of Post Primary Education
KWS	Kenya Wildlife Service
LIA	Leadership and Integrity Act
MDA	Ministries, Departments and Agencies

MOEST	Ministry of Education, Science and Technology
MTP	Medium Term Plan
NACADA	National Agency for Campaign Against Drug Abuse
NACP	National Anti-Corruption Plan
NACCSC	National Anti-Corruption Campaign Steering Committee
NARC	National Rainbow Coalition
NCC	National Coordinating Committee
NCCK	National Council of Churches of Kenya
NEMA	National Environment Management Authority
NGO	Non-Governmental Organization
NHIF	National Hospital Insurance Fund
NSCE	National Survey on Corruption and Ethics
NSSF	National Social Security Fund
OAG	Office of the Auditor General
ODPP	Office of the Director of Public Prosecutions
PSC	Public Service Commission
PSC	Parliamentary Service Commission
POEA	Public Officers' Ethics Act
PPOA	Public Procurement Oversight Authority
RBA	Retirement Benefits Authority
SCC	Sectoral Coordinating Committees
SRC	Salaries and Remuneration Commission
SUPKEM	Supreme Council of Kenya Muslims
TI Kenya	Transparency International Kenya
TIVET	Technical, Industrial, Vocational and Entrepreneurial Training
TSC	Teachers Service Commission
TUC	Trade Unions Congress
UN	United Nations
UNCAC	United Nations Convention Against Corruption
NSCE	National Survey on Corruption and Ethics

## FOREWORD

The development of the Kenya Integrity Plan (KIP) 2015- 2019 is yet another milestone in the fight against corruption and unethical conduct in Kenya. The KIP is formulated as a sector-based Plan to provide a framework for the design and implementation of anti-corruption initiatives by stakeholders. This is in recognition that the war against corruption is the responsibility of all Kenyans. The Plan will enable organizations to discharge their collective and individual responsibilities in the quest for good governance and integrity in the management of public affairs.

The Ethics and Anti-Corruption Commission (EACC) which is constitutionally mandated to spearhead the anti-corruption war in Kenya, is empowered to cooperate and partner with other agencies both nationally and internationally. Given that corruption occurs in all sectors of our society, the Plan is timely and will go a long way in strengthening collaborative efforts in the war against corruption and resultantly promote good governance.

The Plan has been developed at a time when Kenya is implementing reforms aimed at improving governance and enhancing service delivery. It comes in the wake of major developments in the country such as: the implementation of the Constitution of Kenya 2010 and actualization of the Kenya Vision 2030. In order to realize these developments, there is need for concerted efforts aimed at upholding principles of good governance in the public sector, private sector and civil society organizations.

I confirm that this Plan presents a comprehensive framework through which stakeholders will collectively tackle the challenge of corruption and unethical conduct. I note with satisfaction that the Plan contains strategies and activities that require the involvement of all sectors of our society for a better Kenya.

In this regard, I call upon sector stakeholders to implement the respective programs and activities formulated in this Plan. I urge all Kenyans to individually and collectively resolve to combat corruption in all its forms and manifestations. It is our civic duty to build a prosperous nation for today and posterity.

In conclusion, I reiterate my government's commitment to fight corruption in all its forms. We will all be assisting in making Kenya a globally competitive destination for doing business by reducing incidences of corruption and improving service delivery. All these are at the core of this Plan.

The Government recognizes the multi-sectoral approach in the fight against corruption and will continue to support the Kenya Leadership and Integrity Forum in the implementation of the Plan.



**UHURU KENYATTA**  
**PRESIDENT OF THE REPUBLIC OF KENYA**

## PREFACE

The Kenya Integrity Plan (KIP) is the successor of the National Anti-Corruption Plan (NACP) which was launched on 5th July, 2006 and has continued to guide the multi-sectoral approach in the fight against corruption to date. The NACP was the first anti-corruption mechanism through which structured interventions based on sectoral approach were implemented. This is in recognition of the fact that the fight against corruption can only be won through collective and collaborative efforts.

The development of KIP comes at a time when the national focus is on the promotion of ethics and integrity in the society. The Plan therefore reflects the hopes and aspirations of both the leadership and the people of Kenya as espoused in both the Constitution of Kenya, (2010) and Kenya Vision 2030.

The objectives of the KIP are to combat and reduce the incidence of corruption and unethical conduct; improve institutional governance and business ethics for transparency and accountability; enhance efficiency in service delivery in the public and private sector; create and maintain partnerships in the fight against corruption and unethical conduct; and strengthen the policy and legal framework.

The development of the KIP was through the efforts of a technical committee. The members of the Technical Committee were drawn from the 14 sectors that form the Kenya Leadership and Integrity Forum (KLIF). The Committee convened various meetings and workshops which provided an opportunity for deliberations and consensus building. The initial draft Plan was reviewed by the KLIF National Coordinating Committee comprised of the 14 sectors. The Plan was validated by representatives of the public and private sectors, religious and civil society organisations and development partners. The process was therefore, participatory, consultative and inclusive.

The Plan advocates the interests and focus of all stakeholders in the fight against corruption and unethical conduct. It also provides the framework for ownership and commitment in its implementation. The success of the Plan will greatly rely on the support, goodwill, dedication and commitment of all stakeholders. I urge all those implementing the Plan to identify "quick wins" that can be achieved in the short term to deliver greater impact in the fight against corruption.

Collaboration and partnership among stakeholders in the implementation of the Plan will create the requisite synergy for better results with shared resources. Each sector leverages on its competitive advantage in its contribution to the fight against corruption.

KLIF is committed to partnering with all stakeholders in the fight against corruption and unethical conduct in our country. I am confident that the implementation of KIP will go a long way in instilling the principles of good governance and establishing a culture of transparency and accountability across all sectors.

The KIP is a five-year plan covering the period 2015-2019. The sectors have identified the five strategic objectives which provide a basis upon which all the sector activities and initiatives will be implemented. Each sector will implement identified activities towards the realization of the set objectives. The plan also provides a framework for monitoring,

evaluation and reporting.

We all appreciate that the war against corruption will be won when all of us get involved.

  
**Hon. Prof. Githu Muigai, EGH, S.C., FCI Arb**  
**Attorney General of Kenya and Chairman, KLIF National Coordinating Committee**

## ACKNOWLEDGEMENT

The Kenya Leadership and Integrity Forum (KLIF) wishes to extend sincere gratitude to the Ethics and Anti-Corruption Commission (EACC) for its invaluable financial support and moral assistance in developing this Plan.

We recognize the immense contribution and dedication of the Steering Committee that consists of the National Coordinating Committee drawn from the fourteen (14) KLIF sectors. The Committee has provided direction to ensure that the Plan development remained on course and the strategies proposed are appropriate in the fight against corruption in Kenya.

We acknowledge the tireless work of the Technical Committee that coordinated the preparation of the KIP with all the stakeholders from the fourteen (14) KLIF sectors. This team received, collated and reviewed input from all sectors, prepared the draft KIP that was validated by stakeholders and was eventually published and launched.

The Technical Committee was ably guided by a dedicated team comprising of the following members: Jackson Mue (Chairman of the Technical Committee), Nancy Namenge, James Isoe and Derrick Kaisha from EACC; Mary Wairagu and John Tuta from AG&DOJ; David Gathii and Evalyne Rono from NACCSC; Veronica Ochieng from DPSM; Doreen Mulekyo from the Judiciary; Peter Achar from NCCCK and Bakary Chemaswet from SUP-KEM; Richard Chesos from the NGO Coordinating Board; Kevinnah Loyatum, Violet Jumba Okinda and Mohammed Noor from the Council of NGOs; Esther Masibayi from KRA; Sebastian Mutinda and Vivian Kambaga from ODP; Alice Naliaka from the Kenya Police; Anastasia Cecilia Magoma Odhiambo, and David Tambo from the Ministry of Planning and Devolution; Michael Wanga from the Council of Governors; Albert Njeru from COTU; George Mukuah from KENAO; Eng. Francis Ngokonyo from KEPSA; Jerry Abuga (formerly) from the Media Council of Kenya; Kenneth Kariuki and Samuel Moturi from APSEA; Mariko Chepkonga and William Adhoch from the Ministry of Education and Technology.

Further, we would like to appreciate the members of the Drafting Committee that compiled the first draft of the KIP. Members of this team were: Jackson Mue, Emily Chege, James Isoe, Nancy Namenge, Derrick Kaisha, Mary Wairagu, David Gathii, Richard Chesos, Peter Achar and Farida Kokita.

We also recognize the Editorial Committee that completed the draft document that was subjected to the validation process. Members of this Committee included: Jackson Mue, Dr. Purity Gitonga, Farida Kokita, Gorai Molu Galgallo, Eric Ngumbi, Esther Masibayi, Richard Chesos, Peter Achar, Sebastian Mutinda and Beatrice Odera.

We also wish to acknowledge the KLIF Secretariat: Charles Rasugu (Deputy Director), Dr. Purity Gitonga and Emily Chege (former Deputy Directors), Farida Kokita, Gorai Molu Galgallo and Sophie Mwai for spearheading the process of developing the KIP to its successful conclusion.

Lastly, we are indebted to all the fourteen sectors for their contribution through the Sector working Groups and the National Coordinating Committee who provided overall guidance in the process. These sectors are the owners of this Plan.



**Halakhe D. Waqo, ACI Arb**

**Secretary/CEO, EACC and Secretary, Kenya Leadership and Integrity Forum**

## EXECUTIVE SUMMARY

The Kenya Integrity Plan provides a strategy for promoting integrity and ethical conduct through partnerships and collaborative networks in Kenya for the period 2015 -2019. The Plan takes into account the Constitution of Kenya, 2010; Kenya Vision 2030 and other legal and policy instruments in the fight against corruption.

The Plan was developed by the fourteen sectors under the Kenya Leadership and Integrity Forum namely: Executive, Legislature, Judiciary, Labour, Education, Media, Civil Society, Religious Sector, Private Sector, County Governments, Watchdog Agencies, Enforcement, Professional Bodies and Ethics and Anti-Corruption Commission. These sectors represent a wide range of stakeholders whose participation in the process was well articulated.

The KIP formulation process began in May 2012 when members of the National Coordinating Committee (NCC) agreed to review the National Anti-Corruption Plan (NACP) through the development of a 5-year National Anti-Corruption strategy that would be aligned to the Constitution of Kenya and Vision 2030. A multi-sector Technical Committee was constituted to spearhead this process. This plan is a result of the numerous consultation meetings of the Technical Committee.

The introduction part of the plan provides a background to corruption, its effects and some of the measures Kenya has put in place in fighting corruption. It also provides a brief about the Kenya Leadership and Integrity Forum and the Kenya Integrity Plan. It further links the KIP to the Constitution of Kenya through Chapter 2 (Article 10), Chapter 6, Chapter 13 (Article 232) and Chapter 11 while further linking the Plan to the Kenya Vision 2030 and shows how it is aligned to the Medium Term Plan II.

The plan also contains a review of the National Anti-Corruption Plan (NACP), the predecessor of the KIP. The NACP, which was launched in 2006, has guided the efforts of the sectors in collectively implementing strategies to fight corruption in their respective institutions. The KIP has assessed the implementation of the NACP by sector over the years with a view to identifying achievements, challenges and lessons learnt. It also reviews the operating environment that may affect the implementation of the plan through a SWOT, PESTLE and stakeholder analysis.

The vision, mission, core values, strategic goals and objectives of the KIP have also been outlined in an effort to redirect the Sectors to common goals and resolve in the fight against corruption. The strategic objectives are outlined as follows: To reduce incidences of corruption and unethical conduct, To improve institutional governance and business ethics, To enhance efficiency in service delivery in the public and private sector, To strengthen partnerships and collaborations in the fight against corruption and unethical conduct, To strengthen the integrity and anti-corruption legal and policy framework.

The implementation and coordination framework for the KIP and the support mechanisms are also defined to ensure the success of the KIP implementation. The framework recognizes the role of the Head of State in steering the anti-corruption agenda and has therefore proposed a **National Forum on Integrity (NFI)** with The President as the patron and whose members shall be drawn from policy level leadership of the participating sectors. The NFI is expected to meet annually. The second tier in the framework is the **National Coordinating Committee** which will be chaired by the Cabinet Sec-

retary responsible for matters of ethics and integrity and will draw membership from the Accounting Officers of the participating institutions. The NCC will meet quarterly to review the implementation of the KIP. The **Sector Coordinating Committees** will consist of representatives from participating institutions in each sector. The 15 SCC will meet regularly to spearhead the implementation of the sector activities as outlined in the Plan and to carry out monitoring and evaluation. EACC will provide the Secretariat to all the committees and facilitate linkages and coordination.

The Plan also has a comprehensive stakeholder mapping to ensure inclusiveness and robust participation. Specifically, it has identified the Constitutional Commissions as a key sector, making it the 15<sup>th</sup> sector. It also distinguishes the County Governments as a distinct sector to replace the former Local Authorities sector, and recognizes the role of the development partners in the fight against corruption.

The Plan further outlines the monitoring, evaluation and reporting framework that defines the processes that will be carried out to assess implementation of the KIP and also inform strategic changes and policy direction.

In conclusion, the KIP has been developed through an inclusive and participatory process that has ensured all sectors are able to align their efforts towards combating corruption and promoting ethical culture. This process also aimed at garnering ownership and commitment by all stakeholders to the implementation of the Plan.



## CHAPTER 1: INTRODUCTION

### 1.1 Background

The development of the Kenya Integrity Plan is premised on the recognition that corruption is one of the world's greatest challenges. Overtime, Kenya has implemented various initiatives to eradicate the vice. One of the initiatives was the formation of the Kenya Integrity Forum, now called the Kenya Leadership and Integrity Forum, a partnership platform of fourteen sectors.

#### What is Corruption?

While there is no universally accepted definition of corruption, Transparency International defined corruption as the abuse of entrusted power for private gain. According to the World Bank, corruption is the misuse or the abuse of public office for private gain.

The Anti-Corruption and Economic Crimes Act 2003 sets out offences that constitutes corruption to include:

- Bribery
- Abuse of Office
- Fraud
- Embezzlement of public funds
- Misappropriation of public funds
- Breach of trust
- An offence involving dishonesty-In relation to taxes, or Under any written law relating to elections of persons to public office
- Conflict of interest, extortion, favoritism and nepotism

#### Causes of Corruption

Some of the factors that contribute to corruption include:

- Erosion and distortion of values
- Weak institutional systems and structures.
- Disregard for professional ethics
- Poor governance
- Lack of checks and balances
- Weak enforcement of laws and policies
- Political patronage
- Tribalism
- Ethnicity
- Greed
- Unfettered discretionary powers

### Effects of Corruption

The effects of corruption pervade all sectors of society, and affect virtually every aspect of life. Corruption is noted to be a major obstacle to economic development and a large contributor to increasing the cost of doing business. Corruption costs the country millions of shillings every year through siphoning of scarce resources and therefore affecting development. Its impact is more felt by the poor and it generally worsens the welfare of the citizens. Corruption leads to lack of respect for the rule of law and generally affects the integrity of public officials. The trustworthiness of public officials is eventually eroded, justice is subverted and ultimately the human rights of the citizens are undermined.

Other effects of corruption include insecurity, unemployment, and loss of investment and political instability. These may eventually cause a total collapse of the social, economic and political establishment.

Various Corruption Perception Surveys indicate that corruption in Kenya is still high. According to the findings of the EACC National Survey on Corruption and Ethics (NSCE) 2012) 67.7% of the respondents indicated that corruption is very high.

Kenya has performed dismally in the global Corruption Perception Index (CPI) 2014 released by the Transparency International. Kenya scored 25 on a scale of zero to 100 (with zero perceived to be highly corrupt, and 100 very clean), down two points from the previous year's (2013) score of 27. Kenya ranked at position 145 out of 174 countries and territories ranked in the 20th edition of the CPI.

#### Anti-Corruption Strategies

In order for the Country to attain its development goals, there is need for both national and county governments to take proactive steps to detect and prevent corruption. This calls for all the stakeholders and partners in all sectors to synergize and collaborate in developing and implementing integrity and anti-corruption initiatives.

In the efforts to combat and prevent corruption, Kenya continues to implement diverse anti-corruption initiatives at the international, regional and national levels. At the international level, Kenya has signed and ratified the United Nations Convention against Corruption (UNCAC), the African Union Convention on Preventing and Combating Corruption (AUCPCC) and is currently collaborating with other East African Community (EAC) Partner States to develop an EAC Protocol on Preventing and Combating Corruption. At the national level, Kenya has developed an elaborate legal, institutional and policy framework aimed at escalating the war against corruption. These frameworks are implemented by different agencies discharging diverse responsibilities. This is in appreciation of the fact that a successful war against corruption requires a multi-sectoral approach bringing together the relevant stakeholders. It is against this backdrop that the Kenya Leadership and Integrity Forum was established.

## 1.2 The Kenya Leadership and Integrity Forum

The Kenya Leadership and Integrity Forum (KLIF) is a platform that brings together fourteen (14) sectors comprising public, private, civil society and faith based organizations. The sectors are: the Judiciary, Executive, Legislature, Enforcement Agencies, Media, County Governments, Private Sector, Professional Associations, Religious Organizations, Labour, Ethics and Anti-Corruption Commission (EACC), Watchdog Agencies, Education and the Civil Society. The Kenya Integrity Plan further recognizes the Constitutional Commissions as the fifteen sector.

KLIF was initially referred to as the Kenya Integrity Forum (KIF). It was established following the launch of the National Anti-Corruption Plan (NACP) on 5th July 2006. The NACP was developed by sector based stakeholders who sought for a unified and coherent front for preventing and combating corruption. It provided the first multi-sectoral and structured approach to fighting corruption in Kenya. The forum was initiated in recognition of the fact that no single person or organization can win the war against corruption and unethical conduct.

### Why partnership in the fight against corruption

The spirit of partnership and collaboration recognizes that corruption takes place in all sectors. Therefore, it is imperative that all sectors are involved in preventing and eradicating it.

Some of the benefits of partnering in the fight against corruption are as follows:

1. Provides unity of purpose for all those involved in the fight against corruption
2. Leads to concerted efforts in fighting corruption
3. Enables stakeholders to work towards a common goal of a corrupt free nation
4. Enables sharing of ideas in solving the problems caused by corruption.
5. Promotes a culture of ethics and integrity
6. Makes the fight against corruption inclusive
7. Enhances a cohesive team and builds trust among partners in the fight against corruption
8. Facilitates achievement of great results and impacts
9. Creates ownership of the process

## 1.3 The Kenya Integrity Plan

The Kenya Integrity Plan is an Action Plan which provides an operational framework for the implementation, monitoring and evaluation of anti-corruption initiatives in various sectors. It seeks to make the fight against corruption more strategic and relevant to the

Constitution of Kenya, 2010 as well as Kenya's development blue print, Vision 2030. It provides for a collaborative approach to the fight against corruption while ensuring that the input of each sector is distinct and quantifiable.

The KIP is expected to greatly enhance the fight against corruption by ensuring strategies are more specific, focused and well-coordinated. It will effectively inform the implementation of the identified strategies for the fight against corruption in both public sector and private sector through; law enforcement, public education, audit of systems of public bodies, asset recovery and the promotion of ethics and integrity.

KLIF provides the platform upon which the KIP will be implemented.

## CHAPTER 2: LINKING THE PLAN TO THE NATIONAL DEVELOPMENT AGENDA

Kenya aims to be a middle income rapidly industrializing country by 2030, offering all its citizens a high quality life. The Kenya Integrity Plan, which provides a multi-sectoral approach to combat corruption and unethical conduct, is therefore critical to the achievement of the national development agenda.

Kenya's national development agenda is documented in various key documents, including the Constitution, Kenya Vision 2030 and Medium Term Plans (MTPs). The KIP has been aligned to these policy and legal instruments with a clear focus on the fight against graft and promotion of ethics and integrity in management of national affairs. The fight against corruption and promotion of integrity, ethics and good governance are important ingredients in the realisation of the nation's development and transformation agenda.

### 2.1 The Constitution of Kenya

The Kenya Integrity Plan (KIP) recognises the supremacy of the Constitution of Kenya, 2010 which broadly espouses the aspirations of Kenyans. It provides for prudent and sustainable management of public resources, separation of powers and good governance. It also provides the normative and legal foundations for ethics and integrity in the fight against corruption and promotion of ethical values. The centrality of ethics and integrity is provided for in the following:

- Chapter 4 on the Bill of Rights
- Chapter 6 on Leadership and Integrity
- Article 10 on the National values and principles of governance
- Article 232 on Values and Principles of Public Service

Further, Chapter 11 of the Constitution outlines the objects and principles of Devolved Government. The introduction of devolved systems of governance is aimed at taking service close to people, promoting democracy, enhancing self-governance, promoting checks and balances and separation of powers.

The KIP has identified strategies and activities towards the implementation of these Constitutional provisions. In line with the principle of the Constitution that gives emphasis on public participation, KIP has adopted a multi-sectoral approach in the fight against corruption and promotion of ethical conduct. The Plan aims to foster anti-corruption measures in the County Governments. For this reason, the County Governments are also expected to coordinate anti-corruption interventions to prevent and combat corruption, enact anti-corruption laws and policies, promote ethical conduct and foster partnerships and coalitions in the fight against corruption.

### 2.2 Kenya Vision 2030

Kenya Vision 2030 is the country's development blue print covering the period 2008 to 2030. It aims to transform Kenya into a newly industrializing middle income country providing high quality of life to all its citizens. The Vision is anchored on three pillars: Economic, Social and Political Pillars. The Economic pillar aims at maintaining a sustained economic growth of 10% per annum. The Social pillar aims at a just and cohesive society enjoying equitable social development in a clean and secure environment, while, the political pillar seeks to improve governance systems and to achieve an issue based, people centred, results oriented and accountable democratic political system.

The Vision 2030 is implemented through five-year Medium Term Plans (MTP). The first MTP covered the period 2008 to 2012 while the second MTP covers the period 2013 to 2017. The MTP has identified the following priority areas towards national transformation: Infrastructure, Information and Communication Technology (ICT); Science Technology and Innovation (ST&I); Land Reforms; Human Resource Development, Labour and Employment; Security; Public Sector Reforms; Ending Drought Emergencies (EDE) and National Values and Ethics. The MTP II has identified national values and ethics as one of the cornerstones of our overall development.

Further, the strategies under the Leadership, Ethics and Integrity flagship programme under the Political Pillar provide the;

- Reviewing and strengthening legislative, policy and institutional framework for ethics and integrity in the country;
- Strengthening capacity of ethics and anti-corruption agencies to promote leadership, ethics and integrity;
- Enhancement of asset tracing and recovery;
- Establishment of effective accountability mechanisms;
- Education, sensitization and awareness on corruption, integrity and ethical issues;

The Kenya Integrity Plan is aligned to the Medium Term Plan II (2013-2017).

The Kenya Integrity Plan recognizes that for the vision to be realized, greater focus should be on the promotion of ethical conduct and the fight against corruption. The plan provides mechanisms for promotion of transparency and accountability, efficiency in the allocation and utilization of resources as well as effective public sector service delivery.

Some of the priority areas identified in the Plan are: capacity building of institutions with regard to corruption prevention, investigation, asset recovery, law enforcement and good governance.

Stakeholders have committed themselves to implement strategies and activities geared towards realizing the Vision and Kenya's National Development Agenda.

## CHAPTER 3: REVIEW OF THE NATIONAL ANTI-CORRUPTION PLAN

The National Anti-Corruption Plan (NACP) was developed by stakeholders from diverse sectors in Kenya in pursuit of a unified and coherent front for combating and preventing corruption. It was launched on 5<sup>th</sup> July 2006. It provided the first multi-sectoral and structured approach to fighting corruption in Kenya. This approach was informed by the understanding that corruption avenues are found in all sectors of society hence making it imperative for all stakeholders and individuals to be involved in its eradication.

The NACP provided a framework for the implementation of action-based initiatives to reinforce the Government's anti-corruption reform efforts. Through the NACP, stakeholders were able to interact and share experiences in an environment of mutual understanding and accountability.

### 3.1 Objectives of the NACP

The main objective of the NACP was to marshal the efforts and resources of various stakeholders to progressively and systematically reduce – to the extent possible – the causes and the destructive effects of corruption in Kenya. The specific objectives are:

- To transform the situation where corruption was a low-risk high-gain undertaking to one where it is a high-risk low-gain venture
- To provide a platform where all individuals and organizations in Kenya could be involved in the war against corruption
- To create public awareness on the dangers of corruption and sensitize Kenyans on their role in eradicating the vice
- To promote good governance in organizations with a view to eliminating sectoral corruption
- To enhance reporting of corruption cases
- To encourage organizations and individuals to develop in-house strategies for preventing and fighting corruption;
- To encourage organizations and individuals to contribute towards the evaluation, improvement and reinforcement of the plan

### 3.2 Key Achievements of Specific Sectors under NACP

In the period between 2006 and 2014, the sectors made notable gains in the promotion of good governance and the war against corruption. These are outlined below:

#### 3.2.1 The Executive Sector

The Executive comprises of Government Ministries, Departments and Agencies involved in formulation of anti-corruption policies and public sector reforms. During the period under review, the following key achievements were made:

- Formulation and implementation of the Sessional Paper No. 8 of 2013 on National Values
- Development and review of codes of conduct for State and Public Officers
- Ensuring compliance with the requirement for declaration of assets and liabilities by State and Public Officers
- Development and publication of institutional service charters to enhance dissemination of information to the public
- Participation in review of legislation including amendments to the Anti-Corruption and Economic Crimes Act and the Public Officer Ethics Act
- Participation in enactment of integrity and anti-corruption laws, policies and regulations
- Digitization of public services and records management
- Establishment of Huduma Centres to enhance efficient and effective public service delivery
- Implementation of the Kenya National Integrated Civic Education (KNICE) programme to promote collective national aspirations as envisioned in the Constitution and enhance citizens' participation and engagement in governance processes
- Establishment of anti-corruption civilian oversight committees in Counties.
- Undertaking anti-corruption awareness creation programmes nationally and in the Counties
- Implementation of international conventions and instruments on integrity and anti-corruption issues

#### 3.2.2 The Legislature

The Legislature includes the National Assembly, the Senate and County Assemblies who are primarily tasked with legislation and oversight of the other arms of government. During the period under review, the Legislature made the following achievements:

- Enactment of the Constitution of Kenya, 2010
- Enactment of anti-corruption laws including the Leadership and Integrity Act, 2012; Ethics and Anti-Corruption Commission Act, 2011 and the Public Finance Management Act, 2012
- Establishment and operationalization of the Parliamentary Budget Office
- Enhancing the capacity of Parliament oversight through the establishment of various committees
- Vetting and approval of candidates nominated to serve as State Officers
- Removal from office of public officials on grounds of corruption, poor performance and other matters that compromise public interest

### 3.2.3 The Judiciary

During the review period, the judicial sector underwent significant reforms that have significantly enhanced the administration of justice. On the promotion of integrity, the Judiciary made the following key achievements:

- Establishment of the Supreme Court
- Vetting of Judges and Magistrates who served before the promulgation of the Constitution 2010 to determine their suitability
- Launch and implementation of the Judiciary Transformation Framework which provides general principles and goals to be pursued in implementation of judicial reforms
- Decentralization of services by establishing court stations throughout the country to enhance service delivery
- Establishment of the Court Users' Committee to enhance liaison on effective administration of justice
- Establishment of an ombudsperson within the judiciary to address complaints of maladministration
- Establishment of a fully-fledged directorate of performance management to monitor and track performance of judicial officers.
- Establishment of special courts to adjudicate corruption and economic crime cases
- Formulation of bail and bond regulations to ensure efficient and fair determination of bail and bond applications and reviews

### 3.2.4 The County Governments

The County Governments Sector was prior to the promulgation of the Constitution referred to as the Local Government Sector. During the review period, the following achievements were made:

- Involvement of the public in the development of county budgets, county legislation, policies and regulations to facilitate public participation
- Enactment of county anti-corruption laws to supplement national legislation
- Establishment of Corruption Prevention Committees
- Training and sensitization of county staff on integrity
- Establishment and strengthening of institutional internal controls
- Conducting Corruption Risk Assessment
- Formulation of Leadership and Integrity Codes
- Vetting of officers transiting from local authorities to the county governments
- Impeachment and suspension of State and Public Officers serving in the county governments over corrupt malpractices and unethical conduct
- Holding devolution conferences to benchmark and deliberate on county governance issues
- Participation in the National and County Governments Coordinating Summit to enhance intergovernmental relations and cooperation on governance and other matters
- Development and launch of Strategic Plans on delivery of services in the counties

### 3.2.5 Labour Organizations

Labour Organizations made significant achievements including the following:

- Sensitization on labour laws, good governance and integrity leading to awareness of labour related disputes and corruption cases at the workplace
- Advocating for good governance and enhanced service delivery.

### 3.2.6 The Ethics and Anti-Corruption Commission (EACC)

The Ethics and Anti-Corruption Commission achieved the following through the implementation of its mandate of combating corruption and economic crime through law enforcement, prevention measures, public education, and promotion of standards and practices of integrity, ethics and anti-corruption:

- Investigation of corruption and unethical conduct
- Tracing and recovery of assets suspected to be corruptly acquired
- Training of Integrity Assurance Officers (IAO's) drawn from many government Ministries, Departments and Agencies
- Continuous assessment of the implementation of the anti-corruption criteria within the performance contracting framework
- Vetting of persons aspiring to hold state and public offices
- Ethics and integrity awareness for public, private and CSO institutions
- Training and sensitization for tertiary institutions/ institutions of higher learning
- School Outreach programmes targeting learners and teachers
- Training for integrity Club champions/patrons
- Public Education for counties through outreach programmes
- Training of Corruption Prevention Committees in the public sector
- Training of community based anti-corruption monitors with CSOs
- Spearheading annual commemoration of the international anti-corruption days
- Education and awareness thorough music and drama festival
- Systems reviews/examinations and Corruption Risks Assessments in public institutions
- Advisories on Corruption Prevention to national government institutions and county governments
- Corruption related research to inform anti-corruption interventions
- Expansion of its services through establishment of regional and satellite offices.

### 3.2.7 The Enforcement Sector

#### i) Office of the Director of Public Prosecutions (ODPP)

- Establishment of the ODPP as an Independent Office
- Capacity building through hiring and training of staff to ensure effective prosecution of corruption and economic crimes
- Decentralization of the ODPP services to all the 47 counties and 68 sub-counties to enhance access of service by the public
- Formulation of Anti-corruption Prosecution Guidelines on the prosecution of corruption and economic crimes
- Professionalization of the prosecution and economic crime cases: taking over prosecution of cases from the police
- Participation in the review and formulation of legislation, policies, rules and regulations
- Enhanced inter-agency cooperation and stakeholder collaboration for effective prosecution of corruption and economic crime cases
- Participation in the promotion of Mutual Legal Assistance and extradition in the investigation and prosecution of corruption and economic crime cases
- Undertaking prosecution-led investigations
- Establishment of the ODPP website to create public awareness on ODPP services and enlist public support in the prosecution of corruption cases and economic crime

**ii) National Police Service (NPS)**

- Establishment of the National Police Service (NPS) as an Independent Office
- Development and implementation of code of conduct for the Police Service
- Establishment of an Internal Affairs Unit within NPS to provide for an internal mechanism to receive and investigate complaints against members of the service including cases of corruption.
- Vetting of Senior Police Officers to determine their suitability.
- Sensitization of staff on integrity and anti-corruption issues
- Development of Guidelines and Policies on recruitment, appointment, transfers, promotion and discipline to prevent corrupt practices
- Undertaking capacity building of police officers through retraining on basic and advanced investigation to enhance investigative skills on corruption cases
- Establishment of Corruption Prevention Committees at the National, County and Sub-county levels as well as in the Police Posts, camps and units to prevent and combat corruption
- Partnered with members of the public to carry out community policing

**iii) Kenya Revenue Authority**

- Automation of KRA Operations to facilitate effective and efficient service delivery and seal corruption loopholes: i-Tax, Electronic Cargo Tracking System, Integrated Tax Management System, Simba System, Data Processing Centre, KRA Portal, Call Centre, Vehicle Management System, Valuation Database System, Manifest Management System, Common Cash Receipting System, Enterprise Resource Planning System, among others.
- Establishment of a fully-fledged Ethics and Integrity Department with a direct report to Commissioner General, to oversee the Integrity Programme
- Establishment of Corruption Prevention Committees in the Authority;
- Comprehensive Annual Corruption Risk Assessment and Corruption Prevention Plans with monitoring and evaluation of the plans.
- Development of the KRA Anti-Corruption policy, Gifts Policy and Conflict of Interest Policy to enhance integrity practices in the Authority
- Gifts and Conflict of Interest Registers in place for staff to declare gifts received and Conflict of Interest in line with the Leadership and Integrity Act
- KRA Code of Conduct revised to realign to Leadership and Integrity Act, 2012
- Corruption Reporting Channels in place: hotline: 0726 986 668 and email: corruption-reporting@kra.go.ke.
- Collaboration on Integrity with the Ethics and Anti-Corruption Commission; Kenya Leadership and Integrity Forum; and Regional Revenue Authorities (Uganda, Tanzania, Rwanda and Burundi)
- Education/Sensitization of Stakeholders and KRA Staff on Integrity.

**3.2.8 The Watchdog Agencies**

The Watchdog Agencies Sector is comprised of the Office of the Auditor General (OAG) and the Public Procurement Oversight Authority (PPOA). During this implementation phase, OAG and PPOA continued to audit public entities in both the National and County Governments.

- OAG established a Forensic Audit department
- PPOA developed and issued a Code of Ethics to all procuring Agencies to enhance compliance with procurement rules and regulations

- Development of a Code of Conduct and Ethics for Suppliers and Contractors by PPOA
- Hearing and determination of procurement related disputes by the Public Procurement Administrative Review Board (PPARB)
- OAG has adopted risk based audit methodology and strengthened the Quality Assurance Division
- OAG recruited additional staff with various skills and experiences and regional hubs established to enhance efficiency and effectiveness in audit of clients based at the county level
- OAG is carrying out performance/value for money audits and has introduced continuous audit at the county level
- The OAG has enhanced the use of technology in audit especially in data analysis and staff are using laptops to speed up the audit process
- Audit backlogs have been cleared at OAG

**3.2.9 The Media**

The media is a key stakeholder in the quest for good governance and war against corruption due to the oversight role that it plays. During this implementation period, the media remained vibrant in advocating for good governance as well as addressing corruption issues within its sector. Some of the key achievements made during the review period include:

- Enactment of Code of Conduct for the Practice of Journalism and entrenchment of the same in the Media Act 2007 and the subsequent Media Council Act 2013;
- Establishment of the Media Council Complaints Commission which handles complaints against the media, cases of corruption and integrity issues surrounding media practice
- Creating anti-corruption awareness broadcasting and filing of stories to support anti-corruption and integrity issues.
- Establishment of an Annual Award Scheme for journalists who exhibit excellence and integrity in the discharge of their duties.
- Sensitization of Journalists on the Code of Conduct and Ethics for media practice
- Protection of Journalists who are exposed to risk due to reporting of corruption.
- Launch of the 1st Survey in Kenya on Journalists Working Conditions in 2014 and implementation of the report commenced
- Accreditation of Journalists to eliminate impostors from the media practice
- Exposure of corruption scandals through investigative journalism

**3.2.10 The Private Sector**

The private sector implemented diverse strategies aimed at promoting integrity and corruption intolerance. The achievements made include the following:

- Adoption of the Code of Ethics for Business in Kenya to nurture an ethical climate for conducting business. A total of fifty seven (57) companies signed the Code to confirm their commitment to abide by the provisions of the Code. They will be expected to regularly report on implementation
- A total of Ninety Four (94) organizations which have signed up to the UN Global Compact principles continue to report on measures they are undertaking to fight corruption in business and within the supply chain
- Holding stakeholder consultation sessions with key public, private sector and civil society to share experiences and best practices in the fight against corruption
- Advocating for good governance in the discharge of public duties by public officers

- Participation in development of legislation and legal reforms
- Undertaking Corruption Risk Assessment targeting key functional areas in the private and public sector
- Conducting training targeting business organizations and other key actors in the private sector on integrity and ethics

### 3.2.11 Professional Bodies

The Professional Bodies Sector continued to strengthen good governance and professional ethics among its members. During the review period, professional associations made the following key achievements:

- Development of Codes of Ethics for fourteen (14) Professional Associations through the facilitation of the Association of Professional Societies in East Africa (APSEA) in collaboration with EACC
- Supporting the review of Codes of Ethics for Professional Association to incorporate integrity and anti-corruption content
- Coordination of ethics and anti-corruption training workshops targeting Professionals
- Development of a Monitoring and Evaluation tool to support Professionals in monitoring implementation of Codes of Ethics

### 3.2.12 The Education Sector

The sector achieved the following during the review period:

- Participation in the enactment of the Education Act, 2012 which makes provisions for governance and management of learning institutions
- Participation in the amendment of the Kenya National Examination Council to give the Council powers to address examination cheating
- Inclusion of ethics and integrity content in the education curriculum in liaison with EACC
- Mainstreaming integrity via integrity clubs and drama and music festivals in partnership with EACC

### 3.2.13 The Civil Society Sector

The civil society sector brings together various actors including non-governmental organizations (NGOs) involved in championing for good governance in Kenya and other public interest matters. They are represented in KLIF by the NGOs Coordination Board, National Council for NGOs and the Transparency International- Kenya (TI). Some of the notable achievements of the sector during the implementation phase under review include the following:

- Automation of the registration of NGO's
- Participation in the Review and development of the NGOs Co-ordination Act
- Participation in the review of the rules and regulations of the National Council of NGOs
- Conducted research aimed at informing the development of appropriate policies and legislation as well as advocacy efforts in the fight against corruption
- Carried out public education to sensitize the public on corruption and their role in fighting it. This was done through sensitization and education, public interest litigation and public petitions
- Engaged policy makers to support the development of quality anti-corruption laws and further carried out monitoring implementation of laws

### 3.2.14 Religious Organizations

This sector recorded a number of achievements including the following:

- Development of faith related and scriptural based IEC materials against corruption
- Conducting good governance as well as civic, voter and peace education
- Participation in the implementation of the Constitution by advocating for respect of the rule of law
- Participation in the enactment of the Constitution of Kenya, 2010
- Speaking against corruption from the pulpit and calling Kenyans to Godliness
- Nurturing a culture of integrity in society through character formation and advocating for character change
- Providing checks and balances on the exercise of public authority
- The formation of various religious membership bodies aimed at enhancing accountability and transparency in the sector
- Engagement in mobilization of members to participate in decision making in various governance processes
- Nomination of top clergy as members of agencies that seek to enhance good governance
- Mobilization of funds for initiatives aimed at promoting integrity and good governance

### 3.3 Achievements of KLIF Secretariat

The Kenya Leadership and Integrity Forum is supported by a Secretariat which works under the guidance of the National Coordinating Committee (NCC). During the review period, the Secretariat provided the necessary support to the participating sectors to ensure timely implementation of their anti-corruption activities. Key among them includes the following:

- Development of a Monitoring & Evaluation framework to assess performance of sectors
- Conducting annual integrity review conferences to assess progress in implementation of the NACP
- Conducting one National & County Leadership & Integrity Conferences in June 2013
- Annual commemoration of the International Anti-Corruption Day since 2008
- Sustained participation by the fourteen sectors
- Development of KIP
- Development and dissemination of information, education and communication (IEC) materials

### 3.4 Challenges in the implementation of the NACP

- i) The NACP did not provide for an implementation time frame. This necessitated a review in order to align the NACP to the changing trends of corruption and current concerns of the people of Kenya
- ii) Although KLIF draws its mandate from the EACC Act 2011 under Section 11 (1) (i), (2), and (6) (c), KLIF is not anchored in any legal or policy framework thus affecting its efficiency & effectiveness in monitoring implementation of the NACP
- iii) Inadequate funding that is received mainly from EACC
- iv) Varied levels of commitment by the sectors

## CHAPTER 4: SITUATIONAL ANALYSIS

A situational analysis was undertaken to evaluate the internal and external operating environment that may affect implementation of the Plan. Specifically, analysis of the Plan's strengths, weaknesses, opportunities and threats (SWOT); Political, Economic, Socio-cultural, Technological, Legal and Environmental (PESTLE); and the role of stakeholders was undertaken. The objective of the situational analysis was to improve the implementation strategies of the plan.

A summary of the various analyses is tabulated below:

### 4.1 Strengths, Weaknesses, Opportunities, and Threats (SWOT) Analysis

**Table 1: SWOT Analysis**

<b>Strengths</b>	<b>Weaknesses</b>
<ol style="list-style-type: none"> <li>Government goodwill (specify National or County)</li> <li>EACC support</li> <li>Stakeholders participation</li> <li>Diversity of the stakeholders</li> <li>Availability of expertise in ethics and anti-corruption</li> <li>Widespread geographical presence of the stakeholders</li> <li>Functional coordinating office (KLIF)</li> </ol>	<ol style="list-style-type: none"> <li>Inadequate framework for stakeholder cooperation and networking</li> <li>Inadequate synergy among sectors</li> <li>Weak communication strategy &amp; information sharing platform.</li> <li>Inadequate stakeholder financial support</li> <li>Inadequate public ownership of the war against corruption</li> <li>Insufficient deliverables of anti-corruption activities</li> <li>Inadequate sensitization of stakeholders</li> <li>Inadequate M&amp;E and follow up</li> </ol>
<b>Opportunities</b>	<b>Threats</b>
<ol style="list-style-type: none"> <li>Goodwill from development partners</li> <li>National, regional and international anti-corruption legal frameworks and networks</li> <li>Anti-corruption indicators in performance contracting</li> <li>Provisions in the national development agenda</li> <li>Advancement in technology</li> <li>Enlightened citizenry</li> <li>Public sector reforms</li> </ol>	<ol style="list-style-type: none"> <li>Stakeholder fatigue</li> <li>Erratic support</li> <li>Politicization of the fight against corruption</li> <li>Erosion of societal values</li> <li>Public cynicism</li> </ol>

### 4.2 Political, Economic, Socio-cultural, Technological, Legal and Environmental (PESTLE) Analysis

**Table 2: PESTLE Analysis**

<b>Factor</b>	<b>Issues</b>	<b>Effects</b>
<b>Political</b>	<ul style="list-style-type: none"> <li>Politicization of the fight against corruption</li> <li>Inconsistent support for the fight against corruption</li> <li>Enactment of weak anti-corruption laws</li> </ul>	<ul style="list-style-type: none"> <li>Protection of corrupt persons on account of political and ethnic considerations</li> <li>Inadequate capacity</li> <li>Insufficient legal mechanism</li> </ul>
<b>Economic</b>	<ul style="list-style-type: none"> <li>Inadequate funding towards anti-corruption interventions</li> <li>Lack of transparency and accountability in the management of public resources</li> </ul>	<ul style="list-style-type: none"> <li>Limited capacity to roll out anti-corruption interventions</li> <li>Increased corruption loopholes</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>Apathy towards fighting corruption</li> <li>Nepotism</li> <li>Glorification of the rich</li> <li>Culture of dependency</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate participation in the fight against corruption</li> <li>Poor service delivery</li> <li>Appointments not based on merit</li> <li>No social checks or accountability by the citizens</li> <li>Shortcuts to opportunities and to resources</li> </ul>
<b>Technological</b>	<ul style="list-style-type: none"> <li>Technology based corruption malpractices</li> <li>Transnational corruption</li> <li>Innovative corruption cartels</li> </ul>	<ul style="list-style-type: none"> <li>Increased speed in corrupt activities</li> <li>Difficulty in detection and investigation of corruption across different jurisdictions</li> <li>New frontiers of corruption</li> </ul>
<b>Legal</b>	<ul style="list-style-type: none"> <li>Inadequate policy and legal framework</li> <li>Legal bottlenecks created through piecemeal legislation</li> <li>Disharmony in the anti-corruption laws</li> </ul>	<ul style="list-style-type: none"> <li>Loopholes within the policy and legal frameworks</li> <li>Slow disposal of corruption cases</li> <li>Contradictions and conflicts in case handling</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>Low levels of public confidence in the fight against corruption</li> <li>Fear by the public to report corruption</li> </ul>	<ul style="list-style-type: none"> <li>Public apathy in fighting corruption</li> <li>Increased levels of corruption</li> </ul>

### 4.3 Stakeholder Analysis

The Kenya Leadership and Integrity Forum (KLIF) is a collaborative network involving various stakeholders. A Stakeholder analysis was conducted to facilitate an understanding of the stakeholders, their roles and responsibilities, and to highlight their participation in implementing the KIP.



**Table 3: Stakeholder Analysis**

STAKEHOLDER	RESPONSIBILITIES	EXPECTED RESULTS
1. Executive	<ul style="list-style-type: none"> <li>Resource mobilization</li> <li>Policy formulation</li> <li>Drafting of Bills</li> <li>Negotiation and implementation of regional and international anti-corruption instruments</li> <li>Formulation and implementation of awareness creation campaign programmes</li> </ul>	<ul style="list-style-type: none"> <li>Adequate resources</li> <li>Improved governance</li> <li>Strengthened legal and policy framework on ethics, integrity and anti-corruption</li> <li>Mutual legal assistance</li> <li>Increased awareness</li> </ul>
2. Legislature	<ul style="list-style-type: none"> <li>Enactment of anti-corruption laws</li> <li>Oversight role</li> <li>Resource mobilization</li> <li>Resource allocation</li> </ul>	<ul style="list-style-type: none"> <li>Robust and relevant legislation</li> <li>Enhanced accountability</li> <li>Adequate resources for anti-corruption</li> </ul>
3. Judiciary	<ul style="list-style-type: none"> <li>Adjudication of anti-corruption cases</li> <li>Develop case law</li> <li>Promote alternative dispute resolution</li> </ul>	<ul style="list-style-type: none"> <li>Expeditious disposal of cases</li> <li>Transparent judicial processes</li> <li>Improved legal framework for anti-corruption</li> </ul>
4. County Governments (County Executives & County Assemblies)	<ul style="list-style-type: none"> <li>Enact anti-corruption laws at county level</li> <li>Oversight role</li> <li>Resource mobilization</li> <li>Resource allocation</li> <li>Resource utilization</li> </ul>	<ul style="list-style-type: none"> <li>Robust and relevant legislation</li> <li>Enhanced accountability</li> <li>Adequate resources for anti-corruption</li> </ul>
5. Labour	<ul style="list-style-type: none"> <li>Whistle blowing</li> <li>Awareness creation</li> <li>Advisory</li> </ul>	<ul style="list-style-type: none"> <li>Increased public awareness</li> <li>Reduced incidences of corruption</li> </ul>

STAKEHOLDER	RESPONSIBILITIES	EXPECTED RESULTS
6. EACC	<ul style="list-style-type: none"> <li>Promotion of ethics</li> <li>Education</li> <li>Prevention</li> <li>Investigation</li> <li>Asset tracking and recovery</li> <li>Advisory</li> </ul>	<ul style="list-style-type: none"> <li>Strengthened partnerships and coalitions</li> <li>Increased public awareness</li> <li>Recovery of public assets</li> <li>Expedited investigations</li> <li>Reduction in incidences of corruption</li> </ul>
7. Enforcement	<ul style="list-style-type: none"> <li>Law enforcement</li> </ul>	<ul style="list-style-type: none"> <li>Timely investigations and prosecution</li> <li>Public awareness</li> </ul>
8. Watchdog Agencies	<ul style="list-style-type: none"> <li>Audit</li> <li>Advisory</li> </ul>	<ul style="list-style-type: none"> <li>Good governance</li> <li>Prudent management of resources</li> <li>Timely audits</li> </ul>
9. Media	<ul style="list-style-type: none"> <li>Awareness creation</li> <li>Education</li> <li>Whistle blowing</li> </ul>	<ul style="list-style-type: none"> <li>Increased public awareness</li> <li>Reduced corruption levels</li> <li>Public participation</li> </ul>
10. Private Sector	<ul style="list-style-type: none"> <li>Signing of Integrity pacts</li> <li>Lobbying</li> <li>Legislative proposals</li> <li>Whistle blowing</li> </ul>	<ul style="list-style-type: none"> <li>Ethical business practices</li> <li>Good governance</li> <li>Increased public awareness</li> <li>Strengthened anti-corruption policy and legal regime</li> </ul>

STAKEHOLDER	RESPONSIBILITIES	EXPECTED RESULTS
11. Professionals	<ul style="list-style-type: none"> <li>Develop and implement Codes of conduct</li> <li>Conduct of Continuous Professional Development trainings</li> <li>Development of legislation for individual Professionals Association workshops on Ethics and Integrity</li> </ul>	<ul style="list-style-type: none"> <li>Enhanced professionalism and ethical practices</li> </ul>
12. Education	<ul style="list-style-type: none"> <li>Mainstreaming ethics and anti-corruption in the curriculum</li> <li>Awareness creation</li> <li>Educating the society on the effects of corruption</li> <li>Audit &amp; quality assurance of educational institutions</li> </ul>	<ul style="list-style-type: none"> <li>Promotion of values</li> <li>Enhanced public awareness</li> <li>Enhanced service delivery and resources management in education institutions</li> </ul>
13. Civil Society	<ul style="list-style-type: none"> <li>Lobbying and advocacy</li> <li>Public mobilization</li> <li>Drafting of Bills</li> <li>Anti-corruption campaigns and research</li> <li>Public interest litigation</li> </ul>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Public awareness</li> <li>Improved legal framework for anti-corruption</li> </ul>
14. Religious Organizations	<ul style="list-style-type: none"> <li>Education</li> <li>Awareness creation</li> <li>Lobbying</li> <li>Advisory</li> <li>Whistleblowing</li> </ul>	<ul style="list-style-type: none"> <li>Increased public awareness</li> <li>Improved values system</li> </ul>
15. Constitutional Commissions	<ul style="list-style-type: none"> <li>Recruitment and wealth declarations</li> <li>Advisory</li> <li>Vetting</li> <li>Awareness creation</li> <li>Investigations on human rights violations resulting from corruption</li> <li>Public interest litigation</li> <li>Research, monitoring and evaluation</li> </ul>	<ul style="list-style-type: none"> <li>Integrity in the work place.</li> </ul>
16. Development Partners	<ul style="list-style-type: none"> <li>Financial and technical assistance</li> <li>Whistle blowing</li> <li>Lobbying</li> <li>Advisory</li> </ul>	<ul style="list-style-type: none"> <li>Increased public awareness</li> <li>Improved capacity</li> <li>Good governance</li> </ul>

#### 4.4 Scope of Risks Analysis and Mitigation

The environment in which the KIP anticipates to operate remains challenging and uneven. The implementation of this plan is prone to various risks. The table below presents the type of risk, risk anticipated and the mitigation measures.

**Table 4: Risk Analysis and Mitigation for the Plan**

Type of Risk	Risk anticipated	Mitigation Measures
Strategic risk	<ul style="list-style-type: none"> <li>KLIF not anchored in any policy or legal framework</li> </ul>	<ul style="list-style-type: none"> <li>Lobby for anchoring of KLIF in the National Ethics and Anti-Corruption Policy</li> <li>Lobbying for anchoring of KLIF in a statute</li> </ul>
	<ul style="list-style-type: none"> <li>Politicization of the fight against corruption</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen partnerships and coalitions</li> <li>Public sensitization and civic education</li> </ul>
Technological risks	<ul style="list-style-type: none"> <li>Changing trends and complexities of corruption</li> </ul>	<ul style="list-style-type: none"> <li>Continuous capacity building</li> <li>Regular review and update of legal framework</li> </ul>
Sector risks	<ul style="list-style-type: none"> <li>Instability of sectors</li> <li>Erratic commitment</li> <li>Declining collaboration and cooperation among sectors</li> </ul>	<ul style="list-style-type: none"> <li>Continuous engagement with the sectors</li> <li>Lobby policy makers for commitment</li> </ul>
Financial risks	<ul style="list-style-type: none"> <li>Inadequate funding</li> </ul>	<ul style="list-style-type: none"> <li>Lobby sectors to allocate funds for anti-corruption activities</li> <li>Source funds from development partners</li> <li>Lobby for additional GOK allocation.</li> </ul>

## CHAPTER 5: STRATEGIC OBJECTIVES AND FOCUS OF THE PLAN

The Kenya Integrity Plan (KIP) is implemented through the platform of the Kenya Leadership and Integrity Forum (KLIF). The forum's mandate and strategic direction are the basis for its development. This chapter provides the Vision, Mission, Core Values, Strategic Goals, Strategic Themes and Objectives of the KIP.

### 5.1 Vision

A corruption-free, ethical and prosperous Kenya

### 5.2 Mission

To promote ethical conduct and integrity through partnerships and collaborative networks

### 5.3 Core Values

1. Integrity
2. Professionalism
3. Inclusiveness
4. Innovation
5. Transparency and Accountability
6. Rule of Law

### 5.4 Strategic Goals

The strategic goals during the Plan period are:

1. To promote integrity and combat corruption and unethical conduct in the public and private sector.
2. To raise competitiveness in doing ethical business.
3. To forge strategic alliances against corruption.

### 5.5 Strategic Themes

Four strategic thematic areas have been identified as follows:

1. Corruption reduction
2. Institutionalization of ethics, integrity and good governance;
3. Raising competitiveness in doing business; and
4. Forging all-inclusive partnerships.

### 5.6 Strategic Objectives of the Kenya Integrity Plan (KIP)

The strategic objectives of the KIP are specific and bound within the implementation period of the plan. They provide the basis upon which all the sectoral activities and initiatives will be implemented. A combination of various strategies will contribute to the achievement of these strategic objectives.

The strategic objectives of KIP are as follows:

#### I. To reduce incidences of corruption and unethical conduct.

This aims at carrying forward the gains made in the fight against corruption and developing new and sustainable strategies for combating new forms of corruption and unethical conduct both in the public and private sector.

#### II. To improve institutional governance and business ethics

This will ensure the promotion of ethical values and principles of good governance in the conduct of business. It will guide the building of capacity of institutions to detect and prevent corruption and unethical conduct.

#### III. To enhance efficiency in service delivery in the public and private sector

This focuses on ensuring quality and timely provision of goods and services to the public.

#### IV. To strengthen partnerships and collaborations in the fight against corruption and unethical conduct

This aims at enlisting stakeholders support in the war against corruption. The focus will be to pursue complementary collaborations in the implementation of the Plan.

#### V. To strengthen the integrity and anti-corruption legal and policy framework

This seeks the enactment and review of laws, policies, regulations and guidelines that facilitate the fight against corruption.

### 5.7 Linking the Strategic Objectives, Strategies and Activities

The linkage and logical relationship between the strategic objectives, strategies and sectoral activities are as summarized in the table below. When mapping out implementation, all participating institutions will align their activities to the KIP Strategic Objectives and will identify strategies that are relevant to their institutions. These are not limited to those outlined in the KIP.

**Table 5: Summary of strategic objectives, strategies and activities**

Strategic Objective	Strategy	Activities
To reduce the incidences of corruption and unethical conduct	Enhance financial management	<ul style="list-style-type: none"> <li>Conduct and submit annual audits</li> <li>Formulate and implement policies on donations, funding and sponsorships</li> <li>Undertake program based budgeting and planning</li> <li>Review enforcement of financial controls</li> </ul>
	Mainstream ethics and integrity	<ul style="list-style-type: none"> <li>Develop and implement codes of ethics and integrity</li> <li>Strengthen corruption reporting mechanisms</li> <li>Conduct corruption risk assessments</li> </ul>
	Intensify public education, training and awareness on ethics and integrity	<ul style="list-style-type: none"> <li>Undertake training and sensitization</li> <li>Carry out anti-corruption campaigns and identify anti-corruption champions</li> <li>Mobilize the public to participate in the fight against corruption</li> <li>Review of educational curricula to include ethics and anti-corruption issues</li> </ul>
	Intensify investigation and prosecution of corruption and unethical conduct	<ul style="list-style-type: none"> <li>Undertake investigations on corruption and unethical conduct</li> <li>Prosecute cases of corruption and unethical conduct</li> </ul>
To improve institutional governance and business ethics	Strengthen institutional frameworks for ethics and integrity	<ul style="list-style-type: none"> <li>Develop and enforce of Codes of Ethics for public and private sector institutions</li> </ul>
	Promote good governance and accountability	<ul style="list-style-type: none"> <li>Lobby and enforce compliance with laws, rules and regulations</li> <li>Monitor and enforce implementation of recommendations of oversight authorities</li> </ul>
	Set norms and standards for human resource management for the counties	<ul style="list-style-type: none"> <li>Formulate guidelines, norms and standards for human resource management</li> <li>Sensitize the county public service boards on Constitutional provisions</li> <li>Monitor implementation of guidelines, norms and standards</li> </ul>

Strategic Objective	Strategy	Activities
To enhance efficiency in service delivery in the public and private sector	Strengthen tax administration systems	<ul style="list-style-type: none"> <li>Develop Business Intelligence Framework</li> <li>Automate risk based audit and identify compliance risks</li> <li>Fully operationalize the Kenya National Electronic Single Window System</li> </ul>
	Enhance efficiency in handling corruption cases.	<ul style="list-style-type: none"> <li>Install effective ICT systems</li> </ul>
	Strengthen policies, systems, procedures and practices of work	<ul style="list-style-type: none"> <li>Undertake system review to identify corruption loopholes</li> <li>Provide advisory services</li> <li>Develop and promote standards in ethics and integrity</li> <li>Automate processes</li> <li>Develop and implement Service Delivery Charters</li> </ul>
	Improve communication strategies and systems	<ul style="list-style-type: none"> <li>Develop and implement an effective communication strategy</li> <li>Hold regular briefings and meetings and issue press releases on major institutional events and successes</li> <li>Use e-platform and other media to disseminate information</li> </ul>
To strengthen partnerships and collaborations in the fight against corruption and unethical conduct	Forge strategic alliances and collaborations	<ul style="list-style-type: none"> <li>Establish and maintain collaborations and networks</li> <li>Establish a recognition, honours and awards scheme</li> </ul>
	Advocate for good governance and corruption intolerance	<ul style="list-style-type: none"> <li>Lobby law enforcement agencies to enhance efficiency and service to the public</li> <li>Undertake joint studies on corruption and disseminate study findings</li> <li>Innovate new ways of addressing the changing trends of corruption</li> </ul>

Strategic Objective	Strategy	Activities
Strengthen integrity and anti-corruption legal and policy framework	Develop and re-view anti-corruption laws, policies, Regulations and Guidelines	<ul style="list-style-type: none"> <li>Review existing legislation</li> <li>Develop new legislation and regulations</li> <li>Formulate and implement the National Ethics and Anti-corruption Policy</li> </ul>
	Audit compliance with statutes, regulations, parliamentary and county assembly resolutions and judicial precedents.	<ul style="list-style-type: none"> <li>Carry out annual audits</li> <li>Undertake compliance audits of international and regional instruments on anti-corruption and ethics</li> </ul>

## CHAPTER 6: IMPLEMENTATION AND COORDINATION

This chapter stipulates the framework that will guide each sector in implementing its activities in relation to the objectives and strategies of the Kenya Integrity Plan (KIP). The sector coordination will provide inter and intra sectoral linkages and harness resources within and among sectors to undertake related activities. This chapter provides details on the implementation model; and institutional and coordination framework.

### 6.1 Implementation Framework

The KIP has been developed through a consultative process involving the fourteen sectors under the Kenya Leadership and Integrity Forum (KLIF) framework. The Plan has outlined programmes and activities to be implemented by the various sectors across the five strategic objectives. Sectors will prepare annual integrity plans drawn from the KIP which will be submitted to the KLIF Secretariat for consolidation and coordination. The consolidated annual integrity plans will then be submitted to the National Coordinating Committee for adoption.

### 6.2 Coordination Framework

Coordination framework refers to arrangements that encourage joint decision-making with regard to implementation and review of the KIP. KIP is developed through multi-sectoral approach and thus all sectors are accountable to each other for the implementation of the plan.

Similarly, KIP will be guided by sectoral approach where different sectors collectively participate in the implementation of the plan through the co-ordination of the framework discussed in the plan. In the management of the KIP, there will be National Forum on Integrity (NFI), National Coordinating Committee (NCC), Sector Coordinating Committee (SCC) and KLIF Secretariat.

#### 6.2.1 National Forum on Integrity (NFI)

The patron of the NFI shall be the **President of the Republic of Kenya** and members will be drawn from policy level leadership of the participating sectors such as Chairpersons of Commissions, Cabinet Secretaries, Principle Secretaries, CEOs of stakeholder institutions etc. The NFI will provide the policy direction in the implementation of the KIP. The NFI shall meet annually.

#### 6.2.2 National Coordinating Committee (NCC)

Members of the NCC shall represent the stakeholders of the participating sectors. Each sector will appoint at least two (2) NCC members who should be Chief Executive Officers or Accounting Officers in their respective institutions. Members of the NCC will be expected to be persons of high integrity.

The NCC shall be chaired by the Cabinet Secretary responsible for matters of ethics and integrity. The Ethics and Anti-Corruption Commission will provide the Secretariat.

The NCC shall meet quarterly to review the implementation of KIP and will have the following roles:

- Oversee the implementation of the Plan;
- Provide policy direction for anti-corruption initiatives;
- Set priorities and coordinating programmes;

- Approve annual implementation plans;
- Collaborate and partner with other key stakeholders;
- Mobilize resources;
- Oversee monitoring and evaluation of the Plan; and
- Contribute to national policy and law formulation processes on anti-corruption and ethics.

### 6.2.3 Sector Coordinating Committees (SCC)

The various sectors will develop an internal framework that will be consistent with the progress implementation matrix provided by the Secretariat so as to enhance effective and efficient implementation of the KIP in their institutions.

When mapping out implementation, all participating institutions will align their activities to the KIP Strategic Objectives and will identify strategies that are relevant to their institutions. These are not limited to those outlined in the KIP.

The stakeholders within each sector will form the Sector Coordinating Committees (SCC) to spearhead the implementation of the sector activities. Each sector shall nominate a convenor who shall provide coordination, planning, progress reviewing, as well as general consultations on matters of the Plan.

The key responsibilities of the SCC are:

- Developing action plans for the implementation of the Plan;
- Managing and coordinating sectoral matters and emerging issues in the implementation of the KIP;
- Monitoring implementation of the Plan;
- Reviewing implementation of the Plan; and
- Submitting quarterly reports to the Secretariat on the implementation progress.

### 6.2.4 Kenya Leadership and Integrity Forum Secretariat

The Kenya Leadership and Integrity Forum shall have a fulltime secretariat working under the guidance of the NCC Secretary.

The Secretariat will collate issues arising from the various KIP committees and present them to the NCC for guidance and decisions. The Secretariat will also provide the necessary support to the participating organizations to ensure timely implementation of their anti-corruption project activities. It will collect/receive data, collate and compile reports from the stakeholders. With the direction of the NCC, the Secretariat will analyse the data and provide feedback to the stakeholders for planning and implementation.

The Secretariat will have the following responsibilities:

- Provide Secretariat services to all sub-committees of the NCC and the NFI;
- Implement decisions of the NCC and the NFI;
- Support NCC in monitoring implementation of the Plan;
- Coordinate monitoring and evaluation of the KIP;
- Maintain a database of the partners/stakeholders;
- Serve as a resource and documentation center for the stakeholders;
- Provide or arrange for professional and technical support to stakeholders initiatives;

- Coordinate sector workshops to address cross cutting anti-corruption issues;
- Organize forums for continuous engagement with County leadership and members of the public; and
- Organize the annual International Anti-Corruption Day and National Leadership and Integrity Conferences.

### 6.3 Support Mechanism

The various sectors will develop internal framework that will enhance effective and efficient implementation of the KIP in their institutions. The implementation of KIP will depend mainly on the sectors effort to mobilize resources, offer commitment and execute communication strategy.

#### 6.3.1 Financial Support and Resource Mobilization

Implementation of the Plan will depend on the availability of financial, human capital and technological resources from all sectors. Sectors will provide the resources in addition to building their capacities for the benefits of the Plan. The KLIF secretariat will annually present budgets required to implement joint programmes to the NCC for consideration. The Committee will provide guidelines for resource mobilization. The sectors will commit financial resources and in-kind support towards KLIF programmes.

During the planning period, it is expected that the sectors will provide budgets to implement activities within their ambit. In view of this, sectors will be encouraged to consider capturing KIP activities within their Strategic Plans and performance contracting programmes. KLIF will also make a proposal for resource mobilization from development partners for consideration and implementation.

#### 6.3.2 Sector Commitment

The commitment of the sectors in implementing the KIP is crucial in the fight against corruption and unethical conduct. Therefore all the sectors are urged to mainstream the KIP strategies and activities into institutional Strategic Plans, work plans, performance contracting, operational manuals and governance policies.

#### 6.3.3 Communication Strategy

The KLIF Secretariat will communicate all matters related to the Plan. To ensure synergy, the Secretariat will design and implement an effective communication strategy. The strategy shall provide interactions among participating sectors and KIP organs, and the public. Platform, meetings, workshops, seminars, retreats and conferences will be used to share information on implementation of KIP and its achievements. Other channels like letter, memos, newsletters, press releases, public debates and electronic and print media web platforms will also be employed. The communication strategy shall provide for feedback mechanism to enable the participating sectors and key stakeholders to draw lessons from the implementation of the Plan.

## CHAPTER 7: MONITORING, EVALUATION AND REPORTING FRAMEWORK

This Chapter outlines the processes that will be carried out to assess implementation of the Kenya Integrity Plan (KIP) as a measure to ensure that the set targets are achieved within the Plan period. For the successful implementation of the Plan, the sectors will be expected to develop sector action plans and integrate them into their institutional annual work plans. The action plans will indicate specified time frames with systematic and well-coordinated monitoring and evaluation systems.

The framework will provide a structured system for the National Coordinating Committee (NCC) to measure and assess performance in the implementation of the Plan in order to more efficiently manage the inputs, processes, outputs, outcomes and impacts of anti-corruption programmes. It will also allow the sectors to identify weaknesses in the implementation of their plans with a view to suggesting areas for adjustment so that the plans address the needs for preventing and fighting corruption. Broadly the framework will help improve performance and achieve desired results.

### 7.1 Goals and Objectives

The purpose of the Monitoring, Evaluation and Reporting Framework is to:

- i). Assess the status of the KIP implementation
- ii). Ensure that performance takes place in accordance with work plans
- iii). Improve coordination and communication through readily available information/data
- iv). Improve awareness on KIP activities among all stakeholders
- v). Identify and explain the problems affecting the KIP implementation
- vi). Assess the effectiveness of the KIP interventions
- vii). Assess whether the activities are on track in meeting the KIP goals
- viii). Improve the implementation of the KIP activities through timely feedback to stakeholders for decision making
- ix). Strengthen the capacities for monitoring and evaluation at sector level

### 7.2 Monitoring, Evaluation and Reporting Framework

KLIF will put in place a robust system for tracking implementation of the KIP, evaluating results, and documenting and disseminating progress reports. The Monitoring and Evaluation will be linked to the overall goals and strategic objectives of the Plan. Reports would be collected through regular sectoral meetings.

### 7.3 Reporting

The channels for reporting and dissemination will include meetings, presentations, publications, website, press releases, launches, workshops, amongst others.

Each sector will prepare Quarterly Progress Reports and Annual Progress Review Reports and submit them to the KLIF Secretariat for compilation. The Reports will be disseminated during the quarterly NCC meetings and also at the Annual Conference. The KLIF Secretariat will also conduct mid-term and end term evaluation on the implementation of the KIP.

### 7.4 Key Performance Indicators (KPI)

The KPIs measure the extent to which the Plan will have achieved its objectives and the long term goals. Indicators of impact/outcome related to KIP's strategic objectives that will be considered are:

- i). Level of corruption and unethical conduct
- ii). Compliance to the relevant spheres of law
- iii). Level of satisfaction in service delivery
- iv). Level of confidence in KLIF member institutions

A robust and functioning monitoring and evaluation framework will realize a number of benefits including:

- Improved performance through timely feedback to stakeholders
- Improved coordination and communication through readily available information
- Greater transparency
- Improved awareness of the KIP activities
- Increased public confidence

**APPENDICES****Appendix 1: IMPLEMENTATION MATRIX FOR THE KIP**

\*Budgets for implementing the activities will be provided by each sector.

\*When mapping out implementation, all participating institutions will align their activities to the KIP Strategic Objectives and will identify strategies that are relevant to their institutions. These are not limited to those outlined in the KIP.

**STRATEGIC OBJECTIVE 1: To reduce the incidence of corruption and unethical conduct**

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
Enhance financial management	Conduct and submit annual audits	Audited Financial Statements	<ol style="list-style-type: none"> <li>Accountability and transparency in financial management</li> <li>Reliable financial statements</li> <li>Reduced malpractices</li> </ol>	<ol style="list-style-type: none"> <li>No. of audited financial statements</li> <li>Level of compliance</li> </ol>	All Sectors	2015-2019
	Formulate and implement policies on donations, funding and sponsorships	Policies	<ol style="list-style-type: none"> <li>Accountability and transparency in management of funds and donations</li> </ol>	<ol style="list-style-type: none"> <li>No. of Policies formulated</li> <li>No. of policies Adopted</li> <li>Level of compliance with policies</li> </ol>	<ol style="list-style-type: none"> <li>Religious Sector</li> <li>Professional Associations Sector</li> <li>Civil Society Sector</li> <li>All sectors</li> </ol>	2015-2019
Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
	Undertake program based budgeting and planning	Approved balanced budgets and plans	<ol style="list-style-type: none"> <li>Efficient utilization of financial resources</li> <li>Achievement of the development goals</li> </ol>	<ol style="list-style-type: none"> <li>Annual budget estimates</li> <li>No of budget monitoring reports</li> </ol>	All Sectors	2015-2019
	Review enforcement of financial controls	<ol style="list-style-type: none"> <li>Expenditure returns</li> <li>Audit reports</li> </ol>	<ol style="list-style-type: none"> <li>Enhanced adherence to financial controls</li> </ol>	<ol style="list-style-type: none"> <li>No. of expenditure returns</li> <li>No. of audit reports</li> </ol>	All Sectors	2015-2019



Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
Mainstreaming ethics and integrity	Develop and implement codes of ethics and integrity	Codes and Regulations	<ol style="list-style-type: none"> <li>Improved service delivery</li> <li>Improved ethical practices</li> <li>Enhanced governance</li> <li>Reduced malpractices</li> </ol>	<ol style="list-style-type: none"> <li>No. of codes and Regulations developed</li> <li>Gazetted codes and regulations under LIA 2012</li> <li>Level of Compliance with codes and regulations under LIA 2012</li> </ol>	All Sectors	2015-2019
	Strengthen corruption reporting mechanisms	Whistle blowing and reporting mechanisms	<ol style="list-style-type: none"> <li>Improved corruption reporting</li> <li>Deterrence of corruption</li> <li>Disruption of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No of corruption reports received</li> <li>No. of disruption reports</li> </ol>	All sectors	2015-2019
	Conduct corruption risk assessments	<ol style="list-style-type: none"> <li>Risk assessment reports</li> <li>Corruption prevention plans</li> </ol>	<ol style="list-style-type: none"> <li>Reduced incidents of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No of risk assessments conducted</li> <li>No of corruption prevention plans</li> <li>No. of M&amp;E reports</li> </ol>	<ol style="list-style-type: none"> <li>All sectors</li> <li>EACC</li> <li>County Governments</li> </ol>	2015-2019
Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
	Implement the national integrity pact	Signed integrity pacts	<ol style="list-style-type: none"> <li>Enhanced ethical practices in business</li> <li>Reduced costs of doing business</li> <li>Enhanced professionalism</li> <li>Increased domestic and international investments</li> <li>Improved ranking in internationally recognized indices</li> </ol>	<ol style="list-style-type: none"> <li>No of signatories to the pact</li> <li>Level of compliance</li> </ol>	EACC KEPSA KAM	2015-2019

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
Intensify public education, training and awareness on ethics and integrity & corporate governance	Undertake training and Sensitization	<ol style="list-style-type: none"> <li>Conferences, workshops, Open Days, Exhibition and Clinics</li> <li>Standard operating manuals</li> <li>Establish and Revamped CPCs</li> </ol>	<ol style="list-style-type: none"> <li>Improved Professionalism and Integrity</li> <li>Informed and responsible citizenry</li> <li>Adoption of standard operating manuals</li> </ol>	<ol style="list-style-type: none"> <li>No. of trainings and sensitizations</li> <li>Level of awareness on corruption and ethics</li> <li>No. of operational CPCs</li> </ol>	<ol style="list-style-type: none"> <li>All Sectors</li> <li>Civil society sector</li> <li>NACCSC</li> <li>EACC</li> </ol>	2015-2019
	Carry out anti-corruption campaigns and identify anti-corruption champions	<ol style="list-style-type: none"> <li>Anti-corruption Messages and endorsements</li> <li>Champions identified</li> <li>Trainings undertaken</li> </ol>	<ol style="list-style-type: none"> <li>Increased awareness</li> <li>Improved value system</li> <li>Increased public participation in the fight against corruption</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No of campaigns carried out</li> <li>No of champions identified and trained</li> <li>Annual benchmarking visits</li> </ol>	<ol style="list-style-type: none"> <li>NACCSC</li> <li>Executive Sector</li> <li>KEPSA</li> <li>EACC</li> <li>Faith sector</li> <li>Education</li> </ol>	2015-2019
	Mobilize the public to participate in the fight against corruption	<ol style="list-style-type: none"> <li>Civilian oversight committees</li> <li>Sensitization forums and barazas</li> <li>Anti-corruption messages</li> <li>Media</li> </ol>	Empowered Citizenry	<ol style="list-style-type: none"> <li>No. of sensitization forums and barazas</li> <li>Number of messages developed and disseminated</li> <li>No. of IEC materials distributed</li> <li>No. of Civilian oversight committees established</li> <li>No. of media programs</li> </ol>	<ol style="list-style-type: none"> <li>Religious Sector</li> <li>NACCSC</li> <li>Council of Governors</li> <li>EACC</li> <li>Civil Society</li> <li>Education Sector</li> <li>Media</li> </ol>	2015-2019
		<ol style="list-style-type: none"> <li>Reviewed curricula that includes ethics and anti-corruption issues</li> </ol>	<ol style="list-style-type: none"> <li>Increased awareness</li> <li>Positive change in attitude, behaviour and practices</li> </ol>	<ol style="list-style-type: none"> <li>No. of curricula reviewed and implemented</li> </ol>	<ol style="list-style-type: none"> <li>Education Sector</li> <li>KRA</li> <li>National Police Service</li> <li>Religious Sector</li> <li>KICD</li> <li>EACC</li> <li>Professional Associations Sector</li> <li>Executive Sector</li> </ol>	2015-2019
	Review of educational curricula to include ethics and anti-corruption					

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
Intensify investigation and prosecution of corruption and unethical conduct	Undertake investigations on corruption and unethical conduct	1. Completed investigation files 2. Value of Assets traced, preserved and recovered	1. Reduced incidences of corruption and unethical conduct	1. No. of forensic investigations 2. No. of traps and stings operations 3. Value of disruptions 4. Value of assets recovered	1. EACC 2. Attorney General (Asset Recovery Agency) 3. NPS 4. KRA	2015-2019
	Prosecute cases of corruption and unethical conduct	1. Prosecutions undertaken 2. No of persons charged 3. No of cases concluded	1. Reduced incidences of corruption and unethical conduct 2. Improved corruption perception index	1. No. of cases prosecuted	1. Judiciary 2. ODPP 3. EACC 4. KRA 5. NPS 6. FRC	2015-2019

### STRATEGIC OBJECTIVE 2: To improve institutional governance and business ethics for transparency and accountability

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
Strengthen institutional frameworks for ethics and integrity.	Develop and enforce Codes of Ethics for public and private sector institutions	1. Codes of conduct 2. Advisories on codes of conduct 3. Assessment reports 4. Adoption of best practices	1. Professionalism in public and private sector 2. Improved institutional governance	1. No. of codes developed and implemented 2. Level of compliance 3. No. of advisories	1. EACC 2. All Sectors	2015-2019
	Lobby and enforce compliance with laws, rules and regulations	Compliance reports	Improved institutional governance	1. No. of compliant entities. 2. Level of compliance	All Sectors	2015-2019
Promote good governance and accountability	Monitor and enforce implementation of recommendations of oversight authorities	Implementation reports	Improved institutional governance	Level of compliance	1. Parliament 2. County Assemblies 3. Watchdog Sector 4. Enforcement Sector 5. Education 6. EACC	2015-2019

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
Strengthen policies, systems, procedures and practices of work	Undertake system review to identify corruption loopholes	Systems review reports	<ol style="list-style-type: none"> <li>Reduced incidences of corruption</li> <li>Improved governance</li> <li>Value for money service delivery</li> </ol>	<ol style="list-style-type: none"> <li>No. of system reviews</li> <li>No. of corruption prevention guidelines developed</li> <li>No. of Assessment reports</li> </ol>	<ol style="list-style-type: none"> <li>EACC</li> <li>All Sectors</li> </ol>	2015-2019
	Provide advisory services	<ol style="list-style-type: none"> <li>Advisories</li> <li>Legal opinions</li> <li>Standards and guidelines</li> </ol>	<ol style="list-style-type: none"> <li>Reduced incidences of corruption</li> <li>Increased awareness</li> </ol>	<ol style="list-style-type: none"> <li>No. of advisories issued</li> <li>No. of guidelines developed</li> <li>No. of legal opinions provided</li> <li>No. of Assessment reports</li> </ol>	<ol style="list-style-type: none"> <li>EACC</li> <li>Judiciary</li> <li>ODPP</li> <li>Legislature</li> <li>KEPSA</li> </ol>	2015-2019
	Develop and promote standards in ethics and integrity	Standards and guidelines	<ol style="list-style-type: none"> <li>Enhanced professionalism and ethical standards</li> <li>Best practices integrated</li> </ol>	<ol style="list-style-type: none"> <li>No. of guidelines</li> <li>No. of policies,</li> <li>Best practices and standards developed and implemented</li> </ol>	<ol style="list-style-type: none"> <li>EACC</li> <li>All sectors</li> </ol>	2015-2019
Improve communication strategies and systems	Automate processes	Automated Systems	<ol style="list-style-type: none"> <li>Efficiency</li> <li>Transparency</li> <li>Accountability</li> </ol>	<ol style="list-style-type: none"> <li>No. of Automated functions</li> </ol>	All Sectors	2015-2019
		Service Charters	<ol style="list-style-type: none"> <li>Efficiency in service delivery</li> <li>Customer Satisfaction</li> <li>Value for money in service delivery</li> </ol>	<ol style="list-style-type: none"> <li>No. of charters developed</li> <li>Satisfaction indices</li> <li>Level of Compliance</li> </ol>	All Sectors	2015-2019
		Communication strategy	<ol style="list-style-type: none"> <li>Increased levels of awareness</li> <li>Public support and confidence</li> </ol>	<ol style="list-style-type: none"> <li>No. of media messages broadcasted or published</li> <li>No. of forums and meetings held</li> </ol>	Secretariat All Sectors	2015-2019
	Hold regular briefings, press releases and meetings on major institutional events	Publications	<ol style="list-style-type: none"> <li>Public support and confidence</li> <li>Promotion of openness, efficiency</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No. of Publications</li> <li>No. of Press Releases</li> <li>Level of public confidence</li> </ol>	<ol style="list-style-type: none"> <li>Media</li> <li>All Sectors</li> </ol>	2015-2019
		Press Releases	<ol style="list-style-type: none"> <li>Public support and confidence</li> <li>Promotion of openness, efficiency</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No. of Materials posted on websites</li> <li>No. of Anti-corruption Messages</li> </ol>	All Sectors	2015-2019
		Anti-corruption messages	<ol style="list-style-type: none"> <li>Public support and confidence</li> <li>Promotion of openness, efficiency</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No. of Materials posted on websites</li> <li>No. of Anti-corruption Messages</li> </ol>	All Sectors	2015-2019
Use of e-platform and other media to disseminate information	Materials on websites	<ol style="list-style-type: none"> <li>Public support and confidence</li> <li>Promotion of openness, efficiency</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No. of Materials posted on websites</li> <li>No. of Anti-corruption Messages</li> </ol>	All Sectors	2015-2019	
	Anti-corruption messages	<ol style="list-style-type: none"> <li>Public support and confidence</li> <li>Promotion of openness, efficiency</li> <li>Reduced incidences of corruption</li> </ol>	<ol style="list-style-type: none"> <li>No. of Materials posted on websites</li> <li>No. of Anti-corruption Messages</li> </ol>	All Sectors	2015-2019	

**STRATEGIC OBJECTIVE 3: To enhance efficiency in service delivery in the public and private sector**

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
Strengthening tax administration systems	Develop Business Intelligence Framework	Interfaced Business Intelligence Framework	Improved tax collection	Level of tax compliance	1. KRA 2. EACC 3. NPS 4. National Transport and Safety Authority	2015-2019
	Automate risk based audit and identify compliance risks	Report on the identified risks	Increased efficiency in tax administration	1. No. of risk reports 2. Level of compliance 3. Percentage increase in tax collection	1. KRA 2. County Governments	2015-2019
	Fully operationalise the Kenya National Electronic Single Window System	Automated system fully operationalised	1. Reduced incidences of corruption at border points 2. Improved efficiency in clearance of goods	Level of compliance	1. KRA 2. KEPSA 3. National Treasury 4. Ministry of Trade 5. Ministry of Transport 6. Ministry of East Africa	2015-2019
Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsible Sector	Time Frame
Enhance efficiency in handling corruption reports.	Install effective ICT systems	Digital Records ICT systems	Efficiency in handling corruption reports and cases	1. No. of ICT systems 2. Percentage of digitized records	1. NPS 2. IPOA 3. Commission on Administrative Justice 4. EACC	2015-2019

### STRATEGIC OBJECTIVE 4: To strengthen partnerships and collaborations in the fight against corruption and unethical conduct

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
Forge strategic alliances and collaborations	Establish and maintain collaborations and networks	<ol style="list-style-type: none"> <li>1. Joint forums and initiatives</li> <li>2. Memoranda of understanding</li> <li>3. Anti-corruption networks</li> <li>4. One stop shops for business registration</li> </ol>	<ol style="list-style-type: none"> <li>1. Coordinated anti-corruption approach</li> <li>2. Efficient Anti-Corruption, and Integrity campaigns</li> <li>3. Reduced incidences of corruption.</li> <li>4. Reduced cost of doing business</li> </ol>	<ol style="list-style-type: none"> <li>1. No. of Joint forums and initiatives</li> <li>2. No. of MOUs</li> <li>3. No. of collaborative networks</li> </ol>	<ol style="list-style-type: none"> <li>1. All Sectors</li> <li>2. EACC</li> <li>3. NACCSC</li> <li>4. KLIF</li> </ol>	2015-2019
Advocate for good governance and corruption intolerance	Establish a recognition, honours and awards scheme	<ol style="list-style-type: none"> <li>1. Standards</li> <li>2. Awards</li> </ol>	<ol style="list-style-type: none"> <li>1. Improved standards of integrity</li> <li>2. Increased motivation to uphold integrity</li> </ol>	<ol style="list-style-type: none"> <li>1. Number of awards</li> <li>2. Levels of compliance to established standards</li> <li>3. No. of awards</li> </ol>	<ol style="list-style-type: none"> <li>1. All Sectors</li> <li>2. EACC</li> <li>3. KEPSA</li> <li>4. APSEA</li> <li>5. Devolution sector</li> </ol>	2015-2019
	Lobby law enforcement agencies to enhance efficiency and service to the public	<ol style="list-style-type: none"> <li>1. Petitions</li> <li>2. Memoranda</li> <li>3. Forum reports</li> </ol>	Improved service delivery	<ol style="list-style-type: none"> <li>1. Number of Petitions</li> <li>2. No. of memoranda</li> <li>3. No. of forums</li> </ol>	<ol style="list-style-type: none"> <li>1. NACCSC</li> <li>2. EACC</li> <li>3. Civil society Sector</li> <li>4. Faith Based Sectors</li> <li>5. Enforcement Sector</li> </ol>	2015-2019
Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
	Undertake joint studies on corruption and disseminate study findings	<ol style="list-style-type: none"> <li>1. Study Reports</li> <li>2. Baseline information</li> <li>3. Dissemination reports and forums</li> </ol>	<ol style="list-style-type: none"> <li>1. Informed interventions</li> <li>2. Empowered citizenry</li> </ol>	<ol style="list-style-type: none"> <li>1. No. of study reports</li> <li>2. Percentage of recommendations implemented</li> <li>3. Baseline information</li> <li>4. No. of dissemination forums</li> </ol>	<ol style="list-style-type: none"> <li>1. EACC</li> <li>2. NACCSC</li> <li>3. TI(K)</li> <li>4. All Sectors</li> </ol>	2015-2019
	Innovate new ways of addressing the changing trends of corruption	Innovative measures developed and implemented	<ol style="list-style-type: none"> <li>1. Changes(- improved) in perception and attitude towards corruption</li> <li>2. Improved business environment</li> <li>3. Reduced corruption</li> </ol>	<ol style="list-style-type: none"> <li>1. Number of innovative measures developed and implemented</li> <li>2. Changes in the business environment</li> <li>3. Changes in perception and attitude towards corruption</li> </ol>	<ol style="list-style-type: none"> <li>1. KEPSA</li> <li>2. KAM</li> <li>3. EACC</li> <li>4. Judiciary</li> <li>5. Government Agencies</li> </ol>	2015-2019
	Carry out strategic benchmarking on good governance	Benchmarking reports	Improved performance	No of benchmarking initiatives implemented	All sectors	

### Strategic Objective 5: Strengthen the integrity and anti-corruption legal and policy framework

Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
Develop and review anti-corruption laws, policies, regulations and guidelines	Review existing legislation	Reviewed laws	<ol style="list-style-type: none"> <li>Strong, supportive legal and policy framework</li> <li>Increased deterrence</li> <li>Improved investor confidence</li> </ol>	<ol style="list-style-type: none"> <li>No of laws Reviewed</li> <li>No of Bills tabled</li> <li>Improved ranking on the ease of doing business</li> </ol>	<ol style="list-style-type: none"> <li>OAG and DOJ</li> <li>KLRC</li> <li>EACC</li> <li>Parliament</li> <li>County Assemblies</li> <li>County Governments</li> <li>All sectors</li> </ol>	2015-2019
	Develop new legislation and regulations	New laws and regulations	Increased deterrence	<ol style="list-style-type: none"> <li>No of bills tabled</li> <li>No of laws enacted</li> </ol>	<ol style="list-style-type: none"> <li>OAG and DOJ</li> <li>KLRC</li> <li>EACC</li> <li>Parliament</li> <li>County Assemblies</li> <li>County Governments</li> <li>All sectors</li> </ol>	2015-2019
	Formulate and implement the National Ethics and Integrity Policy	National Ethics and anti-corruption policy document	A harmonized coordinated and effective approach to the fight against corruption	<ol style="list-style-type: none"> <li>Policy adopted</li> <li>Level of implementation</li> </ol>	<ol style="list-style-type: none"> <li>OAG&amp;DOJ</li> <li>Parliament,</li> <li>EACC</li> <li>KLIF</li> <li>All Sectors</li> </ol>	2015-2019
Strategies	Activities	Output	Expected Outcome/ Impact	Indicators	Responsibility	Time Frame
	Undertake compliance audits of international and regional instruments on anti-corruption and unethical practices	Implementation review reports	<ol style="list-style-type: none"> <li>Improved Governance</li> <li>Improved corruption perception index</li> <li>Competitiveness in doing business</li> </ol>	<ol style="list-style-type: none"> <li>No. of audits</li> <li>Level of compliance</li> </ol>	<ol style="list-style-type: none"> <li>OAG&amp;DOJ</li> <li>ODPP</li> <li>EACC</li> <li>Judiciary</li> <li>APSEA</li> <li>All Sectors</li> </ol>	2015-2019

## Appendix 2: Sector Mapping

The Kenya Integrity Plan is a five year Plan involving fifteen sectors and stakeholders as follows:

	<b>SECTOR</b>	<b>STAKEHOLDERS</b>
1	<b>Executive</b>	The Presidency, Office of the Attorney General & Department of Justice, Cabinet Office, National Anti-Corruption Campaign Steering Committee, National Treasury, PSC(k)
2	<b>Legislature</b>	National Assembly, The Senate, County Assemblies, PSC
3	<b>Judiciary</b>	Judiciary, Judicial Service Commission, National Council on the Administration of Justice, Kenya Law Reform Commission, Kenya Law
4	<b>County Governments</b>	Ministry of Devolution, Council of Governors, County Assembly Forum, Association of County Governments of Kenya
5	<b>Labour</b>	Ministry of Labour, COTU, NITA, FKE, NSSF, NHIF, RBA, Department of Pensions, Productivity Centre, TUC
6	<b>EACC</b>	EACC
7	<b>Enforcement</b>	ODPP, KRA, National Police Service, KWS, Anti-Counterfeit Agency, Immigration, Ministry of Interior and Coordination of National Government
8	<b>Watchdog Agencies</b>	EMU, KEBS, NEMA, Inspectorate of State Corporations, Auditor General, PPOA Controller of Budget, IPOA, NACADA
9	<b>Media</b>	Media Council of Kenya, Media Owners Association, Editors Guild, Ministry of Information, Kenya Film Corporation, Kenya Film Classification Board, Kenya Film Commission, Communications Authority of Kenya, Kenya Union of Journalists, Kenya Correspondents' Association, Association of Media Women in Kenya, Public Relations Society of Kenya, Media training institutions
10	<b>Private Sector</b>	KEPSA, KAM, Chamber of Commerce (KNCCI)
11	<b>Professional Bodies</b>	APSEA, Professional Bodies
12	<b>Education</b>	MOEST TSC, KICD, KNEC, HELB, CUE, KLB, TIVET, Universities, KISE, Kenya Private Schools Association, KUPPET, KNUT, KEP-SHA, KSSHA
13	<b>Civil Society</b>	NGO Council, NGO Coordination Board, NGOs, TI-Kenya
14	<b>Religious Organizations</b>	Hindu Council, SUPKEM, NCKK, EAK, KCCB, Inter-Religious Conference of Kenya (ICK)
15	<b>Constitutional Commissions</b>	National Police Service Commission, SRC, CAJ, TSC, JSC PSC, NLC, IEBC, CRA, Gender and Equality Commission, KNCHR, Chair's Forum