# REPUBLIC OF KENYA



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# DRAFT NATIONAL ETHICS AND ANTI-CORRUPTION POLICY

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# FOREWORD

## ABBREVIATIONS AND ACRONYMS

| | |
|---|---|
| **ACECA** | Anti-Corruption and Economic Crimes Act |
| **ADR** | Alternative Dispute Resolution |
| **AG** | Attorney General |
| **AIE** | Authority to Incur Expenditure |
| **APRM** | African Peer Review Mechanism |
| **ARA** | Asset Recovery Agency |
| **AU** | African Union |
| **AUCPCC** | African Union Convention on Preventing and Combating Corruption |
| BETA | Bottom-Up Economic Transformation Agenda |
| **CAJ** | Commission for Administrative Justice |
| **CBK** | Central Bank of Kenya |
| **COB** | Controller of Budget |
| **CPI** | Corruption Perception Index |
| **DCI** | Directorate of Criminal Investigation |
| **DOJHRCA** | Department of Justice, Human Rights and Constitutional Affairs |
| **DPP** | Director of Public Prosecution |
| **EAC** | East African Community |
| **EACC** | Ethics and Anti-Corruption Commission |
| **EACCA** | Ethics and Anti-Corruption Commission Act |
| **EMU** | Efficiency Monitoring Unit |
| **FATF** | Financial Action Task Force |
| **FRC** | Financial Reporting Centre |
| **GAP** | Governance Action Plan |
| **IEBC** | Independent Electoral and Boundaries Commission |
| **IFMIS** | Integrated Financial Management Information System |
| **IPRS** | Integrated Population Registration System |
| **KACA** | Kenya Anti-Corruption Authority |
| **KACC** | Kenya Anti-Corruption Commission |
| **KIF** | Kenya Integrity Forum |
| **KLIF** | Kenya Leadership and Integrity Forum |
| **KLRC** | Kenya Law Reform Commission |
| **KRA** | Kenya Revenue Authority |
| **KSG** | Kenya School of Government |
| **M&E** | Monitoring and Evaluation |
| **MDA** | Ministries Departments and Agencies |
| MDACs | Ministries Departments and Agencies and Counties |
| **MDGs** | Millennium Development Goals |
| **MLA** | Mutual Legal Assistance |
| MPTIV | FourthMedium Term |
| **NACCSC** | National Anti-Corruption Campaign Steering Committee |
| **NACP** | National Anti-Corruption Plan |
| **NARC** | National Rainbow Coalition |
| **NCIC** | National Cohesion and Intergration Commission |

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| **NIA** | National Integrity Academy |
| **NIS** | National Intelligence Service |
| **NPS** | National Police Service |
| **NSE** | Nairobi Stock Exchange |
| **OAG** | Office of the Auditor General |
| **OAG&DOJHRCA** | Office of the Attorney General and Department of Justice, Human Rights and Constitutional Affairs |
| **ODPP** | Office of the Director of Public Prosecutions |
| **OOP** | Office of the President |
| **PCSC** | Public Complaints Standing Committee |
| **POEA** | Public Officer Ethics Act, 2003 |
| **PPRA** | Public Procurement Regulatory Authority |
| **PSI** | Public Service Integrity Programme |
| **TGs** | Thematic Groups |
| **TI** | Transparency International |
| **TNT** | The National Treasury |
| **UN** | United Nations |
| **UNCAC** | United Nations Convention against Corruption |
| **UNDOC** | United Nations Office on Drugs and Crime |
| **WPA** | Witness Protection Agency |

## DEFINATION OF KEY TERMS

| | |
|---|---|
| **Accountability** | A system of internal and external checks and balances aimed at ensuring that public officers carry out their duties properly and are held responsible if they fail to do so. |
| **Beneficial Ownership** | Having direct or indirect, ownership, control, exercise of substantial interest in, or receiving substantial economic benefit from a corporation through various means. |
| **Bribe** | An inducement whether, monetary or non-monetary, by one person to another person who holds a public or private office with the intention to influence them to act or forego to act as required of them in their official capacity. |
| **Corruption** | Soliciting, accepting, obtaining, giving, promising or offering of gratification by way of a bribe or other personal temptation or inducement or the misuse or abuse of a public office or authority for private advantage or benefit for oneself or another person. |
| **Digital Corruption** | Use of computers, mobile phones, internet systems, or other digital technologies to steal, manipulate, hide, or unfairly benefit from public or private resources and services. |
| **Civil Society** | An amalgamation, either formally or informally, of independent, autonomous, voluntary organizations designed to advance collective interests and ideas particularly the promotion of citizens' interests and concerns and may include: International and national Non-Governmental Organizations (NGOs); community-based organizations (CBOs); social movements; women's groups; faith-based organizations (FBOs); foundations; youth-led organizations; think tanks and research institutions. |
| **Code of Conduct and Ethics** | The Specific Code of Conduct and Ethics developed by a public body pursuant to Part II or the General Code of Conduct and Ethics established pursuant to Part III, of the Public Officer Ethics Act No. 4 of 2003. |
| **Cryptocurrency** | A cryptocurrency is a form of digital money that exists online and can be bought, sold, or transferred electronically without the need for a bank to control it. It uses secure computer technology to record and protect transactions |
| **Devolution** | The transfer of decision-making authority, implementation functions, responsibilities, and resources to legally constituted and democratically elected local governments. |
| **Governance** | Management of public affairs. |
| **Economic Crime** | A crime committed with the intention to obtain financial gain or a professional advantage. |
| **Education** | A process of imparting knowledge. |

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|---|---|
| **Ethics** | The standard of morality that a State or public officer must commit themselves to follow. |
| **Financial Declaration** | Declaration of income, assets and liabilities as provided for under Part IV of the Public Officer Ethics Act No.4 of 2003. |
| **Human Rights** | Rights possessed by all persons, by virtue of their common humanity, to live a life of freedom and dignity. |
| **Mutual Legal Assistance** | Formal process through which one country requests and obtains legal assistance from another country in the investigation, prosecution, or judicial handling of criminal matters, including corruption, money laundering, asset recovery, cybercrime, and other transnational offences. |
| **Oversight Institution** | A government agency or body that is charged with the responsibility of overseeing or regulating the operations of government entities through supervision, monitoring, evaluation and review of performance as a means of ensuring compliance with relevant laws, regulations and policies |
| **Public Officer** | Any State officer or any person, other a State officer, who holds a public office. |
| **Sextortion** | The abuse of power to obtain sexual benefit or advantage |
| **State Officer** | A person holding or acting in a state office. |
| **Virtual Assets** | A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes. |

## EXECUTIVE SUMMARY

# CHAPTER ONE: TOWARDS A NATIONAL ETHICS AND ANTI-CORRUPTION POLICY

## 1.1 Background

Kenya has struggled with corruption, both before and after independence. The long struggles against graft are marked by uneven interventions, weak enforcement, and lack of steady political support.[1] The anti-corruption efforts have often lacked coordinated policy framework. There has been low impact despite many legal and institutional initiatives.[2] This has led to high levels of corruption and relatively low ranking in global corruption perception indices.[3] Corruption in Kenya is not only sustained through formal institutional weaknesses but is also reinforced by informal systems and socio-political dynamics such as ethnicity, patronage networks, nepotism, clientelism, political protection and other forms of unethical conduct that undermine merit, accountability and public trust. These informal practices often influence access to public resources, opportunities and decision-making processes, thereby weakening institutional effectiveness and entrenching corruption. Consequently, efforts to combat corruption must address both formal governance structures and the informal norms and practices that facilitate unethical conduct.

The war against corruption in Kenya dates back to 1956 following the enactment of the Prevention of Corruption Ordinance, which later became the Prevention of Corruption Act (Cap. 65) at independence. During this period, corruption was considered an ordinary criminal offence under the Penal Code (Cap. 63) and was mainly handled by the police. However, the raising concerns over widespread corruption led to the formation of more specialized institutions to respond to it. Early attempts included the establishment of the Anti-Corruption Squad in 1992 and the Kenya Anti-Corruption Authority (KACA) in 1997. KACA was declared unconstitutional in 2000 on the basis that it usurped the prosecutorial powers of the Attorney General and the investigative powers of the Commissioner of Police.[4]



Subsequent reforms led to the enactment of the Anti-Corruption and Economic Crimes Act (ACECA), CAP. 65 (This Act established the Kenya Anti-Corruption Commission (KACC) to undertake investigations, prevention, public education, and asset recovery. Related law such as the Public Officer Ethics Act, CAP. 185B institutionalized ethical conduct within the public service through codes of conduct, financial disclosure requirements, and enforcement mechanisms. These reforms marked a significant shift towards a more structured anti-corruption framework.

The adoption of the Constitution of Kenya, 2010, greatly changed the governance system. The reviewed Constitution embedded integrity, transparency, and accountability as national values under Article 10. It established an independent anti-corruption body under Article 79, leading to the creation of the Ethics and Anti-Corruption Commission (EACC) through the EACC Act, CAP. 7H and the enactment of the Leadership and Integrity Act, CAP. 7H to operationalize Chapter Six of the Constitution. The Constitution also strengthened oversight of public finance and

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[1] World Bank (2010). *Kenya Governance, Corruption, and Public Sector Reform* Daniel Branch (2011). *Kenya: Between Hope and Despair, 1963–2011.* Yale University Press; John Githongo (2012). *"Corruption and the Rule of Law in Kenya."* In The Oxford Handbook of Kenyan Politics; Also various Transparency International**'s** Corruption Perceptions Index (CPI) Reports since 2018.

[2] Government of Kenya (2018). *National Ethics and Anti-Corruption Policy.*

[3] Transparency International (various years). *Corruption Perceptions Index & Kenya Country Reports;*

[4] *Stephen Mwai Gachiengo & Albert Muthee Kahuria* v. R [2000] eKLR.

procurement, further reinforcing the fight against corruption. In addition, the 2015 Taskforce on the Review of the Legal, Policy and Institutional Framework for Fighting Corruption in Kenya constituted another important milestone in Kenya's anti-corruption journey. The Taskforce undertook a comprehensive review of existing anti-corruption laws, policies, and institutions, and made recommendations aimed at strengthening coordination, enhancing enforcement mechanisms, addressing legislative gaps, and improving institutional effectiveness in the fight against corruption.

Since 2018, Kenya's anti-corruption efforts have intensified through legislative, institutional, and technological reforms. These include the enactment and adoption of key laws and policy frameworks such as the Data Protection Act, CAP 411C; The National Information Communication Technology Policy, 2019; Passage of the Virtual Assets Service Providers Act 2025; and the Conflict of Interest Act 2025. In addition, the government adopted the Kenya Integrity Plan (2023–2028) by the Kenya Leadership and Integrity Forum (KLIF); Anti-Corruption Strategic Guiding Framework for Kenya's Justice Sector 2025 and Kenya Artificial Intelligence Strategy 2025-2030. The Government also expanded the use of digital governance systems, including the Integrated Financial Management Information Systems (IFMIS), Electronic Government Procurement (e-GP) system in April 2025, electronic revenue collection, and integrated complaints and reporting mechanisms.

These reforms introduced transparency and traceability. However, they also created new integrity risks related to data management, cyber security, and the use of automated systems in decision-making. Despite these efforts, recent evidence does not indicate marked improvement in the war against corruption. There is relatively low conviction rates for corruption-related offences. High-profile corruption scandals in public procurement and financial mismanagement undermine public trust and institutional credibility. Additionally, Kenya was grey-listed by the Financial Action Task Force (FATF) in February 2024 due to deficiencies in its anti-money laundering and counter-terrorism financing framework.

Despite reforms, the United Nations Convention against Corruption (UNCAC) highlighted that Kenya still faces many challenges. These include weak enforcement of preventive measures, limited penalties for non-compliance, procurement weaknesses, delays in regulating political finance, and difficulties in recovering stolen assets.[5] The Kenya National Gender and Corruption Survey (2026) demonstrates that corruption disproportionately affects women and other vulnerable groups by limiting equitable access to public services and reinforcing structural inequalities.[6] The Survey reveals distinct gendered patterns in corruption experiences. The findings further reveal extremely low reporting rates of corruption (98.6% non-reporting), with gendered barriers such as fear, stigma, lack of awareness, and weak protection mechanisms disproportionately affecting women's willingness and ability to report corruption incidents. These findings underscore a critical policy gap: while Kenya has made significant progress in strengthening legal and institutional anti-corruption frameworks, the current policy does not sufficiently address the differentiated experiences, vulnerabilities, and barriers faced by men and women. Consequently, the absence of



[5] The country review report on Kenya's implementation of the United Nations Convention against Corruption. The challenge of recovering stolen assets becomes complicated particularly where the value of recovered proceeds remains disproportionately low compared to the magnitude and scale of corruption and economic crimes.
[6] Ethics and Anti-Corruption Commission (EACC), The Kenya National Gender and Corruption Survey (2026)

a gender-responsive approach limits the effectiveness, inclusivity, and equity of anti-corruption interventions.

In addition, empirical findings from the Baseline Survey on the Implementation of the National Ethics and Anti-Corruption Policy (NEAP) reinforce the need for a comprehensive policy review. The survey reveals that while the policy is broadly aligned with institutional mandates (with over 83% of respondents affirming strong alignment), its implementation remains uneven and constrained by structural and operational challenges.[7] Notably, awareness of the policy is only moderate with nearly one-third of respondents reporting low levels of awareness, pointing to significant gaps in dissemination and internalization. Furthermore, although some progress has been made in implementation, financial constraints emerge as the most critical impediment, with over two-thirds of respondents identifying inadequate funding as a major barrier to effective implementation. Legal and regulatory gaps, capacity limitations, and overlapping institutional mandates further weaken enforcement and coordination mechanisms. The survey also highlights weaknesses in monitoring and evaluation (M&E) systems, with only about half of institutions reporting the existence and effective use of M&E frameworks, thereby limiting evidence-based decision-making and accountability. While respondents acknowledge modest gains in accountability, service delivery, and public trust, these outcomes remain fragile and insufficiently institutionalized. Importantly, the survey identifies critical systemic issues such as insufficient political will, limited policy dissemination, and inadequate resourcing, and alongside emerging risks linked to digital transformation. These findings underscore that, despite significant reforms since 2018, the current policy framework has not fully addressed the evolving nature of corruption risks, particularly in technologically mediated governance environments.



Since the adoption of the National Ethics and Anti-Corruption Policy in 2018, significant governance, technological, environmental and socio-economic developments have created new ethics and integrity challenges. The increasing use of digital technologies, artificial intelligence (AI), big data analytics, digital identity systems, blockchain technologies and automated decision-making processes has transformed public administration and service delivery. While these innovations offer opportunities for improving transparency, efficiency, monitoring and corruption detection, they also create new risks relating to algorithmic bias, cyber-enabled corruption, misuse of personal data, weak accountability for automated decisions, and vulnerabilities within digital infrastructure.

Emerging integrity risks are also evident in climate governance and climate finance. Increasing flows of resources associated with climate adaptation, mitigation, carbon markets, carbon credit trading, green investments and environmental programmes require robust accountability, transparency and oversight mechanisms to prevent fraud, misappropriation, elite capture and other forms of corruption. As Kenya expands its participation in climate finance initiatives, effective safeguards will be necessary to ensure that climate resources achieve their intended developmental and environmental outcomes. Further, the growing importance of data governance, cybersecurity and digital public infrastructure has introduced new ethical obligations relating to privacy, information security, access to information, responsible use of technology and protection of citizens' rights. These developments require policy responses that balance innovation with

[7] The Baseline Survey on the Implementation of the National Ethics and Anti-Corruption Policy, Unpublished.

integrity, accountability and respect for human rights. At the same time, corruption continues to disproportionately affect youth, persons with disabilities, marginalized communities, women and other vulnerable groups through unequal access to opportunities, services and justice. A comprehensive ethics and anti-corruption framework must therefore promote inclusion, equity and non-discrimination while recognizing the differentiated impacts of corruption across society.

The National Ethics and Anti-Corruption Policy (Sessional Paper No. 2 of 2018) was formulated to provide a broad framework for coordinating legal reforms, institutional mandates, preventive strategies and public participation mechanisms. However, rapid legal, technological, environmental and governance developments, lessons from policy implementation, findings from national surveys and international review mechanisms, and the emergence of new corruption risks necessitate policy revision. The revised Policy seeks to address evolving challenges associated with digital governance, artificial intelligence, data governance, cybersecurity, climate finance, carbon markets, informal systems of corruption, and social inclusion while strengthening implementation, accountability, institutional coordination and public participation. Ultimately, the Policy seeks to foster a resilient national culture of ethics, integrity and responsible governance capable of supporting democratic development, human rights, public trust and sustainable development.



### 1.2 Policy Rationale

Kenya's efforts to fight corruption have evolved through a series of legal, institutional, and policy reforms aimed at strengthening integrity, accountability, and ethical conduct in public and private affairs.[8] Over time, the country has established many laws, specialized oversight institutions, and adopted several national, sectoral, and institutional strategies targeting corruption prevention, enforcement, ethics regulation, public education, and asset recovery.[9]

Kenya has also ratified and domesticated key international and regional anti-corruption instruments, including the UNCAC, the African Union Convention on Preventing and Combating Corruption (AUCPCC) and commitments under the African Peer Review Mechanism (APRRM). Despite this extensive legal and institutional framework, corruption remains widespread at both national and county levels. Reviews of Kenya's implementation of international anti-corruption obligations, particularly under the UNCAC peer review mechanism, consistently reveal that the main challenge is not the lack of laws or institutions, but weak implementation, poor compliance, limited enforcement, and inadequate coordination.[10]

These challenges are made worse by the changing nature of corruption. Modern corruption increasingly involves complex systems, cross-border financial flows, digital platforms, and information gaps.[11] New technologies and the growth of transnational and cyber-enabled crimes have introduced new integrity risks that were not adequately anticipated in earlier policy

[8] Hope Sr, K. R. (2014). Kenya's corruption problem: causes and consequences. *Commonwealth & Comparative Politics*, *52*(4), 493-512.

[9] National Ethics and Anti-Corruption Policy (Sessional Paper No. 2 of 2018)

[10] United Nations Office on Drugs and Crime. (2019). Kenya: UNCAC Implementation Review Report; World Bank. (2020). Enhancing Government Effectiveness and Transparency: The Fight against Corruption. Washington, DC.

[11] United Nations Office on Drugs and Crime. (2019). *State of Implementation of the United Nations Convention against Corruption*. Vienna; Organization for Economic Co-operation and Development. (2017). *Preventing Corruption in Public Procurement*. Paris.

frameworks.[12] Although the digitization of public services has enhanced efficiency and transparency[13] it has also generated new risks related to data governance, system manipulation, cyber security, and misuse of personal and financial information.

Corruption in Kenya increasingly manifests through both formal and informal systems. While legal and institutional reforms have strengthened oversight mechanisms, informal practices such as patronage networks, nepotism, political protection, ethnic favouritism and clientelism continue to undermine accountability and merit-based decision-making. These practices weaken public confidence in institutions and reduce the effectiveness of anti-corruption interventions. Consequently, the Policy recognizes the need to address both structural and behavioral drivers of corruption through a comprehensive approach that combines enforcement, prevention, civic engagement and ethical transformation.

The Constitution of Kenya, 2010 improved governance by establishing national values and principles of governance. It strengthened oversight and accountability institutions and set high ethical standards for leadership and integrity under Chapter Six.[14] The Constitution also introduced a devolved system of government that transferred substantial resources and responsibilities to county governments.[15] However, the rapid service demands has not effectively established the expected systems of transparency, accountability, information management, and integrity assurance in the county governments. This has created new corruption risks and coordination challenges at both the national and county governments.[16]



The increased use of digital technologies and artificial intelligence in public services presents both significant opportunities and profound ethical and corruption-related risks. However, without proper safeguards, these technologies can increase opacity, bias, and new forms of corruption. When properly managed, however, they can significantly improve corruption detection, monitoring, and enforcement.

Recent reviews of Kenya's compliance with international anti-corruption instruments reveal the need for an updated, coherent, and forward-looking national policy framework that combines legal reforms, institutional mandates, preventive strategies, and information governance in a coordinated manner.[17] Such a framework must respond to traditional corruption challenges. At the same time it must explicitly address digital integrity, data governance, inter-agency information

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[12] Financial Action Task Force. (2021). *Money Laundering and the Digital Transformation of Finance*. Paris; World Bank. (2020). *Enhancing Government Effectiveness and Transparency: The Fight Against Corruption*. Washington, DC.

[13] United Nations Office on Drugs and Crime. (2019). *State of Implementation of the United Nations Convention against Corruption*. Vienna; Organization for Economic Co-operation and Development. (2017). *Preventing Corruption in Public Procurement*. Paris.

[14] Republic of Kenya. (2010). *The Constitution of Kenya*. Nairobi: Government Printer; World Bank. (2012). *Devolution without Disruption: Pathways to a Successful New Kenya*. Washington, DC.

[15] Commission for Revenue Allocation. (2013). *Report on the Basis for Revenue Sharing among the National and County Governments*. Nairobi; Council of Governors. (2016). *Status of Devolution Report*. Nairobi.

[16] Ethics and Anti-Corruption Commission. (2016). *National Ethics and Corruption Survey*. Nairobi; Transparency International Kenya. (2019). *East African Bribery Index*. Nairobi; Office of the Auditor-General Kenya. (Various years). *County Audit Reports*. Nairobi.

[17] United Nations Office on Drugs and Crime. (2019). *State of Implementation of the United Nations Convention against Corruption*. Vienna.

sharing, algorithmic accountability, and technology-enabled corruption risks. This revised National Ethics and Anti-Corruption Policy provides that overall framework. It comprehensively reexamines Kenya’s legal, policy, institutional, and technological landscape to strengthen enforcement and compliance. It further aims at enhancing coordination across national and county governments, aligning domestic measures with international obligations, and harnessing technology responsibly to promote ethics and integrity. In doing so, the Policy seeks to support democratic governance, restore public trust, and contribute to sustainable development in line with the Vision 2030, the Fourth Medium Term (MPTIV), 2023-2027 and Bottom-Up Economic Transformation Agenda (BETA).

### 1.3 Policy Objectives

The overall objective of this Policy is to reduce corruption and unethical practices in Kenya by providing a coordinated, and enforceable framework that strengthens prevention, detection, enforcement, and ethical conduct across national and county governments.

The specific objectives of the Policy are to:

a) Strengthen coordination, collaboration, and information-sharing among state and non-state actors involved in ethics and anti-corruption interventions, including through interoperable data, reporting, and information management systems.

b) Enhance political commitment, leadership accountability, and compliance with ethics and integrity standards across public and private sectors.

c) Promote transparency, meaningful public participation, access to information, whistle-blower protection, and civic oversight in the prevention, detection, and reporting of corruption.

   Strengthen legal, institutional, investigative, prosecutorial, and asset recovery frameworks for ethics and anti-corruption by addressing implementation gaps, enforcement weaknesses, compliance deficits, and capacity constraints.

d) Promote social inclusion, equity and human rights in anti-corruption interventions by addressing the differentiated experiences and vulnerabilities of women, youth, persons with disabilities, marginalized communities and other vulnerable groups, and by strengthening access to services, reporting mechanisms and redress systems.

e) Mainstream ethics, integrity, digital governance, data governance, cybersecurity and artificial intelligence considerations across public sector systems to enhance transparency, accountability and resilience against technology-enabled corruption and unethical conduct.

f) Strengthen integrity, transparency and accountability in climate governance, climate finance, carbon markets and environmental management systems.

g) Strengthen ethics, integrity, transparency, accountability, information management, and anti-corruption systems within county governments and enhance intergovernmental coordination mechanisms.

h) Establish an efficient monitoring, evaluation, reporting, and learning framework based on data and evidence to track performance, detect risks, support adaptive policy responses, and inform continuous institutional improvement.

i) Strengthen compliance with and implementation of regional and international anti-corruption obligations, standards, and cooperation frameworks, including those arising under UNCAC, the African Union Convention on Preventing and Combating Corruption (AUCPCC), and the African Peer Review Mechanism (APRM).

### 1.4 Policy Outcomes

The implementation of this policy expected to result in:

a) A coordinated, integrated, and information-driven national approach to ethics and anti-corruption at national and county levels.
b) Strengthened political leadership, institutional accountability, and compliance with ethics and integrity standards across public and private sectors.
c) Enhanced transparency, public participation, and civic trust, supported by access to information, digital reporting platforms, and protection of whistle-blowers.
d) More effective legal and institutional enforcement mechanisms, including improved investigation, prosecution, asset recovery, and sanctions for non-compliance.
e) Strengthened inclusive and human rights-based anti-corruption systems that address differentiated vulnerabilities and improve equitable access to public services, reporting mechanisms and justice.
f) Reduced opportunities for corruption and unethical conduct, including technology-enabled, cyber-related and data-related corruption, through strengthened digital governance, cybersecurity and integrity controls. Enhanced transparency, accountability and integrity in climate governance, climate finance and carbon market mechanisms.
g) Strengthened ethics and anti-corruption capacity at both national and county levels, resulting in more transparent, accountable, and responsive service delivery at the county level.
h) Institutionalized evidence-based monitoring, evaluation, reporting, and learning systems that enable early detection of corruption risks, continuous learning, and adaptive policy responses in a dynamic governance environment.
i) Improved implementation of regional and international anti-corruption obligations, including those arising under UNCAC, the African Union Convention on Preventing and Combating Corruption (AUCPCC), and the African Peer Review Mechanism (APRM).

### 1.5 Policy Development Approach

The Policy is being developed through a consultative, participatory, and inclusive process involving government institutions, oversight bodies, county governments, the private sector, civil society, academia, and development partners. A thematic and evidence-based approach is used to ensure that both traditional and emerging corruption risks were addressed.

The Policy development process is guided by several thematic areas:

a) Legal, institutional, and enforcement frameworks, including compliance, sanctions, and inter-agency coordination.
b) Preventive, detection, and enforcement strategies, with emphasis on ethics management, risk assessment, and asset recovery.
c) Ethics and anti-corruption in national and devolved systems of government, including intergovernmental relations and capacity strengthening.
d) Information governance, digital integrity, and technology-enabled corruption risks, including data protection, cyber security, and responsible use of artificial intelligence.

e) Cross-cutting governance issues, including leadership and integrity, public participation, human rights, social inclusion, climate governance, climate finance accountability, youth empowerment, monitoring and evaluation, and international cooperation.
f) Emerging governance and integrity issues, including artificial intelligence, data governance, cybersecurity, digital public infrastructure, carbon finance accountability and technology-enabled corruption risks.

### 1.6 Policy Principles

In recognition of the aspirations to achieve zero tolerance to corruption, this Policy is founded on the following principles:

a) **Constitutionalism and the rule of law**: This requires compliance with the spirit and the letter of the Constitution and other laws of the Republic of Kenya.
b) **Ethical leadership**: Adherence to national values is a pre-condition for good governance and zero tolerance to corruption.
c) **Ethics and ethical conduct**: A moral and social norm that requires doing what is right.
d) **Responsibility**: The fight against corruption is a duty of every citizen and institution.
e) **Collaboration and co-operation**: The fight against corruption requires development and involvement of strategic partnerships and alliances of all the stakeholders and provision of assistance to one another.
f) **Accountability and transparency**: The involvement of many actors in the fight against corruption calls for strict adherence to codes of conduct that guide working relationships.
g) **Consistency:** The fight against corruption entails continuous efforts
h) **Participation and inclusivity**: All stakeholders will be encouraged and facilitated to participate in all the processes in the fight against corruption.

# CHAPTER TWO: LEGAL FRAMEWORK FOR FIGHTING CORRUPTION AND UNETHICAL CONDUCT

## 2.1 Introduction

This chapter examines the legal framework that governs the fight against corruption and unethical conduct in Kenya. It provides a comprehensive overview of the constitutional foundation, the principal anti-corruption legislation, subsidiary legislation, and the supporting policies, strategies, and international instruments that guide prevention, detection, investigation, prosecution, and recovery of proceeds of corruption. The chapter further assesses the key legislation across each governance domain — mapping their scope, objectives, and inter-relationships — so as to present a consolidated picture of Kenya's normative framework for fighting corruption. The chapter also assesses emerging challenges in implementation, particularly those arising from rapid technological change, institutional coordination gaps, and evolving forms of corruption. Overall, it situates the legal framework within Kenya's broader governance and integrity architecture, highlighting both its achievements and the gaps that necessitate this revised Policy.

## 2.2 Policy Objectives

The objectives of the legal framework chapter are to:

a) Provide a comprehensive and authoritative account of Kenya's statutory anti-corruption architecture, encompassing constitutional foundations, primary legislation, subsidiary legislation, and international instruments;
b) Identify the legal scope, mandate, and operational limitations of each key instrument;
c) Map areas of legislative overlap, gaps in coverage, and harmonization needs across the framework;
d) Assess the extent to which the existing legal framework adequately addresses emerging corruption risks arising from digital governance, artificial intelligence, virtual assets, and cross-border financial flows; and
e) Provide a sound legal basis for the policy interventions and institutional measures proposed in this Policy, ensuring alignment between the normative framework and the policy objectives.

## 2.3 Situation Analysis

The legal framework for fighting corruption and unethical conduct in Kenya is anchored in the Constitution of Kenya, 2010. The Constitution sets out binding national values, principles of governance, and public service ethics, and provides strong systems for oversight and accountability. In particular, Article 10 entrenches national values and principles of governance, including the rule of law, democracy, public participation, human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, protection of the marginalized, good governance, integrity, transparency, and accountability. Articles 73 and 75 establish binding standards of responsibility and conduct for State officers and public servants respectively, while Chapter Six as a whole sets out the foundational leadership and integrity obligations applicable to all persons holding public office. Articles 201 to 229 reinforce fiscal accountability and public finance management as a further safeguard against corruption. The Constitution also establishes independent institutions — including the Ethics and Anti-Corruption Commission under Article 79, the Auditor-General under Article 229, the Controller of Budget under Article 228, and the Director of Public Prosecutions under Article 157 — that collectively form the constitutional anti-corruption architecture.

In line with this constitutional foundation, Kenya has enacted a wide range of laws and regulations to prevent, detect, investigate, and prosecute corruption, as well as recover stolen assets. Collectively, these laws promote ethics and integrity across both public and private sectors. The principal legislation comprising this framework includes the following:

a) **The Anti-Corruption and Economic Crimes Act, (ACECA) CAP. 65.**
The primary statute criminalizing corruption and economic crimes, establishing offences of bribery, fraud, abuse of office, and conflict of interest, and providing for civil recovery of corruptly acquired assets. ACECA also mandates the EACC to investigate, prevent corruption and promote public education on integrity.

b) **The Ethics and Anti-Corruption Commission Act, (EACCA) CAP. 7H**
Establishes and operationalizes the EACC, defining its mandate, powers, and composition as the principal anti-corruption body, and replacing the former Kenya Anti-Corruption Commission.

c) **The Leadership and Integrity Act, CAP. 185C**
Operationalizes Chapter Six of the Constitution by establishing specific integrity requirements for State officers, including vetting processes, codes of conduct, and mechanisms for enforcement of integrity standards in appointment processes.

d) **The Anti Bribery Act, 79B**
Extends the anti-bribery framework to the private sector by imposing obligations on commercial organizations to prevent bribery, creating offences for both active and passive bribery, and introducing corporate criminal liability for failure to prevent bribery. This represents a significant expansion beyond the public sector focus of ACECA.

e) **The Proceeds of Crime and Anti-Money Laundering Act, CAP. 59A (POCAMLA)**
Establishes the regime for tracing, freezing, restraining, confiscating, and forfeiting proceeds of crime, and establishes the Financial Reporting Centre (FRC) as Kenya's Financial Intelligence Unit (FIU).

f) **The Public Procurement and Asset Disposal Act, CAP. 412C**
As amended in 2022, the regulatory framework provides for public procurement, prescribing competitive tendering procedures, debarment of corrupt suppliers, and accountability requirements for procuring entities.

g) **The Access to Information Act, CAP. 7M**
Gives effect to Article 35 of the Constitution by guaranteeing the right of citizens to access information held by the State and by private bodies acting in the public interest, thereby supporting transparency and citizen oversight.

h) **The Data Protection Act, CAP. 411C**
Establishes the Office of the Data Protection Commissioner, regulates the collection, use, processing, and sharing of personal data, and introduces obligations of data minimization, purpose limitation, transparency, and accountability, all of which bear on integrity in automated and digital governance systems.

i) **The Conflict of Interest Act, No. 11 of 2025**
Introduces a standalone statutory framework for identifying, disclosing, managing, and enforcing compliance with conflict of interest obligations across the public service. It addresses regulatory capture, self-dealing in procurement, and post-employment restrictions for former public officers. This Act repealed The Public Officer Ethics Act, POEA).

j) **The Virtual Asset Service Providers Act, No. 20 of 2025**

Regulates virtual asset service providers, establishes licensing requirements and Anti-Money Laundering (AML)-/CFT obligations applicable to the digital assets sector, and introduces a framework for tracing and recovering assets held through virtual asset systems , thereby addressing a significant gap in Kenya's anti-money laundering architecture identified by FATF in 2024.

This framework covers key governance domains, including corruption and economic crimes, leadership and integrity, bribery control, public procurement, asset recovery and anti-money laundering, access to information, and broader governance standards. It therefore creates a comprehensive normative environment intended to support integrity in public affairs. Kenya's domestic framework is further reinforced by a set of international and regional anti-corruption instruments to which Kenya is a State Party, and which impose direct legal obligations on the Government. These instruments include:

a) The United Nations Convention against Corruption (UNCAC), ratified by Kenya in 2003 — the most comprehensive global anti-corruption treaty, covering prevention, criminalization, international cooperation, and asset recovery across 71 articles. Kenya is subject to periodic peer review under the UNCAC Review Mechanism, the most recent cycle of which identified persistent implementation gaps in enforcement, asset recovery, and procurement integrity.
b) The African Union Convention on Preventing and Combating Corruption (AUCPCC), ratified by Kenya in 2007 — requires State Parties to adopt legislative and other measures to prevent, detect, punish, and eradicate corruption, and to promote regional cooperation in asset recovery and mutual legal assistance.
c) The Financial Action Task Force (FATF) Recommendations — Kenya was grey-listed by FATF in February 2024 for deficiencies in its anti-money laundering and counter-terrorism financing framework. While not binding treaties, FATF Recommendations carry significant legal and economic consequences and have necessitated urgent legislative and operational reforms, including the enactment of the Virtual Asset Service Providers Act, 2025.
d) **The African Peer Review Mechanism (APRM)**
A voluntary continental governance assessment to which Kenya has submitted, providing an additional accountability platform for governance and anti-corruption performance. (v) The East African Community (EAC) Protocol on Good Governance — regional commitments on anti-corruption, transparency, and democratic accountability applicable within the EAC framework.

Since the adoption of the National Ethics and Anti-Corruption Policy in 2018, Kenya's legal and policy environment has continued to evolve, creating the need for stronger coordination across the integrity ecosystem. There is need to align the Policy with newer and complementary instruments, including the Data Protection Act No. 24 of 2019; Conflict of Interest Act No. 11 of 2025 and Virtual Asset Service Providers Act No. 20 of 2025, and governance-related policies and strategies such as the Kenya Integrity Plan (2023–2028), the Anti-Corruption Strategic Guiding Framework for Kenya's Justice Sector (2025), and the Guidelines for Expeditious Trial of Corruption and Economic Crime Cases in Special Magistrates Courts (2025).

Additional policy instruments of relevance include the Kenya National Information Communication Technology Policy (2019), the Kenya Artificial Intelligence Strategy (2025–2030), and the Electronic Government Procurement (e-GP) system launched in April 2025. These instruments collectively expand and operationalize the legal framework, and must be read together with the primary legislation to obtain a complete picture of Kenya's anti-corruption normative environment.

The legal framework now operates in a context shaped by rapidly expanding digitization and use of new technologies in public administration. This has introduced new integrity risks that the legal framework must address, including cybercrime, data security challenges in public service delivery, illicit financial flows, transparency in beneficial ownership, integrity in climate financing, political finance accountability, and cross-border corruption linked to digital economies.

These issues underscore that the legal framework must go beyond criminalizing corruption and providing enforcement powers. . It must also support prevention through transparency, information governance, and technology-resilient controls in public systems.

In this context, Kenya's key legal challenge is no longer the "absence of laws" but gaps in harmonization, operationalization, implementation, and enforcement and the ability to respond to emerging digital and technology-driven corruption risks. Strengthening the legal framework therefore requires not only law reform, but also effective implementation, improved coordination, adequate resourcing, alignment with international standards, and the development of legal and operational responses to corruption risks arising from digital governance and the use of artificial intelligence in public administration. This revised Policy accordingly provides the overarching framework within which these legal gaps are to be addressed in a systematic, coordinated, and forward-looking manner.



### 2.4 Policy Issues

The legal framework for fighting corruption and unethical conduct faces key challenges:

a) Weak enforcement and limited sanctions gaps, including limited consequences for failing to comply with anti-corruption recommendations, which undermines deterrence.
b) Institutional capacity constraints, including inadequate staffing and resources for key oversight and enforcement bodies, limiting their effectiveness.
c) Fragmentation and weak inter-agency coordination, particularly among institutions responsible for prevention, investigation, prosecution and oversight, resulting in duplication of roles, gaps in accountability, weak information sharing, and limited system-wide monitoring and evaluation.
d) Procurement vulnerabilities and limited oversight capacity, despite digital systems such as IFMIS, leading to continued violations and reduced value for money.
e) Regulatory gaps in political and campaign finance, including delayed operationalization of election campaign regulations.
f) Access-to-information implementation weaknesses, including broad grounds for refusal and uneven enforcement of disclosure obligations, limiting transparency and citizen oversight.

g) Weaknesses in financial disclosure and Anti-Money Laundering (AML)-related integrity controls, including reliance on manual systems with limited verification capacity, incomplete coverage under reporting obligations, and gaps in monitoring beneficial ownership information.
h) Asset recovery challenges, including lengthy court processes, weaknesses in specialized asset management arrangements, and limited data on recoveries and international cooperation outcomes.
i) Emerging technology-enabled corruption risks outpacing legal and operational controls, including cybercrime and data security risks in service delivery, cross-border corruption risks linked to digital economies, illicit financial flows, beneficial ownership opacity, and integrity risks in climate financing and digital trade.
j) Need for stronger legal-policy coherence and harmonization to align the integrity framework with newer statutes, strategies, and justice-sector reforms, including conflict-of-interest regulation and accelerated trial guidance for corruption and economic crimes.
k) Delays in the investigation, prosecution, adjudication and conclusion of corruption and economic crime cases, which undermine deterrence, public confidence, asset recovery efforts and the effective administration of justice.

**2.5 Policy Statements and Strategic Interventions**

In order to address the legal framework challenges identified in this chapter, the Government shall pursue the following strategic interventions:



a) Harmonize and strengthen the anti-corruption legal framework: The Government shall, within 24 months of adoption of this Policy, , undertake a systematic review of all anti-corruption legislation to identify and address overlaps, inconsistencies, gaps in coverage, and barriers to enforcement. Priority areas for harmonization include the intersection of ACECA and the Bribery Act, the alignment of POCAMLA with the Virtual Asset Service Providers Act, 2025, and the operationalization of the Conflict of Interest Act, 2025 across all public sector entities.
b)
c) Strengthen sanctions and enforcement mechanisms: The Government shall review , within 24 months of adoption of this Policy, review all anti-corruption statutes to ensure that penal provisions are sufficiently deterrent, proportionate, and consistently applied. This includes introducing mandatory minimum sentences for high-value corruption, strengthening civil recovery mechanisms, and ensuring that administrative sanctions — including debarment from public office and blacklisting from public procurement — are effectively enforced against persons and entities found guilty of corruption.

d) Address emerging digital and technology-enabled legal gaps: The Government shall, within 36 months of adoption of this Policy, review and, where necessary, amend existing legislation or enact new legal instruments to address corruption risks arising from the use of digital public systems, artificial intelligence in administrative decision-making, virtual assets, cyber-enabled financial crimes, and algorithmic opacity. This shall include developing clear legal standards for the admissibility and evidential weight of digital evidence in corruption proceedings, and establishing legal obligations for algorithmic accountability and auditability in high-stakes automated public decisions.

e) Align the legal framework with international anti-corruption obligations: The Government shall, within 18 months of adoption of this Policy, undertake a legal gap analysis and implement legislative reforms necessary to comply with Kenya's obligations under UNCAC, AUCPCC and FATF standards. The OAG&DOJ shall lead a legal gap analysis identifying all remaining UNCAC implementation gaps identified in the Second Review Cycle and develop a time-bound action plan for their legislative resolution, which shall form part of the implementation framework of this Policy.
f) Regulate political and campaign finance: The Government shall, within 24 months of adoption of this Policy, through Parliament and the Independent Electoral and Boundaries Commission (IEBC), operationalize comprehensive regulations on political party financing and election campaign expenditure, including real-time disclosure requirements, spending limits, and sanctions for non-compliance. Given the well-documented link between unregulated political finance and systemic corruption in Kenya, this is a priority legal reform that shall be completed within 24 months of the adoption of this Policy.
g) Strengthen access to information as an anti-corruption tool: The Government shall, within 24 months of adoption of this Policy, through OAG&DOJ, Commission on Administrative Justice review the Access to Information Act, 2016 to narrow unduly broad grounds for refusal of information requests, strengthen enforcement of proactive disclosure obligations, and ensure that public entities publish corruption-relevant information — including procurement records, asset declarations, audit reports, and investigation outcomes — on accessible digital platforms as a default, rather than only upon request.
h) The Government shall, within 24 months of adoption of this Policy, strengthen implementation of the Access to Information Act by enhancing proactive disclosure, improving enforcement mechanisms and expanding public access to corruption-related information.
i) Enact a standalone Whistleblower Protection Act: The Government shall, within 18 months of the adoption of this Policy, through OAG&DOJ, Parliament enact a comprehensive Whistleblower Protection Act that consolidates existing fragmented protections, establishes a single accessible reporting portal administered by the EACC, defines enforceable anti-retaliation remedies including reinstatement and compensation, and extends protection to private sector whistleblowers reporting corruption. This is a priority legal reform consistent with UNCAC Article 33 and international best practice.
j) Criminalize sextortion: The Government shall, within 18 months of adoption of this Policy, through KLRC and the OAG & DOJ, initiate amendments to ACECA or the Sexual Offences Act to insert a specific, standalone sextortion offence with appropriate penalties, survivor-centered procedural protections, and institutional guidance for investigation and prosecution. The amendment shall be guided by comparative legislative models and shall be developed in consultation with the National Gender and Equality Commission (NGEC) and civil society organizations with expertise in gender-based violence.
k) Strengthen Inter-Agency Coordination in Anti-Corruption Enforcement: The Government shall, within 24 months of adoption of this Policy, through OAG&DOJ, EACC, establish a formal legal and operational framework for coordination among institutions responsible for prevention, investigation, prosecution, adjudication, asset recovery and oversight of corruption cases.
l) Strengthen Asset Recovery and Beneficial Ownership Transparency: The Government shall, within 24 months of adoption of this Policy, through National Treasury, Asset Recovery Agency strengthen legal and institutional mechanisms for asset tracing, seizure,

recovery, management and beneficial ownership transparency, including cross-border cooperation frameworks.

m) Reduce Delays in Corruption and Economic Crime Cases: The Government shall, within 24 months of adoption of this Policy, through Judiciary and ODPP implement legal, procedural and institutional reforms to reduce delays in the investigation, prosecution, adjudication and conclusion of corruption and economic crime cases. The reforms shall include case management systems, timelines for investigations and prosecutions, expansion of specialized anti-corruption courts, increased judicial and prosecutorial capacity, and enhanced coordination among investigative, prosecutorial and judicial institutions.

# CHAPTER THREE: INSTITUTIONAL FRAMEWORK FOR FIGHTING CORRUPTION

## 3.1 Introduction

This chapter examines the institutional framework for preventing and combating corruption and unethical conduct in Kenya. It outlines the roles of both state and non-state actors involved in implementing the anti-corruption policy, legal and institutional framework and promoting integrity, accountability, transparency, and ethical governance in public and private sector operations. The chapter therefore adopts a whole-of-society approach that acknowledges the important role of civil society organizations, the private sector, faith-based organizations, professional associations, media, academia, community structures, and citizens in the prevention and fight against corruption. It further examines the operational dynamics influencing institutional performance and highlights systemic gaps relating to coordination, institutional fragmentation, political interference, weak accountability, and emerging digital governance risks. The chapter underscores the need for stronger collaboration, institutional coherence, ethical leadership, civic participation, and social transformation in order to strengthen integrity systems and improve anti-corruption outcomes in Kenya.

## 3.2 Situation Analysis

Kenya has developed a comprehensive institutional and legal framework for preventing and combating corruption, anchored in the Constitution of Kenya and supported by various legal, policy, and administrative reforms. At the center of this framework is the Ethics and Anti-Corruption Commission, established under Article 79 of the Constitution and operationalized through the Ethics and Anti-Corruption Commission Act, 2011. Over time, the anti-corruption framework has expanded to include a wide range of institutions involved in law enforcement, prosecution, oversight, regulation, public finance management, and citizen engagement. These institutions operate within an evolving governance environment shaped by devolution, digital transformation, globalization, and emerging risks such as cyber-enabled corruption, illicit financial flows, misuse of personal data, and abuse of emerging technologies.



Recent reforms have further reshaped the governance and anti-corruption landscape. These include the Public Procurement and Asset Disposal Act, 2015 (as amended in 2022), the Data Protection Act, 2019, the Conflict of Interest Act, 2025 the Virtual Asset Service Providers Act, 2025 and governance-related frameworks such as the Kenya Integrity Plan (2023–2028) and the Anti-Corruption Strategic Guiding Framework for Kenya's Justice Sector (2025). In addition, digital systems such as IFMIS, eCitizen, and e-procurement platforms have strengthened transparency, automation, and financial oversight.

Despite these reforms, corruption and unethical conduct remain persistent and deeply embedded challenges. While the institutional framework has largely focused on formal state institutions, corruption in Kenya is also sustained through informal political, social, and economic systems that shape governance and public decision-making processes. Practices such as patronage, ethnicity, nepotism, clientelism, favoritism, and political protection networks continue to undermine merit, accountability, institutional independence, and equitable access to public resources and opportunities.

These informal systems often weaken enforcement efforts, influence public appointments and procurement processes, discourage reporting of corruption, and erode public trust in institutions. In some instances, corruption is normalized through social and political networks that reward loyalty over integrity and public interest. Consequently, corruption is not only a legal or institutional problem, but also a broader governance, ethical, and societal challenge.

The fight against corruption therefore requires a whole-of-society approach that goes beyond state-centered interventions. Non-state actors including civil society organizations, the private sector, faith-based organizations, professional associations, academia, media, community organizations, and citizens play a critical role in promoting accountability, public education, advocacy, whistleblowing, civic oversight, and ethical leadership.

The private sector remains a key stakeholder given its interaction with public procurement systems, investment processes, taxation, and regulatory institutions. At the same time, civil society and media organizations continue to provide oversight, expose corruption, mobilize public participation, and advocate for reforms. Strengthening collaboration between state and non-state actors is therefore essential for building a sustainable culture of integrity and accountability.

However, challenges such as weak institutional coordination, overlapping mandates, political interference, limited technical and financial capacity, inadequate protection of whistleblowers, and weak enforcement mechanisms continue to undermine institutional effectiveness. These challenges are further compounded by emerging digital governance risks and increasing sophistication of corruption networks. Addressing these gaps requires stronger institutional coherence, ethical leadership, enhanced civic participation, behavioral and cultural change, strengthened accountability systems, and improved integration of digital governance safeguards within the broader anti-corruption framework.



### 3.3 Policy Objectives

The Policy seeks to:

a) Strengthen coordination, collaboration, and information-sharing among state and non-state actors involved in anti-corruption and integrity promotion at national and county levels.
b) Address institutional, social, political, and cultural factors that sustain corruption and unethical conduct, including patronage, nepotism, ethnicity, and political interference.
c) Improve public service delivery systems and governance processes to reduce opportunities for corruption and abuse of office.
d) Build institutional and societal capacity for fighting corruption.
e) Integrate anti-corruption and integrity measures into governance systems, digital platforms, emerging technologies, and data governance frameworks.
f) Promote active citizen participation, private sector accountability, and civic responsibility in the prevention and reporting of corruption.

### 3.4 Policy Issues

Persistent corruption challenges arise from:

a) Weak coordination, fragmentation, and duplication of mandates among institutions;

b) Entrenched informal systems and unethical practices such as patronage, ethnicity, nepotism, clientelism, and political interference that undermine merit, accountability, and institutional independence;
c) Frequent interactions between citizens and public officials at service delivery points that create opportunities for bribery and abuse of office;
d) Complex, bureaucratic, and non-transparent administrative procedures that encourage rent-seeking behavior;
e) Weak enforcement, delayed investigations, and low prosecution and conviction outcomes;
f) Emerging risks including digital corruption, cyber-enabled fraud, misuse of personal data, and abuse of emerging technologies;
g) Inadequate protection and incentives for whistleblowers, witnesses, and reporting persons;
h) Limited public awareness, civic engagement, and ethical consciousness in anti-corruption efforts;
i) Weak private sector compliance and corporate governance mechanisms;
j) Transnational corruption, illicit financial flows, and cross-border concealment of proceeds of

### 3.5 Policy Statements and Strategic Interventions

The Government shall:

**(a) Strengthen Institutional Coordination and Multi-Stakeholder Collaboration**
Establish and strengthen coordinated anti-corruption frameworks that bring together state and non-state actors to promote a coherent, whole-of-society approach to corruption prevention and enforcement. Enhance collaboration, information-sharing, and joint action among relevant institutions through interoperable systems, integrated platforms, and coordinated operational mechanisms, while strengthening the effectiveness of existing coordination structures, including the Multi-Agency Team (MAT), the Kenya Leadership and Integrity Forum (KLIF), and county-level anti-corruption coordination mechanisms.

**(b) Promote Ethical Governance and Accountability**
Strengthen transparency, accountability, and integrity systems across public and private sector institutions to promote ethical governance, responsible leadership, and institutional trust. Promote merit-based public administration, ethical leadership, and professional standards in decision-making, while strengthening the implementation and enforcement of leadership, integrity, and conflict-of-interest frameworks to prevent abuse of office, favoritism, and unethical conduct.

**(c) Address Informal Drivers of Corruption and Unethical Conduct**
Develop and implement targeted interventions to address the informal institutional, social, political, and cultural drivers of corruption, including patronage, nepotism, ethnicity, political interference, and other practices that normalize or facilitate unethical conduct. Promote national values, ethical citizenship, and a culture of integrity in public life through sustained ethics education, civic awareness, and behavior change initiatives aimed at transforming attitudes, norms, and practices that enable corruption.

**(d) Streamline Public Service Delivery and Reduce Corruption Opportunities**
Digitize, automate, and simplify public service delivery systems to reduce excessive human

discretion, administrative inefficiencies, and opportunities for rent-seeking and corruption. Standardize service delivery procedures, strengthen transparency and accountability in procurement, licensing, recruitment, and public resource allocation systems, and promote efficient, predictable, and citizen-centered governance processes that minimize corruption risks.

**(e) Strengthen Institutional and Technical Capacity**
Strengthen the institutional, technical, and operational capacity of anti-corruption and governance institutions by enhancing investigative, prosecutorial, forensic, financial intelligence, and digital governance capabilities. Invest in technology-driven anti-corruption tools, including e-procurement systems, digital audit mechanisms, data analytics, and safeguards for artificial intelligence and emerging technologies, while ensuring adequate resourcing, institutional independence, and professional competence to effectively prevent, detect, investigate, and respond to corruption.

**(f) Promote Citizen, Civil Society, and Private Sector Participation**
Promote active citizen participation, public oversight, and community-based accountability mechanisms in the prevention, detection, and monitoring of corruption. Strengthen the role of civil society organizations, faith-based institutions, media, academia, professional associations, and other non-state actors in anti-corruption advocacy, civic education, and social accountability, while promoting private sector compliance, corporate integrity systems, and ethical business practices as part of a broader multi-stakeholder anti-corruption effort.

**(g) Strengthen Protection, Reporting, and Access to Information**
Strengthen whistleblower, witness, and reporting person protection mechanisms to encourage safe disclosure of corruption and unethical conduct. Expand accessible, secure, and technology-enabled corruption reporting platforms, improve responsiveness and feedback systems, and enhance access to information, transparency, and open government initiatives to support public oversight, accountability, and evidence-based anti-corruption action.



**(h) Address Emerging Governance and Digital Risks**
Strengthen the regulation, governance, and oversight of digital public systems to prevent cyber-enabled corruption, manipulation of digital platforms, and technology-related abuse of public resources. Enhance data protection, cybersecurity, financial intelligence systems, and oversight of virtual assets, artificial intelligence, and other emerging technologies, while strengthening regional and international cooperation to address transnational corruption, illicit financial flows, and evolving digital governance risks.

### 3.6 Institutional Framework

Kenya's anti-corruption and integrity system is anchored in the Constitution of Kenya and comprises a network of state and non-state actors with complementary mandates relating to corruption prevention, regulation, enforcement, oversight, accountability, civic participation, and knowledge generation. These institutions constitute the national integrity system and are categorized as follows:

Kenya’s anti-corruption framework comprises seven broad categories:

- Preventive Institutions
- Regulatory and Compliance Institutions
- Enforcement and Recovery Institutions
- Oversight and Accountability Institutions
- Collaborative and Coordination Mechanisms
- Non-State and Societal Actors
- Knowledge, Media and Digital Governance Actors

### 3.6.1 Preventive Institutions

These institutions are primarily responsible for preventing corruption through integrity promotion, public education, ethical leadership, risk management, transparency measures, and institutional safeguards.

**Table 1: Preventive Institutions**

| Institution | Constitutional/Statutory Function |
|---|---|
| Ethics and Anti-Corruption Commission (EACC) | Established under Article 79. Responsible for developing and promoting standards of integrity, ethics, and anti-corruption measures; public education; prevention of corruption; and monitoring compliance with integrity laws. |
| Public Procurement Regulatory Authority (PPRA) | Regulates public procurement and asset disposal processes to ensure fairness, transparency, competitiveness, and value for money. |
| Public Service Commission (PSC) | Established under Articles 233 and 234. Promotes values and principles of public service, merit-based recruitment, discipline, and ethical conduct in the public service. |
| Controller of Budget (CoB) | Established under Article 228. Oversees implementation of national and county budgets through authorization of withdrawals from public funds. |
| Commission on Administrative Justice (CAJ) | Established under Article 59(4). Addresses maladministration, abuse of power, unfair administrative action, and promotes accountability in public institutions. |
| National Anti-Corruption Campaign Steering Committee (NACCSC) | Coordinates public awareness, civic education, and national campaigns against corruption |
| National Police Service | Established under Article 243. Prevents crime and maintains law and order through community policing and crime prevention initiatives. |

### 3.6.2 Regulatory and Compliance Institutions

These institutions establish governance standards, regulatory frameworks, compliance mechanisms, and institutional controls designed to reduce corruption risks.

**Table 2: Regulatory and Compliance Institutions**

| | |
|---|---|
| The Presidency | Provides national leadership and policy direction in promoting integrity, good governance, and implementation of constitutional values. |
| Office of the Attorney-General and State Department for Justice | Established under Article 156. Principal legal adviser to Government and responsible for legal reform, legislative drafting, and policy coordination. |
| National Treasury | Established under Article 225 and the Public Finance Management Act. Oversees public finance management, fiscal accountability, and internal control systems. |
| Ministry Responsible for Information, Communications and the Digital Economy | Provides policy direction on digital governance, cybersecurity, artificial intelligence governance, e-government systems, digital public infrastructure, and ICT-enabled transparency and accountability mechanisms. |
| State Corporations Advisory Committee (SCAC) | Advises Government on governance and management of state corporations. |
| Office of the Registrar of Political Parties (ORPP) | Regulates political parties and monitors compliance with political party financing and governance requirements. |
| Independent Electoral and Boundaries Commission (IEBC) | Established under Article 88. Conducts elections and regulates aspects of campaign financing and electoral integrity. |
| Central Bank of Kenya (CBK) | Regulates financial institutions and supervises compliance with anti-money laundering and financial integrity requirements. |
| Capital Markets Authority (CMA) | Regulates capital markets and safeguards investor confidence through transparency and disclosure requirements. |
| Competition Authority of Kenya (CAK) | Promotes fair competition and prevents anti-competitive practices and market abuse. |
| Office of the Data Protection Commissioner (ODPC) | Regulates processing of personal data and safeguards data privacy and accountability in digital governance systems. |
| Professional Regulatory Bodies | Enforce professional ethics, standards, licensing, and disciplinary procedures within their respective professions. |

3.6.3 Enforcement and Recovery Institutions

These institutions investigate, prosecute, adjudicate, trace, confiscate, and recover proceeds of corruption and economic crimes.

**Table 3: Enforcement and Recovery Institutions**

| | |
|---|---|
| EACC (Investigative Function) | Investigates corruption and economic crimes and recommends prosecution and asset recovery. |
| Office of the Director of Public Prosecutions (ODPP) | Established under Article 157. Directs investigations and prosecutes criminal offences including corruption and economic crimes. |
| Judiciary – Anti-Corruption and Economic Crimes Courts | Established under Articles 159 and 160. Adjudicates corruption and economic crime cases independently. |
| Asset Recovery Agency (ARA) | Traces, freezes, confiscates, and recovers proceeds of crime and unexplained assets. |
| Witness Protection Agency (WPA) | Protects witnesses and whistleblowers participating in corruption investigations and prosecutions. |
| Financial Reporting Centre (FRC) | Receives, analyses, and disseminates financial intelligence relating to money laundering and corruption. |
| Kenya Revenue Authority (KRA) | Detects tax evasion, illicit financial flows, customs fraud, and revenue-related corruption offences. |
| Central Bank of Kenya | Supports financial surveillance and anti-money laundering compliance. |
| National Police Service | Investigates criminal offences and supports enforcement operations |
| Kenya Wildlife Service (KWS) | Investigates corruption and economic crimes linked to wildlife resources and conservation activities. |
| Kenya Prisons Service | Supports implementation of judicial sanctions and correctional measures. |



### 3.6.4 Oversight and Accountability Institutions

These institutions provide independent scrutiny, audit, review, monitoring, and accountability mechanisms over public institutions.

**Table 4: Oversight and Accountable Institutions**

| | |
|---|---|
| Office of the Auditor-General | Established under Article 229. Audits and reports on the management of public resources. |
| Parliament | Established under Articles 94 and 95. Exercises legislative oversight over public finance, governance, and implementation of public policy. |
| National Council on Administration of Justice (NCAJ) | Facilitate coordination, accountability, and efficiency within the justice sector. |
| County Assemblies | Exercise oversight over county executives and public expenditure pursuant to Articles 185 and 195. |
| Controller of Budget | Monitors implementation of budgets and reports on expenditure. |
| Kenya National Commission on Human Rights (KNCHR) | Promotes human rights, accountability, and constitutional governance. |
| Commission on Administrative Justice | Reviews complaints against public institutions and promotes administrative accountability. |

### 3.6.5 Collaborative and Coordination Mechanisms

These structures and platforms facilitate inter-agency coordination, policy harmonization, information sharing, joint investigations, collective action, and stakeholder engagement in the prevention and fight against corruption and unethical conduct.

**Table 5: Collaborative and Coordination Mechanisms**

| **Mechanism** | **Role** |
|---|---|
| Multi-Agency Team (MAT) on Corruption and Economic Crimes | Brings together investigative, prosecutorial, financial intelligence, and asset recovery agencies to coordinate investigations, prosecutions, asset tracing, recovery of proceeds of corruption, and information sharing on corruption and economic crimes. |
| Kenya Leadership and Integrity Forum (KLIF) | A multi-stakeholder platform that promotes implementation of leadership and integrity standards, coordinates integrity initiatives among public institutions, and facilitates sharing of best practices on ethics and accountability. |
| National Anti-Corruption Campaign Steering Committee (NACCSC) | Coordinates nationwide public education, awareness creation, civic engagement, and behavioral change initiatives aimed at promoting integrity and preventing corruption. |
| National Council on Administration of Justice (NCAJ) | Facilitates coordination among justice sector institutions to improve efficiency, accountability, case management, information sharing, and timely resolution of corruption and economic crime cases. |
| Intergovernmental Relations Technical Committee (IGRTC) | Facilitates collaboration and coordination between national and county governments on governance, accountability, public finance management, and anti-corruption initiatives within the devolved system of government. |
| County Anti-Corruption Forums | Provide county-level platforms for collaboration among county governments, oversight institutions, civil society, private sector actors, and citizens to address corruption risks and strengthen local accountability mechanisms. |
| Public-Private Integrity Partnerships | Promote collaboration between government, private sector organizations, professional bodies, and business associations to strengthen corporate integrity, ethical business conduct, compliance systems, and corruption risk management. |
| International Cooperation Mechanisms under UNCAC and AUCPCC | Facilitate cross-border cooperation in investigation, extradition, mutual legal assistance, asset recovery, information sharing, capacity building, and implementation of international anti-corruption commitments and standards. |

3.6.6 Non-State and Societal Actors

Non-state and societal actors play a critical role in promoting transparency, accountability, ethical conduct, civic participation, and social accountability. They complement government efforts through advocacy, public education, monitoring, whistleblowing, research, and citizen mobilization.

**Table 6: Non-State and Societal Actors**

| Actor | Role in Fighting Corruption and Unethical Conduct |
|---|---|
| Non-Governmental Organizations (NGOs) | Promote anti-corruption advocacy, civic education, public interest litigation, policy reform, social accountability, citizen monitoring, and oversight of public institutions. |
| Inter-Religious Council of Kenya (IRCK) | Promotes ethical values, integrity, moral leadership, social justice, and public accountability through faith-based initiatives, public awareness, and community outreach programmes. |
| Community-Based Organizations (CBOs) | Mobilize communities to participate in governance processes, monitor public service delivery, report corruption, and strengthen grassroots accountability mechanisms. |
| Trade Unions | Promote ethical labour practices, protect workers who expose corruption, advocate for accountability in workplaces, and support transparency in public and private institutions. |
| Professional Associations | Develop and enforce professional codes of ethics, promote integrity standards, discipline members engaged in unethical conduct, and support professional accountability. |
| Kenya Private Sector Alliance (KEPSA) | Promotes corporate integrity, ethical business conduct, anti-bribery compliance, public-private dialogue, and private sector participation in anti-corruption initiatives. |
| Business Membership Organizations (BMOs) | Support adoption of corporate governance standards, business ethics programmes, integrity pacts, and compliance mechanisms aimed at reducing corruption risks in commercial activities. |
| Citizens and Whistle-blowers | Serve as the first line of accountability by reporting corruption, participating in public oversight, demanding transparency, and supporting enforcement efforts through provision of information and evidence. |



3.6.7 Knowledge, Media and Digital Governance Actors

Knowledge, media, and digital governance actors contribute to corruption prevention through research, evidence generation, public education, investigative reporting, innovation, technological solutions, and promotion of transparency and accountability.

**Table 7: Knowledge, Media and Digital Governance Actors**

| Actor | Role in Fighting Corruption and Unethical Conduct |
|---|---|
| Ministry of Education; Universities and Academia | Integrates ethics, integrity, citizenship, and national values into education curricula and supports development of a culture of accountability and ethical conduct among learners; Generate research and evidence on corruption trends, governance challenges, and policy reforms; support ethics education, leadership development, and capacity building. |
| Research Institutes and Think Tanks | Conduct policy research, corruption risk assessments, governance studies, and provide evidence-based recommendations for strengthening anti-corruption interventions. |
| Kenya School of Government (KSG) | Builds capacity of public officers on ethics, leadership, integrity, accountability, governance, public financial management, and anti-corruption practices. |
| Media Houses | Inform the public, expose corruption, facilitate public debate, promote transparency, and strengthen accountability through investigative and public-interest journalism. |
| Investigative Journalists | Conduct in-depth investigations into corruption, illicit financial flows, abuse of office, procurement irregularities, and other unethical practices, thereby supporting public accountability. |
| Digital Media Platforms | Enhance citizen engagement, facilitate reporting of corruption, disseminate information, and support public participation in governance and accountability processes. |
| Open Data and Civic Technology Organizations | Develop digital tools that enhance transparency, public monitoring, budget tracking, procurement oversight, citizen reporting, and access to government information. |
| Data Analytics and Artificial Intelligence Governance Institutions | Support corruption detection through data analytics, digital forensics, risk modelling, artificial intelligence applications, and development of safeguards against technology-enabled corruption and cybercrime. |
| Public Education and Awareness Platforms | Promote integrity, ethical values, civic responsibility, and anti-corruption awareness through sustained public communication and behavioural change campaigns. |
| | |



### 3.7 Operational Dynamics and Systemic Institutional Challenges

Despite the existence of a robust legal and institutional framework, the effectiveness of anti-corruption efforts continues to be constrained by several operational and systemic challenges.

**a) Institutional Fragmentation and Duplication of Mandates**

The anti-corruption architecture comprises multiple institutions with complementary but sometimes overlapping mandates relating to prevention, investigation, prosecution, asset recovery, public finance oversight, and accountability. This fragmentation may lead to duplication of efforts, inefficient use of resources, jurisdictional conflicts, and uncertainty regarding institutional responsibility.

**b) Weak Coordination and Information Sharing**

Although coordination platforms such as the Multi-Agency Team (MAT), Kenya Leadership and Integrity Forum (KLIF), and NCAJ exist, information sharing among institutions remains inconsistent. Weak interoperability of information systems, limited data integration, and institutional silos often delay investigations, asset tracing, prosecution, and recovery processes.

**c) Political Interference and Undue Influence**

Political influence, elite capture, and external interference continue to undermine institutional independence and impartiality. Such interference may affect investigations, prosecutions, public appointments, procurement processes, regulatory enforcement, and oversight functions, thereby weakening public confidence in anti-corruption institutions.



**d) Resource and Capacity Constraints**

Many institutions face shortages of financial resources, specialized personnel, modern investigative tools, digital forensic capabilities, and technological infrastructure. These limitations constrain their ability to effectively prevent, detect, investigate, prosecute, and recover proceeds of corruption.

**e) Weak Accountability and Enforcement Mechanisms**

Inadequate follow-up on audit findings, delays in implementation of recommendations, weak sanctions for non-compliance, and limited consequences for unethical conduct continue to undermine accountability. Delays in investigation, prosecution, adjudication, and conclusion of corruption cases further weaken deterrence and public trust.

**f) Emerging Digital Governance Risks**

The increasing digitization of government services has created new opportunities for efficiency and transparency but has also introduced emerging risks including cyber-enabled corruption, manipulation of digital systems, misuse of personal data, identity theft, digital procurement fraud, abuse of artificial intelligence systems, virtual asset-related crimes, and sophisticated financial crimes facilitated through technology.

**g) Influence of Informal Institutions and Socio-Political Dynamics**

Corruption is often reinforced by informal institutions and socio-political practices such as patronage networks, ethnicity, nepotism, clientelism, favoritism, and political protection. These informal systems frequently influence access to public resources, appointments, procurement opportunities, and decision-making processes, undermining meritocracy, institutional independence, accountability, and public trust.

**h) Need for a Whole-of-Society Response**

Addressing corruption requires sustained collaboration among government institutions, county governments, civil society organizations, the private sector, faith-based organizations, professional associations, academia, media, development partners, and citizens. Strengthening collective action, ethical leadership, civic responsibility, and social accountability remains essential for building a resilient national integrity system and achieving sustainable anti-corruption outcomes.

## CHAPTER FOUR: STRATEGIC PILLARS FOR IMPLEMENTING THE NATIONAL ETHICS AND ANTI-CORRUPTION POLICY

### 4.1 Introduction

This chapter presents the strategic pillars of the National Ethics and Anti-Corruption Policy that provide the framework for preventing, detecting, investigating, prosecuting, and combating corruption and unethical conduct in Kenya. Building on the policy context, legal framework, and institutional architecture outlined in the preceding chapters, the chapter translates the policy into coherent policy pillars. The pillars address corruption prevention, public education and awareness, citizen engagement and social accountability, criminalization and law enforcement, prosecution, asset recovery, international cooperation, leadership and integrity, and other cross-cutting governance issues. Together, they provide an integrated, systems-based and forward-looking framework for strengthening ethics, integrity, accountability and good governance in Kenya.

### 4.2 Prevention of Corruption

4.2.1 Introduction

Corruption prevention entails the systematic identification, assessment, and mitigation of corruption risks through the establishment of institutional safeguards, systems, and controls. It focuses on eliminating opportunities for corruption by strengthening governance systems, reducing discretion, and enhancing transparency and accountability.[18]

In line with Chapter III of the United Nations Convention against Corruption (UNCAC), prevention requires States to establish effective anti-corruption policies, strengthen institutional frameworks, promote integrity in both public and private sectors, and ensure active participation of all stakeholders.[19]

In Kenya, corruption prevention is anchored in a broad legal framework. Key among them being the Ethics and Anti-Corruption Commission Act, CAP. 7H; Leadership and Integrity Act, CAP.185C; Anti-Bribery Act, CAP.79B; Public Procurement and Asset Disposal Act, CAP. 412C; the Data Protection Act, CAP 411C; the Conflict of Interest Act No. 11 of 2025; and the Virtual Asset Service Providers Act No. 20 of 2025. Collectively, these statutes emphasize preventive controls, transparency, ethical conduct, and accountability in governance systems.

Notably, emerging governance realities, particularly digitization of public services, e-procurement systems, and data-driven decision-making—have introduced new corruption risks, including cyber-enabled corruption, manipulation of digital systems, and misuse of personal data, thereby necessitating a broader, technology-sensitive corruption prevention framework.

### 4.2.2 Situation Analysis

Kenya has implemented several corruption prevention initiatives, notably the Public Service Integrity Programme (PSIP), which institutionalized corruption prevention mechanisms across public institutions. These initiatives include corruption risk assessments, integrity committees, training of integrity assurance officers, and the inclusion of anti-corruption indicators in

[18] The Organization for Economic Co-operation and Development. Anti-Corruption and Integrity.
[19] Chapter III of the United Nations Convention against Corruption (UNCAC),

performance contracts. While these initiatives have helped strengthen internal systems and enhanced awareness, their impact has been limited by weak enforcement, limited capacity, and inconsistent institutional commitment.

Since 2018, several developments have reshaped Kenya's corruption prevention landscape, including:

- The introduction of e-government systems, such as the Integrated Financial Management Information System (IFMIS) and e-Procurement (eGP), to reduce human discretion and enhance transparency in public service delivery.
- Strengthened private sector compliance obligations under the Anti-Bribery Act, 2016.
- The expansion of financial intelligence and anti-money laundering frameworks to improve the detection and prevention of illicit financial flows.
- Establishment of the Office of the Data Protection Commissioner (ODPC) to regulate data governance and safeguard personal data.

Despite these gains, systemic vulnerabilities persist, including procurement fraud, digital manipulation, regulatory capture, and weak internal controls. The Baseline Survey on the Implementation of the National Ethics and Anti-Corruption Policy (NEAP), 2026, further highlights challenges in embedding ethics and integrity within public institutions. Notably, the survey found that awareness of the policy remains only moderate, with a mean score of 3.29, while nearly one-third of respondents reported low levels of awareness. These findings point to significant gaps in dissemination, institutionalization, and internalization.[20]

### 4.2.3 Policy Objectives

The objectives of this policy area are to:

a) Institutionalize corruption prevention across all Ministries, Departments, Agencies and Counties (MDACs).
b) Strengthen compliance with corruption prevention recommendations.
c) Enhance institutional capacity for corruption risk management in both public and private sectors.
d) Simplify administrative systems and reduce discretion in service delivery.
e) Integrate digital governance safeguards into corruption prevention frameworks.
f) Promote the participation of the private sector and other non-state actors in corruption prevention.

### 4.2.4 Policy Issues

The key policy issues to be addressed include:

a) Weak enforcement of corruption prevention measures.
b) Limited institutional capacity for detecting risks and addressing them.
c) Increased complexity of corruption due to globalization and digitalization.
d) Entrenched culture of corruption.
e) Bureaucratic inefficiencies that create opportunities and incentives for rent-seeking behavior.
f) Emerging risks such as cyber corruption, data manipulation, and algorithmic opacity.

[20] The Baseline Survey on the Implementation of the National Ethics and Anti-Corruption Policy, Unpublished.

g) Weak integration of data governance with corruption prevention and broader anti-corruption systems.

### 4.2.5 Policy Statements

The Government shall:

- Strengthen the enforcement of corruption prevention measures across all Ministries, Departments, Agencies and County Governments (MDACs).
- Institutionalize corruption risk assessments and integrity systems across MDACs.
- Foster public-private partnerships and multi-stakeholder collaboration in corruption prevention.
- Integrate data protection and digital governance safeguards into anti-corruption frameworks;
- Digitize public services and public procurement systems to enhance transparency, efficiency, and accountability.
- Strengthen internal controls and transparency mechanisms across public institutions.
- Integrate data protection and digital governance safeguards into anti-corruption frameworks.
- Institutionalize a Monitoring, Evaluation, Reporting and Learning (MERL) framework to monitor policy implementation, measure performance, and promote accountability and continuous improvement.



## 4.3 Public Education, Training and Awareness Creation

4.3.1 Introduction

Public education, training and awareness creation are central to the prevention of corruption and the promotion of ethics, integrity, and accountable citizenship. They are essential for shaping attitudes, influencing behavior, strengthening civic responsibility, and building a sustained national culture that rejects corruption in both public and private life.

This policy area is anchored in international obligations under the United Nations Convention against Corruption (UNCAC). In line with Article 7(1)(d) of the United Nations Convention against Corruption (UNCAC), States are required to promote education and training programmes that enhance awareness of corruption risks within public bodies and support the proper, honorable, and lawful discharge of public functions.[21] Article 13(1) of UNCAC further requires States to promote the active participation of society, including civil society, community organizations, the private sector, and citizens, in the prevention of and fight against corruption, including through public awareness initiatives.[22]

In Kenya, public education and awareness creation have historically been used to influence behavior change, increase intolerance to corruption, and encourage citizens to report corruption, support investigations, provide evidence, and monitor the implementation of publicly funded projects and programmes. These efforts have included curriculum support materials, public campaigns, community outreach, partnerships with non-state actors, and public sensitization initiatives.

[21] Article 7(1)(d) of the United Nations Convention against Corruption (UNCAC),

[22] Article 13(1) of UNCAC

However, the governance environment has changed significantly since the adoption of the 2018 National Ethics and Anti-Corruption Policy. Corruption now increasingly manifests itself through digital platforms, complex administrative systems, misinformation ecosystems, data misuse, opaque automated decision-making, cyber-enabled fraud, and cross-border financial flows. At the same time, digital technology provides new opportunities for civic learning, public reporting, targeted communication, early warning, and citizen oversight.

Public education, training and awareness creation must, therefore, move beyond general sensitization to become more strategic, evidence-based, digitally responsive, and action-oriented. They must equip citizens, public officers, learners, communities, and institutions not only to understand corruption, but also to identify evolving corruption risks, use safe reporting channels, demand accountability, and participate effectively in oversight at both national and county levels.

### 4.3.2 Situation Analysis

Kenya has implemented several anti-corruption education, training and awareness creation interventions. These have included mainstreaming anti-corruption content in formal education, development of curriculum support materials, community outreach programmes, use of media and Information, Education and Communication (IEC) materials, collaboration with non-state actors, operationalization of county anti-corruption networks, and sensitization of communities to monitor public projects and service delivery. These efforts have helped generate public discourse on corruption, improve awareness of its effects, and promote some degree of public oversight, social audit, whistleblowing, and citizen participation.

Despite these gains, a significant gap remains between public awareness and public action. Corruption is still perceived as high and widespread, while actual reporting by individuals who witness corruption remains low. This demonstrates that awareness alone is insufficient unless accompanied by trust in institutions, accessible and secure reporting channels, effective feedback mechanisms, witness and whistleblower protection and support systems, civic empowerment, and visible institutional response.

The challenges have become more complex in modern governance, including digital misinformation, the online normalization of corruption, weak civic engagement in monitoring public projects, under-resourced public education programmes, and limited policy attention to petty and medium-scale corruption despite their widespread everyday impact. In addition, corruption risks are increasingly linked to digitization, data misuse, cyber-enabled corruption, algorithmic opacity, and information asymmetries. These developments require a shift in public education strategy to respond to both traditional corruption risks and emerging technology-enabled threats.

Further, anti-corruption education efforts continue to face structural constraints, including many actors with overlapping mandates, weak coordination, and uneven reach across counties, inadequate social accountability structures, weak reporting and feedback systems, politicization and ethnicization of anti-corruption discourse, inadequate public trust, and insufficient resources for sustained behavior-change programming. The result is a fragmented landscape in which anti-corruption messaging is not always coherent, targeted, measurable, or linked to practical citizen action.

Accordingly, there is need to widen, deepen and modernize public education, training and awareness creation so that it promotes behavioral change, strengthens values-based citizenship, addresses digital-era corruption risks, enhances public oversight of service delivery and public finance, and builds a society that is not only aware of corruption but also capable of resisting, reporting, and preventing it.

### 4.3.3 Policy Objectives

The objectives of this policy area are to:

a) Enhance the capacity and sustained participation of citizens, communities, public officers, learners, civil society and the private sector in preventing and combating corruption and unethical conduct.
b) Mainstream ethics, integrity, anti-corruption and good governance content in formal, non-formal and public sector training systems at all levels.
c) Establish a coordinated, inclusive and evidence-based framework for public education, training and awareness creation at national and county levels.
d) Leverage digital platforms, public communication systems, and emerging technologies to strengthen civic education, public engagement, safe reporting and feedback on corruption issues.
e) Strengthen public understanding of emerging corruption risks, including conflicts of interest, misuse of data, cyber-enabled corruption, digital financial abuse, misinformation, and manipulation of public decision-making systems.
f) Strengthen public oversight, social accountability and citizen monitoring of publicly funded projects, service delivery and use of public resources.

### 4.3.4 Policy Issues

The policy issues to be addressed include:

a) The persistence of an entrenched culture of corruption, impunity and normalization of unethical conduct in society.
b) Weak behavioral change despite relatively high awareness of corruption and its harmful effects.
c) Fragmentation, overlap and inadequate coordination among institutions and actors engaged in anti-corruption education, training and awareness creation.
d) Inadequate participation of citizens, communities, private sector actors and non-state organizations in reporting, monitoring and preventing corruption.
e) Limited public trust in reporting, complaint-handling and feedback systems, including concerns about safety, responsiveness and confidentiality.
f) Inadequate mainstreaming of ethics, integrity, anti-corruption and national values in education curricula, professional training, workplace systems and community learning spaces.
g) Weak civic oversight and social accountability mechanisms for publicly funded projects, public procurement, service delivery and local development processes.
h) Insufficient attention to petty and medium-scale corruption that directly affects citizens in everyday interactions with public institutions;
i) Under-resourcing of public education, training and awareness creation initiatives, especially at county and community levels;

j) Politicization and ethnicization of anti-corruption discourse, which undermine public confidence and weakens collective ownership of preventive efforts.
k) Limited adaptation of anti-corruption communication to the digital environment, including misinformation, online tolerance of corruption, cyber-enabled corruption, misuse of personal data, and weak public understanding of technology-related integrity risks.
l) Inadequate use of evidence, data, audience segmentation, and monitoring and evaluation in the design of awareness and behavior-change programmes.
m) High public expectations that are not always matched by visible institutional action, resulting in apathy, fatigue and reduced willingness to participate in anti-corruption efforts.

**4.3.5 Policy Statements**

The Government shall:

a) Promote a national culture of ethics, integrity, accountability and zero tolerance for corruption through sustained, evidence-based and behavior-change communication.
b) Mainstream ethics, integrity, anti-corruption, responsible citizenship, national values and digital responsibility across formal education, professional training and lifelong learning systems.
c) Promote targeted and inclusive public education, training and awareness programmes that respond to sector-specific corruption risks and the needs of different population groups.
d) Strengthen a coordinated, multi-sectoral framework for anti-corruption education, training and awareness creation through effective institutional collaboration and harmonized national messaging.
e) Strengthen partnerships with civil society, faith-based organizations, the private sector, academia, professional associations, development partners, the media and community organizations in promoting ethics, integrity and anti-corruption efforts.
f) Strengthen civic oversight, public participation and social accountability in the monitoring of public procurement, public finance, service delivery and development programmes.
g) Strengthen county-level integrity, public education and citizen accountability mechanisms to enhance anti-corruption efforts at the devolved level.
h) Promote safe, accessible, responsive and user-friendly corruption reporting, complaint-handling and feedback mechanisms, including digital and anonymous reporting channels.
i) Strengthen public confidence in anti-corruption institutions by promoting transparency, confidentiality, witness and whistleblower protection, institutional responsiveness and effective public communication.
j) Promote public awareness and resilience against emerging corruption risks, including cyber-enabled corruption, digital fraud, misuse of personal data and technology-related integrity threats.
k) Leverage digital technologies, mass media, social media and other innovative communication platforms to expand access to anti-corruption education and public engagement.
l) Promote non-partisan, inclusive and values-based anti-corruption communication that strengthens national cohesion, responsible citizenship and collective ownership of integrity reforms.
m) Institutionalize evidence-based planning, research, monitoring, evaluation, reporting and learning (MERL), supported by relevant indicators, to strengthen accountability, decision making and continuous improvement in anti-corruption education, training and awareness programmes.
n) Institutionalize regular public communication and feedback on the implementation and outcomes of anti-corruption initiatives to strengthen public trust, accountability and citizen participation.

## 4.4 Citizen Engagement and Social Accountability in Anti-Corruption

### 4.4.1 Introduction

Citizen engagement and social accountability are critical pillars in the prevention, detection and reporting of corruption. They empower citizens, communities, civil society organizations, the media and the private sector to actively promote integrity, demand accountability, and monitor the use of public resources. In line with Article 13 of the United Nations Convention against Corruption (UNCAC), States are required to promote the active participation of society in preventing and combating corruption through access to information, public awareness, transparency and reporting mechanisms.

In Kenya, citizen engagement has increasingly become an important component of anti-corruption efforts through public participation frameworks, civic oversight initiatives, complaints and reporting mechanisms, community monitoring of public projects, and partnerships with non-state actors. These mechanisms have contributed to greater public awareness and strengthened opportunities for citizens to hold institutions accountable.

However, evolving corruption risks, declining public trust in institutions, fear of retaliation against whistleblowers, misinformation, and the rapid expansion of digital technologies require a more inclusive, responsive and technology-enabled approach to citizen engagement. Strengthened citizen engagement and social accountability is therefore essential to ensure that citizens can safely report corruption, access information, participate meaningfully in oversight processes, and contribute to building a culture of integrity and accountability at both national and county levels.



### 4.4.2 Situation Analysis

Citizen engagement is central to the fight against corruption because many corruption-related offences arise from interactions between citizens, public institutions and private enterprises. Effective citizen participation strengthens social accountability, improves reporting of corruption, enhances public oversight, and reinforces trust in public institutions. The Government has established an enabling framework for citizen engagement through constitutional provisions on public participation, registration of civil society organizations, community-based organizations, private and community media, toll-free reporting lines, digital platforms, public complaints mechanisms, and civic education initiatives. These mechanisms have expanded opportunities for citizens, the media, civil society and private sector actors to participate in preventing, detecting and reporting corruption.

Despite these efforts, citizen engagement remains constrained by weak whistle-blower protection, inadequate witness support systems, fear of retaliation, limited public feedback on reported cases, low public trust in enforcement institutions, limited awareness of reporting mechanisms, and uneven access to civic information, especially among vulnerable groups. Afrobarometer findings show that about 35% of Kenyans consider corruption a major national problem, while only 22% believe the Government is performing well in combating it. These perceptions underscore the need to strengthen citizen confidence, institutional responsiveness and social accountability mechanisms.

### 4.4.3 Policy Objectives

The objectives of this policy area are to:

a) Strengthen citizen participation in preventing, detecting, reporting and resisting corruption and unethical conduct.
b) Enhance legal, institutional and administrative protection for whistle-blowers, witnesses and corruption reporters.
c) Improve public access to anti-corruption information, reporting channels and feedback mechanisms.
d) Promote social accountability through civic oversight, community monitoring, media engagement and civil society participation.
e) Build public trust in anti-corruption institutions through responsiveness, transparency and accountability.
f) Ensure inclusive participation of women, youth, persons with disabilities, marginalized communities and other vulnerable groups in anti-corruption initiatives.
g) Enhance the role of Public Benefits Organizations in promoting Citizen Engagement and Social Accountability in Anti-Corruption

### 4.4.4 Policy Issues



The key policy issues to be addressed include:

a) Limited public trust and confidence in anti-corruption institutions and processes
b) Weak legal and institutional protection for whistle-blowers, witnesses and corruption reporters.
c) Inadequate public awareness of corruption reporting mechanisms, citizen rights and civic responsibilities.
d) Limited feedback to citizens on corruption complaints, reports and enforcement outcomes.
e) Weak coordination between Government, civil society, media, private sector and community actors in anti-corruption engagement.
f) Fear of retaliation, victimization and social stigma among citizens who report corruption.
g) Limited inclusion of youth, women, persons with disabilities and marginalized communities in anti-corruption platforms.
h) Inadequate use of digital platforms, community media and data-driven tools for citizen engagement and social accountability.

### 4.4.5 Policy Statements

The Government shall:

a) Strengthen transparency, responsiveness and accountability mechanisms within anti-corruption institutions to enhance public trust and confidence in anti-corruption processes and outcomes.
b) Strengthen legal, policy and institutional frameworks for the protection of whistleblowers, witnesses and persons who report corruption and unethical conduct.

c) Expand public education, civic awareness and integrity campaigns on corruption reporting mechanisms, citizen rights, responsibilities, and opportunities for participation in anti-corruption efforts.
d) Establish effective feedback, complaint-tracking and public communication mechanisms to provide timely information on the status and outcomes of corruption reports and complaints.
e) Strengthen coordination, collaboration and partnerships among Government agencies, civil society organizations, media, private sector actors, faith-based organizations and community groups in anti-corruption initiatives.
f) Develop and enforce measures to prevent retaliation, victimization, intimidation and stigmatization of individuals who report corruption, including access to support and protection services.
g) Promote inclusive and equitable participation of youth, women, persons with disabilities, marginalized communities and other vulnerable groups in anti-corruption decision-making, reporting and oversight processes.
h) Leverage digital technologies, community media, open data systems and innovative citizen engagement platforms to strengthen social accountability, transparency and public participation in anti-corruption efforts.
i) Institutionalize a MERL framework, supported by citizen engagement and social accountability indicators, to strengthen accountability, evidence-based decision-making and continuous improvement in citizen participation and anti-corruption initiatives.

## 4.5 Criminalization, Law Enforcement and Jurisdiction

4.5.1 Introduction

Effective criminalization, law enforcement, and jurisdictional competence are important for an effective anti-corruption framework because they change ethical and legal norms into enforceable requirements backed by penalties, deterrence, and accountability. Kenya's framework is anchored in the Constitution of Kenya; the Anti-Corruption and Economic Crimes Act, CAP.65; Proceeds of Crime and Anti-Money Laundering Act, , CAP.59A, Public Procurement and Asset Disposal Act, CAP 412C; Leadership and Integrity Act CAP.185C; Public Finance Management Act, CAP 412A; the Anti-Bribery Act, CAP.79B, the Data Protection Act, CAP 411C; Conflict of Interest Act No. 11 of 2025 and the Virtual Asset Service Providers Act No. 20 of 2025 and is further informed by Kenya's obligations under the UNCAC and the AUCPCC.

Since 2018, the enforcement environment has become more complex. Corruption increasingly exploits digitized systems, cross-border financial channels, beneficial ownership opacity, virtual assets, misuse of personal and financial data, cyber-enabled fraud, and technologically mediated procurement and payment systems. The new laws such as the Data Protection Act, CAP 411C; Conflict of Interest Act 2025; and Virtual Asset Providers Act 2025 will support responses toward emerging corruption risks in an increasingly digital and transnational governance environment, and concerns over illicit financial flows, digital economies, and technology-enabled integrity risks.

### 4.5.2 Situation Analysis

Kenya has progressively strengthened its criminal law framework on corruption and economic crime. Reforms have expanded the scope of punishable conduct, including bribery in both the public and private sectors, liability of legal persons, recovery of corrupt proceeds, and improved institutional roles for the EACC, ODPP, the Judiciary, the Asset Recovery Agency, the Financial Reporting Centre, and other justice-sector actors.

However, enforcement effectiveness remains constrained by several structural and emerging challenges. First, investigative and prosecutorial agencies lack capacity in handling complex financial crimes, concealment of ownership structures, digital evidence, cyber-enabled corruption, and multi-jurisdictional transactions. Second, the evidence gathering systems have not fully kept pace with crimes enabled by technology, including coded or hard-to-read messages, bribery carried out through online platforms or apps, altering or tampering with data, decisions made by computer systems in ways that are not clear or transparent, and use of digital payment or online money systems. Third, international cooperation and cross-border enforcement remain slow and uneven, especially where corrupt proceeds, data, shell entities, or digital assets move across different countries. Fourth, legal and operational fragmentation persists across corruption, money laundering, company regulation, procurement, data governance, and virtual asset oversight, creating enforcement gaps and coordination burdens.

**4.5.3 Policy Objectives**

The objectives of this policy area are to:

a) Strengthen the criminal law framework to comprehensively address both traditional and emerging forms of corruption and economic crime.
b) Enhance the effectiveness, professionalism, independence, and technical capacity of anti-corruption law enforcement and investigative institutions.
c) Strengthen Kenya's jurisdictional reach over corruption and related economic crimes with domestic, cross-border, and digital dimensions.
d) Improve the use of lawful specialized investigative techniques, financial intelligence, digital forensics, and data-driven detection tools in corruption investigations.
e) Strengthen coordination among investigative, prosecutorial, financial intelligence, regulatory, and judicial institutions involved in corruption prevention, investigation, prosecution and adjudication.
f) Protect reporting persons, whistleblowers, witnesses, experts, and victims involved in corruption investigations and proceedings.
g) Ensure that criminalization and enforcement measures remain consistent with constitutional safeguards, human rights standards, due process, and Kenya's international obligations.

**4.5.4 Policy Issues**

The key policy issues are:

a) Gaps in the criminalization of emerging corruption risks: Existing provisions do not always expressly or comprehensively address cyber-enabled corruption, manipulation of digital systems, and data misuse for corrupt purposes, concealment through virtual assets, beneficial ownership opacity, and technology-assisted obstruction of justice.
b) Weak enforcement capacity: Investigative bodies face shortages in specialized expertise, digital tools, forensic capability, financial investigation skills, and cross-border case handling.
c) Limited use of specialized investigative techniques in the context of digital era.

d) Jurisdictional and mutual legal assistance challenges: Corruption schemes increasingly involve foreign nationals, offshore entities, cross-border asset transfers, electronic evidence stored abroad, and digital platforms operating beyond Kenya's immediate jurisdiction, complicating investigation and prosecution.
e) Inadequate integration of data governance and enforcement: Corruption enforcement has not yet been fully aligned with the realities of data protection, digital identity systems, electronic procurement, and virtual asset ecosystems.
f) Weak protection and incentives for reporting: Fear of retaliation, weak confidentiality protections, and slow institutional response discourage early reporting and cooperation.
g) Fragmented institutional coordination: Multiple agencies exercise complementary mandates, weaknesses in inter-agency coordination, data sharing, case referral, and coordinated strategy reduce overall enforcement impact.
h) Risk of selective or politicized enforcement: Public confidence in anti-corruption efforts depends on enforcement that is fair, consistent, impartial, professional, and insulated from political or improper influence.

### 4.5.5 Policy Statements

The Government shall:

a) Strengthen and modernize the legal and regulatory framework to comprehensively criminalize and address traditional, emerging and technology-enabled forms of corruption and economic crime.

b) Strengthen the capacity of investigative, prosecutorial, judicial and regulatory institutions to effectively prevent, detect, investigate and prosecute and adjudicate complex corruption and economic crimes.

c) Promote the lawful, ethical and accountable use of specialized investigative techniques, digital technologies, artificial intelligence, financial intelligence and digital evidence in anti-corruption enforcement, consistent with the Constitution, due process and human rights.

d) Strengthen Kenya's jurisdictional, legal and institutional framework to effectively address domestic, transnational and cross-border corruption and economic crimes.

e) Strengthen international cooperation, mutual legal assistance, extradition, joint investigations and cross-border asset tracing and recovery in accordance with Kenya's international obligations.

f) Harmonize anti-corruption laws and enforcement frameworks with related legislation governing public finance, public procurement, company regulation, cybercrime, data protection, anti-money laundering, conflict of interest, virtual assets and digital governance.

g) Strengthen legal and institutional protection of whistleblowers, witnesses, reporting persons, victims and experts involved in corruption investigations and proceedings.

h) Strengthen inter-agency coordination, information sharing, intelligence exchange and integrated case management among institutions responsible for preventing, investigating, prosecuting, and adjudicating corruption and economic crimes.

i) Promote fair, independent, impartial and effective investigation, prosecution and adjudication of corruption and economic crimes in accordance with the Constitution, the rule of law and the principles of accountability.

j) Institutionalize Monitoring, Evaluation, Reporting and Learning (MERL) to assess the effectiveness, efficiency and impact of criminalization, law enforcement and jurisdictional measures in combating corruption and economic crimes.

## 4.6 Prosecution of Corruption and Economic Crimes

### 4.6.1 Introduction

The prosecution of corruption and economic crimes in Kenya is anchored in the Constitution of Kenya, particularly Article 157 which establishes the independence of the ODPP and vests it with the authority to institute, undertake, and discontinue criminal proceedings. This constitutional mandate is complemented by a comprehensive statutory framework comprising the ACECA, the Anti-Bribery Act, the POCAMLA, the Leadership and Integrity Act, and other sector-specific laws governing public finance, procurement, and ethics.

Since 2018, the legislative environment has continued to evolve to address emerging corruption risks and increasing digitization of financial and public administration systems. Key developments include the enactment of the Data Protection Act (2019), the Conflict of Interest Act (2025), and the Virtual Assets Service Providers Act (2025). These laws introduce new offences, strengthen evidentiary and investigative requirements, and establish additional compliance obligations relevant to the prosecution of corruption and economic crimes within a digital economy.

These legislative developments reflect Kenya's obligations under the UNCAC, which requires States Parties to establish effective systems for the investigation, prosecution, adjudication, and sanctioning of corruption offences, supported by appropriate institutional independence, adequate resources, and inter-agency coordination. These legal developments require prosecutorial frameworks to evolve beyond addressing traditional corruption offences to effectively address complex financial crimes, cyber-enabled corruption, illicit financial flows, and misuse of digital technologies and financial systems.

### 4.6.2 Situation Analysis

Kenya has made notable progress in strengthening the prosecution of corruption and economic crimes through institutional reforms, the establishment of specialized courts, the development of prosecutorial guidelines, and increased inter-agency collaboration. However, significant challenges persist.

First, despite a relatively robust legal and institutional framework, conviction rates remain low, and many cases experience prolonged delays. This undermines deterrence and public confidence in the criminal justice system and reduces the overall effectiveness of anti-corruption efforts. Second, persistent coordination gaps between investigative and prosecutorial agencies continue to affect case outcomes. This include inconsistencies in evidence gathering, case preparation, file management, and information sharing, which ultimately affect the quality and sustainability of prosecutions. Third, corruption and economic crimes are increasingly becoming complex. They involve sophisticated financial transactions, cross-border elements and digital and cyber-enabled mechanisms. Yet, prosecutorial capacity in financial forensics, digital evidence handling, and complex litigation remain uneven.

Fourth, case backlogs and procedural delays within the justice system impede timely resolution of corruption cases, despite the establishment of specialized courts and procedural guidelines. Fifth, the UNCAC implementation review highlights weaknesses in enforcement consistency, sanctions for non-compliance, asset recovery linkages and international cooperation. Addressing these gaps is essential to strengthening Kenya's compliance with international obligations and improving the overall effectiveness of corruption prosecutions.

### 4.6.3 Policy Objectives

The objectives of this policy area are to:

a) Strengthen the effectiveness, independence, and accountability of prosecution of corruption and economic crimes.
b) Enhance coordination between investigative, prosecutorial, judicial, and asset recovery institutions.
c) Strengthen prosecutorial capacity to address complex, transnational, and technology-enabled corruption.
d) Advocate for proportionate and deterrent sanctions in corruption and economic crimes.
e) Enhance the use of data, digital tools, and evidence-based approaches in prosecutorial decision-making.
f) Strengthen international cooperation in the prosecution of cross-border corruption and economic crimes.

### 4.6.4 Policy Issues

The key policy issues include:

a) Weak effectiveness, independence, and accountability in the prosecution of corruption and economic crimes, resulting in low conviction rates and reduced deterrence.
b) Weak coordination and case management among investigative, prosecutorial, judicial, and asset recovery institutions.
c) Delays, case backlogs, and procedural inefficiencies that undermine the quality, timeliness, and effectiveness of corruption prosecutions.
d) Limited prosecutorial capacity to investigate and prosecute complex financial crimes, illicit financial flows, digital evidence, cyber-enabled corruption, and transnational corruption schemes.
e) Inconsistencies in prosecutorial approaches to sentencing submissions and sanctions for corruption offences to promote deterrence, fairness, and public confidence in the justice system.
f) Limited use of technology, data analytics, digital evidence management systems, and integrated information platforms in prosecutorial decision-making and case management.
g) Weak international cooperation mechanisms for mutual legal assistance, extradition, cross-border evidence gathering, asset tracing, and prosecution of transnational corruption and economic crimes.

### 4.6.5 Policy Statements

The Government shall:

a) Strengthen the effectiveness, efficiency, independence and accountability of the prosecution of corruption and economic crimes through timely, risk-based and evidence-informed prosecutorial processes.

b) Promote continuous review and modernization of prosecutorial legal, policy and operational frameworks to respond to emerging corruption risks, technological developments and international best practices.

c) Strengthen coordination, collaboration and integrated case management among investigative, prosecutorial, judicial, asset recovery and other law enforcement institutions.
d) Strengthen the integration of prosecution with asset tracing, restraint, seizure, forfeiture, confiscation, recovery and management of proceeds of corruption and economic crimes.
e) Strengthen prosecutorial capacity, specialization and institutional resourcing to effectively support investigations and prosecute complex, transnational and technology-enabled corruption and economic crimes.
f) Promote the lawful, ethical and effective use of digital technologies, financial intelligence, forensic science, data analytics and digital evidence in corruption prosecutions.
g) Strengthen effective, proportionate, and dissuasive sanctions for corruption and economic crimes through fair, consistent, and effective prosecution in accordance with the law.
h) Strengthen international cooperation through mutual legal assistance, extradition, joint investigations and cross-border prosecutorial collaboration in combating corruption and economic crimes.

i) Promote prosecutorial integrity, transparency, witness and whistleblower protection, public accountability and public confidence in the administration of justice.

J) Institutionalize a Monitoring, Evaluation, Reporting and Learning (MERL) framework, supported by prosecutorial performance standards and indicators, to strengthen accountability, evidence-based decision-making, organizational learning, and continuous improvement in the prosecution of corruption and economic crimes.



**4.7 Asset Recovery**

4.7.1 Introduction

Asset recovery is a central pillar in the fight against corruption because it removes the financial incentive for corrupt conduct, deprives offenders of illicit gains, restores misappropriated public resources, and reinforces public confidence in the rule of law. It complements prevention, investigation, prosecution, and sanctions by ensuring that corruption does not remain profitable. In practical terms, effective asset recovery involves timely identification, tracing, freezing, seizure, confiscation, management, repatriation, and where appropriate restitution of the proceeds of corruption and related economic crimes. It also strengthens accountability by ensuring that offenders are deprived of the benefits of crime while recovered assets are returned for lawful public use or to their rightful owners, in accordance with the law.

Kenya’s asset recovery framework is anchored in the ACECA, the POCAMLA, the Public Procurement and Asset Disposal Act, No. 33 of 2015, the Conflict of Interest Act, 2025 and Kenya’s obligations under international and regional legal instruments, including the UNCAC. This legal framework is complemented by an institutional architecture comprising the Ethics and Anti-Corruption Commission, the Asset Recovery Agency, the Financial Reporting Centre, the Office of the Director of Public Prosecutions, National Police Service; the Judiciary, and the Office of the Attorney General and State Department of Justice, particularly in matters relating to international cooperation and mutual legal assistance.

Since 2018, the asset recovery landscape has become more complex. Proceeds of corruption and economic crimes  can now be layered and concealed through digital payment systems, complex ownership structures, cross-border financial arrangements, and emerging virtual asset ecosystems. At the same time, digital tools, interoperable registries, financial intelligence, and data analytics create new opportunities to trace assets, identify suspicious transactions, and support domestic and international recovery efforts. Asset recovery guidelines should, therefore, move beyond traditional confiscation models and adopt a more integrated, technology-aware, intelligence-driven, and internationally coordinated approach. These developments require Kenya's asset recovery framework to evolve beyond traditional confiscation models towards a more integrated, technology-enabled, intelligence-driven, and internationally coordinated approach. Such an approach strengthens the ability of investigative, prosecutorial, and judicial institutions to identify, restrain, confiscate, recover, and repatriate the proceeds of corruption and economic crimes.

### 4.7.2 Situation Analysis

Kenya has established a strong legal and institutional basis for asset recovery. The legal framework provides for the tracing, preservation, seizure, confiscation, and forfeiture of proceeds of crime and corruption. This is supported by specialized institutions such as the Asset Recovery Agency (ARA) and the Financial Reporting Centre (FRC), which play key roles in financial intelligence, restraint, and recovery processes. The Ethics and Anti-Corruption Commission (EACC) also plays a role in asset recovery as part of its broader mandate to investigate corruption and economic crimes and facilitate recovery of public assets. In addition, the wider criminal justice system, including the Office of the Director of Public Prosecutions (ODPP), the National Police Service (NPS), the Judiciary, and the Office of the Attorney General and Department of Justice (OAG&DOJ), supports both domestic and international asset recovery proceedings. This framework reflects a deliberate effort to treat recovery of illicit assets as an integral part of anti-corruption enforcement rather than as a secondary consequence of prosecution.



Despite this framework, there exist implementation challenges such as capacity constraints, weak implementation mechanisms, lengthy court processes, gaps in specialized asset management arrangements, and limited availability of consistent data on recoveries and international cooperation outcomes. These challenges reduce the speed, efficiency, and credibility of recovery efforts, and may allow illicit assets to be hidden, transferred, lost in value, or moved across borders before effective restraint measures are put in place.

A further challenge lies in the increasing sophistication of concealment methods. Emerging corruption risks now include illicit financial flows, hidden ownership of assets, cross-border corruption linked to digital economies, and the use of digital financial systems to conceal proceeds of corruption. This means that asset recovery is no longer limited to land, bank accounts, vehicles, and conventional corporate interests.

Recovery systems must increasingly deal with complex ownership structures, assets held on behalf of others, foreign-registered entities, digital records, and new forms of value such as virtual assets and other digital storage systems. Without stronger financial investigation capacity, interoperable data systems, beneficial ownership transparency, and specialized digital forensic capabilities, asset recovery efforts may continue to lag the evolving methods used to hide illicit wealth.

There are also coordination challenges, including institutional fragmentation, weak inter-agency coordination, and inadequate collection, sharing, and utilization of evidence and intelligence necessary to support effective investigation, prosecution, and successful conclusion of corruption and economic crime cases. In the context of asset recovery, this affects asset tracing, case development, financial analysis, preservation orders, prosecution support, international cooperation, and management of recovered assets. International best practices similarly stress that transparency and enforcement reforms only become effective when data, verification, oversight, and institutional follow-through are integrated rather than treated as separate projects. This is especially relevant for linking procurement data, beneficial ownership information, financial intelligence, audit trails, and investigative workflows in support of recovery action.

There is also an accountability dimension. Asset recovery is most credible when the public can see that recovered assets are properly managed, transparently accounted for, and where appropriate restored to public benefit. Transparency in the use of recovered assets should be strengthened into a broader governance principle covering asset management, valuation, disposal, restitution, reporting, and public communication.

Accordingly, Kenya's asset recovery strategy now requires not only a strong legal base, but also faster and more coordinated implementation, stronger financial and digital investigative capacity, improved international cooperation, clearer frameworks for digital and transnational assets, and more transparent systems for the management and use of recovered assets.

**4.7.3 Policy Objectives**

The objectives of this policy area are to:

a) Strengthen the legal, institutional, and operational framework for asset recovery.
b) Establish and enhance the legal and operational framework for management of recovered assets.
c) Enhance the effectiveness of coordination of law enforcement agencies in asset recovery.
d) Enhance mutual legal assistance, international cooperation, and transnational asset recovery in line with Kenya's international obligations.
e) Enhance transparency accountability and public reporting of recovered assets
f) Promote the use of data, financial intelligence, digital tools to enhance asset recovery



**4.7.4 Policy Issues**

The key policy issues to be addressed are:

a) Overlapping and, at times, fragmented legal and institutional frameworks governing asset tracing, seizure, forfeiture, confiscation, management, and restitution.
**b)** Weak implementation mechanisms, including delays in obtaining and enforcing court orders for restraint, forfeiture, confiscation, and recovery of proceeds of corruption and economic crimes.
c) Lengthy court processes and procedural bottlenecks that reduce the speed and effectiveness of recovery efforts.
d) Limited capacity in financial investigation, forensic accounting, asset tracing, and digital evidence capacity across relevant institutions.
e) Weak coordination and information-sharing among agencies involved in investigation, prosecution, financial intelligence, asset management, and international cooperation.

f) Limited availability, integration, and public accessibility of reliable and consistent data on restrained, recovered, managed, repatriated, and disposed assets, undermining evidence-based decision-making, inter-agency coordination, and effective enforcement.
g) Challenges in tracing and recovering assets concealed through hidden ownership, including shell companies, proxy arrangements, and other beneficial ownership concealment mechanisms.
h) Limited technical capacity to trace and recover assets held through digital financial systems, virtual asset ecosystems, or other technology-enabled value transfer mechanisms.
i) Weak or uneven systems for management, preservation, valuation, and disposal of recovered or restrained assets, including risks of depreciation, loss in value, misuse, or lack of transparency in disposal.
j) Challenges in mutual legal assistance, international cooperation, and enforcement across jurisdictions.
k) Inadequate transparency and public accountability in the utilization, restitution, or final disposition of recovered assets.

**4.7.5 Policy Statements**

The Government shall:

a) Strengthen and harmonize the legal, policy and institutional framework for the tracing, preservation, seizure, forfeiture, confiscation, management, recovery, restitution and disposal of proceeds of corruption and economic crimes.

b) Strengthen institutional coordination, information sharing and inter-agency collaboration in asset tracing, recovery, management and cross-border enforcement.

c) Strengthen financial investigation, forensic accounting, asset tracing, digital forensics and other specialized capacities required for effective asset recovery.

d) Strengthen systems for the early identification, preservation, management and recovery of proceeds of corruption, including digital and virtual assets.

e) Promote beneficial ownership transparency and the effective use of financial intelligence, interoperable information systems and digital technologies to support asset recovery.

f) Strengthen international cooperation, mutual legal assistance, asset repatriation and cross-border asset recovery in accordance with Kenya's international obligations.

g) Promote transparency, accountability and integrity in the management, utilization and reporting of recovered assets.

h) Provide adequate financial, human, technological and institutional capacity to support effective and sustainable asset recovery.

i) Institutionalize MERL, performance standards and asset recovery performance indicators to strengthen accountability, evidence-based decision-making and continuous improvement in asset recovery.

## 4.8 International Cooperation

### 4.8.1 Introduction

International cooperation is a central pillar in combating corruption, particularly in an era characterized by digital financial systems, and transnational illicit financial flows. Corruption increasingly involves cross-border transactions, offshore financial centres, digital assets, and complex corporate structures that go beyond national jurisdictions. Kenya, as a State Party to the UNCAC and AUCPCC, is obligated to promote effective international cooperation in areas such as Mutual Legal Assistance (MLA), extradition, asset recovery, joint investigations, and information sharing. However, emerging risks such as cyber-enabled corruption, virtual assets, hidden ownership of assets, and data governance challenges require a more coordinated, technology-enabled, and intelligence-driven approach to international cooperation.

#### 4.8.2 Situation Analysis

Kenya actively participates in international and regional anti-corruption frameworks, including the UNCAC, the AUCPCC, the African Peer Review Mechanism (APRM), and various bilateral and multilateral cooperation agreements. The Office of the Attorney General and State Department of Justice (OAG & DOJ) is the central authority for mutual legal assistance and treaty implementation. Despite this progress, several challenges persist: Inefficiencies MLA processes: Delays in processing requests, differing legal standards across jurisdictions, and limited use of digital systems in MLA processes constrain timely cooperation. Weaknesses in extradition and cross-border prosecution: Procedural complexities, evidentiary barriers, and limited coordination between investigative and prosecutorial agencies reduce effectiveness. Limited capacity for transnational investigations: Inadequate technical expertise in financial forensics, cybercrime, and digital asset tracing undermines cross-border investigations. Fragmented information sharing systems**:** Limited interoperability between domestic institutions (e.g., EACC, FRC, DCI, and ODPP) and international platforms hampers intelligence-led cooperation. Challenges in asset recovery across jurisdictions: Differences in legal regimes, beneficial ownership opacity, and weak international coordination mechanisms delay recovery of illicit assets. Emerging risks in digital and virtual financial systems: The rise of cryptocurrencies, digital platforms, and cross-border financial technologies has created new avenues for concealing proceeds of corruption. Underutilization of International Peer Review and cooperation platforms: Findings from UNCAC and APRM reviews are not consistently translated into funded and time-bound domestic reforms or cooperation strategies.

#### 4.8.3 Policy Objectives

The Policy seeks to:

a) Strengthen Kenya's capacity to effectively engage in international cooperation in corruption prevention, investigation, prosecution, and asset recovery.
b) Harmonize domestic legal and institutional frameworks with international anti-corruption standards and obligations.
c) Strengthen international information-sharing systems, including digital and financial intelligence cooperation.
d) Address emerging cross-border corruption risks, including illicit financial flows, digital assets, and technology-enabled corruption.
e) Institutionalize the use of international peer review mechanisms (UNCAC, APRM) as tools for continuous improvement and accountability in anti-corruption efforts.

#### 4.8.4 Policy Issues

Key policy issues include:

a) Fragmented and slow mutual legal assistance and extradition processes.
b) Legal and procedural inconsistencies with international standards and best practices.
c) Limited technical capacity in transnational financial investigations and digital forensic analysis.

d) Weak inter-agency and cross-border information sharing mechanisms, including limited systems for sharing information between institutions and across jurisdictions.
e) Inadequate frameworks for tracing and recovering assets across jurisdictions.
f) Limited regulation and oversight of digital financial systems, virtual assets and emerging financial technologies.
g) Weak integration of beneficial ownership data into international cooperation frameworks.
h) Insufficient follow-through on international peer review recommendations.
i) Limited coordination between national and county levels in cross-border corruption risks.

### 4.8.5 Policy Statements

The Government shall:
a) Strengthen and harmonize the legal, policy and institutional framework for international cooperation in preventing, investigating, prosecuting and recovering assets arising from corruption and economic crimes, in accordance with Kenya's international obligations.
b) Strengthen mutual legal assistance, extradition, joint investigations and other cross-border cooperation mechanisms to improve the effectiveness, timeliness and efficiency of international anti-corruption enforcement.
c) Strengthen institutional capacity, information sharing, financial intelligence and interoperable systems to support transnational corruption investigations, digital evidence management and cross-border enforcement.
d) Strengthen international cooperation in asset tracing, freezing, seizure, confiscation, recovery and repatriation of proceeds of corruption and economic crimes.
e) Strengthen international cooperation to address emerging corruption risks associated with digital technologies, cyber-enabled corruption, virtual assets, illicit financial flows and cross-border data governance.
f) Promote strategic partnerships and regional and international collaboration with governments, international organizations, regional bodies, the private sector and civil society to strengthen collective action against corruption.
g) Institutionalize international peer review, knowledge exchange and continuous learning to strengthen compliance with international anti-corruption standards and improve national anti-corruption performance.
h) Institutionalize MERL, performance standards and international cooperation indicators to strengthen accountability, evidence-based decision-making and continuous improvement in international anti-corruption cooperation.

## 4.9 Leadership and Integrity

### 4.9.1 Introduction

Leadership and integrity are foundational to good governance and the effective fight against corruption. The Constitution of Kenya, particularly Chapter Six, establishes high standards of ethical conduct, accountability, and transparency for State and public officers. These standards are operationalized through legislation, including the Leadership and Integrity Act, 2012, the Public Officer Ethics Act, 2003, and more recent frameworks such as the Conflict of Interest Act, 2025.
Despite this robust legal and institutional framework, persistent integrity failures continue to undermine public trust, institutional credibility, and service delivery. International experience and UNCAC reviews indicate that the effectiveness of leadership and integrity systems depends not only on legal provisions, but also on credible enforcement, verification mechanisms, transparency,

and sustained political commitment. In addition, emerging governance challenges have introduced new ethical risks that require modernized and technology-responsive integrity systems. These challenges include digital decision-making, artificial intelligence in public administration, complex financial systems, and data-driven governance environment.

4.9.2 Situation Analysis

Kenya has established a strong constitutional and legal framework for leadership and integrity, supported by institutions such as the EACC and other oversight bodies. These frameworks provide codes of conduct, financial disclosures, conflict of interest regulation, and ethical standards in public service.

However, several critical gaps persist in the implementation of leadership and integrity frameworks in Kenya. Enforcement of Chapter Six remains inconsistent, with limited penalties for non-compliance and weak follow-through on identified integrity violations. In addition, vetting and appointment processes are often procedural rather than substantive, with limited verification of the information provided.

Financial disclosure and lifestyle monitoring systems also remain weak. Existing asset declaration systems rely heavily on self-reporting, with minimal verification, limited digitization, and weak enforcement mechanisms. Similarly, conflict of interest management remains inadequate despite the existence of a new legal framework, with conflicts of interest still prevalent in procurement, public appointments, and decision-making processes.



The use of data and technology in integrity oversight remains limited. Current integrity oversight systems are fragmented, with weak interoperability, limited data analytics, and insufficient risk-based monitoring capabilities. These challenges are further compounded at the county level where devolution has expanded public resource management responsibilities without commensurate strengthening of ethics and integrity systems. At the institutional and governance level, weak accountability culture and limited political will continue to undermine enforcement. In some cases, application of integrity standards is affected by political interference, selective enforcement of the law, and constraints on institutional independence. Emerging governance risks are also becoming more pronounced in the context of digital transformation. The increased use of automation, algorithmic decision-making, and digital platforms introduce risks of opacity, bias, manipulation, and data misuse. Finally, public participation and civic oversight remain underutilized, despite constitutional provisions on public participation.

**4.9.3 Policy Objectives**

The Policy seeks to:

a) Strengthen enforcement of leadership and integrity standards under the Constitution and relevant laws.
b) Enhance transparency, accountability, and ethical conduct in public sector leadership.
c) Improve effectiveness of integrity vetting, financial disclosure, and conflict of interest management systems.
d) Integrate technology, data analytics, and digital tools into integrity monitoring and enforcement.

e) Promote a culture of ethical leadership and zero tolerance to corruption across all levels of government.
f) Enhance public participation, civic oversight, and social accountability in leadership integrity.

### 4.9.4 Policy Issues

**Key policy issues include:**

a) Weak enforcement and sanctions for violations of Chapter Six.
b) Ineffective and non-verifiable integrity vetting mechanisms.
c) Weak financial disclosure systems and lack of lifestyle audit frameworks.
d) Inadequate management of conflicts of interest.
e) Fragmented and non-integrated integrity information systems.
f) Limited use of technology and data analytics in detecting integrity risks.
g) Weak ethical culture and accountability norms in leadership.
h) Insufficient integrity systems at county level.
i) Emerging risks from digital governance, artificial intelligence, and data misuse.
j) Limited citizen participation in leadership accountability processes.

### 4.9.5 Policy Statements

The Government shall:

a) Strengthen the enforcement of constitutional and statutory leadership and integrity standards to promote ethical leadership, accountability and public confidence in governance.

b) Strengthen integrity vetting, financial disclosure, lifestyle audit and conflict of interest management systems to enhance transparency, accountability and integrity in public service.

c) Promote the use of digital technologies, data analytics and integrated integrity management systems to strengthen integrity oversight, risk management and evidence-based decision-making.

d) Promote ethical leadership, professionalism and a culture of integrity through continuous ethics education, capacity development and institutional accountability mechanisms.

e) Strengthen leadership and integrity systems at both national and county levels through effective institutional coordination, harmonization and capacity building.

f) Promote public participation, social accountability, transparency and stakeholder engagement in leadership and integrity governance.

g) Strengthen governance frameworks to address emerging integrity risks associated with digital technologies, artificial intelligence, data governance and automated decision-making.

h) Institutionalize MER, performance standards and leadership and integrity indicators to strengthen accountability, evidence-based decision-making and continuous improvement in the implementation of leadership and integrity frameworks.

# CHAPTER FIVE: IMPLEMENTATION FRAMEWORK FOR THE POLICY

## 5.1 Implementation Arrangement

### 5.1.1 Introduction

The implementation framework provides a clear and coordinated system for executing the National Ethics and Anti-Corruption Policy. It establishes institutional linkages, operational mechanisms, and accountability structures required to translate policy commitments into measurable outcomes. The framework adopts a whole-of-government and whole-of-society approach, integrating national and county governments, oversight institutions, private sector actors, civil society, and citizens. It emphasizes: Inter-agency coordination and interoperability of systems (coordination among institutions and systems working together); evidence-based planning and monitoring; digital governance and use of digital systems and data to support decision-making and transparency, accountability, and ethical safeguards.

In line with emerging governance trends, the framework incorporates digital integrity, data governance, and artificial intelligence (AI) considerations, ensuring that technology is utilized to enhance corruption prevention, detection, and enforcement while mitigating risks of cyber-enabled corruption and misuse of data. The framework further operationalizes results-focused approach, linking inputs, activities, outputs, and outcomes through clear indicators, performance targets, and reporting mechanisms.

### 5.1.2 Situation Analysis

Kenya has established a comprehensive legal and institutional architecture for combating corruption, anchored in the Constitution, statutory frameworks, and multiple oversight and enforcement agencies. However, implementation remains constrained by: Weak coordination and fragmented institutional mandates; limited interoperability of information systems across agencies; inadequate use of data analytics in corruption risk detection; capacity constraints in investigation, prosecution, and asset recovery and emerging risks from digital systems, including cyber-enabled corruption and illicit financial flows

The OAG&DOJ provides overall policy direction, while the EACC serves as the principal agency for prevention, investigation, and public education. These functions are complemented by institutions across the justice chain, including the ODPP, Judiciary, DCI, NPS, FRC, and ARA.

Despite this extensive framework, system-wide effectiveness is undermined by institutions working in silos, duplication of efforts, and weak feedback between institutions. Additionally, the rapid expansion of digital public finance systems (e.g., IFMIS, e-procurement), financial technologies and virtual assets and data-driven governance systems and AI applications, has introduced new integrity risks. These include manipulation of digital procurement systems, weak oversight of algorithmic decision-making, cyber-enabled fraud and cross-border illicit financial flows and misuse of personal and financial data.

At the same time, these technologies provide opportunities for real-time monitoring, early detection of risks, and improved oversight, which remain underutilized. The current implementation context therefore requires a shift from institution-centric approaches to an integrated, data-driven, and technology-enabled anti-corruption ecosystem.

### 5.1.3 Policy Objective

The objective of the implementation framework is to establish a coordinated, interoperable, and technology-enabled system for implementing anti-corruption interventions that enhance efficiency, accountability, and responsiveness across all institutions and levels of government.
Specifically, the framework seeks to:

- Eliminate fragmentation and duplication in anti-corruption efforts.
- Strengthen inter-agency coordination and information sharing.
- Integrate digital governance and data analytics into anti-corruption systems.
- Enhance enforcement effectiveness and compliance.
- Promote citizen participation and trust in anti-corruption processes.

#### 5.1.3.1 Institutional Framework

The Policy establishes an integrated institutional coordination framework structured around five core functions:

a) Strategic Priority Setting: Alignment of anti-corruption priorities with national development plans and sectoral strategies; and integration of emerging risks (digital corruption, illicit financial flows, AI governance).
a) Planning and Budgeting: Harmonized planning across MDAs and counties; integration of anti-corruption priorities into Medium-Term Expenditure Frameworks (MTEF) and dedicated funding for digital anti-corruption tools and capacity development.
b) Implementation, Monitoring and Evaluation: Joint implementation frameworks across institutions; use of integrated digital dashboards and real-time monitoring systems; and adoption of data analytics for corruption risk detection.
c) Reporting and Information Sharing: Establishment of interoperable data systems across institutions; standardized reporting protocols; and strengthened use of platforms such as Integrated Public Complaints Referral Mechanism (IPCRM) and other digital reporting systems.
d) Accountability and Oversight: Strengthened internal and external accountability mechanisms; integration of citizen feedback and social accountability tools; and enhanced transparency through open data systems.

This framework promotes system-wide coherence, replacing fragmented institutional approaches with coordinated delivery.

#### 5.1.3.2 Institutional Independence

While coordination is essential, the framework safeguards the constitutional independence of key institutions, including the Judiciary, Parliament, and independent commissions. The Policy adopts a balanced approach, recognizing that institutional autonomy is critical for credibility and impartiality while coordination is necessary for effectiveness. To address this, the Policy adopts three complementary mechanisms:

a) Executive Coordination Framework: Clear national coordination strategy led by OAG&DOJ and alignment of institutional mandates without undermining independence.
b) Resource-Based Incentives: Conditional funding linked to joint programming and collaboration and shared investment in digital systems and infrastructure.

c) Peer-Based Coordination and Leadership: Strengthening platforms such as the Kenya Leadership and Integrity Forum (KLIF) and promoting collaborative leadership across institutions.

This approach ensures effective coordination while respecting institutional independence.

### 5.1.4 Policy Issues

Key challenges affecting implementation include:

- Fragmentation and duplication of institutional mandates.
- Inefficient use of financial and human resources.
- Complex and bureaucratic procedures that delay enforcement.
- Weak integration of digital systems and data sharing mechanisms.
- Limited use of data analytics and technology in anti-corruption efforts.
- Public apathy and declining trust due to prolonged and ineffective processes.
- High cost and low efficiency in prosecution and asset recovery.
- Weak citizen participation and limited effectiveness of oversight mechanisms.
- Emerging risks from digital governance, including cyber-enabled corruption and data misuse.

### 5.1.5 Policy Statements and Interventions

The Government shall strengthen the implementation framework through the following interventions:

a) Strengthen coordination mechanisms by institutionalizing a whole-of-government anti-corruption coordination framework under the Office of the Attorney General and State Department for Justice, Human Rights and Constitutional Affairs, strengthening collaboration within the Multi-Agency Team (MAT), and enhancing the role of the Kenya Leadership and Integrity Forum (KLIF) as a national platform for anti-corruption coordination, policy coherence, and inter-agency accountability.

b) Establish integrated digital anti-corruption systems by developing interoperable digital platforms and databases that enable secure information sharing among anti-corruption, investigative, prosecutorial, judicial, and financial intelligence institutions, deploying data analytics and artificial intelligence tools for corruption risk detection and early warning, and strengthening the cybersecurity, resilience, and integrity of public digital governance systems.

c) Mainstream anti-corruption in governance systems by integrating anti-corruption, ethics, and integrity measures into public finance management, procurement, human resource management, and service delivery systems, and institutionalizing risk assessments across Ministries, Departments, Agencies, and county governments to proactively identify and mitigate corruption vulnerabilities.

d) Strengthen planning and budgeting for anti-corruption implementation by ensuring dedicated and sustainable budgetary allocations for anti-corruption interventions at national and county levels, and linking resource allocation to performance, compliance, and measurable anti-corruption outcomes.

e) Enhance accountability and performance management by integrating anti-corruption and integrity indicators into performance contracting and institutional performance management frameworks and establishing clear enforcement measures and sanctions for non-compliance with anti-corruption obligations and standards.

f) Strengthen citizen engagement and transparency by expanding accessible digital corruption reporting and public feedback platforms, promoting open data and proactive public access to information, strengthening whistleblower protection mechanisms, and enhancing citizen participation in anti-corruption oversight and accountability processes.
g) Address emerging technology risks by developing robust legal and regulatory frameworks for artificial intelligence, digital governance, and emerging technologies, strengthening oversight of virtual assets and digital financial systems, and enhancing national and cross-border cooperation to prevent, detect, and respond to cyber-enabled corruption and technology-facilitated economic crime.

## 5.2 Resource Mobilization and Financing

### 5.2.1 Introduction

Effective implementation of the National Ethics and Anti-Corruption Policy requires adequate, predictable, and strategically deployed resources, supported by strong financial governance and accountability mechanisms. Resource mobilization is not merely a budgetary exercise, but also a strategic investment in governance, public trust, and economic efficiency. Anti-corruption interventions generate significant returns through prevention of resource leakages, improved efficiency in public expenditure, and enhanced investor confidence and economic growth.

The Government shall, therefore, adopt a whole-of-government financing approach, integrating anti-corruption priorities into national and county planning, budgeting, and expenditure frameworks.

Considering emerging governance challenges, the financing framework will also support:

a) Digital anti-corruption systems (e.g., IFMIS enhancements, e-procurement integrity tools).
b) Data analytics and artificial intelligence for risk detection.
c) Cybersecurity and data protection safeguards.
d) Capacity building in digital investigations and financial intelligence.

This reflects a shift from viewing anti-corruption as a cost centre to recognizing it as a high-impact governance investment.

### 5.2.2 Situation Analysis

Despite sustained efforts, resource mobilization for anti-corruption remains constrained by several structural and operational challenges:

**a) Resource Constraints and Allocation Inefficiencies**

Funding to anti-corruption institutions is inadequate, uneven, and often not aligned with risk priorities. In some cases, resources are allocated but remain underutilized due to institutional inefficiencies.

**b) Weak Prioritization and Fragmentation**

The absence of a unified prioritization framework has resulted in duplication of programmes, fragmented interventions across institutions, and limited economies of scale.

**c) Limited Absorptive Capacity**

Some institutions face constraints in technical expertise (digital forensics, financial intelligence), project execution and financial management, and utilization of advanced technologies.

**d) Weak Integration of Digital Investments**

Existing financing frameworks do not adequately prioritize, digital integrity systems, Interoperable data platforms and advanced analytics for corruption detection.

**e) Dependence on External Financing**

While development partners provide critical support, over-reliance on external funding risks fragmentation, donor-driven priorities, and sustainability challenges.

**f) Emerging Financial Risks**

New corruption risks require new financing responses, including: Monitoring of virtual assets and digital financial systems, addressing cross-border illicit financial flows and strengthening beneficial ownership transparency systems.

**g) Weak Coordination in Resource Utilization**

Limited coordination across institutions leads to inefficient use of funds, overlapping mandates, and reduced overall impact. Overall, the financing challenge is not only about quantity of resources, but also about efficiency, coordination, and strategic deployment.

5.2.3 Policy Objectives

The objective of the resource mobilization and financing framework is to:

Ensure sustainable, transparent, and strategically aligned financing for anti-corruption interventions that maximize efficiency, strengthens institutional capacity, and supports innovation in addressing emerging corruption risks.

This will be guided by the following principles:

**(a) Transparency and Accountability**

Financing mechanisms shall uphold the highest standards of transparency, including:

i. Public disclosure of anti-corruption expenditures.
ii. Integration with open government and access-to-information systems.
iii. Strengthened audit and oversight mechanisms.

The anti-corruption framework must model the integrity standards it seeks to enforce across government.

**(b) Predictability and Adequacy**

Anti-corruption financing shall be:

i. Predictable to support long-term planning.
ii. Adequate to address both traditional and emerging corruption risks.

Given the systemic and entrenched nature of corruption, sustained and scaled investment is required in investigation and prosecution, digital systems and data analytics, and institutional capacity development.

**(c) Strategic Investment and Value-for-Money**

Resources shall be allocated based on risk-based prioritization; expected impact and returns, and cost-effectiveness. The Government shall adopt a value-for-money approach, recognizing that prevention yields significantly higher returns than enforcement alone.

**(d) Stakeholder Engagement**

A multi-stakeholder financing approach shall be adopted, involving:

i. Government institutions.
ii. Private sector.
iii. Civil society.
iv. Development partners.
v. Academia and research institutions.

Structured engagement platforms shall be established to mobilize resources, promote accountability, and build national consensus on anti-corruption priorities.

**(e) Coordination and Harmonization**

Financing shall be coordinated across institutions to avoid duplication, enhance complementarities and promote joint programming. The multi-agency approach shall be strengthened as a core mechanism for coordinated resource utilization.

**(f) Innovation and Digital Transformation**

Dedicated funding shall be allocated for digital anti-corruption tools, artificial intelligence and data analytics, cybersecurity systems and financial intelligence and tracking systems.

5.2.4 Policy Statement

The Government shall ensure sustainable and strategic financing of anti-corruption interventions through the following measures:

a) Strengthen domestic financing for anti-corruption efforts by increasing budgetary allocations to anti-corruption institutions, ring-fencing resources for priority anti-corruption interventions, and integrating anti-corruption priorities into national and county planning and budgeting frameworks to ensure sustainable and predictable financing.
b) Establish dedicated anti-corruption funding mechanisms by creating special financing windows for high-impact anti-corruption interventions and, where legally permissible, allocating a proportion of recovered assets and proceeds of corruption to support anti-corruption prevention, enforcement, capacity-building, and institutional strengthening initiatives.

c) Leverage development partner support by aligning external financing with national anti-corruption priorities, promoting pooled funding and coordinated programmatic approaches, and strengthening mechanisms for harmonization, transparency, and effective coordination of donor support.
d) Promote public–private partnerships for anti-corruption action by engaging the private sector in integrity and anti-corruption initiatives, supporting the adoption of compliance, anti-bribery, and ethical business systems, and mobilizing private sector resources, expertise, and innovation for anti-corruption capacity development and reform.
e) Invest in digital systems and innovation by financing interoperable anti-corruption data systems, supporting the deployment of artificial intelligence and advanced analytics for corruption risk detection and early warning, and strengthening cybersecurity, digital resilience, and data protection frameworks to safeguard anti-corruption systems.
f) Enhance financial oversight and accountability by strengthening audit, expenditure monitoring, and financial reporting mechanisms for anti-corruption resources, linking financing to performance and compliance indicators, and enforcing clear sanctions and corrective measures for misuse, inefficiency, or diversion of anti-corruption funds.
g) Build institutional capacity for sustainable anti-corruption implementation by investing in skilled human capital including investigators, prosecutors, legal experts, and financial analysts, strengthening institutional financial management and resource absorption capacity, and promoting continuous professional development on emerging corruption risks, investigative techniques, and evolving governance challenges.



**5.3 Communication Strategy**

Corruption is a complex and evolving phenomenon with far-reaching socio-economic and governance consequences. An effective communication strategy is essential to simplify public understanding, strengthen stakeholder engagement, and sustain national momentum in the fight against corruption.

The communication strategy shall function as a strategic enabler to complement core anti-corruption interventions such as legal enforcement, institutional strengthening, and system reforms. It shall play a critical role in:

a) Enhancing public awareness and understanding of corruption risks and impacts.
b) Promoting transparency and access to information.
c) Strengthening public trust in institutions; encouraging citizen participation and reporting.
d) Supporting deterrence by highlighting consequences of corrupt conduct.

In the prevention domain, communication shall be deployed as a behavioral change tool, aimed at shifting societal attitudes from tolerance or ambivalence toward active resistance, ethical conduct, and civic responsibility.

**Objective of the Communication Strategy**

The objective of the communication strategy is to promote a national culture of ethics and integrity by increasing awareness of the costs of corruption, strengthening public engagement, and supporting transparency, accountability, and behavioral change across society.

The strategy shall clearly communicate that:

a) Government bears the cost through loss of public resources and reduced capacity to deliver services.
b) The economy bears the cost through reduced investment, inefficiency, and diminished competitiveness.
c) Citizens bear the greatest burden through loss of livelihoods, limited access to essential services (health, education, infrastructure, security, and justice), and erosion of trust in public institutions.

Sustained corruption undermines confidence in governance systems and perpetuates a self-reinforcing cycle of impunity, which the communication strategy seeks to disrupt.

**Strategic Approach**

The communication strategy shall adopt a multi-channel, data-driven, and stakeholder-inclusive approach, comprising the following elements:

**(a) Whole-of-Government and Multi-Stakeholder Communication**

Communication shall be a shared responsibility across all institutions, including:

i. Ministries, Departments and Agencies (MDAs).
ii. Independent oversight bodies.
iii. County governments and Private sector and civil society.

A designated lead coordinating entity shall develop and oversee a national anti-corruption communication framework. It will also ensure consistency of messaging and coordinate campaigns and reporting across institutions.

**(b) Digital and Technology-Enabled Communication**

In line with emerging governance trends, the strategy shall leverage:

i. Digital platforms and social media.
ii. Open data and transparency portals.
iii. E-participation and citizen feedback systems.

These tools shall enhance real-time dissemination of information, improve accessibility and inclusivity and support reporting and whistleblowing mechanisms.

**(c) Behavioral Change and Public Education**

Communication shall go beyond awareness to influence norms and behavior, including:

i. Promoting ethical values and integrity in public and private sectors.
ii. Targeting high-risk sectors (e.g., procurement, service delivery points)
iii. Integrating anti-corruption education into curricula and civic platforms.

**(d) Strategic Messaging for Deterrence**

The strategy shall support enforcement efforts by:

i. Publicizing sanctions, prosecutions, and asset recovery outcomes.
ii. Highlighting personal, legal, and reputational consequences of corruption;
iii. Reinforcing the credibility and effectiveness of anti-corruption institutions

**(e) Transparency and Public Accountability**

Communication shall strengthen accountability through:

i. Regular public reporting on anti-corruption performance.

ii. Dissemination of audit findings and investigation outcomes and promotion of access to information.

**Implementation and Coordination**

The communication strategy shall be:

i. Institutionalized across all implementing agencies as a core component of anti-corruption programming.
ii. Coordinated by the lead anti-corruption agency through a consultative and inclusive framework.
iii. Integrated into national and county planning, budgeting, and reporting systems.

Each institution shall develop communication plans aligned to the national strategy, allocate resources for communication activities, and report on communication outcomes as part of performance frameworks.

**Planning, Financing, and Review**

The communication strategy shall be implemented through annual work plans, aligned to broader anti-corruption priorities and activities. Key features include:

i. Integration into institutional planning and budgeting cycles.
ii. Clear linkage between communication activities and program objectives.
iii. Defined performance indicators and targets.
iv. Periodic monitoring, evaluation, and learning mechanisms.

Annual reviews shall be undertaken to assess effectiveness of messaging and outreach, incorporate feedback from stakeholders and citizens, and adjust strategies in response to emerging risks, including digital and technology-enabled corruption.

# CHAPTER SIX: MONITORING AND EVALUATION OF POLICY IMPLEMENTATION

## 6.1 Monitoring and Evaluation

### 6.1.1 Introduction

This chapter establishes a comprehensive, integrated, and technology-enabled Monitoring and Evaluation (M&E) framework for the implementation of the National Ethics and Anti-Corruption Policy. The framework provides a results-based, data-driven, and adaptive system for tracking progress across all policy priority areas. It links inputs, outputs, outcomes, and impact at national and county levels. In line with the evolving governance context, the M&E framework incorporates:

- Digital governance and data systems (e.g., IFMIS, e-procurement, integrated complaints platforms).
- Information governance and data protection safeguards.
- Artificial intelligence and data analytics tools for corruption risk detection and early warning.
- Interoperable institutional reporting mechanisms across the anti-corruption ecosystem.

The framework emphasizes evidence-based decision-making, continuous learning, and accountability, ensuring that anti-corruption interventions move beyond policy declarations to measurable results, institutional performance, and public trust outcomes. It further aligns with national planning frameworks (MTP, MTEF), international obligations (UNCAC), and emerging best practices in governance diagnostics, corruption measurement, and performance management.



### 6.1.2 Situation Analysis

An efficient monitoring and evaluation system is central to effective implementation of the National Ethics and Anti-Corruption Policy. Despite multiple reporting mechanisms across institutions, the current M&E landscape is fragmented, weakly coordinated, and insufficiently evidence driven. Key challenges include:

a) Fragmentation and weak coordination: The current M&E efforts are dispersed across institutions with limited harmonization. This has resulted in duplication, inconsistent indicators, and weak system-wide accountability.
b) Overemphasis on outputs over outcomes and impact: Current reporting frameworks mainly focus on activities such as the number of cases investigated and training conducted. There is limited measurement of behavioral change, reduction in corruption risks, public trust and service delivery outcomes.
c) Data gaps and limited interoperability: There is weak integration of institutional databases in the EACC, ODPP, Judiciary, FRC, ARA, IFMIS systems; limited sharing of data across agencies; and inadequate use of real-time and administrative data.
d) Limited use of technology and analytics: Although digital systems have expanded, their use in M&E remains underdeveloped. There is minimal use of data analytics, AI, and predictive tools for corruption risk monitoring. Additionally, the system lacks effective capacity for analyzing complex financial and digital corruption trends.
e) Credibility and perception gaps: Administrative reports often indicate progress, while public perception surveys suggest persistent corruption. This reflects weak outcome measurement and limited triangulation of data sources.

f) Capacity and Resource Constraints: Sustaining a results-based M&E system requires skilled personnel in data analysis and evaluation, institutional commitment, adequate financing, and technological infrastructure.

These gaps underscore the need for a coherent, integrated, and technology-enabled M&E framework that aligns with evolving governance realities and supports real-time monitoring, accountability, and adaptive policy responses.

**6.1.3 Policy Issues**

The key policy issues to be addressed in strengthening M & E include:

a) Weak coordination and lack of a centralized, multi-stakeholder M&E framework across national and county levels.
b) Absence of a harmonized results-based M&E system with clearly defined outcome and impact indicators.
c) Fragmented and non-interoperable data systems limiting information sharing and integrated reporting.
d) Limited use of digital technologies, data analytics, and artificial intelligence in corruption monitoring and risk detection.
e) Inadequate integration of emerging corruption risks, including cybercrime, digital financial systems, and data governance challenges, into M&E frameworks.
f) Weak linkage between M&E outputs and policy learning, enforcement action, and institutional accountability.
g) Limited capacity for data collection, analysis, and evaluation across institutions.
h) Absence of a comprehensive national database of anti-corruption actors, interventions, and outcomes across: Prevention, enforcement, asset recovery, international cooperation, non-state actor engagement.
i) Weak mechanisms for public reporting, transparency, and citizen feedback in monitoring anti-corruption efforts.



**6.1.4 Policy Statements and Interventions**

The Government shall establish and operationalize a comprehensive, integrated, and technology-enabled M & E framework for the National Ethics and Anti-Corruption Policy. Specifically, the Government shall:

**a) Institutionalize a National Anti-Corruption M&E Framework**

- Develop a harmonized, results-based M&E framework with clear input, output, outcome, and impact indicators.
- Align M&E systems with national development frameworks (MTP, MTEF) and international obligations (UNCAC).

**b) Establish a Multi-Stakeholder Coordination Mechanism**

- Create an integrated coordination platform bringing together MDAs, county governments, oversight institutions, private sector, and civil society.
- Strengthen the role of EACC (or designated coordinating body) in leading M&E harmonization.

**c) Develop an Integrated Digital M&E System**

- Establish interoperable data systems linking key institutions (EACC, ODPP, Judiciary, FRC, ARA, IFMIS, e-GP, IPCRM).
- Promote real-time data sharing and reporting.

**d) Leverage Technology and Data Analytics**

- Deploy data analytics, artificial intelligence, and early warning systems for corruption risk detection.
- Strengthen digital forensic and financial intelligence capabilities.

**e) Establish a National Anti-Corruption Data Repository**

- Create and maintain a centralized database covering:
  - i. Corruption prevention initiatives.
  - ii. Law enforcement and prosecution data.
  - iii. Asset recovery outcomes.
  - iv. International cooperation.
  - v. Technical assistance.
  - vi. Non-state actor interventions.

**f) Strengthen Evidence-Based Research and Measurement**

- Regularly conduct corruption risk assessments, sector diagnostics, and impact evaluations.
- Integrate administrative data with perception surveys and independent assessments.

**g) Enhance Monitoring of Emerging Risks**

- Incorporate indicators on:
  - Digital governance integrity.
  - Cyber-enabled corruption.
  - Virtual assets and illicit financial flows.
  - Data protection and information governance.

**h) Strengthen Institutional Capacity for M&E**

- i. Build technical capacity in data management, analytics, and evaluation.
- ii. Provide adequate financial and technological resources.

**i) Enhance Transparency and Public Accountability**

- i. Publish periodic national anti-corruption performance reports.
- ii. Establish citizen feedback and reporting mechanisms through digital platforms.

**j) Link M&E to Enforcement and Policy Action**

- Ensure M&E findings inform:
  - Enforcement priorities
  - Policy reform
  - Institutional accountability mechanisms

### 6.2 Policy Monitoring

Policy monitoring shall be undertaken through a structured, tiered, and technology-enabled reporting system designed to support operational management, strategic oversight, and public accountability. While detailed data collection remains essential, the nature, depth, and frequency of reporting shall be tailored to specific audiences and decision-making needs as follows:

- Operational Level (MDAs, counties, agencies):
  - High-frequency (monthly/quarterly) reporting.
  - Detailed administrative, financial, and performance data.
  - Real-time monitoring through digital platforms and dashboards (e.g., IFMIS, e-procurement, integrated complaints systems).
  - Focus on implementation progress, risk flags, and corrective action.
- Strategic and Coordination Level (EACC / coordinating body / inter-Agency platforms):
  - Quarterly and annual consolidated reports.
  - Cross-institutional analysis using integrated and interoperable data systems.
  - Identification of systemic risks, trends, and performance gaps.
- Executive and Parliamentary Oversight:
  - Bi-annual reporting aligned to national planning and budgeting cycles.
  - Focus on key milestones, outcomes, and impact indicators.
  - Evidence-based summaries to inform policy direction, legislative oversight, and resource allocation.



To enhance effectiveness, policy monitoring shall:

- Integrate administrative data, survey data, and independent assessments.
- Utilize data analytics, artificial intelligence, and early warning systems for corruption risk detection.
- Incorporate indicators on emerging risks, including cyber-enabled corruption, digital financial systems, and data governance.
- Promote transparency and public reporting, including accessible summaries for citizens.

### 6.3 Review

Policy implementation reviews shall be conducted at national, county, and institutional levels to assess performance, relevance, efficiency, and responsiveness of interventions within a dynamic governance environment.

These reviews shall:

- Assess results achieved relative to resources utilized, implementation strategies, and policy objectives.
- Examine the effectiveness of coordination mechanisms, data systems, and institutional performance.
- Identify emerging risks, including those associated with digital governance, artificial intelligence, and cross-border corruption dynamics.

A structured and standardized review approach shall be adopted, guided by clearly defined terms of reference, to ensure methodological consistency, stakeholder participation, and policy relevance.

Two complementary review mechanisms shall be applied:
**a) Periodic Strategic Reviews**

- Conducted every 2–3 years focusing on progress towards outcomes and impact; policy coherence with evolving legal, institutional, and technological frameworks; and alignment with national priorities (e.g., Vision 2030, MTP cycles).
- Serve as a self-assessment and adaptive learning mechanism. This identifies implementation gaps, opportunities for reform, and emerging threats and trends.

**b) Ad Hoc Reviews**

This is undertaken in response to significant changes in legal and regulatory frameworks (e.g., new legislation), institutional arrangements, and governance risks (e.g., major corruption scandals, technological disruptions). These reviews enable timely policy adjustment and responsiveness.

All reviews shall emphasize stakeholder engagement, including state and non-state actors, and shall feed directly into policy refinement, institutional strengthening, and enforcement priorities.

### 6.4 Evaluation

Evaluation shall constitute an independent, objective, and outcome-oriented assessment of the effectiveness, efficiency, relevance, and impact of policy implementation. The primary purpose of evaluation is to determine: The extent to which policy objectives are being achieved; the effectiveness of interventions in reducing corruption risks and strengthening integrity systems; the contribution of the policy to institutional performance, public trust, and governance outcomes.



Key features of the evaluation framework include:

a) Outcome and impact focus: Assessment of behavioral change, institutional accountability, and systemic integrity improvements; and measurement of both quantitative and qualitative outcomes, including perception and experience-based indicators.
b) Independence and credibility: Evaluations shall be conducted by independent external evaluators to ensure objectivity and credibility.
c) Periodic evaluation cycle: Comprehensive evaluations shall be undertaken at a minimum of five-year intervals. Where necessary, mid-term evaluations may be conducted to inform course correction.
d) Integration with National Planning Frameworks: Evaluation cycles shall be synchronized with Vision 2030 Medium-Term Plans (MTPs) to ensure findings inform: Policy revision; strategic planning; and resource allocation.
e) Use of advanced analytical methods: Incorporation of data analytics, digital evidence, and mixed-method approaches; and integration of administrative data, survey data, and independent studies.
f) Utilization of evaluation findings: Evaluation results shall inform: Policy review and reform; institutional accountability; strengthening of enforcement and prevention strategies; and public reporting and transparency.

## 6.5 Logical Matrix (Revised)

This Policy shall be operationalized through a comprehensive Logical Framework Matrix (Log frame), as provided in Appendix 1. It serves as a central instrument for planning, monitoring, reporting, and evaluation.

The Logical Matrix: Translates the Policy into a structured results chain. It links objectives, impact, outcomes, outputs, and activities.

- It aligns each level of intervention with performance indicators (quantitative and qualitative), means of verification (data sources, reports, systems) and assumptions and risks, including emerging governance and technological risks.
- Integrates cross-cutting dimensions, including digital governance and data systems, institutional coordination, public participation and transparency, and emerging corruption risks (e.g., cybercrime, virtual assets, AI systems).
- Incorporates budgetary and resource allocation elements, linking activities to financing frameworks under the MTEF.

The Logical Matrix enhances clarity and coherence of policy interventions, accountability and traceability of results, consistency across sectors and institutions, and evidence-based monitoring and evaluation. It provides a unified framework through which all stakeholders can track progress, assess performance, and ensure that policy implementation remains results-oriented, adaptive, and responsive to a rapidly evolving governance environment.

The vertical logic (or intervention logic) identifies what the project intends to do. It clarifies the causal relationships and specifies the important assumptions and risks. The horizontal logic relates to the measurement of the effects of, and resources consumed in policy implementation through the specification of key indicators and the means of verification.

**POLICY IMPLEMENTATION MATRIX**

| Thematic Area | Objectives | Interventions | Output | Performance Indicators | Expected Outcomes | Timeframe | Responsible Institutions |
|---|---|---|---|---|---|---|---|
| **Institutional Framework for Fighting Corruption** | | | | | | | |
| **Institutional measures** | Strengthen coordination, collaboration, and information-sharing among state and non-state actors involved in anti-corruption and integrity promotion at national and county levels. | Establish and strengthen coordinated multi-stakeholder anti-corruption and integrity frameworks at national and county levels | Coordinated multi-stakeholder anti-corruption and integrity frameworks established and operationalized at national and county levels. | Number of coordinated multi-stakeholder anti-corruption and integrity frameworks established and operational at national and county levels. | Enhanced collaboration, cooperation, coordination, and information-sharing among state and non-state actors in the prevention and fight against corruption at national and county levels | 1 Year | **Lead Institution**<br>OAG&SDOJ<br>**Supporting Institutions**<br>EACC<br>-ODPP<br>-NPS<br>-CAJ<br>-KLIF<br>-COG<br>-NASCC<br>-CSOs<br>-Professional Bodies<br>-Media |
| | Address institutional, social, political, and cultural factors that sustain corruption and unethical conduct, including patronage, nepotism, ethnicity, and political interference. | Develop and implement national ethics, civic education, and behavioral change programmes to address patronage, nepotism, ethnicity, political interference, and other social and cultural practices that sustain | National ethics and behavioral change programmes established and implemented. | Number of ethics, civic education, and behavioral change programmes implemented at national and county levels. | Reduced tolerance for corruption and unethical practices, and strengthened culture of integrity, merit, accountability, and ethical citizenship. | 1 Year | **Lead Institution**<br>-Executive Office of the President (Directorate of National Cohesion and Values<br>**Supporting Institutions**<br>-EACC<br>-NACCSC<br>-NCIC<br>-PSC |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | corruption and unethical conduct | | | | | |
| | | | | | | | |
| **Thematic Area** | **Objectives** | **Interventions** | **Output** | **Performance Indicators** | **Expected Outcomes** | **Timeframe** | **Responsible Institutions** |
| | Improve public service delivery systems and governance processes to reduce opportunities for corruption, and abuse of office. | Digitize, simplify, and standardize public service delivery systems and governance processes to minimize human discretion, delays, and opportunities for corruption, and abuse of office. | Digitalization of public service delivery and governance systems operationalized | Number of public services and governance processes digitalized. | Improved efficiency, transparency, accountability, and integrity in public service delivery and governance processes. | Continuous | **Lead Institutions**<br>-Ministry of Information, communication and Digital Economy<br>-Ministry of Interior and National Administration<br>**Supporting Institutions**<br>-All MDAs |
| | Build institutional and societal capacity for fighting corruption. | Strengthen institutional and societal capacity through training, technical support, resource allocation, and public education. | Enhanced institutional and societal anti-corruption capacity established. | Number of institutions and stakeholders trained and supported on anti-corruption, oversight, investigation, and civic engagement initiatives. | Improved effectiveness of corruption prevention, investigation, enforcement, public oversight, and citizen participation in anti-corruption efforts. | Continuous | **Lead Institution**<br>-EACC<br>**Supporting Institutions**<br>-National Treasury<br>-Parliament<br>-NACCSC |
| | Integrate anti-corruption and integrity measures into governance systems, digital platforms, emerging technologies, and | Interoperable digital systems | Real time information exchange and detection | Number of governance systems and digital platforms with integrated anti-corruption, integrity, and data protection safeguards. | Number of agencies linked to shared platforms | Continuous | **Lead Institution**<br>-Ministry of Information, communication and Digital Economy<br>-Ministry of Interior and National Administration<br>**Supporting Institutions**<br>-All MDAs |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | data governance frameworks. | | | | | | |
| **Thematic Area** | **Objectives** | **Interventions** | **Output** | **Performance Indicators** | **Expected Outcomes** | **Timeframe** | **Responsible Institutions** |
| **Strategies for Fighting Corruption and Unethical Conduct** | | | | | | | |
| **2.1 Prevention of Corruption** | Institutionalize corruption prevention across all Ministries, Departments, Agencies and Counties (MDACs). | Establish and operationalize mandatory corruption prevention and integrity frameworks in all MDACs | Functional corruption prevention frameworks established across MDACs | % of MDACs with approved and operational corruption prevention frameworks | Institutionalized and coordinated corruption prevention systems across government | 5 Years | **Lead Institution**<br>-SDOJ<br>-EACC<br>**Supporting Institutions**<br>-PSC<br>-All MDAs<br>-CoG |
| | Strengthen compliance with corruption prevention recommendations. | Enforce implementation of recommendations arising from corruption risk assessments, audits, and oversight reports, with sanctions for non-compliance | Compliance enforcement mechanism operational | % of corruption prevention recommendations implemented within prescribed timelines | Improved accountability and compliance with corruption prevention measures | 3 years | **Lead Institution**<br>EACC<br>**Supporting Institutions**<br>SDOJ<br>MDACs |
| | Enhance capacity for corruption risk management in both public and private sectors. | Conduct structured capacity-building programmes on corruption risk identification, assessment, and mitigation | Trained institutions with strengthened corruption risk management capacity | Number of public and private sector institutions trained on corruption risk management | Enhanced institutional capacity to identify and mitigate corruption risks | Continuous | EACC |
| | Simplify systems and reduce | Review and automate high-risk service | Simplified and digitized service | Number of service delivery processes reviewed, | Reduced corruption opportunities | Continuous | **Lead Institution** |

| Thematic Area | Objectives | Interventions | Output | Performance Indicators | Expected Outcomes | Timeframe | Responsible Institutions |
|---|---|---|---|---|---|---|---|
| | discretion in service delivery. | delivery processes to minimize human discretion and procedural complexity | delivery processes in high-risk sectors | simplified, or automated | and improved efficiency in public service delivery | | -Ministry of Information, communication and Digital Economy<br>-Ministry of Interior and National Administration<br>**Supporting Institutions**<br>-All MDACs |
| | Promote private sector and non-state actor participation in prevention of corruption | Establish purposive multi-stakeholder anti-corruption partnerships | Functional public-private-civil society anti-corruption collaboration platforms | Number of active anti-corruption partnerships or collaborative initiatives established | Increased collective action and stakeholder participation in corruption prevention | Continuous | **Lead Institution**<br>-KLIF<br>**Supporting Institutions**<br>-OAG&SDOJ<br>-EACC<br>-KLIF Members |
| | | | | | | | |
| **2.2 Public Education, Training and Awareness Creation** | Enhance the capacity, and sustained participation of citizens, communities, public officers, learners, civil society and the private sector in preventing and fighting corruption and unethical conduct. | Strengthen partnerships with civil society, faith-based organizations, community groups, media, professional bodies, academia, youth and women's organizations, and the private sector | Establish and operationalize anti-corruption civic engagement and participation mechanisms in all 47 counties, with structured participation of citizens, CSOs, public institutions, learners and private sector actors. | Number of counties with operational anti-corruption civic engagement mechanisms. | Increased citizen and stakeholder participation in corruption prevention, reporting and accountability processes. | 2 Years | **Lead Institution**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>MDACs<br>CSOs<br>Media |
| | | Develop targeted public education interventions for high-risk sectors and audiences. | Public education strategy developed<br><br>Sector-specific awareness materials | Number of education campaigns implemented. | Increased awareness and understanding of risks and preventive | Continuous | **Lead Institution**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>MDACs |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | (brochures, posters, radio/TV spots, social media content, guidelines) produced<br><br>Awareness campaigns conducted in identified high-risk sectors<br><br>Community outreach sessions, workshops, and sensitization meetings held | Number of IEC (Information, Education, and Communication) materials developed and distributed.<br><br>Percentage of target audience demonstrating improved knowledge in pre-/post-assessments.<br><br>Number of partnerships established to support awareness activities | measures among high-risk audiences<br><br>Strengthened stakeholder engagement in risk prevention and mitigation efforts | | CSOs<br>Media |
| | | Strengthen and publicize safe, accessible and user-friendly reporting, complaints and referral mechanisms. | Reporting, complaints, and referral mechanisms reviewed and strengthened<br><br>Standard operating procedures (SOPs) developed or updated<br><br>Reporting channels (hotlines, online platforms, help desks, suggestion boxes, mobile applications) established or improved. | Number of reporting and referral mechanisms established or improved<br><br>Number of awareness campaigns conducted<br><br>Number of people reached with information on reporting mechanisms<br><br>Number of complaints/reports received and | Increased public awareness of available reporting and referral mechanisms<br><br>Improved accessibility and utilization of reporting channels<br><br>Increased reporting of incidents due to greater trust and accessibility<br><br>Enhanced confidence in | Continuous | **Lead Institution**<br>EACC<br>CAJ<br>NACCSC<br>**Supporting Institution**<br>MDACs<br>CSOs<br>Media |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | appropriately referred | reporting systems and greater accountability | | |
| | | Promote public confidence in reporting mechanisms. | Public awareness campaigns on available reporting mechanisms conducted<br><br>Information, education, and communication (IEC) materials developed and distributed.<br><br>Community outreach forums, dialogues, and sensitization meetings held.<br><br>Feedback mechanisms established to inform complainants on the status of their reports<br><br>Citizen satisfaction surveys conducted | Number of awareness campaigns conducted<br><br>Percentage of target population aware of reporting channels; number of communication platforms utilized<br><br>Number of officers/focal persons trained; percentage demonstrating improved knowledge<br><br>Percentage of reports receiving feedback within the stipulated timeframe; number of feedback mechanisms operational<br><br>Number of surveys conducted; percentage of respondents expressing | Increased public awareness of available reporting mechanisms<br><br>Greater accessibility and visibility of reporting mechanisms<br><br>Improved quality of interaction between the public and reporting institutions<br><br>Enhanced public confidence through increased transparency and accountability.<br><br>Improved public perception and confidence in | Continuous | **Lead Institution**<br>EACC<br>CAJ<br>NACCSC<br>**Supporting Institution**<br>MDACs<br>CSOs<br>Media |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | confidence in reporting mechanisms | reporting systems | | |
| | | | | | | | |
| | | Provide adequate financial, human and technological resources. | Adequate budget allocated to support implementation of reporting mechanisms and related services.<br><br>Additional staff recruited, deployed, or retained to manage reporting systems<br><br>Staff trained on reporting systems, case management, and use of technology.<br><br>ICT infrastructure upgraded, including hardware, software, and internet connectivity<br><br>Digital reporting platforms (e.g., web portals, mobile applications, hotlines) established or enhanced<br><br>Resource mobilization and partnership initiatives implemented | Percentage increase in budget allocation; proportion of planned budget disbursed<br><br>Number of staff recruited/deployed staff-to-workload ratio<br><br>Number of staff trained; percentage demonstrating improved competency<br><br>Number of ICT systems upgraded; percentage of operational ICT equipment.<br><br>Number of digital platforms operational; system uptime (%); number | Sustainable financing for reporting mechanisms and related operations.<br><br>Improved institutional capacity to manage reports effectively.<br><br>Enhanced staff skills and service delivery<br><br>Improved efficiency and reliability of reporting systems.<br><br>Increased accessibility and efficiency of | Continuous | **Lead Institution**<br>EACC<br>CAJ<br>NACCSC<br>**Supporting Institution**<br>MDACs<br>CSOs<br>Media |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | of users accessing platforms<br><br>Number of partnerships established; mount of additional resources mobilized. | reporting channels.<br><br>Increased resource sustainability and institutional resilience | | |
| | Mainstream ethics, integrity, anti-corruption and good governance content in formal, non-formal and public sector training systems at all levels | Mainstream ethics, integrity, anti-corruption and national values in curricula and professional development programmes in all public education and public service training institutions. | Integrate approved ethics, integrity and anti-corruption content into curricula, training manuals curricula. | % of public education and training institutions implementing approved ethics and anti-corruption curricula. | Improved knowledge, values and competencies on ethics, integrity and anti-corruption across learning and public service institutions. | Continuous | **Lead Institution**<br>EACC<br>CAJ<br>NACCSC<br>**Supporting Institution**<br>MDACs |
| | Integrate ethics, integrity, conflict-of-interest awareness, data responsibility and anti-corruption content into induction, in-service training and Continuing Professional Development (CPD). | Develop and institutionalize standardized training modules on ethics, integrity, conflict of interest, data responsibility, and anti-corruption for induction programmes | Standardized induction training modules developed and approved. | Number of training modules developed and approved; percentage of new staff receiving induction. | All new employees acquire foundational knowledge of ethics, integrity, conflict- of-interest management, data responsibility, and anti-corruption obligations. | Continuous | **Lead Institution**<br>EACC<br>CAJ<br>NACCSC<br>**Supporting Institution**<br>MDACs |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | Integrate ethics and integrity topics into regular in-service training programmes | Ethics and integrity sessions incorporated into annual in-service training plans. | Number of in-service training sessions conducted; percentage of staff trained annually. | Improved knowledge and application of ethical standards among existing staff. | | |
| | | Embed ethics, integrity, conflict-of-interest, data responsibility, and anti-corruption courses into CPD programmes. | CPD curriculum revised to include ethics and integrity content | Number/percentage of CPD programmes incorporating ethics content; number of staff completing CPD courses. | Continuous reinforcement of ethical behavior and professional accountability | | |
| | | Conduct periodic knowledge assessments and evaluate training | Training evaluation reports produced. | Percentage of trainees demonstrating improved knowledge; participant satisfaction scores. | Improved understanding and application of ethical principles in the workplace. | | |
| | | | | | | | |

| **Thematic Area** | **Objectives** | **Interventions** | **Output** | **Performance Indicators** | **Expected Outcomes** | **Timeframe** | **Responsible Institutions** |
|---|---|---|---|---|---|---|---|
| | Establish a coordinated, inclusive and evidence-based framework for public education, training and awareness creation at national and county levels. | Establish and implement a coordinated national framework for anti-corruption public education, training and awareness creation. | Develop and operationalize a national anti-corruption public education and awareness framework adopted by national government and all 47 counties. | National framework developed and number of counties implementing the framework. | Harmonized, coordinated and evidence-driven anti-corruption public education and awareness programming. | 2030 | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>MDACs<br>CSOs |
| | | Strengthen partnerships with stakeholders in education and outreach. | Stakeholder engagement strategy developed and implemented | Number of stakeholder engagement plans developed and implemented | Structured and coordinated stakeholder engagement | 2028 | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | | mechanisms established | | |
| | | | Partnerships established with government agencies, academia, civil society, development partners, and private sector | Number of Memoranda of Understanding (MoUs) or partnership agreements signed | Increased collaboration and resource mobilization for education and outreach initiatives | Continuous | |
| | | | Regular stakeholder consultation forums and meetings conducted | Number of stakeholder meetings, forums, or dialogues held annually | Stronger stakeholder participation in policy implementation and decision-making | Continuous | |
| | | | Partnership monitoring and evaluation reports produced | Percentage of partnership activities implemented according to annual work plans | Improved accountability and effectiveness of stakeholder partnerships | Quarterly and annually | |
| | | Support counties to establish local integrity forums and public education platforms. | County integrity forum framework/guidelines developed | Framework and operational guidelines developed and approved | Standardized approach for establishing county integrity forums | 2030 | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>COG<br>CSOs |
| | | | County integrity forums established | Number of counties with functional integrity forums | Increased county-level coordination on integrity and anti-corruption initiatives | 2030 | |
| | | | Public awareness campaigns implemented | Number of public education campaigns conducted | Increased public awareness of integrity, ethics, and anti-corruption issues | Annually | |
| | | | | | | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | Monitoring and evaluation reports produced | Number of monitoring and evaluation reports completed | Improved accountability and continuous improvement of county integrity forums | Quarterly monitoring; annual reporting; | |
| | | Ensure public education strategies are informed by research, survey evidence, behavioral insights and regular M&E. | Research, surveys, and behavioral insight studies conducted to inform public education strategies. | - Number of research studies, surveys, or behavioral insight assessments completed.<br>- Baseline and follow-up surveys conducted according to plan | Public education strategies are evidence-based and responsive to identified knowledge, attitudes, and behavioral gaps. | Baseline in Year 2; follow-up studies in Years 3 and 5; targeted research conducted annually. | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>COG<br>MDACs<br>KLIF<br>CSOs |
| | | | Public education strategies, campaigns, and materials reviewed and updated based on research findings and M&E evidence. | - Percentage of public education strategies reviewed using evidence.<br>- Number of strategies or campaigns revised based on research and M&E findings | Public education interventions are more relevant, targeted, and effective in addressing priority issues. | Annual Reviews | |
| | | | Monitoring, evaluation, and learning (MERL) system established and operational for public education programmes. | - MERL framework developed and implemented.<br>- Number of monitoring reports and evaluation reports produced.<br>- Percentage of recommendations implemented | Continuous learning, adaptive management, and improved performance of public education programmes. | MERL framework established in Year 1; quarterly monitoring, annual reviews, | |
| | | Provide adequate resources. | Financial resources mobilized and allocated for implementation of | - Percentage of annual budget allocated to public education activities.<br>- Amount of funding | Sustainable financing enables effective implementation of public | Annual budgeting and continuous resource mobilization | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>All MDACs |

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| | | | public education programmes. | mobilized from government and development partners.<br>- Percentage of planned activities funded. | education programmes. | | |
| | | | Adequate human and technical capacity deployed to support implementation | - Number of staff recruited, designated, or trained.<br>- Percentage of approved positions filled.<br>- Staff-to-programme workload ratio. | Improved institutional capacity to implement and sustain public education initiatives. | Capacity assessment in Year 1; recruitment/deployment in Years 1–2; continuous capacity strengthening | |
| | | | Essential infrastructure, equipment, and operational resources provided and maintained | - Percentage of required equipment and ICT tools procured.<br>- Availability of operational facilities and logistics.<br>- Percentage of planned procurements completed on time. | Public education programmes are delivered efficiently with adequate operational support. | Needs assessment in Year 1; procurement in Years 1–2; continuous maintenance and replacement | |
| | Leverage digital platforms, public communication systems and emerging technologies to strengthen civic education, public engagement, safe reporting and feedback on corruption issues. | Expand the use of digital platforms, mass media, social media, mobile technologies and community media. | Establish integrated digital anti-corruption communication, reporting and public feedback platforms accessible nationally and in all counties. | Number of operational digital reporting and civic engagement platforms established and utilized. | Increased public access to safe, timely and technology-enabled corruption reporting, civic engagement and feedback mechanisms. | Continuous | **Lead Institutions**<br>EACC<br>NACCSC<br>Ministry of ICT<br>**Supporting Institution**<br>All MDACs |

| Thematic Area | Objectives | Interventions | Output | Performance Indicators | Expected Outcomes | Timeframe | Responsible Institutions |
|---|---|---|---|---|---|---|---|
| | | Strengthen safe, accessible and digital reporting mechanisms. | Secure, user-friendly digital reporting platforms established and enhanced (e.g., web portals, mobile applications, toll-free channels). | - Number of digital reporting platforms established or upgraded.<br>- Percentage of platforms meeting accessibility and security standards.<br>- System uptime and availability. | Citizens have access to safe, secure, and accessible channels for reporting corruption and providing feedback | Platform assessment and design in Year 1; development/upgrades in Years 1–2; continuous maintenance and enhancements | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>All MDACs |
| | | | Public awareness and user support initiatives implemented to promote the use of reporting mechanisms | - Number of awareness campaigns conducted.<br>- Number of citizens reached through digital and traditional communication channels.<br>- Number of users accessing or registering on reporting platforms | Increased public awareness, confidence, and utilization of safe reporting mechanisms. | Awareness campaign launched in Year 1 and continuous annual implementation | |
| | | | Feedback, case management, and monitoring systems operationalized to support timely response to reports. | - Percentage of reports acknowledged within the prescribed service standard.<br>- Average response time to reports.<br>- Number of monitoring and performance reports produced.<br>- Percentage of users | Improved responsiveness, transparency, and public trust in corruption reporting mechanisms. | System operational by Year 2; quarterly monitoring and annual performance reviews | |

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| | | | | satisfied with the reporting process | | | |
| | | Promote public confidence in reporting mechanisms. | Public confidence-building initiatives on corruption reporting mechanisms implemented. | - Number of public confidence and awareness campaigns conducted.<br>- Percentage increase in public awareness of available reporting mechanisms.<br>- Percentage of citizens expressing confidence in the safety and effectiveness of reporting mechanisms (survey-based).<br>- Percentage increase in reports submitted through official reporting channels. | Increased public trust and confidence in reporting mechanisms, leading to greater willingness to report corruption and provide feedback. | Annual Awareness campaigns | **Lead Institutions**<br>EACC<br>**Supporting Institution**<br>CAJ<br>All MDACs<br>Office of Data Protection Commissioner<br>CSOs<br>Media |
| | | Institutionalize regular public communication on anti-corruption progress and outcomes. | A structured and sustained public anti-corruption communication and reporting system established and operational. | - Number of public anti-corruption progress reports published (quarterly/annual).<br>- Frequency of press briefings, public updates, or dashboards released.<br>- Percentage of planned communication outputs delivered on schedule.<br>- Level of public | Improved transparency, accountability, and public trust in anti-corruption efforts through consistent and accessible communication of progress and results. | Framework developed in Year 1. | **Lead Institutions**<br>EACC<br>**Supporting Institution**<br>All MDACs<br>Office of Government Spokesman<br>Media |

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| | | | | awareness of anti-corruption progress (survey-based).<br>- Media uptake and coverage of published reports. | | | |
| | Strengthen public understanding of emerging corruption risks, including conflicts of interest, misuse of data, cyber-enabled corruption, digital financial abuse, misinformation, and manipulation of public decision-making systems. | Integrate ethics, conflict-of-interest awareness, and data responsibility into training. | Implement targeted public awareness programmes on emerging corruption risks reaching at least 60% of identified high-risk stakeholder groups. | % of targeted stakeholder groups reached through awareness programmes on emerging corruption risks. | Improved public awareness and resilience against emerging and technology-enabled corruption risks. | Continuous | EACC |
| | | Strengthen public understanding of emerging corruption risks | Public education and risk awareness system on emerging corruption risks developed and implemented | - Number of risk-focused public education campaigns conducted annually.<br>- Number of analytical briefs/alerts on emerging corruption risks produced and disseminated.<br>- Percentage of targeted audiences reached (citizens, public officers, private sector).<br>- Increase in public awareness of emerging corruption risks (survey-based). | Improved public awareness and understanding of emerging corruption risks, leading to more informed civic engagement, prevention-oriented behavior, and early reporting of suspicious activities | Risk assessment and messaging framework developed in Year 1 | **Lead Institutions**<br>EACC<br>**Supporting Institution**<br>Ministry of Information, Communications and the Digital Economy<br>All MDACs<br>Office of Government Spokesman<br>Media<br>Research Institutions |

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| | | | | - Number of stakeholder engagements on emerging risk trends held. | | | |
| | | Expand use of digital and public communication platforms for awareness. | Multi-platform digital and public communication system for awareness on anti-corruption and civic education expanded and operational. | - Number of digital platforms (websites, social media channels, apps) actively used for awareness campaigns.<br>- Number of awareness campaigns disseminated through digital and public media channels.<br>- Audience reach and engagement metrics (views, clicks, shares, impressions).<br>- Percentage increase in public awareness of anti-corruption and civic issues (survey-based).<br>- Frequency of content updates across platforms. | Increased reach, accessibility, and effectiveness of public awareness efforts on anti-corruption and civic education through expanded use of digital and traditional communication platforms. | Platform enhancement and integration in Year 1; scale-up and optimization in Years 2–3; Annual performance reviews continuous sustained implementation and innovation | **Lead Institutions**<br>EACC<br>**Supporting Institution**<br>Ministry of Information, Communications and the Digital Economy<br>All MDACs<br>Government Advertising Agency<br>Media<br>Digital communication partners. |
| **Thematic Area** | **Objectives** | **Interventions** | **Output** | **Performance Indicators** | **Expected Outcomes** | **Timeframe** | **Responsible Institutions** |
| | Strengthen public oversight, social accountability and citizen monitoring of publicly funded | Strengthen civic oversight, public participation, social accountability | Institutionalize citizen oversight and social accountability mechanisms for public projects and | Number of counties and public institutions with functional citizen oversight and social | Enhanced public accountability, transparency and citizen oversight in the | Continuous | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>All MDACs |

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| | projects, service delivery and use of public resources. | and community monitoring. | service delivery in all 47 counties and key national public institutions. | accountability mechanisms. | management of public resources and service delivery. | | CSOs<br>Media |
| | | Support counties to establish citizen accountability mechanisms. | Functional county-level citizen accountability mechanisms established and operational. | - Number of counties with established citizen accountability mechanisms (e.g., public participation forums, social accountability platforms, citizen report cards).<br>- Number of citizen engagement sessions held annually.<br>- Percentage of county departments using citizen feedback in decision-making.<br>- Number of citizen reports/feedback submissions received and addressed.<br>- Citizen satisfaction level with county responsiveness (survey-based). | Strengthened citizen participation in governance, improved accountability at county level, and enhanced responsiveness of county governments to public feedback and concerns. | Framework and guidelines developed in Year 1; phased establishment in Years 1–3; full operationalization and scaling in Years 3–5; | **Lead Institutions**<br>COG – Through CECMs<br>**Supporting Institution**<br>EACC<br>CAJ<br>CSOs |
| | | Develop targeted interventions for community project committees and citizens exposed to petty corruption. | Targeted anti-petty corruption intervention programmes for community project committees and vulnerable citizens developed and implemented. | - Number of targeted community-based anti-petty corruption programmes developed.<br>- Number of community project committees trained | Reduced incidence of petty corruption at community level and improved integrity, transparency, and | Needs assessment and targeting framework in Year 1; pilot interventions in selected communities in Years 1–2; scale-up in Years 2–4; consolidation and sustainability measures | **Lead Institutions**<br>EACC<br>NACCSC<br>**Supporting Institution**<br>All MDACs<br>Development partners<br>CSOs<br>Media |

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| | | | | or engaged.<br>- Number of citizens reached through targeted interventions.<br>- Reduction in reported cases of petty corruption in targeted areas (where measurable).<br>- Percentage of community projects applying transparency and accountability tools. | accountability in community-managed projects. | in Years 4–5; continuous monitoring and annual reviews | |
| | | Ensure evidence-informed public education and monitoring. | Integrated evidence-informed public education and monitoring framework developed and operationalized | - Existence of an approved evidence-informed public education and M&E framework.<br>- Percentage of public education programmes designed using research, surveys, or behavioral insights.<br>- Number of monitoring reports and learning briefs produced annually.<br>- Percentage of programme recommendations implemented.<br>- Frequency of data-driven reviews of public education interventions. | Improved effectiveness, relevance, and impact of public education programmes through continuous use of evidence, monitoring, and learning for decision-making and programme improvement. | Framework developed in Year 1; full implementation and integration in Years 1–2; continuous monitoring and learning in Years 2–5; annual reviews | **Lead Institutions**<br>EACC<br>**Supporting Institution**<br>Ministry of Information, Communications and the Digital Economy<br>Kenya National Bureau of Statistics<br>Research institutions, Development partners<br>CSOs |
| **2.3 Citizen Engagement** | Strengthen citizen participation in | Strengthen civic education on | civic education materials developed | number of citizens reached; percentage | Increased citizen participation in | Continuous | **Lead Institutions**<br>-EACC, |

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| **and Social Accountability in Anti-Corruption** | preventing, detecting, reporting and resisting corruption and unethical conduct. | ethics, integrity and reporting | | increase in corruption reports from citizens; | anti-corruption efforts; reduced tolerance of unethical conduct | | -NACCSC<br>**Supporting Institutions**<br>-Ministry of Interior,<br>-State Department for Public Service,<br>-CSOs and CBOs |
| | | Institutionalize citizen feedback forums in public institutions | Citizen engagement framework operational | number of public institutions holding citizen feedback forums | improved detection and reporting of corruption; | Continuous | |
| | Enhance legal, institutional and administrative protection for whistle-blowers, witnesses and corruption reporters. | Enact and operationalize comprehensive whistle-blower protection legislation; | Whistle-blower protection framework enacted and operational<br><br>Implementation regulations, guidelines, and institutional frameworks developed<br><br>Functional whistle-blower protection and reporting support system established | Whistle-blower protection law enacted;<br>- Number of implementing regulations and guidelines developed and gazetted.<br>- Percentage of reported cases handled under protection protocols.<br>- Number of whistle-blowers/witnesses receiving protection support (legal, physical, or administrative). | - Strengthened legal and institutional safeguards for whistle-blowers, witnesses, and corruption reporters.<br>- Increased willingness of citizens and public officials to report corruption without fear of retaliation.<br>- Enhanced public trust in accountability and anti-corruption institutions. | 2-3 Years | **Lead Institutions**<br>Parliament,<br>-OAG&DOJ<br>**Supporting Institutions**<br>EACC, ODPP, Witness Protection Agency, Judiciary, National Police Service, KNCHR, Civil Society |
| | | strengthen witness protection mechanisms; | protection protocols developed | number of reports handled confidentially; number of whistle-blowers/witnesses protected; number of retaliation | Enhanced safety, security, and confidentiality for witnesses involved in corruption and | 2-3 Years | **Lead Institutions**<br>-WPA<br>- CAJ<br>**Supporting Institutions**<br>EACC,<br>ODPP, |

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| | | | | complaints investigated | related criminal cases<br><br>Reduced incidence of witness intimidation, interference, or withdrawal from legal processes. | | |
| | | establish confidential reporting and referral protocols; | referral mechanism between EACC, ODPP and Witness Protection Agency established | - Existence of approved confidential reporting and referral protocols.<br>- Percentage of institutions implementing standardized confidentiality procedures... | - Strengthened protection of identity and safety of whistle-blowers, witnesses, and corruption reporters.<br>- Improved coordination and efficiency in handling reports through clear referral pathways | - **Year 1:** Develop and validate confidential reporting and referral protocols; establish inter-agency coordination framework.<br>- **Years 1–2:** Roll out protocols across key institutions; train personnel; establish secure reporting channels and referral pathways.<br>- **Years 2–5:** Full operationalization, continuous compliance monitoring, periodic system audits, and refinement of protocols based on lessons learned. | **Lead Institutions**<br>- CAJ<br>- WPA<br>**Supporting Institutions**<br>EACC,<br>NPS<br>Judiciary |
| | Improve public access to anti-corruption information, reporting channels and feedback mechanisms. | Strengthen EACC online, telephone, walk-in and anonymous reporting systems; | Accessible multi-channel reporting system strengthened | Number of functional reporting channels; | Improved access to reporting mechanisms; | 2 Years | EACC, Huduma Kenya, ODPC, ICT Authority, County Governments, Commission on Administrative Justice, Media Council of Kenya |

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| | | create integrated public complaints and feedback dashboards; | public feedback dashboard operational | average response time to reports; | increased transparency in complaint handling; | | |
| | | translate reporting materials into accessible local languages and formats | - Reporting materials (guides, forms, posters, digital content) translated into key local languages and simplified formats (including visual, audio, and disability-friendly formats such as Braille or easy-read versions). | percentage of complainants receiving feedback; number of reports submitted through digital and non-digital channels | improved public confidence in anti-corruption institutions | 2-3 years | **Lead Institutions**<br>- EACC<br>- CAJ<br><br>**Supporting Institutions**<br>Ministry of Information, Communications and the Digital Economy<br>Kenya National Commission on Human Rights<br>County Governments<br>Civil society organizations and media partners |
| | Promote social accountability through civic oversight, community monitoring, media engagement and civil society participation. | Institutionalize social audits and community monitoring of public projects; | Social accountability framework developed; | Number of social audits conducted; | Improved public oversight of government projects; | Continuous | -National Treasury,<br>-PPRA, EACC, Office of the Auditor-General, Controller of Budget, County Governments, Media Council, CSOs, KEPSA |
| | | strengthen CSO participation in anti-corruption monitoring; | media and CSO engagement platforms established | percentage of procurement/project information publicly disclosed | stronger collaboration between state and non-state actors | Continuous | EACC, NACCSC, KLIF, CSOs, Media |
| | | publish project, procurement and budget information | public project monitoring tools operational; | number of public projects monitored; | reduced misuse of public resources; | Continuous | PPRA<br>All Procuring Entities |
| | Build public trust in anti-corruption institutions through | Publish regular anti-corruption performance reports; | Anti-corruption performance reporting system operational; | Number of performance reports published; | Increased public trust; | Continuous | EACC, ODPP, Judiciary, OAG&DOJ, Commission on Administrative Justice, |

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| | responsiveness, transparency and accountability. | | | | | | Parliament, County Governments |
| | | Provide feedback on complaints and investigations within clear timelines; | complaint feedback standards adopted | percentage of complaints acknowledged within set timelines; | improved institutional responsiveness | Continuous | EACC, CAJ, NPS, DCI |
| | | establish public accountability forums; strengthen institutional service charters | Public accountability forums held | number of public accountability forums held | greater transparency in anti-corruption enforcement and prevention | Continuous | EACC, CAJ, CSOs |
| | Ensure inclusive participation of women, youth, persons with disabilities, marginalized communities and other vulnerable groups in anti-corruption initiatives. | Develop targeted outreach programmes for women, youth, PWDs and marginalized communities; ensure reporting platforms are disability-friendly; partner with youth, women and disability organizations; collect disaggregated participation data | Inclusive anti-corruption participation framework developed; targeted outreach programmes implemented; accessible reporting tools established | Number of women, youth, PWDs and marginalized groups reached; percentage of reporting platforms meeting accessibility standards; availability of sex, age and disability-disaggregated data | More inclusive citizen participation; reduced barriers to reporting; stronger representation of vulnerable groups in anti-corruption action | Continuous | EACC, NGEC, NCPWD, State Department for Gender, Youth Affairs, County Governments, Civil Society, Community-Based Organizations |
| **Thematic Area** | **Objectives** | **Interventions** | **Output** | **Performance Indicators** | **Expected Outcomes** | **Timeframe** | **Responsible Institutions** |
| **2.4 Criminalization, Law** | Strengthen the criminal law framework to comprehensively | -Review and strengthen anti-corruption laws. | Review, harmonize, and enact amendments to Kenya's anti- | Number of anti-corruption and related laws | A modernized, coherent and comprehensive criminal law | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- KLRC |

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| **Enforcement and Jurisdiction** | address both traditional and emerging forms of corruption and economic crime. | - Harmonize anti-corruption laws with related frameworks.<br>- Strengthen liability frameworks for legal persons and facilitators.<br>- Review procurement, public finance and audit laws.<br>- Strengthen AI and emerging technology governance frameworks.<br>- Define digital and technology-enabled corruption offences. | corruption legal framework to comprehensively address traditional, digital, transnational, and technology-enabled corruption offences. | reviewed, amended, or enacted | framework capable of addressing evolving corruption risks. | | - PPRA<br>- EACC<br>- ODPP<br>- NPS<br>- NCAJ<br>- The Ministry of Information, Communications, and the Digital Economy (MICDE) |
| | Enhance the effectiveness, professionalism, independence, and technical capability of anti-corruption law enforcement and investigative institutions. | Strengthen investigative, forensic, prosecutorial, judicial and regulatory capacity. | Equip all major anti-corruption enforcement agencies with specialized personnel, forensic tools, digital investigative capacity, and standardized performance frameworks for corruption investigations. | Number of anti-corruption enforcement institutions with operational specialized investigative and forensic capacity. | More professional, technically capable, efficient, and effective anti-corruption enforcement institutions. | Continuous | **Lead Institutions**<br>- ODPP<br>- Judiciary<br>- EACC<br>- NPS<br>- PSPMU |
| | | Strengthen detection, investigation and prosecution of | Specialized investigative units for corporate and complex corruption | Number of complex corruption cases involving legal persons successfully | Increased detection and successful prosecution of | 2-3years | EACC<br>ODPP<br>NPS<br>DCI |

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| | | complex corruption involving legal persons. | cases established or strengthened<br><br>Enhanced inter-agency coordination framework<br><br>Case management system for complex corruption cases established | investigated and prosecuted<br><br>Number of multi-agency joint investigations conducted annually | corporate and multi-layered corruption schemes<br><br>Improved inter-agency coordination and intelligence sharing | | FRC |
| | | Develop implementation guidelines, protocols and performance indicators. | Comprehensive operational guidelines for corruption investigation, prosecution, and case management<br><br>Standardized protocols for evidence collection, chain of custody, and digital/financial evidence handling | Existence and official adoption of national anti-corruption operational guidelines<br><br>Number of institutions adopting harmonized protocols | Improved consistency and professionalism in investigations and prosecutions<br><br>Reduced case dismissal due to procedural or evidentiary weaknesses | 2-3 years | - EACC |
| | Strengthen Kenya's jurisdictional reach over corruption and related economic crimes with domestic, cross-border, and digital dimensions. | Strengthen Kenya's jurisdiction over domestic and transnational corruption offences. | Establish and operationalize strengthened jurisdictional and international cooperation mechanisms for corruption cases involving cross-border, digital and extraterritorial dimensions. | Number of cross-border corruption investigations, MLA requests, or international cooperation actions successfully processed annually. | Enhanced jurisdictional effectiveness in addressing transnational and digitally enabled corruption and economic crimes. | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>- ODPP<br>- EACC |
| | | Strengthen international cooperation, | Updated and operational Mutual Legal Assistance | Number of MLA requests submitted, processed, and | Increased recovery of proceeds of | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>- ODPP |

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| | | MLA, extradition and cross-border asset tracing. | (MLA) and extradition request procedures/manuals<br><br>Agreements/MoUs with key jurisdictions for asset tracing and information exchange (including financial intelligence units) | successfully executed<br><br>Number of international cooperation agreements/MoUs signed and operationalized | corruption held outside Kenya<br><br>Enhanced credibility of Kenya's international anti-corruption cooperation framework | | - EACC<br>- FRC<br>- NPS |
| | | Harmonize related legal frameworks. | Comprehensive review report of Kenyan laws related to corruption, economic crime, extradition, cybercrime, and AML/CFT<br><br>Harmonized legislative amendments proposed to eliminate overlaps, contradictions, and gaps | Number of laws reviewed and harmonized<br><br>Number of legislative amendments enacted or adopted | Coherent and predictable legal framework for corruption and economic crime enforcement<br><br>Reduced legal loopholes exploited in cross-border and digital corruption cases | 2030 | Office of the Attorney General & Department of Justice<br><br>Parliament<br>Ethics and Anti-Corruption Commission<br>KLRC |
| | Strengthen the use of lawful specialized investigative techniques, financial intelligence, digital forensics, and data-based detection tools in corruption investigations. | Facilitate legal reforms for specialized investigative techniques. | Establish specialized digital forensic, financial intelligence, and advanced investigative capabilities in all lead anti-corruption investigative institutions. | Number of corruption investigations utilizing digital forensics, financial intelligence, or specialized investigative techniques. | Improved detection, evidence gathering, and successful investigation of complex corruption cases. | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>- NPS<br>- EACC<br>- FRC<br>- ARA<br>- KRA<br>- NIS |

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| | Strengthen coordination among investigative, prosecutorial, financial intelligence, regulatory, and judicial institutions involved in corruption enforcement. | Strengthen technical and forensic investigative capacity. | Operationalize an integrated inter-agency anti-corruption coordination and information-sharing framework linking all core enforcement institutions. | Number of institutions connected to interoperable anti-corruption coordination systems. | Reduced institutional fragmentation and improved coordination, intelligence sharing and case outcomes. | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- ODPP<br>- Judiciary<br>- NPS<br>- FRC |
| | | Promote lawful and accountable use of digital investigative tools. | National guidelines on lawful use of digital investigative tools (surveillance, e-evidence, forensic software) developed | Number of officers trained and certified in digital investigations | Improved quality and reliability of digital evidence in corruption cases | Continuous | Ethics and Anti-Corruption Commission (lead investigative agency)<br>Office of the Director of Public Prosecutions (ODPP)<br>National Police Service (DCI)<br>Judiciary (admissibility standards for digital evidence) |
| | | Develop implementation protocols and indicators. | Standard Operating Procedures (SOPs) for inter-agency corruption case coordination<br><br>Harmonized performance indicator framework for enforcement institutions | Number of institutions adopting standardized SOPs<br><br>Percentage of corruption cases tracked using harmonized indicators | Improved accountability and comparability of institutional performance<br><br>More efficient allocation of investigative and prosecutorial resources | 2-3years | Public Service Commission / performance management authority<br>Ethics and Anti-Corruption Commission<br>Office of the Director of Public Prosecutions<br>Judiciary (case tracking alignment)<br>Financial Reporting Centre<br>Kenya National Bureau of Statistics (data standardization support) |

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| | | Establish interoperable systems for information sharing and case coordination | Integrated digital case management system linking investigative, prosecutorial, FIU, and regulatory bodies | Number of institutions connected to interoperable system | Seamless and real-time information sharing among enforcement institutions | 2030 | Ministry of ICT and Digital Economy (lead technical coordination)<br>Ethics and Anti-Corruption Commission<br>Office of the Director of Public Prosecutions<br>National Police Service (DCI)<br>Financial Reporting Centre<br>Judiciary (case management integration)<br>Kenya Revenue Authority (financial intelligence input)<br>Central Bank of Kenya (AML/CFT interface support) |
| | | Develop implementation protocols, referral mechanisms and performance indicators. | National referral framework for corruption cases across institutions (investigation → prosecution → asset recovery)<br><br>Standardized case referral protocols with timelines and responsibilities | Average time taken for case referrals between institutions<br><br>Percentage of cases correctly referred on first submission | Faster and more structured movement of cases through enforcement chain<br><br>Reduced institutional turf conflicts and duplication | 2-3years | Office of the Attorney General<br>Office of the Director of Public Prosecutions (lead coordination role)<br>Ethics and Anti-Corruption Commission<br>Judiciary (case flow and docketing coordination)<br>Financial Reporting Centre<br>National Police Service<br>Public Service Commission / inter-agency coordination secretariat<br>Kenya Law Reform Commission (protocol standardization support) |
| | Protect reporting persons, whistleblowers, witnesses, experts, and victims | Fast-track whistleblower protection framework. | Enact and operationalize a comprehensive whistleblower and witness protection | Increased reporting confidence, stronger witness cooperation, and improved integrity of | Increased public trust and greater willingness of witnesses and whistleblowers | Continuous | **Lead Institutions**<br>- Parliament<br>- OAG&SDOJ |

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| | involved in corruption investigations and proceedings. | | framework for corruption reporting, investigation and prosecution. | corruption investigations and proceedings. | to report and cooperate with investigations. | | - State Department for Parliamentary Affairs.*<br>- Office of the Prime Cabinet Secretary<br>**Supporting Institutions**<br>- CAJ |
| | | Develop protection effectiveness indicators. | National framework of witness, whistleblower, and victim protection effectiveness indicators developed | Existence and official adoption of protection effectiveness indicator framework | Improved ability of the state to measure and manage witness and whistleblower protection effectiveness | 1-2years | **Lead Institutions**<br>Ethics and Anti-Corruption Commission (EACC) – witness/whistleblower protection coordination<br>Office of the Attorney General & Department of Justice – legal framework support<br>**Supporting Institutions**<br>Office of the Director of Public Prosecutions (ODPP)<br>National Police Service (Witness Protection Units / investigative support)<br>Judiciary (case management and witness handling processes)<br>Witness Protection Agency<br>Financial Reporting Centre (FRC) – intelligence support and risk indicators |
| | Ensure that criminalization and enforcement measures remain aligned with constitutional safeguards, human rights standards, due process, and | Ensure no immunity or privilege undermines lawful enforcement consistent with constitutional safeguards. | Institutionalize rights-based legal and operational safeguards governing anti-corruption investigations, prosecutions and digital enforcement | Number/percentage of enforcement institutions implementing approved constitutional and human rights compliance protocols. | Anti-corruption enforcement that is effective, lawful, constitutionally compliant, rights-respecting, and | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- KNHRC<br>- EACC<br>- NPS<br>- MFA |

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| | Kenya's international obligations. | | practices across all relevant institutions. | | | | |
| | | Promote ethical and rights-respecting use of digital investigative tools. | National guidelines and Standard Operating Procedures (SOPs) on the lawful, ethical, and accountable use of digital investigative tools developed and adopted | Guidelines and SOPs approved and operational. | Digital investigative tools are used lawfully, ethically, and consistently with constitutional safeguards | 2-3years | Ethics and Anti-Corruption Commission (EACC)<br>Directorate of Criminal Investigations (DCI)<br>Office of the Director of Public Prosecutions (ODPP)<br>Judiciary<br>Office of the Data Protection Commissioner (ODPC)<br>Communications Authority of Kenya (CA)<br>Ministry of Information, Communications and the Digital Economy |
| | | Harmonize laws with constitutional and international obligations. | Review of legislation relating to corruption, digital investigations, privacy, mutual legal assistance, asset recovery, and economic crimes completed. | Number of laws reviewed. | A coherent and consistent legal framework governing corruption investigations and prosecutions | 2-3 years | **Lead Institution**<br>Office of the Attorney General and State Department of Justice<br>**Supporting Institutions**<br>Kenya Law Reform Commission (KLRC)<br>Parliament<br>EACC<br>ODPP<br>Judiciary |
| | | Strengthen compliance with international legal cooperation frameworks. | National framework for implementing international legal cooperation obligations strengthened. | Number of MLA requests processed. | Improved effectiveness of cross-border investigations and prosecutions. | 2-3 years | Office of the Attorney General (Central Authority for MLA)<br>Office of the Director of Public Prosecutions (ODPP)<br>Ethics and Anti-Corruption Commission (EACC)<br>Directorate of Criminal Investigations (DCI) |

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| | | | | | | | Financial Reporting Centre (FRC)<br>Ministry of Foreign and Diaspora Affairs<br>Judiciary<br>Asset Recovery Agency (ARA |
| **2.5 Prosecution of Corruption and Economic Crimes** | Strengthen the effectiveness, independence, and accountability of prosecution of corruption and economic crimes. | Strengthen prosecutorial effectiveness. | Strengthen the prosecutorial effectiveness and accountability of the prosecution of corruption and economic crimes. | Number of corruption and economic crimes cases reviewed and prosecuted. | More effective, timely, independent, and accountable ~~and trusted~~ prosecution of corruption and economic crimes. | Continuous | **Lead Institutions**<br>- ODPP<br>**Supporting Institutions**<br>- EACC<br>- NPS<br>- KRA<br>- Judiciary |
| | | Promote transparency and accountability. | Transparency and accountability framework for anti-corruption institutions developed and operationalized. | Transparency and accountability framework adopted. | Increased transparency in the management and reporting of anti-corruption activities | Continuous | **Lead Institutions**<br>- EACC<br>**Supporting Institutions**<br>Office of the Attorney General and State Department of Justice,<br><br>Office of the Director of Public Prosecutions (ODPP),<br><br>Judiciary, Commission on Administrative Justice Office of the Auditor-General,<br>National Treasury,<br>Ministry responsible for Public Service,<br>county governments, and civil society organizations. |
| | | Strengthen monitoring, evaluation, and learning. | Comprehensive Monitoring, Evaluation, and Learning (MEL) | MEL framework approved and implemented | Improved evidence-based planning, implementation, | Continuous | **Lead Institutions**<br>Office of the Attorney General and State Department of Justice, |

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| | | | framework developed and adopted | | and policy decision-making. | | **Supporting Institutions** Ethics and Anti-Corruption Commission National Treasury, State Department for Public Service and Performance Management, Kenya National Bureau of Statistics (KNBS), Office of the Auditor-General, Office of the Director of Public Prosecutions (ODPP), Judiciary, county governments, and development partners |
| | Enhance coordination between investigative, prosecutorial, judicial, and asset recovery institutions. | Improve investigation–prosecution coordination. | Operationalize coordinated case management, referral and asset recovery linkage mechanisms among investigative, prosecutorial, judicial and asset recovery institutions. | Number of institutions using integrated case coordination, referral and asset recovery protocols. | Improved inter-agency coordination, faster case flow and stronger linkage between investigation, prosecution and asset recovery. | Continuous | **Lead Institutions**<br>- ODPP<br>**Supporting Institutions**<br>- OAG&SDOJ<br>- EACC<br>- ARA |
| | | Enhance asset recovery linkages. | National framework for coordination of asset tracing, freezing, seizure, forfeiture, management, and recovery developed and operationalized | Number of agencies implementing the asset recovery coordination framework. | Improved coordination across the asset recovery chain from investigation through confiscation and management | Continuous | **Lead Institutions** Asset Recovery Agency (ARA). **Supporting Institutions** Ethics and Anti-Corruption Commission (EACC), Office of the Director of Public Prosecutions (ODPP), Directorate of Criminal Investigations (DCI), Financial Reporting Centre (FRC), Kenya Revenue Authority (KRA), Office of the Attorney General and Department of |

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| | | | | | | | Justice, Judiciary, Central Bank of Kenya (CBK), and relevant regulatory agencies |
| | | Strengthen inter-agency coordination. | National inter-agency coordination framework for regulatory oversight and corruption risk management established | Number of regulatory agencies participating in formal coordination mechanisms. | Improved coordination and information exchange among regulatory and enforcement institutions | Continuous | **Lead Institutions**<br>Ethics and Anti-Corruption Commission (EACC) and<br><br>Office of the Attorney General and State Department of Justice (policy coordination)<br><br>**Supporting Institutions**<br>Financial Reporting Centre (FRC), Central Bank of Kenya (CBK), Kenya Revenue Authority (KRA), Public Procurement Regulatory Authority (PPRA), Capital Markets Authority (CMA), Sacco Societies Regulatory Authority (SASRA), Insurance Regulatory Authority (IRA), Directorate of Criminal Investigations (DCI), Office of the Director of Public Prosecutions (ODPP), Asset Recovery Agency (ARA), Judiciary, and county governments |
| | Strengthen prosecutorial capacity to address complex, transnational, and technology- | Build specialized prosecutorial capacity | Establish specialized prosecution capacity for complex, transnational and technology-enabled corruption cases. | Number of prosecutors trained and specialized units operationalized for complex, transnational and technology-enabled | Enhanced prosecutorial capability to handle sophisticated, cross-border and digital | Continuous | **Lead Institutions**<br>- ODPP<br>**Supporting Institutions**<br>- OAG&SDOJ<br>- Development partners |

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| | enabled corruption. | | | corruption, and economic crimes. | corruption and economic crimes. | | |
| | | Address emerging corruption risks. | National corruption risk assessment on emerging threats (e.g., digital platforms, artificial intelligence, cryptocurrencies, beneficial ownership, public-private partnerships, climate finance and procurement) conducted. | National emerging corruption risk assessment completed and updated periodically. | Proactive identification and mitigation of new and evolving corruption risks. | Continuous | **Lead Institutions**<br>Ethics and Anti-Corruption Commission (EACC)<br><br>**Supporting Institutions**<br><br>National Treasury, Directorate of Criminal Investigations (DCI), Financial Reporting Centre (FRC), Central Bank of Kenya (CBK), Public Procurement Regulatory Authority (PPRA), Office of the Attorney General and Department of Justice, |
| | | Standardize digital evidence governance. | National standards and Standard Operating Procedures (SOPs) for collection, preservation, analysis, disclosure, storage, retention, and presentation of digital evidence developed and adopted. | National digital evidence standards adopted. | Consistent, secure, and legally compliant management of digital evidence. | 2-3years | **Lead Institutions**<br>Directorate of Criminal Investigations (DCI).<br><br>**Supporting Institutions**<br>Ethics and Anti-Corruption Commission (EACC), Office of the Director of Public Prosecutions (ODPP), Judiciary, Office of the Data Protection Commissioner (ODPC), Communications Authority of Kenya (CA), Ministry of Information, Communications and the Digital Economy, Kenya |

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| | | | | | | | Bureau of Standards (KEBS) |
| | | Promote strategic public-private collaboration. | Public-private anti-corruption partnership framework established | Public-private collaboration framework adopted | Stronger collaboration between government, regulators, businesses, and civil society in preventing and combating corruption. | | **Lead Institutions**<br>Ethics and Anti-Corruption Commission (EACC)<br><br>**Supporting Institutions**<br>Kenya Private Sector Alliance (KEPSA), Office of the Attorney General and Department of Justice, Office of the Director of Public Prosecutions (ODPP), Directorate of Criminal Investigations (DCI), Financial Reporting Centre (FRC), Public Procurement Regulatory Authority (PPRA), Central Bank of Kenya (CBK), Kenya Revenue Authority (KRA), sector regulators, civil society organizations, and county governments. |
| | Advocate for proportionate and deterrent sanctions in corruption and economic crimes. | Strengthen sanctions and deterrence. | Offer prosecutorial guidance in the prosecution of corruption and economic crimes | Approved prosecutorial guidelines. | More guided prosecution of corruption and economic crimes. | Continuous | **Lead Institutions**<br>- ODPP<br><br>**Supporting Institutions**<br>Development partners. |
| | | Promote adaptive legal and policy review. | Periodic review framework for anti-corruption laws, regulations, and policies developed and institutionalized | Legal and policy review framework adopted. | A responsive and coherent legal and policy framework that keeps pace with evolving corruption risks, technological developments, and international standards | Continuous | **Lead Institutions**<br>Office of the Attorney General and Department of Justice.<br><br>**Supporting:** KLRC, EACC, ODPP, Judiciary, Parliament, National Treasury, DCI, FRC, ODPC, Ministry responsible for Public |

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| | | | | | | | Service, county governments, CSOs academia, and development partners. |
| | Enhance the use of data, digital tools, and evidence-based approaches in prosecutorial decision-making. | Leverage technology and data. | Deploy digital case management, prosecution analytics and digital evidence governance systems across relevant prosecution institutions. | Number of prosecutors using digital case management, analytics and digital evidence systems. | Evidence-based, data-driven and technology-enabled prosecutorial decision-making. | | **Lead Institutions**<br>- ODPP<br>**Supporting Institutions**<br>- The Ministry of Information, Communications, and the Digital Economy (MICDE)<br>- ODPC<br>- EACC<br>- -NPS |
| | | Standardize digital evidence governance. | National standards and Standard Operating Procedures (SOPs) for the identification, collection, preservation, analysis, storage, sharing, disclosure, retention, and disposal of digital evidence developed and adopted | National digital evidence standards and SOPs approved and operational | Consistent, secure, and legally compliant management of digital evidence across all criminal justice institutions. | 2-3years | **Lead Institution:** Directorate of Criminal Investigations (DCI).<br><br>**Supporting:** EACC; ODPP; Judiciary; ODPC; Ministry of Information, Communications and the Digital Economy; Communications Authority of Kenya (CA); KEBS FRC; NPS and Kenya School of Government |
| | Strengthen international cooperation in prosecution of cross-border corruption and economic crimes | Strengthen international cooperation. | Frameworks and Standard Operating Procedures (SOPs) for mutual legal assistance (MLA), extradition, joint investigations, and information sharing developed or updated | Number of MLA requests submitted, received, and successfully executed. | More effective and timely cross-border investigations and prosecutions | 2-3years | **Lead:** Office of the Director of Public Prosecutions (ODPP).<br>**Supporting:** Office of the Attorney General and Department of Justice (Central Authority for MLA), Ethics and Anti-Corruption Commission (EACC), Directorate of Criminal Investigations (DCI), Financial Reporting |

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| | | | | | | | Centre (FRC), Ministry of Foreign and Diaspora Affairs, Judiciary, Asset Recovery Agency (ARA), |
| | | Build specialized prosecutorial capacity. | Specialized prosecutors trained in transnational corruption, financial crime, cyber-enabled corruption, asset recovery, and international criminal cooperation | Number of prosecutors trained and certified. | Increased technical capacity to investigate and prosecute complex transnational corruption cases | 2-3years | **Lead:** Office of the Director of Public Prosecutions (ODPP).<br><br>**Supporting:** Kenya School of Government, Judiciary Training Institute, EACC, DCI, Financial Reporting Centre (FRC), Asset Recovery Agency (ARA), Office of the Attorney General, |
| | | Enhance asset recovery linkages. | Integrated asset tracing, freezing, confiscation, and recovery coordination framework established. | Value of assets traced, frozen, confiscated, and recovered domestically and internationally | Improved recovery of proceeds of corruption and economic crime across jurisdictions. | 2-3years | **Lead:** Asset Recovery Agency (ARA) and Office of the Director of Public Prosecutions (ODPP).<br><br>**Supporting:** EACC, Directorate of Criminal Investigations (DCI), Financial Reporting Centre (FRC), Kenya Revenue Authority (KRA), Office of the Attorney General, Judiciary, Central Bank of Kenya (CBK), Ministry of Foreign and Diaspora Affairs. |
| **2.6 Asset Recovery** | Strengthen the legal, institutional, and operational framework for asset recovery | Review, harmonize, and strengthen laws, regulations and procedures relating to asset recovery | Reviewed, harmonized, and operationalized laws regulations and procedures on asset recovery | Number of asset recovery laws, regulations, procedures, or institutional frameworks reviewed, and revised. | A coherent, effective, and well-resourced national asset recovery framework for corruption and | Continuous | **Lead institution**<br>OAG and DOJ |

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| | | | | | economic crimes. | | |
| | | Strengthen systems for early identification and preservation of suspected corrupt proceeds | Early identification and risk-based detection framework for suspicious and high-risk assets developed and operationalized | Number of suspicious asset cases identified and flagged at early stage | Early detection and preservation of proceeds of corruption before dissipation or concealment | | **Lead Institution:** Asset Recovery Agency (ARA)<br>**Supporting Institution**<br>Ethics and Anti-Corruption Commission (EACC)<br>Office of the Director of Public Prosecutions (ODPP)<br>Financial Reporting Centre (FRC)<br>Directorate of Criminal Investigations (DCI)<br>Kenya Revenue Authority (KRA)<br>Judiciary (asset freezing and restraint orders)<br>Central Bank of Kenya (CBK)<br>Office of the Attorney General and Department of Justice |
| | | Develop and operationalize legal and technical frameworks for tracing, restraining, managing, and recovering digital and virtual assets, including assets linked to cyber-enabled corruption and digital financial systems | Comprehensive legal framework for digital and virtual asset recovery developed or amended (covering cryptocurrencies, digital wallets, online platforms, and fintech assets) | Number of legal instruments enacted or amended to cover digital and virtual assets | Strengthened legal basis for recovering digital and virtual assets linked to corruption | Continuous | **Lead Institution:** Asset Recovery Agency (ARA)<br><br>**Supporting Institution**<br>Office of the Director of Public Prosecutions (ODPP)<br>Ethics and Anti-Corruption Commission (EACC)<br>Financial Reporting Centre (FRC)<br>Central Bank of Kenya (CBK)<br>Capital Markets Authority (CMA)<br>Communications Authority of Kenya (CA) |

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| | | | | | | | Directorate of Criminal Investigations (DCI – Cybercrime Unit)<br>Office of the Attorney General and Department of Justice<br>Judiciary<br>Kenya Revenue Authority (KRA) |
| | Establish and enhance the legal and operational framework for management of recovered assets | Establish and strengthen systems for the management, of recovered assets | Enhance integrated domestic asset recovery coordination and case management mechanisms across all core institutions involved in asset recovery. | Number of institutions coordinating | Coordinated and more effective domestic asset recovery processes. | Continuous | **Lead institutions:**<br>EACC<br>ARA<br>National Treasury<br><br>**Supporting Institutions**<br>Financial Reporting Centre (FRC**)** |
| | | Provide adequate resources. | Dedicated and ring-fenced budget allocation for asset management institutions (especially asset recovery and management entities) | Amount of annual budget allocated and disbursed for asset management functions | Improved efficiency and sustainability in management of recovered assets | Continuous | **Lead Institutions**<br>Asset Recovery Agency (ARA)<br>National Treasury<br>**Supporting Institutions**<br>Office of the Attorney General and Department of Justice<br>Ethics and Anti-Corruption Commission (EACC)<br>Office of the Director of Public Prosecutions (ODPP)<br>Judiciary (orders for forfeiture and disposal authorization)<br>Kenya Revenue Authority (KRA)<br>Public Procurement Regulatory Authority (PPRA)<br>National Police Service |

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| | Enhance the effectiveness of coordination of law enforcement agencies in asset recovery | Strengthen institutional coordination among the EACC, ARA, FRC, ODPP, NPS, Judiciary, OAG&DOJ, registries, and other relevant bodies through clear protocols, joint tasking, interoperable systems, and regular information-sharing arrangements. | Establish specialized multidisciplinary asset tracing and financial investigation capacity across relevant institutions to address complex concealment mechanisms. | Number of institutions with operational specialized asset tracing, forensic accounting, and beneficial ownership investigation capacity. | Improved detection, tracing, and recovery of concealed corruption-related assets. | Continuous | **Lead institution**<br>Office of the Attorney General and Department of Justice<br><br>**Supporting institution**<br><br>EACC<br>ARA<br>ODPP<br>FRC<br>NPS |
| | Enhance mutual legal assistance, international cooperation, and transnational asset recovery in line with Kenya's international obligations | Strengthen mutual legal assistance, international cooperation, repatriation procedures, and cross-border asset recovery mechanisms | Establish and operationalize national legal, technical, and operational frameworks for tracing, preserving, managing, and recovering digital and virtual assets linked to corruption. | Digital and virtual asset recovery framework developed and number of institutions operationalizing it. | Enhanced national capability to recover corruption-linked digital and virtual assets. | Continuous | **Lead institution**<br>Office of the Attorney General and Department of Justice<br><br>**Supporting institution**<br><br>EACC<br>ARA<br>ODPP<br>FRC<br>NPS |
| | Enhance transparency accountability and public reporting of recovered assets | Strengthen systems for management, preservation, valuation, and disposal of recovered assets. | Establish transparent asset management, reporting, utilization, and accountability systems for all restrained, forfeited, confiscated, and recovered assets. | Number of periodic public asset recovery performance reports published and percentage of recovered assets managed under | Greater transparency, accountability, and public confidence in asset recovery management and utilization. | Continuous | **Lead Institutions**<br>Asset Recovery Agency (ARA)<br>National Treasury<br>**Supporting Institutions**<br>Ethics and Anti-Corruption Commission (EACC)<br>National Police Service |

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| | | | | approved accountability frameworks. | | | |
| | | Institutionalize transparent reporting on asset recovery performance. | Standardized national reporting framework for asset recovery developed and adopted | Existence of approved national asset recovery reporting framework | Improved transparency in asset recovery processes and outcomes | Continuous | **Lead Institutions**<br>Asset Recovery Agency (ARA)<br>National Treasury<br>**Supporting Institutions**<br>Office of the Attorney General and Department of Justice<br>Ethics and Anti-Corruption Commission (EACC)<br>Office of the Director of Public Prosecutions (ODPP)<br>National Treasury (public finance integration)<br>Office of the Auditor-General (verification and audit oversight)<br>Judiciary |
| | | Promote transparency and accountability in utilization of recovered assets. | Legal and policy framework for utilization of recovered assets developed | Percentage of recovered assets whose utilization is publicly disclosed | Increased accountability in the use of recovered assets for public benefit | Continuous | **Lead Institutions**<br>National Treasury<br>Asset Recovery Agency (ARA)<br>Office of the Attorney General and Department of Justice<br>Ethics and Anti-Corruption Commission (EACC)<br>Office of the Director of Public Prosecutions (ODPP)<br>Office of the Auditor-General<br>Parliament (oversight and approval where required) |

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| | | | | | | | Commission on Administrative Justice (Ombudsman)<br>County Governments<br>Civil society |
| | Promote the use of data, financial intelligence, digital tools to enhance asset recovery | Strengthen interoperable systems and information sharing among agencies involved in asset recovery | Deploy interoperable data, financial intelligence, and digital asset tracing systems across relevant asset recovery institutions. | Number of institutions using interoperable digital asset tracing, intelligence-sharing, and recovery monitoring systems | More data-driven, efficient, and effective asset tracing, monitoring, and recovery outcomes. | Continuous | FRC<br>ARA<br>EACC |
| | | Enhance forensic and digital investigative capacity for agencies involved in asset recovery | Strengthened digital forensic laboratories and financial investigation units within key agencies | Number of officers trained and certified in financial forensics and digital investigations | Improved detection and tracing of complex and concealed financial flows | 2-3years | **Lead Institutions**<br>Asset Recovery Agency (ARA<br><br>**Supporting Institutions**<br><br>Ethics and Anti-Corruption Commission (EACC)<br>Office of the Director of Public Prosecutions (ODPP)<br>Directorate of Criminal Investigations (DCI – Financial & Cybercrime Units)<br>Financial Reporting Centre (FRC<br>Kenya Revenue Authority (KRA)<br>Central Bank of Kenya (CBK)<br>Ministry of ICT and Digital Economy |
| | | Strengthen beneficial ownership | Fully operational and updated beneficial ownership registry for companies, trusts, | Percentage of registered entities with verified | Increased transparency in corporate | 2-3years | **Implementing Institutions**<br>OAG&SDOJ<br>BRS |

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| | | transparency systems. | and legal arrangements | beneficial ownership information | ownership structures | | FRC)<br>KRA<br>EACC<br>DCI<br>ODPP<br>PPRA<br>CBK<br>CMA |
| **2.7 International Cooperation** | Strengthen Kenya's capacity to effectively engage in international cooperation in corruption prevention, investigation, prosecution, and asset recovery. | Enhance mutual legal assistance and extradition systems. | Operationalize strengthened institutional, technical, and coordination capacity for international anti-corruption cooperation across all relevant national institutions. | Number of institutions with operational international cooperation frameworks, trained personnel, and functional cross-border cooperation mechanisms. | Enhanced national capacity to effectively engage in international anti-corruption cooperation, investigations, prosecutions, and asset recovery. | Continuous | **Lead institution**<br>OAG&SDOJ<br>**Support institutions**<br>EACC<br>DCI<br>ODPP<br>ARO<br>NPS |
| | | Build capacity for transnational investigations. | Specialized training programs for investigators, prosecutors, and financial intelligence officers on cross-border corruption and economic crimes | Number of officers trained in transnational investigations | Improved technical capacity to investigate complex cross-border corruption and financial crimes | Continuous | **Lead**<br>Directorate of Criminal Investigations (DCI)<br>**Support institutions**<br>EACC<br>ODPP<br>FRC<br>NPS<br>ARA<br>KRA<br>Ministry of Foreign and Diaspora Affairs<br>Kenya School of Government |
| | | Enhance cross-border asset recovery mechanisms. | Strengthened Mutual Legal Assistance (MLA) and extradition procedures for asset recovery | Value of assets frozen, seized, or recovered across borders | Increased recovery of proceeds of corruption held abroad | Continuous | **Lead:** Asset Recovery Agency (ARA)<br>**Supporting**:<br>EACC<br>ODPP<br>FRC |

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| | | | | | | | DCI |
| | | Promote regional and global collaboration. | Strengthened participation in regional and international anti-corruption platforms (UNCAC, FATF, EAC, AU conventions) | Number of active international and regional cooperation agreements | Stronger regional and global cooperation in combating corruption and financial crime | Continuous | **Lead:** Ministry of Foreign and Diaspora Affairs<br><br>**Supporting institutions**:<br>OAG&SDOJ<br>EACC<br>ODPP<br>DCI<br>FRC<br>ARA<br>CBK<br>KRA |
| | Harmonize domestic legal and institutional frameworks with international anti-corruption standards and obligations. | Strengthen legal and institutional harmonization. | Review, harmonize, and align Kenya's anti-corruption legal and institutional frameworks with applicable international, regional, and emerging global standards. | Number of laws, regulations, protocols, or institutional frameworks reviewed, revised, or aligned with international obligations. | A coherent domestic anti-corruption framework aligned with international standards and obligations. | 3 Years | **Lead Institution**<br>OAG&DOJ<br>**Supporting Institutions**<br>EACC<br>KLRC<br>ARA<br>MFA |
| | | Institutionalize international peer review and strategic partnerships. | Formal framework for participation in international peer review mechanisms (e.g., UNCAC Implementation Review Mechanism, FATF Mutual Evaluations, ESAAMLG reviews) developed and operationalized | Number of peer review and mutual evaluation processes participated in | Strengthened alignment of domestic legal, institutional, and operational frameworks with international anti-corruption and AML/CFT standards | 2-3years | **Lead Institutions**<br>OAG&DOJ<br>Ministry of Foreign and Diaspora Affairs<br><br>**Supporting Institutions**<br>EACC<br>ODPP<br>FRC<br>DCI<br>ARA<br>CBK<br>KRA<br>Judiciary |
| | Strengthen international information- | Strengthen international information | Establish interoperable international | Number of institutions connected to | Improved real-time information sharing, | Continuous | FRC<br>EACC<br>ARA |

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| | sharing systems, including digital and financial intelligence cooperation. | sharing through formal and informal channels. | information-sharing and intelligence exchange systems linking relevant domestic agencies with regional and global cooperation platforms. | interoperable international intelligence-sharing systems and number of intelligence exchanges conducted annually. | intelligence cooperation, and evidence exchange in transnational anti-corruption enforcement. | | KRA<br>NPS<br>OAG&DOJ |
| | | Build capacity for transnational investigations. | Specialized training programs on transnational corruption, AML/CFT, cyber-enabled financial crime, and asset tracing developed and delivered | Number of officers trained and certified in transnational investigations | Improved capacity of Kenyan institutions to investigate complex cross-border corruption and financial crimes | Continuous | **Lead Institutions**<br>DCI<br>FRC<br><br>**Supporting Institutions**<br>ODPP<br>EACC<br>ARA<br>KRA<br>CBK |
| | Address emerging cross-border corruption risks, including illicit financial flows, digital assets, and technology-enabled corruption. | Build capacity for transnational investigations. | Establish specialized legal, technical, and investigative capacity to detect, investigate, and respond to emerging cross-border corruption risks involving digital assets, illicit financial flows, and technology-enabled crime. | Number of institutions with operational frameworks, tools, and trained personnel addressing emerging cross-border corruption risks. | Enhanced national resilience and enforcement effectiveness against emerging transnational corruption threats. | Continuous | **Lead institution**<br>FRC<br>DCI<br>ARA<br>EACC<br>ODPP<br><br>**Supporting institutions**<br>OAG&DOJ |
| | | Address emerging digital and technology-enabled corruption risks. | National risk assessment on emerging digital corruption risks (AI-enabled fraud, crypto-assets, fintech abuse, cyber-enabled procurement fraud) completed and periodically updated | Number of digital/cyber-enabled corruption cases investigated and prosecuted | Improved detection and prevention of emerging technology-enabled corruption risks | Continuous | **Lead institution**<br>DCI – Cybercrime Unit)<br><br>**Supporting institutions**<br>ODPP<br>EACC<br>ARA<br>KRA<br>CBK<br>ODPC |

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| | | Enhance cross-border asset recovery mechanisms. | Strengthened Mutual Legal Assistance (MLA) and extradition frameworks for asset recovery | Value of assets frozen, confiscated, or recovered across borders | Increased recovery of proceeds of corruption hidden in foreign jurisdictions and digital environments | Continuous | **Lead institution**<br>Asset Recovery Agency (ARA)<br><br>**Supporting institutions**<br>OAG&DOJ<br>ODPP<br>EACC<br>ARA<br>KRA<br>CBK |
| | Institutionalize the use of international peer review mechanisms (UNCAC, APRM) as tools for continuous improvement and accountability in anti-corruption efforts. | Institutionalize international peer review and strategic partnerships. | Institutionalize participation in international peer review mechanisms and implement time-bound national action plans arising from peer review recommendations. | Number of peer review recommendations translated into implemented national action plans. | Strengthened accountability, continuous institutional learning, and sustained improvement in anti-corruption governance. | 5 Years | **Lead institution**<br>OAG&DOJ<br>**Supporting Institution**<br>Relevant stakeholders |
| | | Promote regional and global collaboration. | Formal national coordination framework for participation in UNCAC, APRM, FATF, and related peer review mechanisms established | Number of peer review mechanisms participated in (UNCAC, APRM, FATF or equivalent) | Strengthened alignment of Kenya's anti-corruption framework with international standards and best practices | Continuous | **Lead Institutions**<br>OAG&DOJ<br>**Supporting institutions**<br>ODPP<br>EACC<br>ARA<br>KRA<br>CBK |
| **2.8 Leadership and integrity** | Strengthen enforcement of leadership and integrity standards under the | Strengthen enforcement of leadership and integrity frameworks. | Operationalize strengthened enforcement and compliance mechanisms for leadership and | Number of public institutions implementing leadership and integrity compliance | Stronger enforcement of constitutional leadership and integrity standards with | Continuous | **Lead Institutions**<br>EACC<br>**Supporting institutions**<br>OAG&DOJ<br>ODPP<br>Public service Commission |

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| | Constitution and relevant laws. | | integrity standards across all public institutions and relevant bodies. | and enforcement mechanisms. | improved institutional accountability. | | |
| | | Strengthen conflict of interest management. | Comprehensive national conflict of interest (COI) policy and legal enforcement guidelines developed and operationalized | Percentage of public officials submitting complete and verified conflict of interest declarations | Reduced incidence of corruption arising from undisclosed or unmanaged conflicts of interest | Continuous | **Lead Institutions**<br><br>Ethics and Anti-Corruption Commission (EACC) – lead oversight and enforcement<br>Public Service Commission (PSC) – public service ethics and HR integration<br><br>**Supporting institutions**<br>OAG &SDOJ<br>PPRA<br>National Treasury<br>Parliamentary Service Commission |
| | Enhance transparency, accountability, and ethical conduct in public and private sector leadership. | Strengthen enforcement of leadership and integrity frameworks. | Institutionalize transparency, accountability, and ethical leadership frameworks across public institutions and targeted private sector entities. | Number of institutions publishing integrity performance reports, scorecards, or accountability disclosures. | Improved transparency, ethical conduct, and public confidence in leadership across public and private sectors. | Continuous | **Lead Institutions**<br><br>Ethics and Anti-Corruption Commission (EACC) – lead oversight and enforcement<br>Public Service Commission (PSC) – public service ethics and HR integration<br><br>**Supporting institutions**<br>OAG &SDOJ<br>PPRA<br>National Treasury<br>Parliamentary Service Commission |
| | | Promote ethical leadership and an integrity culture. | National ethical leadership and integrity framework developed and | Percentage of institutions with updated and | Strengthened culture of integrity and ethical | Continuous | **Lead Institutions**<br><br>Ethics and Anti-Corruption Commission (EACC) – |

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| | | | institutionalized across public and private sector | enforced codes of ethics | behaviour in leadership across sectors | | lead oversight and enforcement<br><br>**Supporting institutions**<br>PSC<br>State Corporations Advisory Committee (SCAC)<br>Office of the Auditor-General<br>PPR<br>KEPSA |
| | | Enhance public participation and social accountability. | Strengthened legal and policy framework for public participation in governance and decision-making processes | Number of public participation forums conducted annually at national and county levels | Increased citizen engagement in governance and decision-making processes | Continuous | **Lead Institutions**<br>Ministry of Public Service and Human Capital Development<br>**Supporting Institutions**<br>Public Service Commission (PSC)<br>Intergovernmental Relations Technical Committee (IGRTC)<br>OAG&SDOJ<br>National Treasury<br>CAJ<br>EACC<br>Civil society organizations |
| | Improve effectiveness of integrity vetting, financial disclosure, and conflict of interest management systems. | Strengthen integrity vetting and appointment processes. | Establish integrated and risk-based integrity vetting, financial disclosure, lifestyle audit, and conflict of interest management systems across relevant institutions. | Number of institutions implementing integrated vetting, disclosure, audit, and conflict of interest management systems. | More effective prevention, detection, and management of integrity risks in leadership and public service. | Continuous | **Lead Institutions**<br>EACC<br>IEBC |
| | | Enhance financial disclosure and lifestyle audit systems. | Revised and harmonized financial disclosure and asset declaration | Percentage of public officers submitting timely and complete financial disclosures | Increased transparency in public officials' wealth and | Continuous | **Lead Institutions**<br>EACC<br>**Supporting Institutions**<br>PSC |

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| | | | framework developed and operationalized | | financial interests | | Office of the Auditor-General<br>KRA<br>CBK<br>National Treasury<br>PPRA<br>ODPC |
| | | Strengthen conflict of interest management. | Comprehensive conflict of interest (COI) legal and policy framework developed and harmonized across sectors | Percentage of public officials submitting and updating COI declarations | Reduced corruption risks arising from undisclosed or unmanaged conflicts of interest | Continuous | **Lead Institutions**<br>EACC<br>**Supporting Institutions**<br>PSC<br>Office of the Auditor-General<br>KRA<br>CBK<br>National Treasury<br>PPRA<br>ODPC |
| | Integrate technology, data analytics, and digital tools into integrity monitoring and enforcement. | Leverage technology and data for integrity management. | Deploy integrated digital integrity monitoring and risk detection systems across lead oversight and accountability institutions. | Number of institutions using digital integrity monitoring, analytics, and automated risk detection systems. | More efficient, data-driven, and technology-enabled integrity monitoring and enforcement. | Continuous | EACC,<br>FRC,<br>DCI |
| | | Address emerging digital and AI-related integrity risks. | National framework for managing AI-related integrity and corruption risks developed and operationalized | Number of institutions using AI or data analytics for integrity monitoring | Improved early detection of corruption and misconduct using predictive analytics | Continuous | **Lead Institutions**<br>EACC<br>**Supporting Institutions**<br>Ministry of ICT and Digital Economy<br>ICT Authority<br>ODPC<br>PSC<br>National Treasury<br>PPRA<br>Office of the Auditor-General<br>Judiciary |
| | | Enhance financial disclosure and | Digitized asset declaration and | Percentage of public officials using | Increased transparency in | Continuous | **Lead Institutions**<br>EACC |

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| | | lifestyle audit systems. | financial disclosure system developed and fully operational | digital financial disclosure systems | wealth declarations and public sector integrity systems | | **Supporting Institutions**<br>KRA,<br>ODPC<br>PSC<br>CBK<br>National Treasury<br>PPRA<br>Office of the Auditor-General<br>Judiciary |
| | Promote a culture of ethical leadership and zero tolerance to corruption across all levels of government. | Promote ethical leadership and an integrity culture. | Institutionalize ethics training, integrity performance management, and leadership accountability systems across all levels of government. | Percentage of public institutions implementing ethics training, integrity appraisal, and leadership accountability frameworks. | A stronger culture of ethical leadership, integrity, and zero tolerance to corruption across government. | Continuous | **Lead Institutions**<br>EACC<br>**Supporting Institutions**<br>PSC<br>CCIOs |
| | | Strengthen enforcement of leadership and integrity frameworks. | Strengthened legal and institutional enforcement framework for Chapter Six of the Constitution operationalized | Percentage of public officers compliant with leadership and integrity requirements | Strengthened enforcement of ethical leadership standards across all levels of government | Continuous | **Lead Institutions**<br>EACC<br>PSC<br>**Supporting Institutions**<br>OAG&SDOJ<br>Office of the Auditor-General<br>ODPP<br>PPRA<br>National Treasury<br>County Public Service Boards<br>SCAC |
| | Strengthen leadership and integrity systems within devolved units of government. | Strengthen leadership and integrity in devolved government. | Establish and operationalize harmonized leadership and integrity systems in all 47 county governments. | Number of county governments with functional leadership and integrity systems aligned with national standards. | Stronger ethical governance, accountability, and integrity enforcement within devolved government structures. | Continuous | EACC<br>COG |

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| | | Strengthen enforcement of leadership and integrity frameworks. | County-level leadership and integrity enforcement framework developed and harmonized with national standards | Percentage of county public officers compliant with Chapter Six requirements | Strengthened enforcement of ethical leadership standards across all county governments | Continuous | **Lead Institutions**<br>EACC<br>County Public Service Boards<br><br>**Supporting Institutions**:<br>PSC<br>PPRA<br>OAG&SDOJ<br>ODPP |
| | Enhance public participation, civic oversight, and social accountability in leadership integrity. | Enhance public participation and social accountability. | Institutionalize citizen engagement, civic oversight, and social accountability mechanisms for leadership integrity across national and county levels. | Number of institutions with operational citizen oversight, public participation, or social accountability mechanisms on leadership integrity | Increased citizen oversight, stronger public trust, and improved accountability in leadership conduct | Continuous | **Lead Institutions**<br>EACC<br>NACCSC<br><br>**Supporting Institutions**:<br>CSOs<br>COG |
| | | Strengthen integrity vetting and appointment processes. | Standardized, transparent, and participatory integrity vetting framework developed and implemented for public appointments | Percentage of public appointments subjected to standardized integrity vetting | Improved transparency and credibility in public appointments | Continuous | **Lead Institutions**<br>EACC<br>IEBC<br>**Supporting Institutions**:<br>County Public Service board<br>PSC<br>JSC |
| | | Promote ethical leadership and an integrity culture. | National ethical leadership and integrity framework developed and institutionalized across public sector institutions | Number of public officers trained and certified in ethical leadership | Strong institutional culture of integrity and ethical leadership across public service | Continuous | **Lead Institutions**<br>EACC<br>**Supporting Institutions:**<br>PSC<br>JSC<br>CAJ<br>KSG |
| **3. Implementation Framework for the Policy** | | | | | | | |
| | Harmonize fragmented and duplicated anti-corruption efforts. | Strengthen coordination mechanisms | Establish and operationalize a unified anti-corruption | Number of MDACs implementing the unified anti-corruption | Reduced institutional fragmentation, clearer | 4 Years | **Lead Institutions**<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- EACC |

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| | | | coordination and implementation framework. | coordination and implementation framework. | mandates, and improved coherence in anti-corruption implementation. | | - State Department for Cabinet Affairs<br>- COG |
| | Strengthen inter-agency coordination. | Strengthen the cooperation, collaboration and coordination mechanisms. | Operationalize ~~integrated~~ inter-agency coordination ~~case referral, and secure information-sharing mechanisms~~ linking all key anti-corruption institutions. ~~investigative, prosecutorial, judicial, and financial~~ | Number of institutions connected to operational inter-agency coordination ~~and information-sharing~~ systems. | Improved inter-agency collaboration. | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- EACC<br>- FRC<br>- NPS<br>- ARA |
| | | Establish integrated digital anti-corruption framework. ~~systems~~. | National integrated digital anti-corruption platform designed and operationalized (linking investigation, prosecution, financial intelligence, asset recovery, and regulatory systems) | Number of institutions actively connected to the integrated digital platform | Improved coordination and information-sharing among anti-corruption institutions | Continuous | **Lead Institutions**<br>Ministry of Information, Communications and the Digital Economy / ICT Authority<br>**Supporting Institutions**<br>- EACC<br>- FRC<br>- DCI<br>- ARA |

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| | Integrate digital governance and big data analytics into anti-corruption systems. | -Establish integrated digital anti-corruption systems.<br>-Establish big data analytics<br>-Address emerging technology risks. | Deploy interoperable digital anti-corruption governance systems, analytics tools, and artificial intelligence-enabled risk detection mechanisms across key anti-corruption institutions. | Number of institutions using digital anti-corruption systems, big data analytics tools, or AI-enabled corruption risk detection tools increases | More proactive, data-driven, technology-enabled corruption prevention, detection, and governance oversight. | Continuous | **Lead Institutions**<br>- EACC<br><br>**Supporting Institutions**<br>- The Ministry of Information, Communications, and the Digital Economy (MICDE)<br>- FRC<br>- ARA |
| | Enhance effective enforcement and compliance. | Enhance institutional accountability and compliance frameworks. | Institutionalize anti-corruption compliance monitoring, performance, accountability, and enforcement mechanisms in MDACs. | Number of public institutions implementing anti-corruption accountability and compliance systems. | Improved institutional compliance, stronger accountability, and more effective anti-corruption enforcement. | Continuous | **Lead Institutions**<br>- HOPS<br>- OAG&SDOJ<br>**Supporting Institutions**<br>- All responsible Commissions under COI Act |
| | Promote citizen participation and trust in anti-corruption processes. | Strengthen citizen engagement and transparency. | Establish accessible citizen engagement, corruption reporting, public feedback, and transparency mechanisms across all counties and key public institutions. | Number of counties and institutions with operational citizen engagement, reporting, and public transparency mechanisms. | Increased citizen participation, public trust, transparency, and social accountability in anti-corruption governance. | Continuous | **Lead Institutions**<br>- OAG&SDOJ<br>- NACSC<br>**Supporting Institutions**<br>- EACC |