Ethics and Anti-Corruption Commission

STRATEGIC PLAN
2018 - 2023

Tuangamize Ufisadi, Tuijenge Kenya

VISION

An integrity driven Kenyan society

MISSION

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

MANDATE

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

CORE VALUES

Integrity

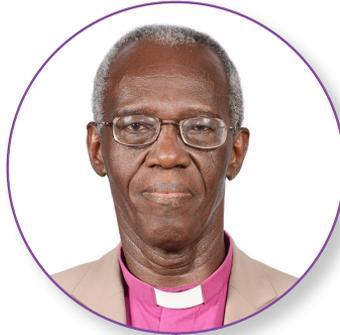Professionalism

Fidelity to the Law

Courage

Teamwork

Innovation

MEMBERS OF THE ETHICS AND ANTI-CORRUPTION COMMISSION

Archbishop (Rtd.) Dr. Eliud Wabukala, EBS

Commission Chairperson

Sophia Lepuchirit

Commission Vice Chairperson

Dr. Dabar A. Maalim

Commission Member

Mwaniki P. Gachoka

Commission Member

Halakhe D. Waqo, CBS, MCIArb

Commission Secretary/ Chief Executive Officer

Rose M. M. Macharia

Commission Member

Table of Contents

Tuangamize Ufisadi, Tuijenge Kenya

LIST OF TABLES

LIST OF FIGURES

ACRONYMS

ACECA	-	Anti-Corruption and Economic Crimes Act
ADR	-	Alternative Dispute Resolution
ATPI	-	Asset Tracing and Preliminary Investigations
AU	-	African Union
AUC	-	African Union Commission
AUCPCC	-	African Union Convention on Preventing and Combating Corruption
B&P	-	Budget and Planning
CC	-	Corporate Communication
CDF	-	Constituency Development Fund
CLARLS	-	Civil Litigation, Asset Recovery and Legal Support
CPCs	-	Corruption Prevention Committees
CEO	-	Chief Executive Officer
DCEO	-	Deputy Chief Executive Officer
DIALs	-	Declaration of Income Assets and Liabilities
EAAACA	-	East Africa Association of Anti-Corruption Authorities
EACC	-	Ethics and Anti-Corruption Commission
EACCA	-	Ethics and Anti-Corruption Commission Act
ELD	-	Ethics leadership Development
EMC	-	Ethics Monitoring Compliance
ETPA	-	Education, Training and Public Awareness
EVID	-	Electronic Voter Identification Devices
F&A	-	Finance and Accounts
FI	-	Forensic Investigations
FM	-	Frequency Modulation
FDI	-	Foreign Direct Investments
FIDA	-	Federation of Women Lawyers
GDP	-	Gross Domestic Product
GIZ	-	Deutsche Gesellschaft für Internationale Zusammenarbeit
GJLOS	-	Governance Justice Law and Order Sector
HRM	-	Human Resource Management
IAOs	-	Integrity Assurance Officers
ICT	-	Information Communication Technology
IEBC	-	Independent Electoral and Boundaries Commission
IEC	-	Information Education and Communication
I&O	-	Intelligence and Operations
IA	-	Internal Audit
ICT	-	Information and Communications Technology
KICC	-	Kenyatta International Convention Centre

KLIF	-	Kenya Leadership Integrity Forum
KMC	-	Kenya Meat Commission
KRA	-	Kenya Revenue Authority
KSMS	-	Kenya School of Monetary Studies
LATF	-	Local Authority Transfer Fund
LIA	-	Leadership and Integrity Act
LSK	-	Law Society of Kenya
M&E	-	Monitoring and Evaluation
MAT	-	Multi - Agency Team
MDAs	-	Ministries, Departments and Agencies
MDG	-	Millennium Development Goal
MLA	-	Mutual Legal Assistance
MTEF	-	Medium Term Expenditure Framework
MTP	-	Medium Term Plan
NECs	-	National Ethics and Corruption Surveys
NHIF	-	National Hospital Insurance Fund
NIS	-	National Intelligence Service
NYS	-	National Youth Service
OAG	-	Office of the Auditor General
PAA	-	Public Audit Act
PESTLE	-	Political, Economic, Social, Technological, Legal and Environmental
PFMA	-	Public Finance Management Act
POCAMLA	-	Proceeds of Crime and Anti Money Laundering Act
POEA	-	Public Officer Ethics Act
PS	-	Principal Secretary
PSC	-	Public Service Commission
PPDA	-	Public Procurement and Asset Disposal Act
R&T	-	Research and Transformation Department
SCM	-	Supply Chain Management
SDGs	-	Sustainable Development Goals
SRC	-	Salaries and Remuneration Commission
SWOT	-	Strength, Weaknesses, Opportunities and Threats
TSC	-	Teachers Service Commission
TVCs	-	Television Video Commercials
UNCAC	-	United Nations Convention against Corruption
UN	-	United Nations
UNDP	-	United Nation Development Programme
UNODC	-	United Nation Office on Drugs and Crime
VSAT	-	Very Small Aperture Terminal

MESSAGE BY THE CHAIRPERSON

This is the second Ethics and Anti-Corruption Commission (EACC) Strategic Plan. The Plan is an important document used by the Commission to communicate to Kenyans its commitment and strategies it will deploy to execute its mandate over the next five years. Implementation of the Plan is predicated on lessons drawn from past challenges and successes identified during the formulation process. Besides, the Strategic Plan accords the Commission an important opportunity to mainstream and align its strategies and programmes to current Government policies and programmes as contained in the Constitution of Kenya, Vision 2030, the Third Medium Term Plan (2018-2022) and the Big Four Agenda.

In the last few years, the Commission has recorded successful convictions as a result of its investigations. However, the public is still yearning to see more serious action taken on those who engage in corruption, economic crime and unethical conduct. Consequently, the Commission will make every effort within its powers to combat mega corruption that results to loss of billions of shillings. Noteworthy, the success in the fight against corruption is dependent on joint efforts and initiatives by stakeholders and the public. In addition, societal and cultural change is critical. To this end, the Strategic Plan provides for programmes that the Commission will implement to inculcate cultural transformation. The Commission will put more effort and direct every resource at its disposal to investigate all cases of corruption and unethical conduct, recover corruptly acquired assets, prevent corruption and educate the public on the dangers of corruption and enlist public support in the fight.

As provided in this Plan, the Commission will be guided by its Vision - **"An integrity driven Kenyan society"** and Mission - **"To promote integrity and combat corruption through law enforcement, prevention and education"**.

This Strategic Plan will ensure that the war against corruption, economic crime and unethical practices is well coordinated. It will also ensure that all stakeholders are effectively engaged. I therefore call upon all Kenyans to play their rightful roles in promoting integrity and combating corruption.

Archbishop (Rtd.) Dr. Eliud Wabukala, EBS

CHAIRPERSON

ETHICS AND ANTI-CORRUPTION COMMISSION

MESSAGE BY THE COMMISSION SECRETARY/CHIEF EXECUTIVE OFFICER

The implementation of the 2013 - 2018 Strategic Plan of the Commission ended in June 2018. Subsequently, the Commission needed to redefine its strategic focus for the next five years hence the formulation of this Strategic Plan 2018 - 2023. The Plan was developed through a participatory process involving the Commission and various stakeholders.

The overall goal of the Commission is to eradicate corruption and unethical practices in Kenya. This goal will be fulfilled through implementation of strategies aimed at achieving the following strategic objectives:

i)   Strengthening policy, legal and regulatory framework;

ii)   Enhancing law enforcement in the fight against corruption and unethical conduct;

iii) Enhancing public education, communication and awareness on corruption and unethical practices;

iv)   Enhancing the prevention of corruption and unethical practices; and

v)   Enhancing institutional capacity of the Commission.

The Commission will put in place a performance management framework that will facilitate effective and efficient programme implementation, monitoring and evaluation. The Commission will mobilize adequate financial resources and strengthen its human resource capacity over the Plan period to support full implementation of the Plan.

I wish to sincerely thank our stakeholders who took part in the Strategic Plan 2018-2023 validation workshop and provided valuable insights and ideas that helped shape the strategic direction and focus of the Commission for the next five years.

I also wish to appreciate the role of the Commission's Technical Committee Members who made significant contributions in the development of this Plan. They were: Michael Mubea, Vincent Okong'o, Jackson Mue, Gilbert Lukhoba, Emily Chege, Julius Muraya, Willis Wasala, Regina Muriuki, Nancy Namenge, Enoch Otiko, Patrick Owiny, Humphrey Mahiva, John Lolkoloi, Petronilla Kyengo, Susan Kinyeki, Joel Mukumu, Beatrice Kungu, Ignatius Wekesa, Ben Murei, Gillian Mutua, George Ojowi, Collins Aluda, Daniel Kang'ethe, Naomi Monari, Jared Aduwo, Farida Kokita, Priscah Bett, Viola Ocharo, Janet Bett, Edward Oyunga and Idris Shidhe. Finally, I recognize and appreciate all members of

staff, individuals and organizations not listed herein but whose contribution was valuable in formulating this Strategic Plan.

Halakhe D. Waqo, CBS, MCIArb

Secretary/Chief Executive Officer

ETHICS AND ANTI-CORRUPTION COMMISSION

BACKGROUND

1.0 Introduction

This section provides the mandate and functions of the Commission as well as the rationale for developing the Strategic Plan.

1.1 Mandate of EACC

The mandate of EACC is to combat and prevent corruption, economic crime and unethical conduct in Kenya through law enforcement, prevention, public education and promotion of ethical standards and practices. This mandate is derived from Articles 79 and 252 of the Constitution; the Ethics and Anti-Corruption Commission Act, 2011; the Leadership and Integrity Act, 2012; the Anti-Corruption and Economics Crimes Act (ACECA) of 2003; the Bribery Act of 2016; the Public Officer Ethics Act of 2003 among other relevant laws and legislation.

1.2 Functions of EACC

The functions of the Commission are to:

i) Enforce compliance with and enforcement of Chapter Six and Article 252 of the Constitution;

ii) Investigate and recommend to the Director of Public Prosecutions the prosecution of any acts of corruption, economic crime, unethical conduct or violation of codes of ethics or other matter prescribed in law;

iii) Trace and institute court proceedings for preservation and recovery of corruptly acquired assets or payment of compensation;

iv) Institute proceedings for forfeiture of unexplained assets;

v) Conduct conciliation, mediation and negotiation;

vi) Facilitate development of a code of ethics for state and public officers;

vii) Oversee enforcement of codes of ethics for state and public officers;

viii) Conduct public education and awareness on anti-corruption and ethical issues;

ix) Provide advisory services on ethics and integrity;

x) Collaborate with and facilitate state, public officers and other stakeholders to promote ethics and anti-corruption initiatives;

xi) Conduct integrity verification for persons seeking elective or appointive positions in state and public office;

xii) Develop and promote standards and best practices in ethics and anti-corruption programmes;

xiii) Monitor the practices and procedures of public bodies to detect corruption and secure revision of methods of work;

xiv) Assist private and public entities, and any interested person to develop and put in place procedures appropriate for the prevention of bribery and corruption; and

xv) Develop and publish guidelines to assist private and public entities in the preparation of procedures appropriate for the prevention of bribery and corruption.

1.3 Rationale for the Development of the Strategic Plan

Significant strides have been made in the fight against corruption globally and nationally. However, corruption remains a major challenge in Kenya. Global corruption perception indices and recent corruption surveys have consistently indicated that more needs to be done in the fight against corruption in Kenya.

The Kenya Vision 2030 envisages a globally competitive economy with high quality of life for its citizens. The realization of the vision is greatly dependent on the eradication of corruption, economic crime and unethical conduct in all Sectors of the economy. Therefore, the Plan is anchored on Vision 2030 and the attendant Medium Term Plan III (2018-2022); lessons learnt in the implementation of the previous Strategic Plan (2013 – 2018); and emerging policy, legal and institutional issues in the fight against corruption which include:

i) Enactment of the Bribery Act of 2016 which enjoins the private sector in the fight against corruption;

ii) Miscellaneous Amendment Act of 2014 which provided for amendment of the EACC Act, Leadership and Integrity Act and The Anti-Corruption and Economic Act 2003;

iii) Development of the Mutual Legal Assistance (MLA) guidelines in criminal matters;

iv) Increasing levels of corruption at the National and County levels;

v) Increasing transnational and cross border nature of corruption;

vi) Increasing use of technology in the perpetuation of corruption and economic crimes;

vii) Declaration of corruption as a national security threat by the President of the Republic of Kenya in his State of the Nation address on 6th March 2015;

viii) Establishment of Anti-Corruption and Economic Crimes Division in the High Court; and

ix) Operationalization of the Asset Recovery Agency and the Financial Reporting Center.

This Plan will guide the operations of the Commission from July 2018 to June 2023. The Plan provides strategic intervention measures that the Commission

will implement in the investigation and prevention of corruption, economic crime and unethical conduct as well as tracing and recovery of corruptly acquired assets, public education and promotion of ethical standards.

1.4 Formulation Process of the Plan

The Plan was formulated through a consultative process which involved the Commission's Steering Committee, Technical Committee, staff and public participation. The Steering Committee provided overall strategic direction while the Technical Committee coordinated the preparation of the Plan. An inception workshop was held on 19th March 2018 at Kenyatta International Convention Centre (KICC) to initiate the process of formulating this Plan. In the workshop, the Commissioners articulated the strategic direction for the Commission. Thereafter, the Commission convened a stakeholder validation workshop on 12th June 2018 at Kenya School of Monetary Studies (KSMS) where the stakeholders gave their views which were incorporated in the Strategic Plan.

1.5 Structure of the Plan

This Strategic Plan is structured into seven sections namely:

(i)   Background;
(ii)   National Development Agenda;
(iii)   Review of the 2013–2018 Strategic Plan;
(iv)   Environmental Scan;
(v)   Strategic Model;
(vi)   Institutional Framework for Plan Implementation and Monitoring; and,
(vii)   Appendices.

EACC Chairperson, Archbishop (Rtd.) Dr. Eliud Wabukala, EBS, Vice-Chairperson, Commissioner Sophia Lepuchirit, Commissioner Mrs. Rose M. M. Macharia, Commissioner Dr. Dabar A. Maalim, Chief Executive Officer/Secretary, Mr. Halakhe D. Waqo, CBS, MCIArb, staff of the Commission and stakeholders pose for a group photo during the EACC Strategic Plan Stakeholder's Workshop at the Kenya School of Monetary Studies, Ruaraka on 12th June 2018

THE NATIONAL DEVELOPMENT AGENDA

2.0 Introduction

This section covers Kenya's Development Agenda and the role of EACC in realizing national development priorities. It also highlights Kenya's obligation and commitment as stipulated in some of the regional and international anti-corruption instruments.

2.1 National Development Policy and Legal Instruments

The development aspiration of the Kenyan people is provided for in the Constitution of Kenya, 2010. In addition, the long term national development agenda is encapsulated in the Kenya Vision 2030. The Vision is implemented through five-year Medium Term Plans (MTP), currently at the Third Medium Term Plan 2018-2022. The Commission is responsible for spearheading the anti-corruption initiatives towards realization of the Vision.

2.1.1 Legal Framework

The Constitution of Kenya 2010 seeks to address problems of weak governance, culture of impunity and corruption that has stifled national development and progress. Article 10 of the Constitution provides National Values and Principles of Governance, Chapter 6 sets the benchmarks for Leadership and Integrity for State and Public Officers and Article 232 provides for the Values and Principles of Public Service.

Pursuant to Article 79 of the Constitution, Parliament enacted the Ethics and Anti-Corruption Commission Act, No. 22 of 2011 (EACC Act, 2011) which establishes EACC and spells out its mandate. The Leadership and Integrity Act of 2012 (LIA 2012), the Anti-Corruption and Economic Crimes Act of 2003 (ACECA, 2003) and the Bribery Act No. 47 of 2016 are the key legal instruments for implementation of Commission's mandate. Other complimentary legal instruments include:

a) Public Officers Ethics Act, 2003 (POEA);
b) Public Procurement and Asset Disposal Act, 2015 (PPDA);
c) Proceeds of Crime and Anti Money Laundering Act, 2009 (POCAMLA);
d) Public Finance Management Act, 2012 (PFMA); and,
e) Public Audit Act, 2015 (PAA).

2.1.2 Policy framework

The Kenya Vision 2030 is the country's long-term development blue-print. The Vision aims at transforming the country into a newly industrialized, "Middle

income country providing a high-quality life to all citizens by the year 2030". The Vision also aims at creating a cohesive, equitable and just society based on democratic principles and issue-based politics grounded on our rich and diverse cultures and traditions. It spells out actions that will be taken to achieve the goals. The Vision is anchored on three pillars: Economic, Social and Political as presented in Figure 1.
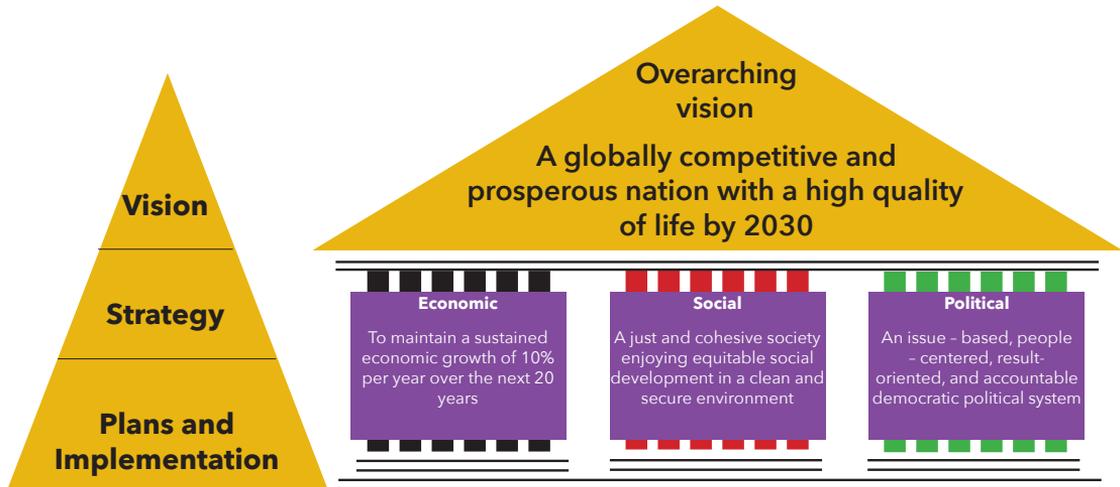
Figure 1: Pillars of the Kenya Vision 2030

The Economic pillar aims to achieve an average economic growth rate of 10 per cent per annum and sustain the same until 2030. The Social Pillar seeks to create just, cohesive and equitable social development in a clean and secure environment.

The Political Pillar aims to realize an "issue-based, people-centered, result-oriented and accountable democratic political system". The transformation of the Country's political governance system cuts across seven strategic thrusts. These are: rule of law; electoral and political processes; democracy and public participation; transparency and accountability; public administration and service delivery; security, peace building and conflict management and national reconciliation and recovery. One of the challenges identified under this pillar, and which the Commission has to play a lead role in tackling, is persistent corruption and weak governance.

The Kenya Vision 2030 is implemented through five-year Medium –Term Plans (MTPs). Having implemented the MTP I and II, the government formulated the MTP III to guide the implementation of the Kenya Vision 2030 over the next five years. MTP III aims at consolidating the gains made towards the attainment of a secure, just, cohesive, democratic, accountable, transparent and conducive environment for a globally competitive and prosperous Kenya. MTP III provides broad strategies on enforcement, prevention, public education and partnerships in the fight against corruption, economic crime and unethical conduct.

On 19th January 2018, the Government issued a Draft Medium-Term Policy Statement, which championed "the Big Four Agenda". The thrust of the Big Four Agenda is to raise the share of the manufacturing sector from nine to 15 percent of the Gross Domestic Product (GDP) by 2022; expand food production and supply to ensure that all citizens enjoy food security and proper nutrition; provide universal health coverage for all Kenyan homes; and build 500,000 affordable houses. The Big Four Agenda proposes entrenchment of structural reforms with the Government continuing to strengthen various institutions that are mandated to fight corruption in the Country, implement reforms on good governance and enhance the capacity to recover corruptly acquired assets.

2.2 Regional and International Instruments

A host of regional and international development blueprints including United Nations' Sustainable Development Goals (SDGs) and Africa Agenda 2063 serve to reinforce the national development agenda.

2.2.1 United Nations Convention against Corruption

Kenya signed and ratified the United Nations Convention against Corruption (UNCAC) and deposited its instrument of ratification, on 9th December 2003. The Convention obligates each member state to develop comprehensive measures for prevention, law enforcement, international cooperation, asset recovery, technical assistance and information exchange as responses for dealing with the global problem of corruption.

2.2.2 United Nations Sustainable Development Goals

World leaders adopted 17 Sustainable Development Goals (SDGs) to end poverty on September 2015 during the UN Sustainable Development Summit held in New York. The SDG number 16 seeks to promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

2.2.3 Africa Agenda 2063

The Golden Jubilee Summit of the Africa Union held in May 2013 in Addis Ababa, Ethiopia prepared a Continental 50-Year Agenda, known as Agenda 2063. The Agenda has seven aspirations of which aspiration 3 fosters: good governance, democracy, respect for human rights, justice and the rule of law.

2.2.4 African Union Convention on Preventing and Combating Corruption

Kenya is a State Party to the African Union Convention on Preventing and Combating Corruption (AUCPCC) having signed the Convention in July, 2003 and ratified it in February, 2007. The Convection criminalizes corruption in

the private and public sector, obligating state parties to adopt legislative, administrative and other measures to tackle corruption. The convention aims to achieve five objectives: Promote and strengthen anti-corruption mechanisms; promote, facilitate and regulate cooperation among state parties; coordinate and harmonize policies and legislation between state parties; remove obstacles to the enjoyment of human rights; and to establish conditions necessary to foster transparency and accountability in the management of public affairs.

2.2.5 East Africa Association of Anti-Corruption Authorities

Kenya is a founder member of the East Africa Association of Anti-Corruption Authorities (EAAACA), which was founded in September 2007. The overall objective of the EAAACA is to promote and facilitate regional cooperation, mutual legal and technical assistance in the prevention and combating of corruption in the region, sharing of information and capacity enhancement of member institutions in the conduct of their anti-corruption mandate.

REVIEW OF THE STRATEGIC PLAN 2013-2018

3.0 Introduction

The Commission's 2013 – 2018 Strategic Plan was anchored on five strategic objectives which were to: Reduce prevalence of corruption and unethical conduct; establish, maintain and strengthen partnerships and networks against corruption and unethical practices; promote ethics and good governance; mobilize resources for effective and efficient service delivery; and strengthen the policy and legal framework.

The review of the Plan covered the achievements, challenges and lessons learnt on law enforcement, prevention, public education, ethics, policy and legal framework.

3.1 Achievements

The following are highlights of achievements of the Strategic Plan.

3.1.1 Law Enforcement

The Commission investigated acts of corruption, economic crimes and unethical conduct. The Commission also traced, preserved and recovered corruptly acquired public assets and disrupted corruption networks.

a) Investigations

A total of 675 investigation files were forwarded to the Office of Director of Public Prosecution (ODPP). A total of 130 cases were completed in criminal courts resulting into 67 convictions, 36 acquittals and 27 withdrawals. To enhance the quality of investigations, the Commission established a well-equipped forensic laboratory.

It is worth noting that investigations into three major Anglo-Leasing Type Security Contracts were completed. These cases had stalled for 12 years after courts barred the Commission from using evidence obtained from other jurisdictions. Former senior government officials (Ministers and Permanent Secretaries) and the contracting companies were charged in courts of law and the cases are ongoing. The three cases were:

i)   Modernization of police security equipment and accessories project valued at Euros 40 million;

ii)   Computerization of security, law and order systems and procedures for Kenya Police project also known as "E-Cops" valued at Euros 59,688,250; and

iii)   Procurement of VSAT products for data network and rural network services for Postal Corporation of Kenya valued at United States Dollar 11,787,100.

Some of the cases completed included:

i)   Procurement irregularities in the purchase of a building to be used as a referral hospital by Trans Nzoia County Government at a cost of Kshs 500 million. Senior County officials were charged in Court;

ii)   Embezzlement of Kshs. 14.5 million belonging to Kenya Meat Commission (KMC) where after investigations the Managing Commissioner and other KMC officials were charged in Court;

iii)   Abuse of office and procurement irregularities in the construction of Kamukuiywa-Kaptama-Kapsokwony-Kimillili Road where a former Cabinet Secretary and several Ministry officials were charged in court;

iv)   Irregularities in the transfer of Karen Land valued at Kshs. 8 Billion where a former Cabinet Secretary, Senior Lands officials and directors of a private company were charged in Court;

v)   Abuse of office in the purchase of the official residence of the Chief Justice at Kshs. 350 million where a former Chief Registrar of the Judiciary and other senior employees of Judicial Service Commission were charged in Court;

vi)   Abuse of office and procurement irregularities in the purchase of Electronic Voter Identification Devices (EVID) at Kshs. 1.3 billion by the Independent Electoral and Boundaries Commission (IEBC) where former Chief Executive Officer, Deputy Chief Executive Officer and other officials were charged in Court;

vii)   Bribery allegations against IEBC officials in the printing of Ballot Papers by Smith and Ouzman and the Chief Executive Officer and other officials were charged in Court;

viii) Abuse of office and fraudulent acquisition of Kshs. 180 million belonging to Youth Enterprise Development Fund where the Chief Executive Officer and directors of a private company were charged in Court;

ix)   Abuse of office and procurement irregularities in the purchase of training materials by National Youth Service (NYS) where a former Principal Secretary and Senior NYS officials were charged in Court;

x)   Embezzlement of Kshs. 69.9 million belonging to Nursing Council of Kenya through operation of a secret Bank Account where after investigations, former Chief Registrar Nursing Council of Kenya and other officials were charged in Court;

xi)   Two cases of abuse of office and procurement irregularities by National Hospital Insurance Fund (NHIF) officials in respect to Public Servants Medical Scheme of Kshs. 116 million and Kshs. 202 million. The Chief Executive Officer and other senior NHIF officials were charged in Court; and

xii) A former Member of Parliament was arrested and charged for receiving a bribe of Kshs. 100,000 from a contractor to facilitate payment from the Constituency Development Fund (CDF) kitty.

As at 31st May 2018, there were 418 criminal cases pending before several courts in the Country. Some of the convictions recorded are provided in Table 1.

Table 1: Highlights of Convictions

	Name of Accused Person	Institution	Sentence / Fine
1.	• John Matsanza, County Secretary • Howard Lukadilu, Tender Committee Member • Oscar Onyango, Tender Committee Member • Ayub Tuavaka, Tender Committee Member • Arlington Shikuku, Tender Committee Member • Jacqueline Nanjala, Tender Committee Member • Reuben Cheruiyot, Tender Committee Member	Bungoma County Government	Accused persons convicted for various corruption offences for purchase of nine wheelbarrows each at Kshs. 109, 320. John Matsanza fined Kshs. 800,000 in default four years imprisonment. Each of the six Tender Committee Members fined Kshs. 600,000 in default three years imprisonment.
2.	• Sammy Kirui, former PS • John Gakuo, former Town Clerk • Mary Ngethe, former Director Legal Services • Alexander Musanga, Deputy Director	Nairobi City Council	Accused persons convicted in the case of Purchase of land to be used for cemetery at a cost of Kshs. 283,200,000 as follows: • Sammy Kirui convicted in a charge of abuse of office to serve three years imprisonment or a fine of Kshs. 1 million; • John Gakuo to serve a sentence of three years for abuse of office or pay a fine of Kshs. 1 million; • Mary Ngethe to serve for three years for knowingly giving a misleading document to principal or serve three years and a mandatory fine of Kshs. 52 million and in default one-year imprisonment; and • Alexander Musanga Musee to pay a fine of Kshs. 32 million or serve one-year imprisonment for knowingly giving a false document.

	Name of Accused Person	Institution	Sentence / Fine
3.	Francis King'ori Githaiga	Sports Kenya	Convicted for an offence of failure to disclose a private interest to one's principal contrary to Section 42 (1) of the Anti-Corruption and Economic Crimes Act, 2003 and Section 43 (1) (b) as read with Section 137 of the Public Procurement and Disposal Act, 2005. Accused fined cumulative fine of Kshs. 3 million in default to serve 60 months imprisonment.
4.	• Moses Gitari, Senior Deputy Secretary • Benjamin Isindu, Head of Procurement • Michael Nduguya, Procurement Officer	Ministry of Special Programs	Three accused persons convicted for a charge of willful failure with laws relating to procurement and fined Kshs. 500,000 each in default to serve one-year imprisonment. Moses Gitari and Benjamin Nduguya also convicted in an offence of abuse of office and fine Kshs. 250,000 or to serve six months imprisonment.
5.	Richard Njoroge Kimani, Assistant Commissioner	Kenya Revenue Authority	Convicted in an offence of corruptly soliciting for a bribe of USD 57,000 and fined Kshs. 1,500,000 or 2 years imprisonment.
6.	Stephen Mbugua, Senior Education Officer	Ministry of Education	Convicted in five corruption offences including abuse of office and fraudulent acquisition of public property. Accused fined Kshs. 3,500,000 or to serve 6 years imprisonment.
7.	Stephen Musina, Head of Procurement	Pumwani Maternity Hospital	Accused sentenced to 2 years imprisonment.
8.	Dr. Ezekiel Chirchir, Chief Finance Officer	Bomet County	5 years imprisonment without an option of a fine.
9.	• John Maina Mwangi • Martin Kanjuaigwa Wamwea • Simon Wachira Kagiri	Nyeri County Executives	The three accused persons convicted in charges of willful failure to follow procurement laws and abuse of office and fined Kshs. 7.8 million each or 3 years imprisonment.
10.	James Kibet, Senior Technician	Kenya Power and Lighting Company	Accused convicted in a charge of soliciting and receiving a bribe and fined Kshs. 300,000.
11.	Kennedy Kabetu, Senior Education Officer	Ministry of Education	Accused convicted in five counts of corruption including abuse of office and fraudulent acquisition of public property and fined a total of Kshs. 2,185,000 or 6 years imprisonment.

	Name of Accused Person	Institution	Sentence / Fine
12.	• David Kamunya Runo, Director of Kawafalls • Zipporah Wangithi Runo, Director Kawafalls • Kawafalls Ltd • Dosana Holdings	Ministry of Lands	David Kamunya Runo convicted in several counts of uttering false documents and fined a total of Kshs. 8.5 million or to serve 5 years imprisonment. Kawafalls and Dosana Holdings convicted in several counts of uttering false documents and ordered to pay Kshs. 8.5 million.
13.	Wycliff Mirega Mitema, Accountant District Treasury	Makueni District Treasury	Accused convicted on charges of fraudulent acquisition of public property and abuse of office and fined a total of Kshs. 16,719,720.

b) Recovery of Corruptly Acquired and Unexplained Assets

The Commission traced and preserved assets valued at Kshs. 21.517 billion and Kshs. 1.485 billion respectively and recovered assets valued at Kshs. 3.565 billion. Table 2 provides details of assets traced, preserved and recovered.

The Commission realized the conclusion of civil recovery suits which resulted into favorable judgements for the Commission. Some of the cases included a suit for the recovery and/or restitution of Kshs. 7,224,612 belonging to the Local Authority Transfer Fund (LATF) for Kisumu, a suit for the recovery of unexplained assets worth Kshs. 80 Million was concluded and judgment issued against the former Managing Director of the Kenya Ports Authority for Kshs. 74,300,000. The Commission is pursuing the return of these monies through court execution procedures. Additionally, Kshs. 2,905,009 belonging to Kenya Pipeline Company was recovered in the year 2017 through an out of court settlement, this is an indication that progressively those in possession of illegally acquired assets are opting to alternative dispute resolution mechanisms.

Table 2: Assets Traced, Preserved, Recovered and Value of Cases Disrupted (Kshs. millions)

Financial Year	2013/14	2014/15	2015/16	2016/17	2017/18	Total
Assets Traced	7,214	3,860	3,614	4,913	1,916	21,517
Assets preserved	-	136	988	220	141	1,485
Value of Assets Recovery Suits filed	9 assets not valued	136	1,080	1,780	929	3,925
Assets Recovered	2,068	140	701	256	400	3,565

The Commission instituted various civil suits for the recovery of corruptly acquired or unexplained assets. Details are illustrated in Table 3.

Table 3: New Civil Recovery Suits in Courts

Financial Year	2013/14	2014/15	2015/16	2016/17	2017/18	Total
On-going civil recovery suits in courts	26	12	18	24	22	102

As at the end of financial year 2017/2018, there were cumulatively 378 ongoing civil recovery suits in courts with approximated value at Kshs. 8.5 billion.

c) Disruptions of Corruption Networks

The Commission averted a loss of Kshs. 19.7 billion of public funds through disruption of corruption and economic crimes networks. The breakdown for loss averted for the respective years is illustrated in Table 4.

Table 4: Value of Loss Averted Through Disruption (Kshs. Million)

Financial Year	2013/14	2014/15	2015/16	2016/17	2017/18	Total
Disruption or Loss Averted	5,600	1,600	2,600	6,180	3,800	19,780

Table 5 provides highlights of some of the disruptions.

Table 5: Highlights of Disruptions

	Financial Year	Nature of allegation(s)	Organization	Amount (Kshs. Million)
1.	2013/2014	Irregular tender for the construction of University Engineering Complex	Multi-Media University	1,800
2.		Bid rigging in the supply and commissioning of a tug boat	Kenya Ports Authority	850
3.		Irregular tender award for the supply of a mobile crane	Kenya Ports Authority	500
4.		Irregular acquisition of land allocated to the Kuwaiti Embassy	Ministry of Lands	2,000
5.	2014/2015	Procurement irregularities	Kenya Ports Authority	1,000
6.	2015/2016	Processing of fraudulent payments	NYS	425
7.		Irregular procurement of office complex	County Government of Embu	400
8.		Tax evasion in the importation of methanol and sugar	KRA/Importers/ Clearing Agents	400
9.		Irregular procurement for the supply of Hydrant Pit Valves, c/w isolation valves and two year operational spares	Kenya Pipeline Company	400
10.		Over-valuation of land in Nanyuki road, Industrial Area, Nairobi	Kenya Pipeline Company	350

	Financial Year	Nature of allegation(s)	Organization	Amount (Kshs. Million)
11.	2016/2017	Irregular sale of 15 acres within Ngara Estate, Nairobi	Kenya Railways Staff Benefits Retirement Scheme	3,000
12.		Irregular award of 89 contracts	County Government of Kitui	1,397
13.		Irregular payment to a private firm	Ministry of Health	800

3.1.2 Prevention of Corruption and Unethical Practices

a) Corruption prevention

The Commission's preventive strategy aimed at strengthening systems of governance, service delivery and raising the bar on integrity and ethical behavior through elimination of loopholes and opportunities of corruption in public organizations.

The Commission carried out systems reviews in 40 institutions at National and County level and provided 5,907 corruption prevention advisories to Ministries, Departments and Agencies (MDAs) under the performance contracting framework. Further the Commission developed and disseminated guidelines to advise all County Assemblies and Executives on the formation and functions of Corruption Prevention Committees (CPCs). Table 6 provides summary of corruption prevention activities undertaken over the period.

Table 6: Summary of Corruption Prevention Activities

Activities	Total
Systems reviews for MDAs	9
Systems reviews in County Executives and Assemblies	32
Number of advisories to MDAs under the Performance Contracting Framework	5,907
Counties advised on the formation of CPCs	47
Institutions assessed on implementation of Corruption Eradication Indicator in the PC	106
Monitoring of the implementation of the systems review recommendations	10

b) Public Education and Awareness

The Commission carried out public education and awareness programmes targeting public officers, institutions of learning and general public through various platforms. These included Media programmes in over 30 local FM radio stations, eight Television Video Commercials (TVCs), Social Media and 13 billboards across the Country as presented in Table 7. In addition, the Commission disseminated 408,934 IEC materials to the public.

Table 7: Summary of Education and Public Awareness Activities

Activity	No. of people reached
General Sensitization to public officers on Ethics, Integrity and Anti-corruption	209,496
Public Anti-corruption clinics (Outreach)	900,580
Community Based Anti-corruption Monitors trained	1,325
County Public Forums (Kajiado, Meru and Garissa)	347
Trade Fairs/Exhibitions	97,213
Training of Integrity Assurance Officers (IAO)	4,929
Training of State and Public Officers from National and County Governments	5,398
Training of Corruption Prevention Committees (CPC)	4,698
School outreach	262,449
Training of integrity club patrons	689

c)   Ethics and Leadership

To strengthen enforcement of Chapter 6 and the Leadership and Integrity Act 2012, the Commission developed Leadership and Integrity Regulations, 2015. In addition, the Commission facilitated 243 public entities develop Specific Leadership and Integrity codes for State Officers and further developed and disseminated three guidelines on conflict of interest, gifts and public collections. Summary of the ethics and leadership interventions are provided for in Table 8.

Commissioner Mrs. Rose M. M. Macharia together with EACC Officers and Integrity Club members of Aquinas High School during a Visit to the Commission on 29th September, 2017

Table 8: Ethics and Leadership Interventions

Activity	Number
Integrity verification (vetting) of candidates seeking:	
a) Elective positions	16,182 candidates
b) Appointment to public office	8,518 candidates
c) Employment in private sector	200 employees
Support for development of Specific Leadership and Integrity for state officers	47 County Executive and Assemblies
Specific Leadership and Integrity codes approval	243
Signing of commitment to Leadership and Integrity Codes	2223
Reviewed and approved general codes of conduct for public officers	190
Investigations on ethical breaches	240
Files on ethical breaches forwarded to ODPP	29
Petitions instituted for removal of state officers for breaches of chapter 6 and LIA	3
Notices issued to public entities for non-compliance with Chapter 6 and LIA	151
Administration action recommendations on ethical breaches	38
Cautions issued for non-compliance with Chapter 6 and LIA	45
Advisories on ethical issues	177

3.1.3 Developments in the Policy and Legal Framework

The Commission endeavored to strengthen the anti-corruption and ethics policy and legal framework. Arising from EACC being a key member of the Task Force Reviewing the Policy, Institutional and Legal Framework for Combating Corruption, 36 pieces of legislation to bolster the war against corruption including the Bribery Act, 2016 were legislated.

Various other laws were enacted or amended during the period, some of which were: the enactment of the Access to Information Act, 2017; amendment to the Leadership and Integrity Act, 2012; Ethics and Anti-Corruption Commission Act, 2011; Anti-Corruption and Economic Crimes Act, 2003 and the Proceeds of Crime and Anti-Money Laundering Act, 2009 (POCAMLA).

3.2 Constraints and Challenges

In implementing the Plan, the Commission experienced a number of constraints and challenges which were largely in the area of human resources and policy, legal and institutional framework.

3.2.1 Human Resources Related Issues

a) Inadequate technical staff;
b) Exit of experienced staff; and,
c) Stagnant pay structure.

3.2.2 Policy, Legal and Institutional Issues

a)   Lack of a Partnership Policy for effective coordination of partnerships;

b)   Lack of accountability and responsibility by accounting officers to fight corruption and unethical conduct in their respective institutions;

c)   Inadequate legal and regulatory framework for enforcement of:
   - Chapter 6 of the Constitution;
   - Leadership and Integrity Act;
   - Declarations of Income, Assets and Liabilities (DIALs);
   - Integrity vetting by the Commission;
   - Amnesty (Section 25 (A) of ACECA); and,
   - Plea bargaining (Section 137A-137N of CPC).

d)   Section 27 of the Bribery Act 2016 is not clear on how to treat bribery offences investigated or prosecuted before the commencement of the bribery Act;

e)   The Commission lacks the legal mandate to implement Proceeds of Crime and Anti-Money Laundering Act, 2009 (POCAMLA);

f)   Piecemeal and disparate nature of anti-corruption laws that could otherwise have been consolidated;

g)   Adverse judicial decisions;

h)   Delay in obtaining evidence from other jurisdictions, destruction of the evidence and slow process of preservation of assets held in other jurisdictions;

i)   Constitutional references and judicial review applications that impede execution of Commission's mandate;

j)   Lenient sentences that do not deter corruption;

k)   Lack of enforcement mechanisms for regulatory breaches and implementation of prevention advisories; and,

l)   Inadequate risk management framework.

3.3 Mitigation Measures

In order to address the constraints and challenges identified, the Commission incorporates the following measures into the Strategic Plan 2018 – 2023:

3.3.1 Human Resources

a)   Recruit technical and experienced staff;

b)   Establish EACC Academy and a graduate trainee programme;

c)   Enhance technical capacity and competence of staff; and,

d)   Improved terms of employment to enhance staff attraction and retention.

3.3.2 Legal, Policy and Regulatory Framework

a) Finalize and approve a Commission partnership policy;
b) Capacity building amongst stakeholders;
c) Develop guideline for Multi-Agency Team (MAT) in terms of information sharing, transfers and operations;
d) Review and propose amendments to legal and regulatory framework for enforcement of:
    - Chapter six of the Constitution;
    - Leadership and Integrity Act, 2012;
    - Declarations of Income, Assets and Liabilities (DIALs);
    - Integrity vetting both in Parliament and the Commission;
    - Amnesty (Section 25(A) of ACECA);
    - Plea bargaining (Section 137A-137N of CPC);
    - Section 27 of Bribery Act 2016; and,
    - Proceeds of Crime and Anti-Money Laundering Act, 2009.
e) Propose legislation to hold Accounting officers responsible for destruction of evidence and corruption taking place in their respective institutions;
f) Propose amendments to legislation to provide for sanctions with regards to Section 11(i) of EACC Act, 2011;
g) Support the finalization of the National Ethics and Anti-Corruption Policy, and
h) Develop and implement a risk management framework for the Commission.

ENVIRONMENTAL SCAN

4.0 Introduction

Strength, Weakness, Opportunities and Threat (SWOT); Political, Economic, Socio-cultural, Technological, Legal and Environmental (PESTLE) and Stakeholder analysis were undertaken to understand the operating environment of the Commission.

4.2 Strengths, Weakness, Opportunities and Threats (SWOT) Analysis

Table 9: SWOT Analysis

Strengths	Weaknesses
• Diversity of skills • Competitive terms of service • Government funding • Investment in modern technology • Regional presence	• Stagnant pay structure • Inadequate internal policies • Inadequate resources • Absence of a National Ethics and Anti-Corruption Policy • Inadequate legal and regulatory framework • Ineffective performance management framework
Opportunities	**Threats**
• Heightened anti-corruption agenda • Goodwill from Kenyans • Stakeholder collaboration • Ready platform in institutions of learning to mainstream ethics and anti-corruption agenda • Vibrant media platforms • Reforms in public and private sectors • Domestication of international instruments • Advancement in technology • Government funding support • International cooperation • Donor support	• Politicization and ethnicization of the fight against corruption and unethical conduct • Adverse judicial decisions • Changing nature of corruption • Public apathy • Culture that support illicit financial success

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

Table 10: PESTLE Analysis

Factor	Issues	Effects
Political	• Delegitimization of government and its institutions • Influence peddling • Hostility during electioneering periods • Enactment of weak anti-corruption laws • Politicization and ethnicization of the war against corruption	• Renders the Commission ineffective • Reduced level of cooperation from the public • Some regions become inaccessible due to hostility • Weak anti-corruption laws and insufficient legal mechanism • Protection of corrupt persons on account of political and ethnic considerations
Economic	• Uncertainty in funding occasioned by fiscal pressures • Poverty • Poor remuneration • Adverse effects of globalization • High cost of living • Inequitable distribution of resources • Lack of transparency and accountability in the management of public resources	• Limited capacity to roll out anti-corruption interventions • Increased corruption incidences • Disempowerment of the citizens
Social	• Glorification of the corrupt • Greed • Conflict between cultural beliefs and anti-corruption laws • Erosion of values • Public tolerance to corruption • Fear by the public to report corruption	• Inadequate participation in the fight against corruption • Poor service delivery • No social checks or accountability by the citizens • Shortcuts to opportunities and to resources • Public apathy • Disregard for merit • Low levels of public confidence in the fight against corruption
Technological	• Rapid technological changes • High cost of technology • Transnational corruption • Reduction of human interactions in government services	• Ease in execution of corrupt activities • Difficulty in detection and investigation of corruption across different jurisdictions • New frontiers of corruption

Factor	Issues	Effects
Legal	• Inadequate policy and legal framework • Legal bottlenecks created through piecemeal legislation • Disharmony in the anti-corruption laws • Inadequate enforcement mechanisms for preventive recommendations • Functional overlaps among institutions • Adverse court ruling	• Loopholes within the policy and legal frameworks • Slow disposal of corruption cases • Contradictions and conflicts in case handling • Non implementation of preventive recommendations • Growing jurisprudence
Environment	• Low levels of public confidence in the fight against corruption • Fear by the public to report corruption • Insecurity in some areas of operation • Inaccessibility of some areas	• Public apathy in fighting corruption • Increased levels of corruption

4.3 Stakeholder Analysis

Table 11: Stakeholder Analysis

Stakeholder	Role/Responsibility	What they can do for EACC	What EACC can do for them
The Presidency	Provide political good will, commitment and leadership	Sign sound and robust law	Law and Policy implementation Provide reports on the state of corruption
National Executive	National policy formulation and implementation	Policy support Act on recommendations by EACC on administrative actions Implement the recommendation of EACC through system reviews and corruption related maters	Policy implementation Provide reports on the state of corruption
Parliament	Legislation and oversight	Enact and amend anti-corruption laws Oversight Commission operations Provision of the budget	Implement Parliamentary recommendations
Judiciary	Adjudication of criminal and civil cases	Adjudication	Provide evidence

Stakeholder	Role/Responsibility	What they can do for EACC	What EACC can do for them
State Law Office and Department of Justice	Provide legal advice to the Government and defend the public interest.	Policy formulation and advisory	Policy implementation
County Executive	Manage and coordinate devolved functions	Support execution of the Commission mandate	Investigate, educate and provide advisories on anti-corruption and unethical issues
County Assemblies	Legislation and oversight of County Executives	Support execution of Commission's mandate	Investigate, educate and provide advisories on anti-corruption and unethical issues
ODPP	Prosecution of corruption and economic crimes cases	Prosecution	Support prosecution
Office of Auditor General	Audit of public revenues and expenditure	Undertake audit of MDAs Share information on corruption for action	Investigate corruption
National Police Service Commission	Employ and manage welfare of persons in the National Police Service	Provide human resource support Provision of security	Refer matters to them
National Police Service	Maintain law and order	Undertake investigation Partner with the Commission Provision of security	Refer cases and provide advisories
Commission on Administration of Justice	Investigate maladministration in public office and recommend appropriate action	Share and refer matters of corruption to the Commission	Share and refer matters of administrative nature to them
National Land Commission	Management of public land	Support investigations, refer matters and review grants Assist in asset recovery	Refer matters to them for further action
National Treasury	Formulate and implement macro-economic and fiscal policies	Provision of financial resources	Recovery of illegally acquired public property Implement Commissions programmes

Tuangamize Ufisadi, Tuijenge Kenya

Stakeholder	Role/Responsibility	What they can do for EACC	What EACC can do for them
Development Partners	Provide technical support Provide financial support Share information	Provide technical support Provide financial support Share information	Information sharing
Witness Protection Agency	Witness protection	Protect Commission witnesses	Refer witnesses
Financial Reporting Centre	Financial intelligence	Provide financial intelligence	Implement their recommendations
Media	Disseminate information	Dissemination and sharing of anti-corruption information	Provide information
The Public	Support anti-corruption initiatives	Provide information to support Commission mandate	Promote and protect public interest Receive and process reports on corruption and unethical conduct
Private, Civil Society, Faith based sectors and trade unions	Support and promote anti-corruption initiatives	Provide information to support Commission mandate	Promote and protect public interest
National Intelligence Service	Gather and disseminate intelligence	Provide intelligence on corruption	Act on the intelligence provided
Kenya Revenue Authority	Revenue Collection	Provide information on tax evasion Provide intelligence	Collaborate in investigation Asset recovery
All Responsible Commissions at the national government level (Such as TSC, SRC, PSC among others) At the Counties level: County Public Service Boards County Assemblies Service Boards	• Exercise disciplinary control over officers in their jurisdiction; • Promote the values and principles referred to in Articles 10 and 232; • Investigate and monitor personnel practices of the public service; and • Ensure that the public service is efficient and effective.	Support the execution of the EACC's mandate in implementation of codes of conduct for public officers and promote ethical conduct within public institutions. Enforce the provisions of LIA and Chapter 6.	Refer matters on ethical breaches and build their capacity to enforce the provisions of LIA and Chapter 6.

4.5 Risk Analysis

In the implementation of this Strategic Plan, the Commission will endeavor to mitigate the risks identified in Table 12.

Table 12: Risk Analysis and Mitigation Measures

Type of Risk	Risk Anticipated	Mitigation Measures
Technological risks	• Exploitation of technology to perpetuate corruption • Inadequate appreciation and use of digital evidence	• Continuous capacity building • Invest in technology
Legal risk	• Adverse changes to anti-corruption legislation and regulations • Failure, delayed and prolonged enactment of relevant legislation • Adverse judicial rulings	• Promote partnerships • Lobby for favourable legislation and regulations
Reputational risk	• Unfavourable public perception of the Commission effectiveness • Perceived high levels of corruption	• Effective communication • Enhance execution of the mandate • Increase awareness
Human risk	• Inability to attract and retain staff	• Succession planning • Knowledge management • Improve terms and conditions of service
Financial risks	• Inadequate funding	• Lobby sectors to allocate funds for anti-corruption activities • Lobby development partners for financial and technical support • Lobby Government of Kenya for adequate allocation

STRATEGIC MODEL

5.0 Introduction

The Strategic Model presents the Vision, Mission, Core Values, Strategic goals, objectives, strategies and key activities that will drive the Commission towards attainment of its goals and objectives in the fight against corruption and unethical conduct.

5.1 Vision and Mission

Vision:

An integrity driven Kenyan society

Mission:

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

5.2 Core Values

Integrity	Acting in an honest, fair, accountable and transparent manner
Professionalism	Maintaining high standards of competence, efficiency, skills and
Fidelity to the Law	Respect and applying the Law consistently and impartially
Courage	Enforcing the anti-corruption laws firmly and without fear or favour
Innovation	Embracing change and continuous improvement
Teamwork	Building corporate ideals to fully tap the rich and multi-skilled human resource base of the Commission to achieve our mandate

5.3 Strategic Goal

The Commission's overall goal is to eradicate corruption and unethical practices in Kenya.

Clarion call:

Tuangamize Ufisadi, Tuijenge Kenya

5.4 Strategic Issues and Themes

The strategic issues that the Commission will address during the plan period include:

Theme 1 - Policy, Legal and Regulatory Framework

1. Inadequate legal and regulatory framework;
2. Lack of a national anti-corruption and ethics policy;
3. Inadequate enforcement mechanism for Chapter 6 of the Constitution and LIA; and,
4. Cumbersome asset recovery framework.

Theme 2 – Enforcement

1. Inadequate tracing, preservation and recovery of unexplained and corruptly acquired assets;
2. Lack of an asset management system for preserved and recovered unexplained and corruptly acquired assets;
3. High number of backlog of cases;
4. Inadequate proactive investigation; and,
5. Slow process of investigations including those in foreign jurisdictions.

Theme 3 - Prevention and Public Awareness

1. Inadequate public education, communication and awareness programmes;
2. Inadequate enforcement of preventive interventions;
3. Inadequate compliance with Chapter 6 of the Constitution;
4. Public apathy; and,
5. Weak monitoring and evaluation framework.

Theme 4 - Institutional Capacity

1. Inadequate capacity of the Commission to deliver on its mandate;
2. Inadequate risk management framework;
3. Inadequate knowledge management framework;
4. Inadequate report handling mechanisms; and,
5. Inadequate capacity in specialized fields.

5.5 Strategic Objectives and Strategies

The strategic objectives, strategies and activities are formulated for each strategic theme as provided in Tables 13 and 14.

Table 13: Strategic Themes and Objectives

Strategic Themes	Strategic Objectives
1. Policy, Legal and Regulatory Framework	a) To strengthen policy, legal and regulatory framework
2. Enforcement	b) To enhance law enforcement against corruption and unethical conduct
3. Prevention and Public Awareness	c) To enhance public education, communication and awareness d) To enhance the prevention of corruption and unethical practices
4. Institutional Capacity	e) To enhance institutional capacity of the Commission

Table 14: Strategies and Activities

Strategic Objectives	Strategies	Key Activities
1. To strengthen policy, legal and regulatory framework	1. Lobby for strengthening of policy, legal and regulatory framework	1. Review and propose new laws, amendments and regulations 2. Support finalization of the national ethics and anti-corruption policy
	2. Enhance asset recovery framework	1. Review asset tracing and recovery laws, processes and procedures 2. Review and amend ADR policy
2. To enhance law enforcement against corruption and unethical conduct	1. Intensify investigation of corruption and ethical breaches	1. Analyze reports 2. Undertake investigations 3. Integrate intelligence in investigations 4. Integrate technology in investigations 5. Analyze evidence and make recommendations 6. Support prosecution of corruption, economic crimes and ethical breaches
	2. Intensify tracing, preservation and recovery of unexplained and corruptly acquired assets	Undertake asset tracing and recovery
3. To enhance public education, communication and awareness	1. Intensify public education and awareness	1. Conduct public education and awareness 2. Entrench ethics and anti-corruption in institutions of learning

Strategic Objectives	Strategies	Key Activities
	2. Enhance corporate brand	Position the Commission
	3. Enhance corporate communication	Create and maintain effective collaboration with the media and other stakeholders
	4. Establish and operationalize Integrity Academy	1. Establish the Academy 2. Develop and implement curriculum
4. To enhance the prevention of corruption and unethical practices	1. Intensify preventive interventions	1. Undertake system reviews in public institutions 2. Support sectors, institutions and stakeholders in mainstreaming corruption prevention under the Bribery Act 3. Provide advisory services on corruption prevention 4. Develop and promote standards and best practices in ethics and integrity 5. Monitor the implementation of prevention interventions
	2. Strengthen mechanisms for compliance with Chapter 6 of the Constitution of Kenya	1. Conduct integrity verifications for elective and appointive positions 2. Support public entities to mainstream ethics and integrity 3. Monitor compliance with provisions of Chapter 6 and LIA 4. Support compliance and management of Declaration of Income, Assets and Liabilities (DIALs) system
	3. Strengthen collaborations, coalitions and partnerships	Establish purposive partnerships and coalitions
	4. Targeted research to inform anti-corruption interventions	1. Undertake research and planning 2. Modernize the resource center
5. To enhance institutional capacity of the Commission	1. Enhance human capital	1. Grow staff compliment 2. Improve staff skills and competencies 3. Manage performance 4. Review terms and conditions of service and welfare
	2. Enhance financial capacity	1. Mobilize financial resources 2. Manage financial resources

Strategic Objectives	Strategies	Key Activities
	3. Enhance physical infrastructure	1. Provide secure and conducive working environment 2. Modernize fleet and equipment 3. Streamline records management
	4. Enhance technological capacity	1. Develop a robust network and communication infrastructure 2. Automate Commission processes
	5. Strengthen supply chain management	Facilitate efficient procurement and disposal of goods and services
	6. Strengthen risk management	Develop integrated Commission-wide risk management framework
	7. Enhance corporate governance	1. Develop and implement corporate governance instruments 2. Provide corporate legal services

Appendix 2 provides a detailed implementation matrix for the Strategic Plan. The matrix provides activities, performance indicators, output targets, expected outcomes and estimated cost of implementing the activities.

EACC Commissioner, Mrs. Rose M. M. Macharia, Deputy Chief Executive Officer, Mr. Michael K. Mubea, EBS, and staff of the Commission during strategic planning Technical Retreat at Lukenya Getaway Resort, Machakos on 16th April 2018

INSTITUTIONAL FRAMEWORK FOR PLAN IMPLEMENTATION AND MONITORING

6.0 Introduction

This section provides the framework that will enable the Commission to execute its mandate through the identified objectives and strategies. The Commission and the Secretariat will play roles that are complementary and synergetic in implementing the Plan. The section also provides a framework through which the Commission will monitor and evaluate the implementation its programmes.

6.1 Role of the Commission

The Chairperson and members of the Commission are responsible for policy formulation, strategic direction and monitoring of implementation of the Plan in accordance with Section 11 (6) of EACC Act, 2011.

6.2 Role of the Secretariat

The Secretariat of the Commission comprises the Commission Secretary and staff. The Secretariat is responsible for the day to day implementation of activities and programmes as provided for in the Plan.

6.3 Resource Requirements

6.3.1 Staff

The Commission will continue to grow and expand its human resource capacity through recruitment, training and development to meet the needs of operations, support services and service delivery Countrywide. The Commission staff establishment based on its current structure (currently under review) is 2,248, including the five Commissioners. The number in post is 725 and the variance is 1,523 as shown in Table 15.

Table 15: Current Staff Establishment

Designation	Grade	Establishment	In-Post	Variance
Commissioners	-	5	5	0
Secretary/CEO	1	1	1	0
Deputy Secretary/CEO	2	2	1	1
Directors	3	6	5	1
Deputy Directors	4	29	23	6
Assistant Directors	5	85	19	66
Officer II/I/Senior (Common Cadre)	8/7/6	1,036	385	651

Designation	Grade	Establishment	In-Post	Variance
Assistant II/I/Senior (Common Cadre)	10/9/8	678	247	431
Assistant III/II/I (Common Cadre)	12/11/10	406	39	367
Total		**2,248**	**725**	**1,523**

EACC Chairperson, Archbishop (Rtd.) Dr. Eliud Wabukala, EBS, Commissioner Mrs. Rose M. M. Macharia, Commissioner Dr. Dabar A. Maalim, Chief Executive Officer/Secretary, Mr. Halakhe D. Waqo, CBS, MCIArb, Deputy Chief Executive Officer, Mr. Michael K. Mubea, EBS, staff of the Commission and representatives from the DPM and National Treasury during the High Level Workshop at Sarova Woodlands, Nakuru on 4th June 2018

6.3.2 Financing the Plan

The successful implementation of the Strategic Plan will largely depend on the financial resources that the Commission will be able to mobilize from the Government and Development partners. Commission's projected financial resource requirement for the implementation of the Plan is estimated at Kshs 26.6 Billion as detailed in Table 16.

During the Plan implementation period, it is expected that the Government will continue to provide budgetary allocation to the Commission within the Medium Term Expenditure Framework (MTEF). The Commission will lobby the Executive and Parliament for enhanced resource allocation for the anti-corruption and ethics Programme under the MTP III. The Commission will continue to seek financial and technical support from the development partners including the United Nation Development Programme (UNDP), United Nation Office on Drugs and Crime (UNODC), World Bank, African Development Bank, GiZ and other multilateral and bilateral partners for enhanced support.

Table 16: Projected Financial Requirement

	Strategic Objective	2018 - 2023 (Kshs. Millions)					Total (Kshs. Millions)
		2018/19	2019/20	2020/21	2021/22	2022/23	
1.	To strengthen policy, legal and regulatory framework	20.00	21.00	10.00	8.00	8.00	67.00
2.	To enhance law enforcement against corruption and unethical conduct	375.00	418.50	465.40	502.75	541.10	2,302.75
3.	To enhance public education, communication and awareness on corruption and unethical practices	326.00	311.00	323.00	355.50	329.00	1,644.50
4.	To enhance the prevention of corruption and unethical practices	107.20	107.10	126.70	128.50	166.20	635.70
5.	To enhance institutional capacity of the Commission	4,047.00	4,306.00	4,432.00	4,507.00	4688.00	21,980.00
Total		4,875.20	5,163.6	5,357.10	5,501.75	5,732.30	26,629.95

6.4 Monitoring and Evaluation

The Commission will undertake monitoring and evaluation of its activities and programmes to measure the level of implementation. Outputs and outcomes will be measured using qualitative and quantitative data obtained from primary and secondary sources and reported in:

i)   Monthly Reports;
ii)   Quarterly Reports;
iii)   Annual Review Reports;
iv)   Mid-term Evaluation Report;
v)   End-term Evaluation Report;
vi)   Survey Reports;
vii)   Reports of various thematic studies; and,
viii)   Programme Evaluation and Assessment Reports.

Monitoring will be done on a monthly, quarterly and annual basis to track progress. Besides, the Commission will evaluate the implementation of the

2018 – 2023 Strategic Plan at the mid and end of its implementation. The Commission will put in place a framework to link monitoring and evaluation to performance management.

APPENDICES

Appendix 1: Current EACC Organizational Structure
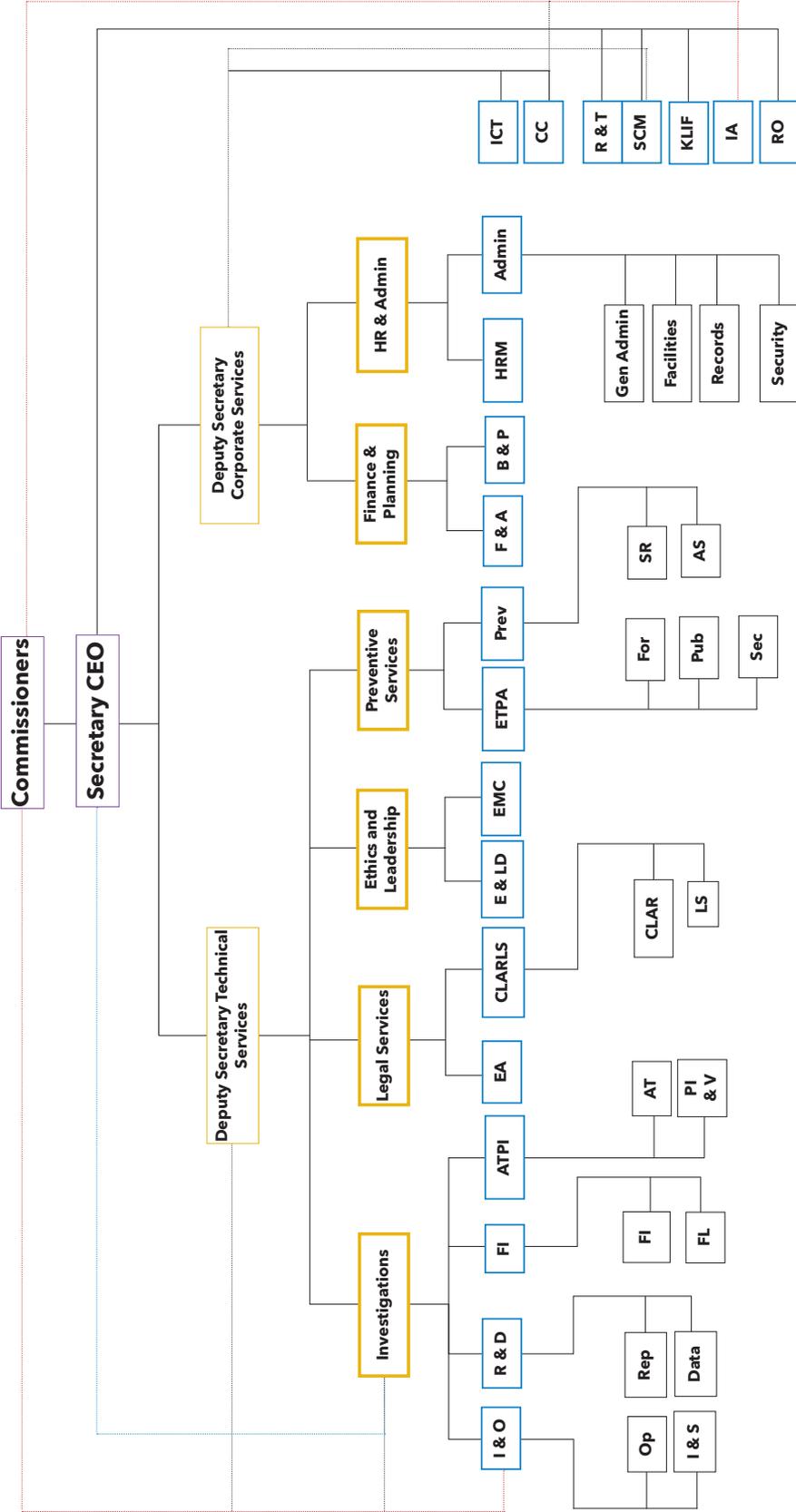
Figure 2: Current EACC Organizational Structure

KEY

Adm.	Administration
AS	Advisory Services
AT	Asset Tracing
ATPI	Asset Tracing and Preliminary Investigations
B&P	Budget and Planning
CC	Corporate Communications
CLAR	Civil Litigation and Asset Recovery
CLARLS	Civil Litigation, Asset Recovery and Legal Support
E&LD	Ethics and Leadership Development
EA	Evidence Analysis
EMC	Ethics, Monitoring and Compliance
ETPA	Education, Training and Public Awareness
F&A	Finance and Accounts
F&P	Finance and Planning
FI	Forensic Investigations
FL	Forensic Laboratory
For	Formal
Gen Adm.	General Administration
HR & Adm.	Human Resource and Administration
HRM	Human Resource Management
I&O	Investigations and Operations
I&S	Intelligence and Surveillance
IA	Internal Audit
ICT	Information and Communications Technology
KLIF	Kenya Leadership and Integrity Forum
LS	Legal Support
Op	Operations
PI&V	Preliminary Investigation and Vetting
Prev	Prevention
Pub	Public

R&D   Report and Data

R&T   Research and Transformation

Rep   Report

RO   Regional Offices

SCM   Supply Chain Management

Sec   Sectoral

SR   Systems Review

Appendix 2: EACC Strategic Plan 2018 – 2023 Implementation Matrix

Strategic Objective 1: To Strengthen Policy, Legal and Regulatory Framework

Strategies	Key Activities	Activities	Performance Indicator	Output Target 2018/19	2019/20	2020/21	2021/22	2022/23	Responsible Department	Expected Outcome	Expected Budget (Kshs. Million) 2018/19	2019/20	2020/21	2021/22	2022/23
Lobby for strengthening of policy, legal and regulatory framework	Review and propose new laws, amendments and regulations	Review and propose new laws, amendments and regulations	1. No. of Laws reviewed and amendments proposed	5	5	5	5	5	1. CLARLS 2. Evidence Analysis 3. Ethics and Leadership 4. Prevention	Effective policy, legal and regulatory framework	2	2	2	2	3
			2. No. of regulations reviewed and amendments proposed	5	5	5	5	5							
			3. No. of new laws proposed	5	5	5	5	5							
			4. No. of new regulations proposed	5	5	5	5	5							
		Review compliance with international and regional instruments (UNCAC) and AUCPCC)	1. No. of new Laws and amendments proposed	2	2	-	-	-	1. CLARLS 2. Evidence Analysis 3. Prevention	Compliance with international and regional instruments	2	2	2	1	0
			2. Country review report on review of Chapter 2 and 5 (UNCAC and AUCPCC)	1	-	-	-	-							
		Implement recommendations of the Country report on implementation of the UNCAC	Percentage of Country reports recommendations implemented	30%	20%	20%	20%	10%	1. CLARLS 2. Evidence Analysis 3. Prevention		2	2	1	1	1

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Responsible Department	Expected Outcome	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
		Lobby for implementation of the Report of the Task Force on the Review of the Legal, Policy and Institutional Framework for the Fight against Corruption	1. No. of proposed laws enacted	-	1	-	-	-	1. CLARLS 2. Evidence Analysis 3. Prevention 4. Ethics and leadership		4	2	2	2	1
			2. No. of proposed amendments	3	3	3	3	3							
			3. No. of new regulations proposed	1	1	1	1	1							
			4. No. of regulations amended	1	1	1	1	1							
	Support finalization of the National Ethics and Anti-Corruption policy	Support the development of National Ethics and Anti-Corruption policy	National ethics and anti-corruption policy gazetted	-	Policy	-	-	-	1. Research & Transformation 2. CLARLS 3. Evidence Analysis 4. Prevention 5. Ethics and Leadership	National Policy on Ethics and Anti-Corruption	2	5	0	0	0
		Develop Corruption Prevention Guidelines under the Bribery Act	Guidelines developed	-	1	-	-	-	1. CLARLS 2. Evidence Analysis 3. Prevention		3	1	0	0	0
Enhance asset recovery framework	Review asset tracing and recovery laws, processes and procedures	Develop an Asset Management Policy for Assets recovered	Asset Management Policy developed	-	-	1	-	-	1. CLARLS 2. Evidence Analysis 3. Prevention 4. Intelligence & Operations	Enhanced recovery of corruptly acquired and un explained assets	1	3	1	0	0
		Review existing law on asset tracing and recovery and propose amendments	No. of laws reviewed and amendments proposed	1	1	1	1	1	1. CLARLS 2. Evidence Analysis 3. Prevention 4. Intelligence & Operations		2	2	2	2	3
	Review and amend ADR Policy	Review and amend ADR policy and amended	ADR Policy reviewed and amended	-	1	-	-	-	1. CLARLS 2. Evidence Analysis 3. Investigations		2	2	0	0	0
Total											**20**	**21**	**10**	**8**	**8**

Strategic Objective 2: To Enhance Law Enforcement against Corruption and Unethical Conduct

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Intensify investigation of corruption and ethical breaches	Analyze reports	Undertake reports prioritization	No. of reports analyzed	100%	100%	100%	100%	100%	Improved quality of investigations	1. Reports &data Centre 2. Regional Offices 3. EMC	0	0	0	0	0
			No. of referrals	100%	100%	100%	100%	100%		1. Reports & Data Centre 2. Regional Offices 3. EMC 4. FI 5. ATPI 6. I&O	0	0	0	0	0
			No. of advisories	100%	100%	100%	100%	100%							
		Develop and implement referral and feedback mechanisms	Referral and Feedback Guidelines developed	-	1	-	-	-		1. Reports &data Centre 2. Region Office 3. EMC	0	5	0	0	0
	Undertake investigations	Conduct preliminary investigations	No. of files completed	120	125	130	135	140		1. ATPI	8	10	11	12	13
		Conduct forensic investigations	No of files completed	120	160	200	240	280		1. FI 2. Regional Offices 3. ATPI 4. EMC	90	100	110	120	130
		Conduct investigations on ethical breaches	No. of files completed	110	121	133	146	160		1. EMC 2. Regional Offices	4	5	5	6	6

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
			No. of petitions initiated for removal under Chapter 6	3	3	3	3	3		1. EMC 2. Regional Offices 3. Legal					
		Conduct investigations on bribery	No. of files completed	250	270	280	290	300		1. I&O 2. Regional Offices	17	18	19	20	21
			No. of sting operations	52	64	76	88	100		1. I&O 2. Regional Offices	3	3	3.5	4	4.5
		Provide legal advice and support	No. of legal opinions	20	25	30	35	40		1. CLARLS 2. Evidence Analysis 3. FI 4. Regional Offices 5. EMC 6. ATPI 7. I&O	1	0.5	1.1	1.3	1.5
			No. of suits, petitions and judicial review applications defended	20	25	30	35	40							
			No. of applications for investigative warrants filed	120	130	140	150	160							
			No. of MLAs	4	6	8	10	12			5	7	8	8	10
	Integrate intelligence in investigations	Undertake surveillance & intelligence probes	No. of surveillance operation executed	60	70	80	100	110		1. I&O 2. Regional Offices 3. ATPI 4. CLAR	75	80	85	90	95
			No. of intelligence probes	20	22	24	26	28							

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
		Undertake information gathering and analysis	No. of information reports	80	90	100	110	120		1. I&O 2. Regional Offices 3. FI 4. ATPI 5. EMC					
		Carry out disruption of corruption networks	No. of disruptions executed	12	16	20	24	28		1. I&O 2. Regional Offices	10	12	14	16	18
			Amount of loss averted	5 billion	6 Billion	7 Billion	7 Billion	7 Billion							
	Integrate technology in investigations	Acquire appropriate technology	Technology acquired	3	3	3	3	3		1. FI 2. ATPI 3. I&O 4. Regional Offices 5. EMC 6. CLAR	80	85	90	95	100
		Undertake digital forensic examinations	No. of digital forensic examinations reports	20	25	30	30	30		FI	15	15	20	20	20
		Undertake forensic document examinations	No. of document examinations reports	240	250	260	260	260		FI	4	4	4.5	4.5	4.5
		Undertake audio and video analysis	No. of analyzed reports	52	64	76	88	100		I&O					
	Analyze evidence and make recommendations	Review investigation files and make recommendations to DPP	No. of files reviewed and forwarded to DPP	200	220	240	260	280		1. Evidence Analysis 2. Regional Offices	0	0	0	0	0
			Concurrence rate												

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
		Prepare Quarterly Reports	No. of Reports submitted	4	4	4	4	4		Evidence Analysis	2	1	1.5	1.6	1.7
	Support prosecution of corruption, economic crimes and ethical breaches	Secure attendance of witnesses, testifying in court, watch brief in court and Participate in plea bargain negotiations	Percentage of cases supported / No. of cases supported	420	460	500	540	580		1. I&O 2. Regional Offices 3. FI 4. ATPI 5. EMC 6. Evidence Analysis	41	50	63	74	85
			No. of plea negotiations concluded	-	-	-	-	-							
Intensify tracing, preservation and recovery of unexplained and corruptly acquired assets	Undertake asset tracing and recovery	Conduct asset tracing	No. of files completed	20	24	28	32	36	Improved recovery of corruptly acquired assets	1. ATPI 2. Regional Offices 3. FI 4. CLAR	16	20	25.5	25.5	25.5
			Value of assets traced and suits filed	1700 million	1950 million	2200 million	2450 million	2700 million							
		File and prosecute applications for preservations	No. of preservation applications filed	15	20	25	30	35		1. CLAR 2. EMC	1	0.5	1.1	1.3	1.5
		Prosecute suits for recovery	Value of assets recovered	1200 million	1400 million	1600 million	1800 million	2000 million		CLAR	2	2	2.2	2.3	2.4

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
		Undertake Alternative Dispute Resolution (ADR)	No. of cases settled	6	8	10	12	14		1. CLAR 2. Evidence Analysis 3. Regional Offices 4. ATPI 5. FI 6. EMC	1	0.5	1	1.25	1.5
Total											**375**	**418.5**	**465.4**	**502.75**	**541.1**

Strategic Objective 3: To Enhance Public Education, Communication and Awareness

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Intensify public education and awareness	Conduct public education and awareness	Undertake robust media programmes	No. of print media, programmes conducted	20	20	20	20	15	1. Improved levels of awareness on corruption and ethics 2. Increased public support in the fight against corruption and unethical conduct 3. Improved levels of integrity in the private and civil society sectors	1. ETPA 2. ELD 3. CC 4. Regional Offices	100	110	120	130	140
			No. of electronic media programmes conducted	50	50	50	50	50							
			No. of people reached	30m	30m	40m	40m	30m							
			No. of IEC materials developed and disseminated	100,000	100,000	50,000	100,000	50,000			30	25	15	25	15
			Types of IEC materials developed and disseminated	5	7	8	5	5							
		Undertake proactive sensitizations in targeted spots	No. of targeted spots reached	40	50	50	40	40		1. ETPA 2. Regional Offices	3	3	3	3	3
		Undertake targeted Public awareness through community and professional networks	No. of networks reached	10	20	30	30	20		1. ETPA 2. Regional Offices	4	3	3	3	3
			Type of networks reached	5	10	15	15	10			15	18	20	22	24
			No. of people sensitized	10,000	10,000	10,000	10,000	10,000			5	5	5	5	5

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
	Entrench ethics and anti-corruption in institutions of learning	Develop and implement Integrity Programmes in institutions of learning	Portable Adili (Integrity) content developed	1	-	-	-	-		1. ETPA 2. Regional Offices	7	0	0	0	0
			No. of institutions Reached	5,000	10,000	10,000	5000	3000			4	3	3	3	3
			No. of learners reached	2.5 million	5 million	5 million	2.5 million	1.5 million							
			Types of programmes undertaken	4	4	4	4	4			3	3	3	3	3
		Monitor the implementation of ethics, integrity and anti-corruption programmes	No. of monitoring reports developed	1	1	1	1	1			1	0.5	0.5	0.5	0.5
Enhance corporate Brand	Position the Commission	Rebrand the Commission	Branding Strategy and guidelines developed and operationalized	Brand Strategy Developed	-	-	-	-	Commission visibility improved / Improved access to EACC services	1. ETPA 2. CC 3. Regional offices	8	0	0	0	0
			Commission rebranded	4 branding activities	4 branding activities	4 branding activities	3 branding activities	3 branding activities			40	30	20	20	20
			No. of public social responsibility events sponsored	4	4	4	4	4			1	1	1	1	1

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Enhance corporate communication	Create and maintain effective collaboration with the media and other stakeholders	Organize media fora	No. of media fora	3	3	3	3	3	Timely sharing of information internally and externally	CC	6	6	6	6	6
			No. of persons reached	100	100	100	100	100							
		Undertake sensitization and training for media practitioners	No. of practitioners trained	50	50	50	50	50	Increased awareness about the commission	1. ETPA 2. C.C 3. Regional Offices	3	3	3	3	3
			No. of trainings and sensitization programmes	3	3	3	3	3							
		Sponsor media awards	No. of media awards sponsored	1	1	1	1	1			1	0.5	0.5	0.5	0.5
Establish and operationalize Integrity Academy	Establish the Academy	Register and launch the Academy	Academy registered and launched	1	-	-	-	-	1. Improved levels of knowledge, skills and attitude on corruption and unethical conduct 2. Improved levels of transparency and accountability 3. Improved levels of professionalism 4. Improved technical capacity	1. Academy 2. ETPA	3	0	0	0	0
		Develop and operationalize the structure and functions of the Academy	Structure and functions developed	1	1	-	-	-		1. Academy 2. ETPA	10	5	0	0	0
		Mobilize resources for the Academy	Amount of financial resources mobilized (Kshs million)	100	120	120	125	100		1. Academy 2. ETPA	1	1	1	0.5	0.5

EACC STRATEGIC PLAN 2018 - 2023

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
			No. of technical experts mobilized	20	30	40	50	50			15	18	20	22	25
		Develop infrastructure for deploying programmes	No. of equipment sourced	20	100	150	200	300			10	15	25	30	35
			Training calendar developed	1	1	1	1	1		1. Academy 2. ETPA	10	10	10	10	10
			No. of linkages established	2	3	4	4	5							
			Acquire facility for the Academy	-	1	-	-	-		Academy	20	30	40	40	0
	Develop and implement curriculum	Develop and roll out curriculum	Curricula developed and rolled out	1	1	1	1	1		1. Academy 2. ETPA	5	6	6	7	7.5
		Market courses	Marketing strategy developed	1	-	-	-	-		1. Academy 2. ETPA	10	0	0	0	0
			No. of promotional programmes	8	10	15	15	15			6	7	8	9	10
		Offer training programmes	No. of training programs offered	4	8	8	8	8		1. Academy 2. ETPA	5	8	10	12	14
			No. of persons trained	2,00	400	4,00	4,00	4,00							
Total											**326**	**311**	**323**	**355.5**	**329**

Strategic Objective 4: To Enhance the Prevention of Corruption and Unethical Practices

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Intensify preventive interventions	Undertake system reviews in public institutions	Undertake sectoral, functional and institutional based system reviews	No. of system review reports	10	13	15	15	15	1. Reduced corruption loopholes in systems of work 2. Improved deterrence of corruption and unethical conduct 3. Reduced incidences of corruption in the private sector 4. Improved levels of professionalism	1. Prevention 2. Regional Offices	12	14	16	20	22
	Support sectors, institutions and stakeholders in mainstreaming corruption prevention under the Bribery Act	Advise sectors, institutions and stakeholders	No. of sectors, institutions and stakeholders advised	5	20	40	40	55		1. Prevention 2. Regional Offices	0.4	0.6	1	1.2	1.4
	Provide advisory services on corruption prevention	Undertake advisory services	No. of advisories	700	800	850	900	1000		1. Prevention 2. Regional Offices	0.8	0.9	1	1	1.2
	Develop and promote standards and best practices in ethics and integrity	Develop and disseminate sectoral and functional corruption prevention guidelines	No. of guidelines developed	2	2	2	4	4		1. Prevention 2. Regional Offices	6	6	8	8	10
			No. of guidelines disseminated	1	2	2	4	4							
		Conduct sectoral corruption prevention fora	No. of fora held	2	2	2	3	3		1. Prevention 2. Regional Offices	4	5	5	7	8

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
	Monitor the implementation of prevention interventions	Assess the implementation of system reviews	No. of monitoring reports / Level of implementation	4	4	6	6	6		1. Prevention 2. Regional Offices	12	12	12	14	15
		Track the implementation of guidelines	No. of monitoring reports	0	2	2	4	4			0.6	0.6	0.6	0.7	0.7
		Follow-up the implementation of advisories	No. of follow-up reports	40	40	40	40	40			0.9	1	1.4	1.4	1.4
Strengthen mechanisms for compliance with Chapter 6 of the Constitution of Kenya	Conduct integrity verifications for elective and appointive positions	Process self-declaration forms and integrity verification requests	No. of self-declarations forms processed	20,000	20,000	20,0000	35,000	45,000	1. Improved quality of leadership in society 2. Increased accountability in leadership 3. Improved societal values	1. EMC 2. Regional Offices	0	0	0	0	0
			No. of integrity verification requests processed	3,500	3,000	3,000	3,000	20,000							
		Develop a database and operationalize self-declaration online portal	Data base developed	1	-	-	-	-		1. EMC 2. Regional Offices	0	0	0	0	0
			No. of entries made	25,000	25,000	25,000	-	-			3	3.5	1.5	0	0
			Self-declaration online portal operationalized	1	-	-	-	-			8	3	3	3	3

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Support public entities to mainstream ethics and integrity		Develop a framework for mainstreaming ethics and integrity	Guidelines, structure and functions developed	1	-	-	-	-		1. ELD 2. Regional Offices	2	0	0	0	0
			No. of workshops held	2	2	2	2	2			3	4.5	4.5	4.5	4.5
		Build technical capacity of public entities to mainstream ethics and integrity	No. of codes approved	25	30	30	20	15		1. ELD 2. Regional Offices	0	0	0	0	0
			No. of institutions	40	30	30	20	40			6	5	5.5	4.5	7.5
			No. of guidelines and standards developed	2	2	2	2	2			2	2.5	2.5	2.5	3
		Issue advisories on Chapter Six	No. of advisories issued	12	12	12	15	15		1. ELD 2. EMC 3. Regional Offices	0	0	0	0	0
	Monitor compliance with the provisions of Chapter six, and LIA	Asses compliance with LIA regulations and codes of conduct and ethics	No. of compliance reports	1	1	1	1	1		1. ELD 2. EMC 3. Regional Offices	2	2.2	2.2	3	3
			Level of compliance												
			No. of cautions	48	48	48	48	60		1. ELD 2. EMC 3. Regional Offices	0	0	0	0	0
			No. of notices issued	48	48	48	48	60		1. ELD 2. EMC 3. Regional Offices	0	0	0	0	0

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
	Support compliance and management of Declaration of Income, Asset and Liabilities (DIALs) system	Facilitate Responsible Commissions and Boards on the development and implementation of administrative procedures for DIALs	No. of institutions facilitated	47	47	15	5	-		1. ELD 2. Regional Offices	3	3	2.5	1.5	0
		Support public entities automate DIALs	DIALs automation guidelines/ standards developed	1	-	-	-	-			3	3	0	0	0
		Asses compliance with Declaration of Income, Asset and Liabilities (DIALs)	No. of compliance reports / Level of compliance	1	1	1	1	1			2	3	3	3.5	3.5
Strengthen collaboration, coalitions and partnerships	Establish purposive partnerships and coalitions	Facilitate development and implementation of the Kenya Integrity Plan 2019-2023	KIP developed and operationalized	KIP 2019-2023		Mid-Term Review Report		End-Term Review Report	1. Enhanced participation 2. Reduced corruption and unethical conduct	KLIF	6	1	6	1.2	7
		Optimize anti-corruption collaborations	No. of enabling partnerships	1 0	12	14	16	1 8		All Departments	5	5	7	8	8

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcomes	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
			No. of Monitoring and Evaluation Reports	1	1	1	1	1		R & T ALL	2	2	2	2	2
			No. of partnership review forums	1	1	1	1	1		Technical Departments	3	3	3	3	3
Targeted research to inform anti-corruption interventions	Undertake research and planning	Conduct thematic, sectoral and diagnostic studies	No. of surveys and study reports	5	2	3	3	1	1. Evidence based anti-corruption intervention 2. Anti-corruption interventions informed by research	R&T	11	13	18	20	16
		Coordinate implementation of the Strategic Plan	Annual Operational plan developed	1	1	1	1	1		1. B&P 2. R&T	1	1	1	1	1
		Conduct monitoring of the SP	No. of Monitoring undertaken	1	1	2	1	2		R&T	2	2.5	8	3	5
		Conduct programmes evaluation	No. of Programmes evaluated	1	1	1	1	1			1.5	1.8	2	2.5	3
		Formulate the 2023-2028 Strategic Plan	2023-2028 Strategic Plan developed	-	-	-	-	1			0	0	0	0	23
	Modernize the Resource Center	Establish and equip a resource center	Resource center established and equipped e-library services operationalized	1	1	1	-	-		1. R&T 2. All Departments	5	8	10	12	14
Total											107.2	107.1	126.7	128.5	166.2

Strategic Objective 5: To Enhance Institutional Capacity of the Commission

Strategies	Key Activities	Activities	Performance Indicator	Output Target 2018/19	2019/20	2020/21	2021/22	2022/23	Expected Outcome	Responsible Department	Expected Budget (Kshs. Million) 2018/19	2019/20	2020/21	2021/22	2022/23
Enhance human capital	Grow staff complement	Review organizational structure	Revised organizational structure	1	-	-	-	-	1. Enhanced performance 2. Improved staff welfare	1. HRM 2. All line managers	5	0	0	0	0
		Undertake recruitment and placement	Number of staff recruited and placed	350	350	350	350	127			700	700	700	700	700
	Improve staff skills and competencies	Undertake training needs assessment	Training needs assessment report	1	-	-	-	-			1	0	0	0	0
		Design and implement training and development plans	Approved training and development plans	1	1	1	1	1			0	0	0	0	0
			Number of staff trained	824	1,064	1,304	1,544	1,797			60	70	80	90	100
		Review career progression guidelines	Revised career progression guideline	1	-	-	-	-			5	0	0	0	0
	Manage performance	Review and implement Performance Management System	Revised Performance Management System	1	-	-	-	-			10	0	0	0	0
		Develop and implement staff change programmes	Number of change programmes	3	3	3	3	3			20	25	30	35	40

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcome	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
	Review terms and conditions of service and welfare	Review staff remuneration	Better terms and conditions of service	-	-	-	-	-			1,800	2,000	2,100	2,500	2,700
		Review and provide staff insurance schemes	Revised insurance schemes implemented (GLA, GPA, Medical, Post retirement & Other Special Covers)	3	3	3	3	3			120	140	160	180	200
		Provide Staff car loans and Mortgage Schemes	Number of applications processed	100	100	100	100	100		1. HRM 2. SCM	80	100	120	160	180
		Develop and implement staff wellness programs	Number of programs developed and implemented	2	3	3	3	3		1. HRM 2. Admin	10	20	30	40	50
		Undertake employee satisfaction surveys	Number of surveys	1	-	-	-	1		1. HRM 2. Admin 3. R&T	5	0	0	0	5
Enhance financial capacity	Mobilize financial resources	Undertake budgeting	1. Budget Estimates	1	1	1	1	1	Adequate finance	1. B&P 2. All Departments 3. Regional Offices	1.5	1.5	1.5	1.5	1.5
			2. Approved estimates	1	1	1	1	1							
			3. Supplementary estimates	2	2	2	2	2							

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcome	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
	Manage financial resources	Generate financial reports	Number of reports	17	17	17	17	17		F&A	2	2	3	3	4
		Execute Budget and apply financial controls	Level of compliance	100%	100%	100%	100%	100%		1. F&A 2. B&P 3. All Departments	0	0	0	0	0
			Budget absorption rate	100%	100%	100%	100%	100%			0	0	0	0	0
		Undertake audit	Number of audit reports	10	10	10	10	10		1. F&A 2. I.A 3. All Departments	5.5	5.5	5.5	5.5	5.5
Enhance physical infrastructure	Provide secure and conducive work environment	Acquire and equip office premises	Number of premises acquired and equipped	4 Regional Offices	2 Regional Offices	2 Regional Offices	2 Regional Offices	1 Regional Office	Conducive work environment	1. Admin 2. All Departments	90	115	135	155	175
			Asset register	2	2	2	2	2		Admin	1	1	1	1	1
			Number of offices refurbished	3	2	2	2	2		Admin	250	300	350	350	250
			Workplace audit report	1	1	1	1	1		1. Admin 2. HRM	1	1	1	1	1
			Modern security equipment installed	Various	Various	Various	Various	Various		Admin	25	25	25	20	15
	Modernize fleet and equipment	Acquire and maintain fleet and equipment	Number of fleet and equipment acquired and maintained	Various	Various	Various	Various	Various		Admin	100	150	200	200	200
	Streamline records management	Review records management processes	Review report	1	-	-	-	-		1. Admin 2. ICT	2	0	0	0	0

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcome	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
Enhance technological capacity	Develop a robust network and communication infrastructure	Upgrade and expand network and communication solutions	Network audit report	1	1	-	-	1	Improved productivity	1. ICT 2. All line managers	10	20	0	0	10
			Level of network upgraded	20%	30%	20%	20%	10%		1. ICT 2. All line managers	20	30	20	20	10
			No of networks expanded	HQ and 3 Regional Offices	2 Regional Offices	2 Regional Offices	2 Regional Offices	1 Regional Office		1. ICT 2. All line managers	40	30	20	20	10
	Automate Commission processes	Identify and automate processes	No of processes automated	7	19	11				1. ICT 2. All line managers	670	560	440	15	20
Strengthen Supply Chain Management	Facilitate efficient procurement and disposal of goods and services	Develop, implement and monitor procurement and disposal plans	No of procurement and disposal plans developed and implemented	1	1	1	1	1	Customer satisfaction	1. SCM 2. All Departments	1	1	1	1	1
			Percentage of plans implemented	100%	100%	100%	100%	100%		1. SCM 2. All Departments	0	0	0	0	0
		Implement E-Procurement	Level of E-Procurement implementation	50%	20%	10%	10%	10%		1. SCM 2. B&P 3. ICT	0	0	0	0	0
Strengthen risk management	Develop integrated Commission-wide risk management framework	Develop, review and implement business continuity and disaster recovery plan	Approved business continuity and disaster recovery plan	1	-	1	-	1	Corporate Sustainability	1. Admin 2. All Line Managers	0.5	0	0.5	0	0.5

Strategies	Key Activities	Activities	Performance Indicator	Output Target					Expected Outcome	Responsible Department	Expected Budget (Kshs. Million)				
				2018/19	2019/20	2020/21	2021/22	2022/23			2018/19	2019/20	2020/21	2021/22	2022/23
		Develop, review and implement risk management plan	Risk management plan	1	-	1	-	1		IA	3	2	1.5	1	1
Enhance corporate governance	Develop and implement corporate governance instruments	Review and operationalize corporate governance policies, procedure and guidelines	No of Policies, Procedures and manuals operationalized	10	-	-	-	-		All Departments	2	2	2	2	2
	Provide corporate legal services	Provide legal support	No. and type of legal services provided	5	7	9	12	15		CLAR&LS	5	5	5	5	5
		Develop and disseminate anti-corruption jurisprudence	No. of anti-corruption jurisprudence developed	50	50	50	50	50		1. CLAR&LS 2. Evidence Analysis 3. Ethics & Leadership	5	2	2	2	2
Total											4,047	4,306	4,432	4,507	4,688