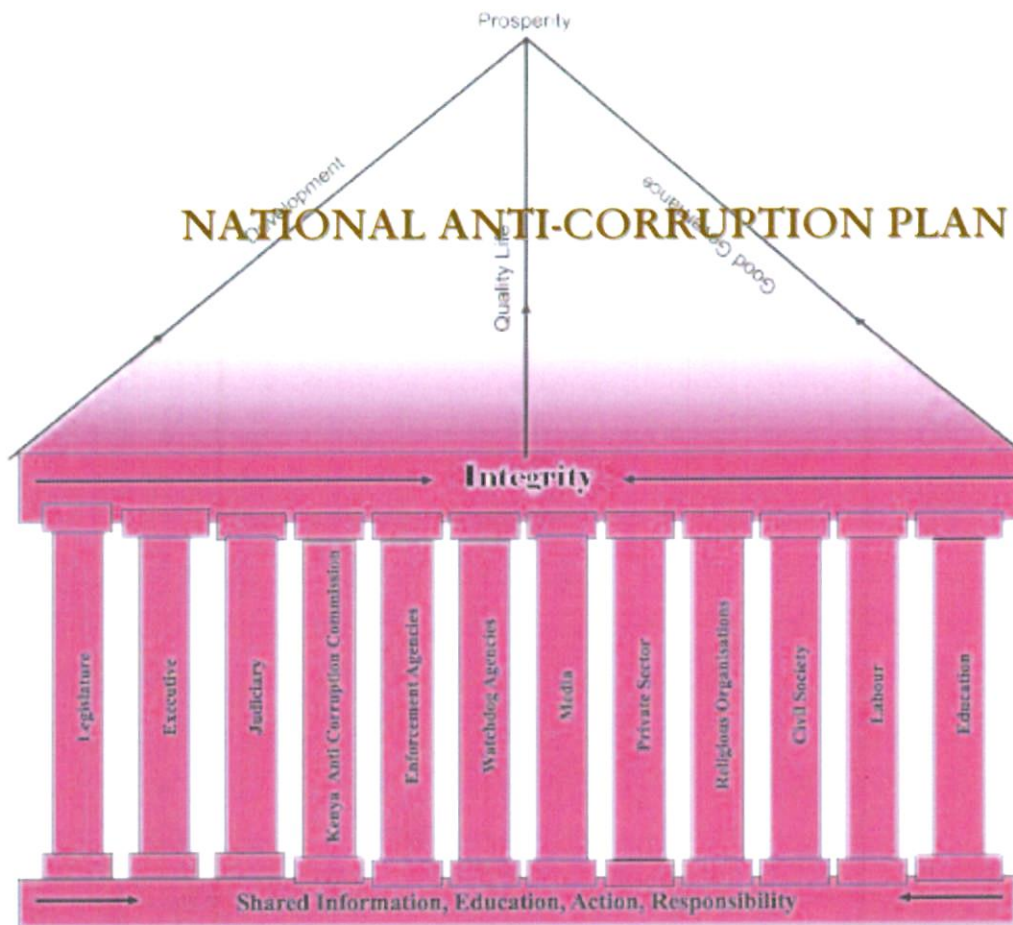


# KENYA INTEGRITY FORUM



## NACP IMPLEMENTATION PROGRESS REPORT

**DRAFT**

JULY 2008 - JUNE 2009

**Kenyans Arise! Fight Corruption Now**

# **KENYA INTEGRITY FORUM**

National Anti-Corruption Plan

# **DRAFT**

**Implementation Progress Report**

**July 2008 - June 2009**



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## INTRODUCTION

The National Anti-Corruption Plan (NACP) was endorsed by stakeholders during the National Stakeholders Conference held on 30<sup>th</sup> May 2006 at the Bomas of Kenya and thereafter launched on 5<sup>th</sup> July 2006. After the launch, all the 14 sectors started implementing their part of the Plan.

The process of overseeing the Plan implementation at sector level is vested on sector convenors, who act as chairpersons of their Sectoral Committees. Sectoral Committees are themselves formed by representatives from stakeholders in each sector. The convenor is assisted by sector liaison officer (s) as each sector may decide. Key responsibilities of the NACP Sectoral Committees include to:- Manage and coordinate efforts in addressing concerns that are highlighted in the Plan; Develop action plans for the implementation; Review implementation; and Monitor implementation of the Plan.

Implementation of the Plan is now on its fourth year and stakeholders meet annually to review progress of implementation of the Plan and account to Kenyans on their effort to promote good governance in their sectors. The following Draft Implementation Progress Report reflects the progress of implementation of the National Anti-Corruption Plan that various sectors have been implementing since July 2008. These are self-assessment reports provided by the sectors themselves. We should see them as a source of encouragement and support, and not negative criticism.

# 1. LEGISLATURE

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes /Activities	On-going Activities			
<i>1. Want of Integrity on the part of some MPs and Public Servants.</i>						
1. Amend the POEA to make wealth declaration forms accessible to the public 2. Repeal the current Secrets Act and replace it with the Freedom of Information Act. 3. The enactment of the Political Parties Bill	1. Parliament 2. Executive 3. KACC 4. Political Parties	1. The adoption of the Political Parties rules 2008 to operationalise the Political Parties Act. 2. Registration of political parties	1. Continued enforcement of the Public Officers Ethics Act. 2. Enforcement of the Political Parties Act	Legal & institutional framework on administration of political parties	1. Political patronage 2. Society values are wanting 3. Bribing of MPs by interest groups	1. Freedom of Information Bill to be reintroduced. 2. Strengthening institutional capacity of KACC and the office of the Attorney General. 3. Develop a code of conduct for MPs
<i>2. Excessive cost of election to the candidates.</i>						
1. Review of electoral boundaries	1. Parliament 2. E.C.K. 3. Political Parties 4. KACC 5. Civil Society 6. The Media 7. Interim Independent Boundaries Commission	1. Approved financial allocation to political parties as per the Political Parties Act of 2007. 2. Establishment of the office of Registrar of Political Parties. 3. Establishment of the IIECK 4. Establishment of the IIBC	1. Operationalization of the Political Parties Act 2. Continuous civic education by the civil society. 3. Establishment of Interim Independent Electoral Commission.	Legal & institutional framework on administration of political parties	1. Wrong public perception on the election process and role of elected leaders. 2. Insufficient funding 3. Bribery of voters by candidates 4. Small parties without parliamentary representation not funded	1. Implementation of the Political Parties Act 2. Comprehensive constitutional reforms 3. Overhaul of the electoral laws. 4. Civic education
<i>3. Wrong perception, limited information on corruption</i>						
1. Create and implement programmes to educate MPs on evils and consequences of corruption 2. Educate constituents on evils and consequences of corruption	1. MPs 2. Civil Society 3. The media 4. KNA	1. Induction for MPs 2. Training of CDF Committees on integrity	1. PR office in Parliament continuous information dissemination to the public 2. Live broadcasting of House proceedings 3. Attendance to anti-corruption fora 4. ICT training for MPs 5. Website revamping and timely posting of information thereon		1. Limited uptake of Information 2. Lack of internet connectivity among the citizenry 3. Impunity 4. Bribing of MPs by interest groups	1. Continuous education and public awareness campaigns 2. Establish accountability & performance mechanisms for MPs 3. Strict enforcement of accountability mechanisms for MPs
<i>4. Wrong perception of role of MPs, other leaders and public officials</i>						
1. Educate public on role of MPs and other leaders 2. Educate public on roles of various organs of government, institutions and organisations	1. MPs 2. Media 3. Civil Society 4. KNA		5. Live broadcasting of House proceedings 1. Information posted on Parliamentary Website 2. Information posted on the website of the Office of	Opening up of parliament to the public	1. Poverty 2. Limited awareness on role of Members of Parliament. 3. Limited or lack of internet connectivity	1. Enforcement of the POEA 2. Civic Education 3. Parliament open days 4. Customer Survey



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes /Activities	On-going Activities			
			3. Opening up of committee proceedings to the public		4. MPs seen as mobile ATMs 5. Misreporting by the media 6. Poverty	
<b>5. MPs' lack of clear understanding of their role.</b>						
1. More purposeful induction courses 2. Amending the Standing Orders 3. Strengthening Capacity for Parliamentary Staff 4. Strengthening the role of political parties in assisting Members to discharge their political responsibility	1. Parliamentary Staff 2. Parliament 3. Parliamentary Service Commission 4. Parliamentary political parties	1. New standing orders adopted. 2. Members and staff trained on implementation of the new standing orders 3. Money allocated to the Committee in the current budget	1. Committee training on roles of members. 2. Continued education on New House Rules. 3. Study visits for Members to other parliaments 4. Bias prioritization	New Standing orders operational	1. Financial constraints. 2. The continued pressure on Members to play several other roles in the society. 3. Control of CDF by MPs	1. Continuous education of MPs and Society 2. Continuous review of Standing Orders 3. MPS should not control CDF
<b>6. Unrealistic demands on MPs by their electorate</b>						
1. Educate public on role of MPs vis-à-vis the electorate 2. Ensure proper administration of CDF, CBF, Constituency HIV/AIDS Fund/ Roads Levy, and LATF	1. MPs/PSC 2. Civil Society 3. Govt. - Public Communications Office 4. Professional Associations 5. KACC	1. The CDF Amendment Act of 2007 implemented. 2. Media consultant and Protocol Officers recruited and employed by Parliament 3. Increased CDF allocation	1. Civic Education 2. Poverty alleviation Programmes. 3. Enhanced monitoring of the use of devolved funds. 4. Committee established to review CDF 5. Investigations of use of CDF resources in various constituencies	More development at the Constituency level through devolved funds	1. Rampant poverty 2. Rapid social change 3. High unemployment rates amongst the youth 4. Rapid social change in society 5. Discrimination by MPs	1. Comprehensive approach to solve perennial problems and institutional weaknesses. 2. Civic Education 3. Strengthening Parliament's Public Relations Department 4. Pressure to keep MPs out of CDF administration
<b>7. Inadequate understanding of Bills.</b>						
1. Recruitment of more staff to increase capacity of Parliament 2. Strengthening Parliamentary Committees	1. Parliamentary Staff 2. Parliament 3. Parliamentary Service Commission	1. More professional staff recruited 2. All departments are functional.	1. Training of MPs & parliamentary staff 2. Staff recruitment 3. KNA strategic plan 2008-2012 4. Engagement of Committees by experts in various fields	1. Enhanced capacity of PSC & parliament 2. Increased consultation between AG, Stakeholders & parliament on draft bills	1. Minimum uptake of information. 2. The Public do not show much interest in some Bills	1. Continuous engagement and education. 2. Strengthening staff capacity to analyse Bills
<b>8. Non-implementation of House Resolutions</b>						
1. Amendment of Standing Orders 2. Fiscal Management Bill 3. Increased oversight activities	1. Parliament 2. Executive	1. New Standing Orders Adopted 2. The Fiscal Management Act passed. 3. Establishment of the Committee on Implementation.	1. Induction of the committees on their functions. 2. Operationalization of the Fiscal Management Act	1. Committee on implementation of house rules	Harmonisation of operations by the ministry of Finance and the KNA	Continuous engagement between the Executive and the legislature for harmonised execution.



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes /Activities	On-going Activities			
		4. Establishment of the Budget Committee. 5. Increased number of departmental committees	2008.	2. Enhanced capacity of Parliamentary service Commission		
<b>9. Limited facilities and equipment</b>						
1. Commission budget to increase tremendously 2. Capacity building for both MPs and staff	1. The Commission 2. The Treasury	1. KNA 2008-2012 strategic plan developed. 2. Broadcasting equipment 3. Acquisition of more office space at KICC & Harambee plaza	1. Acquisition of a digitalised Hansard production Equipment 2. Acquisition of required facilities	Broadcasting equipment acquired	1. Budgetary constraints 2. Delays occasioned by procurement rules	1. Progressive acquisition. 2. Mobilisation of donor's support.
<b>10. Increase in ICT related corrupt practices</b>						
1. Enact legislation on IT 2. Develop and implement comprehensive national IT policy	1. Government 2. Parliament 3. Attorney-General 4. Interest Groups	Enactment of Communications (Amendment) Act of 2008.	ICT Bill		Technophobia by staff & MPs/Resistance to change	1. Continuous revision on ICT related legislation as the sector evolves 2. Explore personalized training for senior staff & MPs
<b>11. Abuse of Office with impunity</b>						
1. Hold all leaders and officials personally responsible for decisions and actions taken while in office 2. Base decisions and actions strictly on laws, policies and plans 3. Prosecution of individuals who have abused their offices 4. Verification of wealth declaration forms 5. Enforce code of conduct and ethics for Ministers, MPs and Parliamentary Service staff.	1. Parliament 2. Attorney-General 3. Civil society 4. Media 5. KACC 6. Responsible Commissions 7. Controller and Auditor General	No confidence motions in Ministers	1. Enforcement of POEA 2. Enforcement of the Anti-Corruption and Economic Crimes Act 3. Prosecution of culprits 4. Education 5. Constitutional process already started	1. Lack of confidence motions on some Ministers 2. Ministerial code of conduct	1. Patronage 2. Political interference 3. Institutional weaknesses to enforce investigate and prosecute offenders. 4. Impunity 5. MPs not declaring their wealth	1. Education 2. Enforcement of Anti-corruption Laws. 3. Encapacitate the office of the Attorney General, KACC and the Police. 4. PSC to verify MPs wealth declarations 5. Enforcement of Ministers code of conduct
<b>12. Inadequate anti-corruption Legislation</b>						
1. Fiscal Management Bill 2. State Law (Miscellaneous Amendments) Bill 3. Freedom of Information Bill 4. Reforms in the tax regime and in the number of licenses required to operate business 5. Parliamentary Committees to be interactive with the public	1. Parliament 2. Executive 3. Civil Society 4. The Media 5. KACC 6. AG	1. Reforms in tax regimes (abolition of certain licences by the government) 2. Parliamentary Committees open to the public on request. 3. Enactment of the Fiscal Management Act	1. Freedom of Information Bill to be re-published. 2. Parliamentary committee meetings open to public. 3. Continuous revision of Anti-corruption laws.	Enhanced anti-corruption legislative framework	Lack of political goodwill to deal with corruption.	1. Government to continue with implementation of various reforms. 2. Strengthening of Anti corruption Laws and institutions. 3. Enact proceeds of crime and anti-money laundering bill

## 2. JUDICIARY

	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Unrepresentative composition of the Judicial Service Commission (JSC)</i>						
1. Consider the reconstitution of JSC to include the following: 2. Chairman of Kenya Magistrates and Judges Association (KMJA), Chief Justice (CJ), a judge of high court, judge of court of appeal, chairman of Law Society of Kenya (LSK), Attorney General and an informed lay person, Chair PSC, Registrar High court	1. Parliament 2. Attorney General 3. CJ 4. KMJA 5. LSK	The issue of the composition of the Judicial Service Commission addressed in the draft constitution.	Task force appointed to fast track Judicial reforms (Judicial Amendment Act)	Task Force on Judicial Reforms	Conflicting political interest in the constitution review talks.	1. Presentation by judiciary stakeholders to the experts 2. KMJA to make presentations to the team of experts on constitutional review 3. Include PS-MoJNCCA & MoF in the JSC
<i>2. Ad-hoc mode of operation of JSC</i>						
1. Establish clear procedures on how JSC business should be transacted. 2. Ensure that at least four (4) members form quorum to transact business. 3. Conduct at least quarterly meetings. 4. Establish a permanent JSC secretariat.	1. CJ 2. Attorney General 3. Parliament for the necessary legislation 4. KMJA 5. LSK	JSC held two meetings in 2009	1. Preliminaries on-going before assessing funds for this consultancies 2. The process of procuring a consultant to commence after the above preliminaries 3. Issues of officers of PLS 8 and below are handled by the Human Resource Committee chaired by the Registrar 4. The Human Resource Committee meets monthly	Regular JSC meetings	Traditional approach to issues.	1. A consultant to be hired to address the problem 2. A Judicial Service commission Act should be enacted as proposed in agenda no. 4 of KNDRC-MoJNCCA 3. Establishing JSC Secretariat
<i>3. Unmerited appointment of judges</i>						
1. Ensure appointments are strictly on merit. 2. Establish a Parliamentary Judicial Committee to vet nominees for appointment as CJ and Judges.	1. CJ. 2. Attorney General 3. Parliament for the necessary legislation. 4. KMJA. 5. LSK.	1. Task force set up as per Agenda 4 2. Judiciary has nominee to the Task force	Wide consultations in vetting appointment of Judges		1. Conflicting political interest in the appointment of judges 2. Lack of an elaborate legal framework of appointing Judges.	1. Wide consultations to be done by JSC recommendations be final 2. Issue to be tackled under Constitutional review 3. Task force to deal with rules and regulations on JSC operations
<i>4. Non-adherence to appointment and promotion procedures and criteria for judicial staff</i>						
1. Implement recommendations of the Kwach Report fully. 2. Introduce and sustain merit-based promotions. 3. Set performance targets, standards and indicators. 4. Establish a clear scheme of service	1. CJ 2. JSC 3. KMJA	1. Schemes of service for all cadres adopted and implemented in 8 <sup>th</sup> May 2009 2. Promotion system based on merit in place where a judicial officer serves for 3 years in one grade before promotion	1. To implement remaining schemes in July 2009 2. Continuous implementation of the Kwach recommendations 3. Performance contracting process	Scheme of service developed	Many stakeholders involved in setting performance targets, standards and indicators e.g. police, prison, probation etc.	1. Judiciary to set up own performance contracting 2. Implement schemes of service 3. Judges to file monthly returns



Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
	Completed Programmes/Activities	On-going Activities			
		<ol style="list-style-type: none"> <li>Appraisal system in place</li> <li>Employment procedures very clear and vacancies are advertised</li> <li>Monthly returns filed by the magistrates</li> <li>Kwach Committee recommendations implemented</li> </ol>			
<b>5. Poor performance by the Judiciary</b>					
<ol style="list-style-type: none"> <li>Establish a public complaints commission to which the public and aggrieved parties can complain against the judicial officers and staff.</li> <li>Carry out regular training programmes.</li> <li>Increase number of judges and magistrates to international standards on judicial staff/population ratios.</li> <li>Publish and enact the Judicial Service Bill.</li> </ol>	<ol style="list-style-type: none"> <li>Parliament</li> <li>Attorney General.</li> <li>JSC.</li> <li>KMJA</li> </ol>	<ol style="list-style-type: none"> <li>Strategic Plan developed and launched</li> <li>23 magistrates hired, 4 high court and 2 court of appeal judges</li> <li>Biennial Governance and Integrity Committee recommendations implemented and action taken on some officers</li> <li>545 clerks hired</li> <li>A Misc. Amendment Bill 2007 enacted</li> <li>Court users committee operational in all provinces</li> <li>Training policy finalized &amp; operational</li> <li>Complaints office established at the High Court in Nairobi</li> <li>Standing Committee on public complaints set up</li> <li>Induction of new judges held for one week</li> </ol>	<ol style="list-style-type: none"> <li>Enhanced Judicial capacity through recruitment and training</li> </ol>	<ol style="list-style-type: none"> <li>Inadequate funds.</li> <li>Poor terms and conditions of service</li> <li>High staff turnover</li> <li>Some new employees did not even take up the appointments</li> </ol>	<ol style="list-style-type: none"> <li>Improving terms and conditions of service for judicial staff to make them realistic are at cabinet level.</li> <li>Use of Judiciary Dialogue cards to monitor complaints</li> <li>Sensitize the Judiciary on performance contracting</li> <li>Implement performance contracting</li> <li>Fill 24 Vacancies of High court Judges and court of appeal</li> <li>Proposal to hold a magistrates colloquium</li> <li>Hiring of a consultant to collect and analyze dialogue cards and issue a report</li> <li>Decentralize complaints to other High Court Stations</li> <li>Implement the misc. amendments 2007 on appointment of Judges</li> </ol>
<b>6. Poor terms and conditions of service</b>					
<ol style="list-style-type: none"> <li>Improve terms and conditions of service.</li> <li>Employment and promotion based on</li> </ol>	<ol style="list-style-type: none"> <li>JSC.</li> <li>Parliament.</li> </ol>	<ol style="list-style-type: none"> <li>Clear recruitment and promotion policy in place</li> </ol>	<ol style="list-style-type: none"> <li>Terms of service</li> </ol>	<ol style="list-style-type: none"> <li>High turnover of personnel due to</li> </ol>	<ol style="list-style-type: none"> <li>JSC to implement the Task Force's recommendations.</li> </ol>

	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
merit. 3. Establish a Standing Committee to review the terms and conditions of judicial officers and staff.		2. Constitutional office holders amendment Act 2009 3. Schemes of Service completed	force on terms and conditions of service for judicial staff	improved 2. Recruitment & promotion policy in place	poor terms 2. Inability to attract sufficient personnel due to poor terms	2. A bill on financial autonomy for Judiciary to be re-introduced 3. Initiate the establishment of a Standing Committee to periodically review terms & conditions of service 4. Benchmark with other jurisdictions
<b>7. Indiscipline and lack of professional ethics</b>						
1. Enforce rules and regulations. 2. Establish and implement a Code of Conduct for all in the Judiciary. 3. Enforce the provisions of the POEA fully. 4. Adopt and implement the Service Charter that has already been prepared.	1. CJ 2. JSC 3. KMJA 4. Consumer of Justice 5. Media 6. Civil Society 7. LSK	1. Biennial Standing Committee on Ethics and Integrity operational 2. The provision of 3. Public Officers Ethics 4. Act fully enforced 5. Litigants charter launched in 2007 and posted on the judiciary website 6. JSC adopted the Code of regulations 7. Service charter adopted & distributed to all courts 8. Some judicial staff charged in court on record tempering 9. A forensic committee set up to investigate loss of courts revenue	Judicial Code of Regulations and Service Charters are operational	1. Instruments of good government 2. Measures taken on indiscipline d officers	1. Lack of funding for KMJA to pursue the Peer Review Mechanism at all court levels 2. Cooperation/sensitization of court users to use avenues available-Judicial dialogue card & litigants charter	1. Continuous sensitization of judicial officers on code of regulations & code of conduct 2. Source for more funds 3. Display the Service Charter in all courts 4. Enforce the regulations & code of conduct 5. Implement forensic committee recommendations
<b>8. Inconsistency in court decisions</b>						
1. Ensure compliance with the law. 2. Encourage complaints to the Complaints Commission. 3. Publish law reports regularly. 4. Circulate judgments by High Court and Court of Appeal to reach magistrates to ensure consistency in application. 5. Carry out sensitization programmes. 6. Ensure adherence to professional ethics and etiquette. 7. Maintain mechanism to audit decisions for miscarriage of justice.	1. KMJA 2. LSK 3. CJ 4. Professional, business and civil society organizations 5. KLRC 6. AG 7. Probation	1. National Council for Law Reporting functional 2. Appellate and review jurisdiction operational. 3. Law reports sent to individual magistrates 4. Practice notes issued by CJ from time to time 5. Enhanced grey book launched, disseminated to courts & issued to every judicial officers 6. Judiciary Training Institute fully operational 7. Judicial Training Institute Board operational	1. Regular publication of Law reports and many available online 2. Bench hotline operational 3. Training of judicial officers 4. Continuous issuance of practice notes by CJ 4. Judicial Review to be filed in all high court stations 5. Kihara Committee on Integrity	Measures to handle inconsistencies in place	1. Lack of basic standards for judicial officers in using discretion 2. Inadequate resources 3. Regular dissemination of landmark rulings & judgments 4. Rulings not based on law	1. Sensitization of the judicial officers. 2. Training of judicial officers. 3. Source for more funds 4. Post rulings on the website 5. The issue of conflicting judgment/rulings of the Court of Appeal should be resolved 6. Enforce internal mechanisms to audit court decisions/rulings



	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>9. Improper allocation of responsibilities</b>						
1. Establish proper and accurate job descriptions based on positions and responsibilities. 2. Develop guidelines and proper procedures on deployment and allocation of responsibilities. 3. Establish a rotational programmed deployment of officers. 4. Define suitable duration at a station for specialized positions to ensure proper planning and implementation 5. Carry out regular and random checks on compliance. 6. Revive the committee to recommend on transfers and assignment.	CJ JSC	1. Scheme service adopted and operational 2. 2009 – 2012 Strategic Plan developed and being implemented 3. Central Planning Unit established 4. 3 Research Officers hired	1. JSC policy on transfer and period of stay at one station being implemented 2. Kwach recommendations on maximum stay in one station being implemented	Scheme of service	1. Inadequate funds 2. Reluctance of some officers to accept transfers 3. Inadequate personnel	1. Track implementation of the targets in the Strategic Plan 2. Debriefing of magistrates/judges
<b>10. Absence of structured training programmes</b>						
1. Carry out training needs analysis regularly. 2. Develop and implement needs based training programme. 3. Strict administration of training. 4. Monitor effectiveness of training. 5. KMJA to lobby for better training. 6. Define mandate and functions of the Judicial Training Committee. 7. Develop and implement a comprehensive training policy and guidelines.	1. CJ 2. JSC 3. KMJA	1. Judicial Training Institute Board operational. 2. Training needs assessment done 3. 300 paralegal staff trained on sign update language 4. 100 court clerks trained 5. 100 accountants trained 6. 100 heads of stations trained on management and administration 7. 100 executive officers trained 8. Judiciary training policy developed & to be adopted by July 2008 9. Judicial Training Institute operational 10. New judges inducted	Finalizing training needs assessment report	Enhanced staff capacity through training	Inadequate resources	1. Implement training needs assessment recommendations. 2. Validation of Judiciary training policy by the CJ 3. Conduct regular training needs assessment 4. Induct all new staff
<b>11. Lack of up-to-date law reports</b>						
Maintain a full-time secretariat of National Council for Law Reporting	1. KMJA 2. LSK 3. CJ	1. National Council for Law Reporting operational. 2. Kenya Law Report Website operational. 3. Kenya Law Report Website with free national legislation posted on the internet	1. Continuous publication of law reports by NCLR. 2. law reports published regularly	Access to updated law reports	1. Shortage of staff 2. Over-editing of the judgments & decisions in the law reports	Improve quality and accuracy of law reports
<b>12. External interference with the judicial process</b>						
1. Establish an internal complaints	1. CJ	1. 2009 – 2012 Judiciary Strategic	1. Judicial Service Bill		1. Parliamentary	1. Re-initiate discussions on

	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
committee with representation from all ranks. 2. Encourage people to expose interference. 3. Enact the whistleblower's Bill to protect and encourage reporting of interference	2. KMJA 3. Media 4. Civil Society 5. LSK 6. KACC 7. Attorney General 8. Parliament 9. MOJNCCA	Plan developed 2. Litigant's charter published 3. Enactment of the Witness Protection Act	2. Training to include independence of judicial officers 3. Biennial Standing ethics and governance committee operational		Calendar. 2. Public need to be sensitized	revival of the JS Bill- (Registrar) 2. Implementation of the Judiciary Strategic Plan 2009 – 2012 3. The Executive/Legislature to take up the issue of discretionary powers 4. Enforce POEA
<b>13. Lack of confidence in the Judiciary</b>						
1. Ensure appointment of persons of integrity. 2. Establish the public complaints Committee. 3. Encourage the public to expose interference. 4. Appoint officers on Merit. 5. Judiciary Open Day where the public interacts with the Judiciary and the Judiciary is able to outline its plans for the year ahead. 6. Develop an IEC Strategy (Information, Education and Communication Strategy)	1. CJ 2. JSC 3. KACC 4. LSK 5. Individual Judicial Officers 6. KMJA 7. AG 8. Parliament	1. Judiciary Website developed and operational. 2. Committee on expeditious disposal of cases established and operational 3. Litigants Charter developed 4. 2nd Judiciary open day held in 20 March 2009 in all High Court stations including Garissa 5. Annual Judiciary Open Day 6. Alternative Disputes Resolution mechanism Bill in Parliament	1. Judiciary sourcing for an IEC consultant to package image & publicity materials 2. Enforcement of the Judicial Code of Conduct and Ethics 3. Vacancies now advertised and interviews carried out 4. Biennial Integrity Committee operational	Annual Judicial Open Day	1. Poor terms and conditions of service. 2. Lack of funds. 3. Want of integrity by some judicial officers	1. Judicial Service bill to be reintroduced 2. More open days to cascade to the grassroots level 3. Develop an IEC strategy 4. Establish courts users committees in all regions 5. Implement the Bosire task Force recommendations 6. Avail litigants charter to those who cannot access website 7. Prominently display litigants Charter in all court 8. Enhance inter-agency relationships in the justice system-KMJA
<b>14. Delays in hearing of cases</b>						
1. Implement Kwach Report. 2. Establish a supervisory and control mechanism to ensure efficient trial of cases. 3. Retrench ineffective staff. 4. Sensitization of staff. 5. Change law to provide for more judges. 6. Legislate the maximum length of time a person can be remanded for certain, petty offences.	1. CJ 2. JSC 3. KMJA 4. Attorney General 5. Parliament 6. Prisons Dept.	1. Recommendations of Kwach Report being implemented 2. Committee on Expeditious Disposal of Cases operational. 3. Rules Committee operational. 4. Monthly returns to Registrar. 5. Judicature Act amendment (Statute Laws. Misc. amendment Act 2007) increased the number of Judges 6. Criminal Procedure Code (Amendment) Bill 2007 which allows plea bargains and agreement enacted	1. Infrastructural development (construction of more courts) on going in the following areas a). Income tax house, Nairobi – to accommodate 56 judicial officers b). Kisumu c). Nyeri d). Malindi e). Busia f). Narok g). Naivasha	More courts established	1. Inadequate resources 2. Inadequate facilities for increased staff 3. Heavily under staffed 4. Heavy workload compromises quality of service 5. Legislating minimum period for trials & remand is not practical	1. Lobby for more funds 2. Inter-agency forum for judiciary, Police, Attorney General, Prisons & all players in the justice system 3. Improvement of infrastructure (Expansion of court facilities) 4. Automation of court proceedings 5. Perception of poor image should be addressed to recognize Judicial staff work under difficult conditions 6. If pilot phase on digital



	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		7. 11 Mobile courts established 8. Completed construction of Butere, Mariakani, Kilifi Meru, Kilgoris, Sotik courts complete 9. Heads of Stations & Resident Judges supervise the subordinate 10. Courts ICT Committee established 11. Garrissa, Kisii and Kakamega identified for high court facilities	2. Pilot Digital recording of proceedings			recording is feasible roll out in all courts 7. e-government should develop an ICT policy 8. Adopt best practices in determination of cases.
<b>15. Poor management of records</b>						
1. Develop an effective records system. 2. Provide proper physical facilities for keeping records. 3. Recruit and train personnel in records management. 4. Identify and discipline persons contributing to malpractices in records management.	CJ	1. Consultant identified to advise on digitalization of records 2. ICT Committee established 3. Some judicial officers charged with record tampering	Court automation and digital recording		1. Inadequate resources 2. Bureaucracy in procurement process	1. Source more funds. 2. Modernization of Records 3. Set in place a case tracking management & case management information system
<b>16. Outdated equipment and technology</b>						
1. Acquire adequate modern equipment and technology. 2. Train staff on modern technology	1. CJ 2. DPM 3. Min. of Finance 4. Min. of Planning and National Development	1. Continuous upgrading of equipment. 2. Acquisition of computers	Training on ICT	Acquisition of ICT equipment	Inadequate financial allocation.	Source more funds.
<b>17. Institutionalized corruption</b>						
Enforce the Anti-corruption and Economic Crimes Act (ACECA) and the POEA.	1. Parliament 2. Attorney General 3. JSC 4. KACC 5. The Media 6. KMJA	1. Ringera Committee's recommendation implemented and action taken on the culprits. 2. The Biennial Judicial Ethics and Governance Committee operational. 3. Publishing and enforcing Public Officers Code of Conduct. 3. The Chief Justice Rules in place. 7. Onyango Otieno Integrity Committee findings have been posted to the website and are being implemented 8. Court users committee operational	1. Guidelines for Peer-Review Mechanism being developed 2. Mainstream anti-corruption prevention committees in all stations 3. Initiation of anti-corruption sensitization content in judicial trainings		1. Resistance to change 2. Interference 3. Abuse of discretionary powers 4. Poor management skills	1. Implement Onyango Otieno Committee recommendations 2. Review of systems and structure 3. Carry out Corruption Risk Assessment
<b>18. Poor linkages with other agencies in the administration of justice</b>						

	Responsibility	Progress of Implementation		Achievement/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
Establish a forum for joint meeting.	1. Government 2. Stakeholders 3. Media 4. Civil Society	1. Regular joint forums held. 2. GJLOS Sector meetings 3. Court users committees operational	1. Court users committees 2. Attitude and socialization	Court users committees established		1. Institutionalize court users committees 2. Strengthen linkages 3. Socialization
<b>19. Inadequate anti-corruption courts</b>						
1. Establish anti-Corruption courts in all provinces. 2. Employ adequate Judicial staff. 3. Sensitize all judicial officers on Governance and Anti-corruption.	1. CJ 2. MoF 3. JSC 4. MoJNCCA 5. Law Reform Commission 6. Parliament	Anti-corruption courts established.		Anti-Corruption Courts	1. Poor terms and conditions of service 2. Capacity constraints 3. Backlog of cases 4. Few anti corruption magistrates	1. Stakeholders to discuss Amendment of Section 3 of the Anti -Corruption and Economic Crimes Act to provide for all principal magistrates and above to hear corruption matters 2. Convene a stakeholders forum to deliberate on the issue and make recommendations 3. Need to sensitize special magistrates dealing with corruption matters under ACECA-e.g. Video evidence



### 3. EXECUTIVE

#### 3.1 GENERAL ISSUES AFFECTING THE EXECUTIVE

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Lack of clear information to the public on existing services, processes and procedures</i>						
1. Establish central reference or documentation and information centre 2. Publish regularly a comprehensive directory of government services and functions with a wide distribution (central reference point where public can obtain information) 3. Ensure Government offices display information on available services and correct procedures and processes including applicable fees and charges 4. Formulate and display clear and specific performance standards 5. Develop and enforce customer charters and organisational performance pledges 6. Introduce results based management 7. Establish a system where wealth declarations forms are made public 8. Harmonize service charters across public service 9. Introduce regular local media programmes on Government services 10. Make it mandatory for all Government agencies to	1. Head of Public Service 2. Accounting Officers/Authorised officers 3. Interest Groups 4. Parliament 5. Ministry of Information	1. Most Ministries, Departments and Agencies (MDAs) have established resource centres 2. Ministerial Service Charters have been cascaded to departmental levels in most MDAs. 3. The Public Officer Ethics Act , 2003 (POEA) was amended to facilitate public access to wealth declarations information 4. Functioning websites in place in most MDAs. 5. Service Regulations pursuant to Service Commissions Act, Cap 185, were put in place for The Police, Local Authorities, Prisons and Pensions Departments. 6. Most MDAs displayed their Service Charters as a Performance Contract (PC) obligation 7. RRI implemented in 19% of all Public Service institutions 8. All Ministries, Local Authorities and most of the State corporations on Performance Contracting 9. All Ministries are implementing the new Performance Appraisal System (PAS) coordinated by the Ministry of State for Public Service (MOSPS) 10. 6 Regional Development Authorities implementing the PAS	1. Consultations still going on the reviewed discipline manual – under the auspices of the Public Service Commission (PSC) 2. Implementation of the Government IEC strategy on-going; <ul style="list-style-type: none"> <li>• TV talk shows</li> <li>• News letters</li> <li>• Up-dating of website</li> <li>• Support for Ministry of Information</li> </ul> 3. implementation of Citizen Service Charters 4. More sensitization for Rapid Results Initiative (RRI) in Ministry of Agriculture at the district level 5. Trained coaches supporting the institutionalization of RBM and all reforms in their institutions 6. MDAs implementing their Performance Contracts 7. implementation of Performance Appraisal Systems	Service charters operational	1. Some of the stakeholders and implementers i.e. Ministries, Local Authorities, the police and Prisons are not fully acquainted with the relevant service regulations. 2. Some Service Charters do not have comprehensive standards for all services offered. 3. Some institutions do not adhere to the standards spelt in their charters 4. Ability to monitor charter to the lowest level is a challenge 5. Many institutions have cascaded charters to the lowest levels 6. Training provided not sufficient to produce effective coaches. 7. Some institutions not complying with the PAS 8. The PAS needs to be reviewed 9. Circulars not	1. Recommendations on wealth declaration analysis to be implemented 2. Initiate recommendations for further amendment to the Public Officer Ethics Act 2003 3. Ministry of Justice has developed drafts to accommodate amendments to the Act made through the Statute Law (Misc. Amendments )Act 2007 4. Develop a monitoring framework for the cascading of charters. 5. Support implementation of Service Charters 6. Initiate review of Service Charters to focus on standards and develop a standard format 7. The implementation of most public service reform programmes have been put in the 2008/2009 Performance Contract. 8. Continued support by the RRI coaches 9. All institutions under the Executive arm of Government and all public tertiary institutions should be put on PC 10. Initiate Plans to place the Judiciary on PC 11. Coordinate the implementation of the new Performance Appraisal System (PAS) in the



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
publish and disseminate annual reports 11. Keep up to date Government/Ministries/ Institutions websites					widely circulated 10. A few MDAs delay in signing their Performance Contract on time.	remaining State Corporations and Local Authorities 12. Support the review of the new PAS. 13. Lobby for entrenchment of performance contracting in the constitution 14. Finalize Draft Performance Management Bill 15. Public Sector Reform has supported the development of service charters for 16 ministries at the moment 16. Capacity Review Programme
<b>2. Limited public access to Government information</b>						
1. Release accurate information regularly through press releases, conferences and briefings 2. Establish public information desks in all Ministries/Institutions 3. Enact Freedom of Information Act (FOI)	1. Government 2. Attorney-General 3. Head of Public Service 4. Parliament 5. Individual ministries and departments 6. Ministry of Information 7. Public Communication Office	1. Dissemination of IEC materials on functions, programmes, services offered of public institutions 2. The Public Complaints Standing Committee operational 3. The Public Service Week held members of the public learn about the Government, MDAs and the services and programmes 4. A number of MDAs participated in Agricultural Society of Kenya (ASK) shows where they also distributed IEC materials and disseminated information on their programmes and activities to members of the public. 5. Some MDAs developed interactive websites to enable the public engage them, e.g. the Public Sector Reforms and Development Secretariat (PSRDS) on issues of development and service delivery. 6. A Freedom of Information Bill was developed and published.	1. Updating of MDA websites with information on Government programmes and activities. 2. Validation process with stakeholders on the steps to be taken, towards the implementation of the Human Resource Management and Reform Strategy in Government	Annual public service week	1. Websites of most MDAs are not interactive 2. Divergent views on the contents of the Freedom of Information Bill (FOI Bill) 3. Tight Parliamentary calendar making it difficult for the FOI Bill to be considered and passed.	1. Transform the Public Complaints Standing Committee into a fully-fledged Ombudsman Office through the development of new legislation i.e. Ombudsman Bill 2. Make MDA websites interactive. 3. MDAs should prepare IEC materials on their mandates, programmes and activities. 4. Freedom of Information Bill should be re-introduced for enactment
<b>3. Poor remuneration of public servants</b>						
1. Implement the recommendations of the Public service salary review and harmonization committee 2. Peg Public Service pay, benefits and pension on	1. Head of Public Service 2. Public Service Commission 3. Attorney-General 4. Directorate of Personnel	1. All the schemes of service submitted to the Ministry of State for Public Service (MOSPS) have been considered, approved and implemented. 2. Review examination syllabus for proficiency and Administrative Officers exams 3. Government has improved remuneration for	1. Adjusting various grades in the Public Service to match what is provided for in the Banding System structure and Job evaluation Report. 2. Adjusting salary levels to	1. Well defined structures for career progression 2. Significant improvement in public	1. Financial constraints 2. Demands in the collective bargaining agreements 3. Decentralized multiple points for reviewing salaries for	1. Implementing the recommendations of the Permanent Public Service Remuneration Review Board 2. Rationalize and harmonize Public Service benefits and Introduce contributory

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
cost of living and best practices 3. Introduce performance based remuneration and appointment/promotion 4. Intensify Corruption Prevention Efforts	Management (DPM) 5. Permanent Public Service Remuneration Review Board 6. Respective Service Commissions 7. KACC	civil servants	match the Harmonization Instrument. 3. Integrating salary adjustments into Government projected allocation in the budget period. 4. Guiding Collective Bargaining Agreement (CBA) negotiations to be based on productivity and performance 5. Legislation of a Central Salary Review Board 6. Instituting regular job evaluation to determine job worth at different times 7. The Government is working towards validating allowances and fringe benefits payable to Public Servants 8. Auditing of schemes of service 9. Draft proposal on incentives/sanction system	sector salaries	various organizations within the Public Service thus causing disparities in payment of remuneration among comparable jobs. 4. Developing a remuneration system that is based on productivity and not just cost of living. 5. Requests for waivers of provisions under the schemes of service. 6. Some authorized officers are yet to develop schemes of service for their employees or review outdated ones 7. Huge disparities in pay awards/salaries for similar jobs 8. Personal/Individually negotiated contracts demoralizes staff	Pension that is sustainable 3. Introduce concept of performance based remuneration and appointment and promotion based on performance and merit 4. Ensuring that the Government gets value worth from the Consultancy Services on Remunerations 5. Finalize proposals on legal basis of the remunerations board. 6. Authorized officers to make proper human resource requirement projections and initiate succession management strategies. 7. Authorized officers to review schemes of service for their employees and initiate schemes where they do not exist 8. Liaise with DPM with regard to public servants
<b>4. Absence of schemes of service and non-adherence where they exist</b>						
1. Improve, harmonize and strictly enforce existing schemes of service 2. Develop and implement schemes of service where they do not exist 3. Punish those who violate the scheme of service	1. Ministry of State for Public Service 2. Public Service Commission (PSC) 3. State Corporation Advisory Committee 4. Public Service Reform & Dev. Secretariat 5. Ministries /Institutions	1. All the schemes of service submitted have been approved and implemented 2. A draft on performance and sanctions framework has already been prepared for legal officers 3. A Cabinet paper on performance contracting has been prepared	1. Ministry of State for Public Service is working towards the development of Schemes of Service for all cadres. 2. New requests are being considered.	1. Most of the officers have schemes of service 2. well defined structures for career progression	1. Requests for waivers of provisions under the schemes of service 2. Political interference disregarding schemes of service 3. Discretionary powers 4. Personally/individually negotiated contracts	1. Authorised officers to make proper human resource requirement projections and initiate succession management strategies. 2. Ministry of state for public service to develop a Cabinet paper 3. Finalize the draft performance/sanctions framework 4. Ministry of State for Public service to convene meetings



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	6. Respective Service Commissions					of relevant stakeholders on the issue of tracking promotions 5. Creation of a budget-line
<b>5. Unclear roles and lines of authority</b>						
1. Office of Public Communication to inform the public of the new organisation structure 2. Implement performance contracting based on clear deliverables 3. Induction, training and refresher courses for all public officers including ministers and assistant ministers	1. Head of Public Service 2. Attorney General 3. DPM 4. PSC	1. Public Service Commission (PSC) Regulations completed and published 2. Relevant implementing agencies sensitised on the regulations. 3. The Office of the President issued a circular spelling out the mandates, roles and responsibilities of all ministries. 4. Different MDAs implementing their performance contract targets 5. Induction curriculum and modules developed for all officers appointed to Leadership positions including Ministers, Assistant Ministers, Permanent Secretaries and Members of Parliament (MPs), PSs, Ministers, Assistant Ministers. Program developed together with the Parliamentary Service Commission for MPs	Strategy on Transformative Leadership being developed.	Increased awareness of Government functions and responsibilities	1. Circulation of regulations in the general civil service 2. Sometimes selected targets of NACP are not results based 3. Compelling institutions to align their PC targets to strategic objectives. 4. Circulars not widely circulated to all public officers	1. Authorised officers to pass information to their staff. 2. Curriculum on Transformative Leadership to be developed in partnership with the Kenya Institute of Administration 3. Circulars not confidential will be published in the Kenya Gazette. 4. Continue aligning PC targets to Strategic plans clear rules and lines of authority, and sector performance standards
<b>6. External interference</b>						
1. Establish a legal institution to handle all the multi-sectoral complaints of external and internal interference and malpractices. 2. Implement codes of conduct 3. Implement and enforce performance contracts at all levels 4. Improve and rationalize assessment of performance contracting	1. Parliament 2. Head of Public Service 3. Attorney-General 4. PSC 5. President 6. Prime Minister's Office	1. Public Complaints Standing Committee (PCSC) operationalized 2. Compliance inspection on POEA undertaken in select ministries, local authorities and parastatals. 3. Prime Minister's office overseeing the implementation and enforcement of Performance Contracting.	1. Development and circulation of user guide to declaration of incomes assets and liabilities 2. Implementation of Codes of Conduct and Ethics 3. Ombudsman Bill	1. Code Of Conduct for MPs 2. Enforcement of POEA	1. Lack of entrenchment of this committee on a statutory or regulatory framework 2. A culture of impunity	1. Politicians and senior administrators to continue to demonstrate sufficient goodwill for the enhancement and promotion of integrity in the Public Service 2. Enforcement of POEA 3. Development of codes of conduct for MPs 4. Finalization of Ombudsman Bill
<b>7. Lack of properly articulated national vision and aspirations</b>						
1. Evolve a shared national vision 2. Articulate national aspirations	1. Min. of Planning and National Development 2. Parliament	1. Implementation of the <i>Kenya Vision 2030</i> , which seeks to make Kenya a middle-income country by the year 2030 2. Implementation of the Medium Term Plan (MTP)	1. Resubmission of Cabinet Memo on DFRD 2. Working with clusters as described in the Vision	An articulated National Vision and MTP	1. Lack of adequate resources to implement programmes	1. Implementation of MTP 2. Lobby for inclusion of planning in the constitutional review



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
3. Develop and enforce a policy and legal national and local infrastructure for planning	3. Attorney-General 4. Interest Groups	for Kenya Vision 2030 for the period 2008-2012 3. Under the current (2008) <i>Organization of the Government of the Republic of Kenya</i> , the Ministry of Planning has been charged with the responsibility of overseeing the implementation of Kenya Vision 2030 4. Long term national aspirations have been translated into medium term aspirations in the MTP 5. A national conference on Kenya we want was held on 4 <sup>th</sup> -6 <sup>th</sup> February 2009 where Kenyans had an opportunity to articulate their national aspirations and country they would want to have. 6. Vision 2030 and MTP publicity through billboards, provincial workshops, press conferences and radio talks. 7. The Minister and Permanent Secretary of Ministry of State for Planning, National Development and Vision 2030 appeared in several press conferences and radio talks to disseminate vision 2030. 8. Public Service Reform Strategy reviewed to rhyme with the Kenya Vision 2030. 9. The concept paper on Kenya School of Government developed	2030 to support them in delivering <i>Results for Kenyans</i> 3. Development of strategies for Local Government and Street families 4. Development of a strategy on Transformative Leadership 5. MTP Vision 2030 publications thro billboards and provincial workshops, press conferences, radio talks		envisaged in MTP 2. Several Acts of Parliament in place governing operations of devolved funds that may conflict with provisions of DFRD 3. The capability Reviews deliberately designed to identify gaps in skills and competencies	3. Support Ministries in the development of strategic plans linked to Vision 2030 4. Provide support for the Ministries already on the Institutional Capacity Building program 5. Validation of the public service reform strategy 6. Disseminate Vision 2030 and its MTP 7. Implementation of recommendations of Kenya We Want Conference 8. Implementation of Vision 2030 9. Harmonize DFRD proposal and devolved funds (CDF, LATF, etc) 10. Review of Planning framework
8. <i>Lack of Legal framework for planning</i>						
1. Develop and enforce legal framework for policy and planning 2. Make execution of approved plans and projects legally compellable	1. Parliament 2. Attorney-General 3. Ministry of Planning & National Dev. 4. Head of Public Service	1. Consultants on Legal Planning framework 2. A draft Monitoring and Evaluation (M& E) policy has been prepared and will have a legal backing 3. Constituency Development and Resources Management Framework was developed and submitted to Cabinet Sub-committee of Finance, Administration and Planning. Comments from the committee have since been incorporated, 4. Constituency Development and Resources Management Framework Bill has been prepared. 5. Compliance with the Anti-Corruption and Economic Crimes Act 2003, which requires that all activities by public institutions should be carried out in accordance with approved plans 6. KIPPRA Act operationalised 7. Kenya National Bureau of Statistics (KNBS) Act operationalised 8. Annual Public Expenditure Review (APER) carried out	1. Committee to review planning ministries in other countries to establish whether their operations are governed by Acts of Parliament and where this is so, establish the kind of legal frame work in place. 2. The Committee established to consider the need for a Planning Bill ruled that unifying various Acts governing planning may be a tall order and needs rethinking 3. Number of officers	1. CDF Act amendment 2. Review of planning framework	1. Shortage of skilled manpower in planning and M&E. 2. Lack of consensus on the Planning Bill	1. Hold further consultations with stakeholders on the need for a Planning Bill 2. Lobby relevant parliamentary committees to enact DFRD Bill 3. Further amendments to the CDF Act to be done

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		9. Development of ministerial Annual Work Plans now entrenched in Performance Contracting 10. National Performance Management Framework developed detailing the role of all Government agencies in planning and implementing programs 11. A task force to review CDF Act 2003 and CDF (amendment) Act 2007 was established and launched. The main responsibility of the task force was to identify potential areas of amendment to the Acts with a view to addressing the operational constraints for smooth management and implementation of CDF.	charged in a court of law 4. Better execution of approved plans			
<b>9. Disjointed approach to national planning</b>						
1. Consider planning periods as follows: 2. Long-term: 50 years or more 3. Medium term: 20 years or less 4. Short term: 5 years or less 5. Improve the CDF and CBF systems. 6. Min. of Planning & Dev. to sensitise the public on national plans 7. Give Development Plans force of law	1. Government 2. Attorney-General 3. Accounting officers 4. Head of Public Service 5. Min. of State for Planning, National Development and Vision 2030. 6. All ministries 7. All stakeholders	1. Under the 2008/2009 Performance Contract period, all MDAs are required to align their Strategic Plans to the Vision 2030 and the MTP. 2. 148 District Development Plan that are aligned to Vision 2030 and its MTP have been edited and are awaiting printing. 3. 20 MTP sector Plans have been prepared edited and are ready for printing. 4. CDF Act amended to ensure better management of CDF funds and projects through Constituency Development Fund (Amendment) Act, 2007. The Act was also amended to vest the management of the Act under the Ministry of Planning – to ensure a co-coordinated approach to planning, implementation and monitoring of CDF projects. 5. CDF Board in place 6. Public sensitization fora held in 8 provinces 7. Sensitization fora held for interest groups on Vision 2030	1. Sensitization on MTP 2. Review of Economic Recovery Strategy 3. Dissemination of vision 2030 & MTP	An articulated National Vision and Medium Term Plan	1. Unplanned projects/programmes through executive orders 2. Political interference on project selection	1. Implementation of Kenya Vision 2030 and the MTP (2008-2012) 2. Monitoring and evaluation of programmes planned activities. 3. Application of Performance Contracts in the planning process. 4. Development of sector specific MTP based on Vision 2030
<b>10. Non-implementation of centrally prepared government plans</b>						
1. Ensure that plans are implemented, evaluated, monitored and reviewed regularly 2. Improve mechanisms to ensure implementation 3. Satisfactory progress or component completion mandatory basis for	1. Head of Public Service 2. Attorney-General 3. Accounting officers 4. Min. of Finance 5. Min. of Planning & National Development 6. All stakeholders	1. 148 District Development Plan that are aligned to Vision 2030 and its MTP have been edited and are awaiting printing. 2. 20 MTP sector Plans have been prepared edited and are ready for printing. 3. CDF Act amended to ensure better management of CDF funds and projects through Constituency Development Fund (Amendment) Act, 2007. The Act was also amended to vest the	2008/2009 PC targets focus on supporting the flagship Ministries in the economic and social pillar of the Vision 2030 Ministries	1. National Vision 2030 2. National Integrated Monitoring & Evaluation System	Lack of Monitoring and Evaluation culture	1. Implementation of NIMES 2. Enforcement of Performance Contract obligations to ensure implementation of planned activities. 3. Lack of M & E culture



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
further disbursements		management of the Act under the Ministry of Planning – to ensure a co-coordinated approach to planning, implementation and monitoring of CDF projects. 4. CDF Board in place 5. Public sensitization fora held in 8 provinces 6. Sensitization fora held for interest groups on Vision 2030				
<b>11. Lack of fiscal discipline</b>						
1. Implement existing financial and budgetary controls 2. Hold individual officers accountable for financial actions and decisions during and after service 3. Enforce fiscal discipline 4. Enforce the law vigorously, consistently 5. Adopt international budgeting, auditing and general financial management standards	1. Head of Public Service 2. Treasury 3. Accounting officers 4. National Audit Office 5. KACC 6. All stakeholders	1. Tax administration reforms and modernisation. 2. Operationalisation of the Privatization Act, 2005 3. Operationalization of the Privatization Commission. 4. Set targets in the PC to comply with Financial controls 5. Cost effectiveness through performance contracting 6. Annual PER	1. Reducing recurrent expenditures. 2. Containing the growth of domestic debt. 3. Rules and regulations on external loans and credit (External Loans and Credits Act Cap 422) to be gazetted 4. CBK is working on draft regulations on internal borrowing 5. The Organic Budget Bill is in Parliament for discussion which will tackle the issues on debt management	1. Increased enforcement of fiscal measures 2. Increased revenue	1. Improving utilization of development funds especially for externally funded projects. 2. Linking expenditure projections to detailed costing of projects/programmes. 3. Delay in processing tax refunds	1. Introduce programme based performance budgeting. 2. There has been an approval of withdrawal of parliament voted budgetary allocation. 3. Audit expenditure on budgetary allocation to confirm compliance. 4. Report to parliament on non-compliance of budget allocation for necessary action 5. The tax bracket should be widened to include constitutional office holders and members of parliament 6. Expedient processing of tax refund 7. Intensify anti-corruption efforts 8. MOF has held a number of workshops 9. There is a circular for contract importation 10. E-procurement Strategy
<b>12. Lack of transparency in procurement</b>						
1. Ensure that procurement tenders are sufficiently publicised at all times 2. Surcharge individual officers for corrupt practices during and after service. 3. Hold individual officers accountable for financial	1. Head of P/Service 2. Treasury 3. Accounting Officers 4. Interest Groups 5. KACC 6. Parliament 7. PPOA	1. Operationalization of the Public Procurement and Disposal Act 2005 and the establishment of the Public Procurement and Oversight Authority responsible for the regulation of procurement in the public sector, including procurement of security related contract. 2. The launch of the Public Procurement and Oversight Authority 3. New procurement regulations and guidelines.	1. PPOA in the process of developing e-procurement system. 2. E-procurement Task force in place to oversee implementation 3. Development of procurement plans by all procuring entities	1. Transparency and accountability in public procurement 2. Increased compliance with PPDA	Capacity constraints, including limited manpower, financial and physical resources and technological capabilities.	1. Posting on the Ministries' websites all information on contracts, including names of contractors, decisions of Procurement Appeals Board, bidders and tenders outcomes, and contractors' performance. 2. Introduce transparent Vetting System to pre-qualify

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<p>actions and decisions during and after service</p> <p>4. Review regularly procurement regulations to ensure value for money and efficiency</p> <p>5. Operationalization of the Public Procurement and Disposal Act (PPDA)</p>		<p>4. E-procurement strategy has been developed.</p> <p>5. PPOA's website established</p> <p>6. The website contains necessary information for public such as average price lists for common user items, contract awards above 5million.</p> <p>7. Drafted MoU with KNBS for the purpose of increasing and updating the price list.</p> <p>8. Summary review cases decided by the Administrative Review Board for the years 2000-2007 posted on the PPOA website.</p> <p>9. Posting of the minimum requirements for lodging complaints is being done. E-advertisement of public tenders now operational- www.tenders.go.ke</p> <p>10. Summary Review of cases on the PPOA website</p>	<p>4. Procurement review/ audit reports conducted for selected procuring entities are posted on the PPOA website. 13 other reviews are currently ongoing.</p> <p>5. PPOA follow up implementation of the ARB decisions and other on-compliance observations made during the hearing to prevent future complaints.</p> <p>6. PPOA follow-up on the various procurement complaints submitted by KACC and provides findings to them for action.</p> <p>7. PPOA organizing a stakeholder's workshop for discussions on the areas that require amendments.</p> <p>8. The PPOA Review Board identifies areas that require amendments during the hearing of review cases.</p>			<p>companies interested in bidding for contracts to address conflict of interest and to enable exposure of fraudulent companies.</p> <p>3. Blacklist companies found to have been involved in corrupt activities and make information publicly available.</p> <p>4. E-Advertisement on public tenders</p> <p>5. Audit Reports posted on the website</p> <p>6. There is a minimum requirement for the Administration Review Board</p>

13. Failure to adopt modern management information systems

<p>1. Implement E-govt. strategy</p> <p>2. Implement ICT policy</p> <p>3. Awareness Creation of information systems</p> <p>4. Harmonize e-Government and Government Information &amp; Technology Services (GITS) and establish a</p>	<p>1. Head of Public Service</p> <p>2. All public institutions</p> <p>3. Interest groups</p>	<p>1. ICT road shows held</p> <p>2. Directorate of E-Government and GITS merged under ICT Secretary</p> <p>3. Automation has been introduced as a requirement in the performance contract</p>	<p>1. Implementation of E-government strategy ongoing</p> <p>2. E-transaction bill under development by E-Government</p> <p>3. Continuous enhancement of level of automation</p>	<p>1. Increased awareness &amp; application of MIS</p> <p>2. Improved efficiency in service delivery</p>	<p>1. Resistance to change</p> <p>2. Inadequate resources</p>	<p>1. Training on change management - in relation to ICT</p> <p>2. Enhance the level of automation</p>
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
focal point						
<b>14. Delayed auditing</b>						
<ol style="list-style-type: none"> <li>Undertake timely auditing (Set a deadline for auditing)</li> <li>Avail more resources to audit agencies</li> <li>Enforce penalties related to audits</li> <li>Enforce Auditor's recommendations</li> <li>Provide access to audit report</li> <li>Operationalize and strengthen Ministerial Audit Committees</li> <li>Publish KNAO service Charter</li> </ol>	<ol style="list-style-type: none"> <li>Head of Public Service</li> <li>LA</li> <li>Ministry of Finance</li> <li>MPND</li> <li>KENAO</li> <li>Interest groups</li> <li>Parliament</li> </ol>	<ol style="list-style-type: none"> <li>Risk-based audit approach rolled out in all Ministries</li> <li>Strengthening capacity of the Kenya National Audit Office (KENAO)</li> <li>KENAO has cleared auditing of all SAGAS</li> <li>Staff training to increase capacity.</li> <li>Audit reports can be downloaded at KENAO'S website</li> <li>New parliamentary Committee to consider LA account</li> </ol>	<ol style="list-style-type: none"> <li>Timely preparation and submission of audit reports.</li> <li>Establishment of Ministerial Audit Committees</li> </ol>	<ol style="list-style-type: none"> <li>Up to date audit reports for Central Govt &amp; state corporations</li> <li>Backlog cleared except for LA.s</li> </ol>	<ol style="list-style-type: none"> <li>Inadequate capacity at KENAO to carry out all necessary audit work</li> <li>Delayed consideration of audit reports by Parliament</li> <li>Not all ministries have established audit committees.</li> </ol>	<ol style="list-style-type: none"> <li>Preparing and publishing external audit reports of the Auditor and Controller General in a timely manner in line with the Public Audit act, 20003.</li> <li>Timely consideration by Parliament of audit reports from KENAO.</li> </ol>
<b>15. Inadequate monitoring and controls</b>						
<ol style="list-style-type: none"> <li>Strengthen monitoring and control systems in all projects and programmes</li> <li>Establish a National Monitoring &amp; Evaluation (ME) system</li> </ol>	<ol style="list-style-type: none"> <li>Head of Public Service</li> <li>LA</li> <li>Min. Finance</li> <li>Min. of Planning and National Dev.</li> </ol>	<ol style="list-style-type: none"> <li>Introduction of Integrated Financial Management Information Systems (IFMIS) in order to strengthen the expenditure commitment control systems, improved budget transparency by eliminating unclassified budget votes and set out clear guidelines for Exchequer issues to line Ministries requiring for up to date bank reconciliation.</li> <li>30 Ministries operating under IFMIS.</li> <li>Further roll out of the NIMES system in districts and provinces was undertaken</li> <li>Ministerial Monitoring and Evaluation Committees were established in all ministries.</li> <li>District Monitoring and Evaluation Committees were revamped.</li> <li>90 District Development Officers (DDOs) and 41 officers from Central Planning and Project Monitoring Units (CPPMUs) were trained on M&amp;E</li> <li>Development of an electronic monitoring and evaluation system (E-Promise) was initiated. The system is at an advanced stage of completion.</li> <li>Draft Monitoring and Evaluation Framework for</li> </ol>	<ol style="list-style-type: none"> <li>Rolling out of IFMIS to the remaining Ministries.</li> <li>Provincial launches of NIMES</li> </ol>	National Integration Monitoring & Evaluation System operationalised.	<ol style="list-style-type: none"> <li>Capacity constraints, including limited manpower, financial and physical resources and technological capabilities.</li> <li>IFMIS still bringing problem</li> </ol>	<ol style="list-style-type: none"> <li>Adopting a risk based internal audit approach including Ministerial audit committees to provide oversight.</li> <li>Testing of M&amp;E tools for reforms in the next contract period</li> <li>Streamline IFMIS operations to address technological challenges</li> <li>Roll out IFMIS in all ministries</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		all Public Service Reforms				
<b>16. Poor management of resources</b>						
<ol style="list-style-type: none"> <li>1. Prioritise resource allocations</li> <li>2. Enforcement of guidelines on use of resources</li> <li>3. Planned procurement</li> <li>4. Strict enforcement of pertinent new laws</li> </ol>	<ol style="list-style-type: none"> <li>1. Min. Finance</li> <li>2. Min. of Planning &amp; National Development.</li> <li>3. Accounting officers</li> <li>4. Interest Groups</li> <li>5. All public sector institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of MTEF</li> <li>2. Programme based budgeting</li> <li>3. Procurement Plan developed</li> <li>4. Parliamentary budget process framework</li> </ol>	<ol style="list-style-type: none"> <li>1. Enhanced implementation of the MTEF in order to align public resources with national objectives.</li> <li>2. Implementation of procurement Plan</li> </ol>	Participatory resource allocation through MTEF	<ol style="list-style-type: none"> <li>1. Experiencing systemic problems in implementing the plan thus occasioning shortages of supplies</li> <li>2. Sometimes the lowest bidder is still above market survey prices thus causing suspicion of the process and delays due to cancellation of quotations</li> </ol>	<ol style="list-style-type: none"> <li>1. Enhance transparency and broader stakeholder participation including Members of Parliament and public in the budget cycle.</li> <li>2. Adhere to procurement plans</li> </ol>
<b>17. Abuse of discretionary powers</b>						
<ol style="list-style-type: none"> <li>1. Implement ACECA</li> <li>2. Establish guidelines to regulate the exercise of discretionary powers</li> <li>3. Enforce guidelines on use of available resources e.g. Transport, stationery, telephony</li> <li>4. Set up committee to consider tax waivers</li> <li>1. Review tax exemption laws</li> <li>2. Limit and in some cases eliminate Ministerial discretion conferred by specific legislation</li> </ol>	<ol style="list-style-type: none"> <li>1. Parliament</li> <li>2. Attorney-General</li> <li>3. Head of Public Service</li> <li>4. Interest groups</li> <li>5. KACC</li> <li>6. Kenya National Commission Human Rights (KNCHR)</li> <li>7. Treasury</li> <li>8. parliament</li> </ol>	<ol style="list-style-type: none"> <li>1. New Transport circular by head of public service under implementation to curb abuse of government vehicles.</li> <li>2. Introduction of the East African Community Customs Management Act (CMA) reduced the number of exemptions that can be granted by the Minister at discretion.</li> <li>3. Strict enforcement of telephone use</li> <li>4. Transport Policy has been finalised</li> <li>5. Stationery policy developed</li> </ol>	<ol style="list-style-type: none"> <li>1. Disposal of excess government vehicles ongoing</li> <li>2. Development of objective criteria for granting tax exemptions and waivers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Improved use of resources</li> <li>2. Guidelines of tax exemptions for NGOs</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of transport policy by all ministries</li> <li>2. Abuse of discretionary powers</li> <li>3. Legislation not yet been introduced to parliament.</li> </ol>	<ol style="list-style-type: none"> <li>1. Introduce legislation to curb abuse of discretionary power.</li> <li>2. Implementation of transport policy</li> </ol>
<b>18. Disregard and or non-existence of professional ethics and practices</b>						
<ol style="list-style-type: none"> <li>1. Strengthen enforcement of professional standards and ethics</li> <li>2. Set up monitoring mechanisms to ensure enforcement of codes of conduct</li> <li>3. Regularly review efficacy</li> </ol>	<ol style="list-style-type: none"> <li>1. Professional bodies</li> <li>2. Accounting officers</li> <li>3. KACC</li> <li>4. Service consumers</li> <li>5. Responsible</li> </ol>	<ol style="list-style-type: none"> <li>1. Enforcement of the Public Officer Ethics Act 2003 (POEA) and the Codes of Conduct and Ethics established thereunder.</li> <li>2. Enforcement of performance management</li> <li>3. Staff sensitization on economic environment and performance management</li> </ol>	<ol style="list-style-type: none"> <li>1. Training on values and ethics conducted</li> <li>2. Implementation of the Annual Integrity Award Scheme in the entire public sector</li> </ol>	Enforcement of professional standards through implementation of POEA	<ol style="list-style-type: none"> <li>1. Officer's perception that the Public Officer Ethics 2003 was made to punish them. This has necessitated a shift in focus from punishment to</li> </ol>	<ol style="list-style-type: none"> <li>1. Strict enforcement of the Codes of Conduct by responsible Commissions under the POEA 2003.</li> <li>2. Establishment of a National Ethics Centre or Institute (e.g. like the Ethics Institute of South Africa).</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
of codes of conduct 4. Establishment of a national ethics centre	Commissions 6. Courts 7. Individual Professionals 8. KNHRC				compliance. 2. Poor enforcement of Codes of Conduct and Ethics by responsible Commission under POEA 2003	3. Enforcement of ethics by professional bodies, e.g. Law Society of Kenya; Institute of Certified Public Accountants of Kenya (ICPAK), among others.

*19. Institutionalized corruption in organizations*

1. Review and amend ACECA as may be necessary 2. Review and amend POEA to include private sector 3. Sensitise the public on evils and consequences of corruption	1. Parliament 2. Attorney-General 3. Judiciary 4. KACC 5. Civil Society 6. Religious organisations 7. Media 8. Private Sector	1. Officers trained on integrity and institutionalization of values and ethics 2. Corruption prevention plans developed 3. Corruption Prevention Committees formed 4. Quarterly corruption prevention meetings 5. Implement the institutional code of conduct of 4Ps and 4Es (All officers of the former PSRDS taken through the 4Ps and 4Es)	1. Officers being appraised on values and ethics in the PAS 2. Implementation of the corruption prevention plans 3. Continuous sensitization and checks and balances on corrupt practices 4. Anti corruption indicators in performance contracting	1. Institutionalization of anti-corruption indicators in performance contracts 2. Increased awareness on ethics & integrity in the public sector	1. Difficulties in enforcing values and ethics 2. Ownership by some institutions 3. Lack of a National Corruption Policy has hampered the development of institutional policy 4. Effectiveness of corruption prevention committees	1. Development of a corruption prevention policy 2. Development of curriculum on Transformative Leadership 3. Train the Anti – Corruption Committee members and the Integrity Assurance Officers on development of checks and balances
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*20. Gaps in institutional arrangements to fight corruption*

Clarify the mandates of various anti-corruption institutions	1. MOJCA 2. Executive 3. Respective institutions	1. A survey on anti-corruption agencies/institutions (their mandates, strategies and performance has been undertaken) 2. The Interagency Committee of all public institutions involved in the war against corruption meetings held. Participating institutions are: Ministry of Justice, National Cohesion and Constitutional Affairs; Judiciary; National Assembly (Legal and Administration of Justice Committee); KACC; Kenya Police; Criminal Investigation Department; DPP; NACCSC; Efficiency Monitoring Unit and Kenya National Audit Office. 3. Participated in the development of the Proceeds of Crime and Anti-Money Laundering Bill 2008 and the Mutual Legal Assistance bill 2008 4. Sector-wide planning and implementation of anti-corruption through GJLOS	1. Further review of the ACECA 2003 and the POEA 2003 to strengthen enforcement 2. Proceeds of Crime and Anti-Money Laundering Bill 2008 before the Finance Committee of Parliament	1. Collaboration of anti corruption institutions 2. Inter Agency Forum	1. Turf wars between the anti-corruption agencies 2. The fact that most of the concerned institutions are legally independent means that the extent to which they can waive some of their rights or be co-ordinated is limited	1. Implementation of the recommendations of the survey report 2. Harmonise the apparent conflicts between the provisions of the proposed Proceeds of Crime and Anti-Money Laundering Bill 2008 and the Anti-Corruption and Economic Crime Act, 2003, in relation to the mandates of the proposed Assets Recovery Agency and the KACC. 3. Lobby for anti-money laundering
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*21. Training focused more on Ministry of State for Public Service than other ministries / Flouting of training policy (training of non civil servants and undergraduates) / Interference of scholarships by*

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>politicians</i>						
<ol style="list-style-type: none"> <li>Decentralize training resources to ministries</li> <li>Involve various stakeholders in selection committees</li> <li>Punish offenders</li> <li>Develop and implement sound training policies for public officials</li> <li>Strengthen Ministerial Training Committees</li> <li>Institutionalize demand driven training</li> </ol>	<ol style="list-style-type: none"> <li>DPM</li> <li>PSC</li> <li>Ministry of Education Science and Technology (MOEST)</li> <li>Standing committee on Public Service Remuneration</li> </ol>	<ol style="list-style-type: none"> <li>Training Needs Analysis on all MDAs has been undertaken through RRI</li> <li>The Government through the Ministry of Education has awarded scholarships to a number of officers.</li> <li>Nomination of officers for courses is done through Ministerial Training Committees</li> <li>Implementation of Government circular, through Head of Public Service on "Training of Public Officers" to ensure focused training of public officers</li> <li>Increased budget allocation for training</li> </ol>	<ol style="list-style-type: none"> <li>Implementation of training Policy</li> <li>Ministerial Training Committees operational. DPM plays an oversight role.</li> <li>Lower cadre training programme is ongoing</li> <li>Establishment of the Task Force on Training for an Effective 21st century Public Service</li> <li>Advertising Scholarships when they arise</li> </ol>	<p>Training Policy implemented at the ministerial and departmental levels</p>	<ol style="list-style-type: none"> <li>Politicians interfering with training</li> <li>Lack of transparency in administration of training opportunities</li> <li>Some Ministries get inadequate financial resources for training.</li> <li>Misinterpretation or inconsistency in the interpretation of DPM circulars</li> <li>High demand for limited scholarships</li> <li>Lack of adequate resources leading to incomprehensive Training Needs Assessment</li> </ol>	<ol style="list-style-type: none"> <li>Implementation of the training program</li> <li>Continuous review of the training policy and its implementation.</li> <li>Strengthening of the Human Resource Development Units in ministries</li> <li>Ensure that nomination of all officers for courses is done through the Ministerial Training Committees</li> <li>Ensure that no officer is trained twice when there is one who has not undergone training.</li> <li>Continue to award scholarships on the basis of merit and streamline the processes for scholarship awards</li> <li>Involvement of development partners, who award scholarships, in the recruitment exercise, in order to enhance transparency</li> </ol>
<b>22. Disparity in schemes of service</b>						
<p>Harmonize schemes of service and grading of posts across entire service</p>	<ol style="list-style-type: none"> <li>DPM</li> <li>PSC</li> <li>Standing committee on Public Service Remuneration</li> </ol>	<ol style="list-style-type: none"> <li>Validation with stakeholders on steps to implementation of the Human Resource Management and Reform Strategy</li> <li>Analysis of all officers in government and their placements</li> </ol>	<ol style="list-style-type: none"> <li>Ensuring that Job Evaluation recommendations prepared by DPM are implemented</li> <li>Training Programme being implemented.</li> <li>Continuous Review of the Training programme.</li> <li>Human Resource being strengthened</li> </ol>	<p>Improved terms &amp; conditions for Civil Servants</p>	<ol style="list-style-type: none"> <li>Outdated schemes of service</li> <li>Lack of a proactive approach to the review of schemes of service by some accounting officers.</li> <li>Some public officers enlist the support of politicians for upgrading, which is illegal and unethical</li> </ol>	<p>Continuously review schemes of service to address disparities</p>
<b>23. Bribery for bigger financial allocations and demands for issuance of AIEs</b>						
<ol style="list-style-type: none"> <li>Strictly enforce financial laws and regulations</li> <li>Rationalize public</li> </ol>	<ol style="list-style-type: none"> <li>Treasury</li> <li>Ministries</li> </ol>	<ol style="list-style-type: none"> <li>Budget Strategy Paper sets the sector and Ministerial ceilings.</li> <li>All the 10 targeted benchmarks of the Public</li> </ol>	<ol style="list-style-type: none"> <li>Implementation of relevant Treasury Circulars</li> </ol>	<ol style="list-style-type: none"> <li>Strict compliance with</li> </ol>	<ol style="list-style-type: none"> <li>Inadequate funds to meet the needs of all MDAs.</li> </ol>	<ol style="list-style-type: none"> <li>Implementation of relevant Treasury Circulars and Financial Regulations</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
resource allocations		Expenditure Management Action Plan have been met	2. Implementation of Government Financial Management Act, 2004	budgetary allocations 2. Enforcement of the Government Financial management 3. Transparency in issuance of AIEs	2. GFM Act Regulations not yet in place	2. Allocate funds based on sectoral priorities 3. Strict enforcement of the GFM Act 2004
<b>24. Inappropriate Technical Assistance (TA) by development partners</b>						
1. Develop external assistance policy 2. Allow TA only where local expertise is lacking	1. Treasury 2. Government 3. Development partners	External resources policy has been developed and awaits submission to the Cabinet for approval	Consideration of the Kenya External Resources Policy by relevant stakeholders.	Consultations on Technical Assistance between Government & Development Partners	Addressing conditionalities attached to TA	1. Develop local capacity in Technical Assistance. 2. Fast tracking of the Kenya External Resources Policy
<b>25. Public asset stripping</b>						
Enforce new laws & procedures strictly	1. Treasury 2. Parliament 3. Government 4. KENAO 5. Interest groups	1. Operationalization of the Public Procurement and Disposal Act 2005 and the establishment of the Public Procurement and Oversight Authority. 2. Enactment of the Privatization Act, 2005 3. Amendments were made to ACECA, through the Statute Law (Miscellaneous Amendments) Act, 2007, to enhance the powers of law enforcement agencies, such as KACC, to undertake asset recovery. 4. Privatization commission is fully operational	1. Operationalization of the Public Procurement and Disposal Act 2005 and the establishment of the Public Procurement and Oversight Authority. 2. Implementation of the Privatization Act, 2005 3. Operationalization of the Privatization Commission.	Continuous enforcement of ACECA, PPDA, POEA	Capacity constraints especially financial resources in the restructuring and privatization of public enterprises.	Enforcement of the Public Procurement and Disposal Act 2005, the Privatization Act, 2005 and the Anti-Corruption and Economic Crimes Act, 2003.
<b>26. Non-observance of international conventions</b>						
1. Ratify and domesticate international conventions 2. Enforce domesticated provisions Compliance of international conventions (reporting)	1. Government 2. Parliament 3. Responsible Departments 4. Civil Society	1. UNCAC finalized and a background paper prepared 2. Notifications under the UNCAC and AU Convention on Preventing and Combating of Corruption prepared. 3. Draft UNCAC Gap Analysis report. 4. Draft concept paper on the National Anti-Corruption Policy for Kenya	1. Finalization of Gap Analysis of the UN Convention Against Corruption 2. Consultation on development of the National Anti-Corruption Policy 3. A draft EAC Protocol on	Compliance of International Conventions (Reporting)	Divergent political and religious opinion have hampered the implementation of some international obligations	1. National Anti-Corruption Policy for Kenya identified as an MTP priority under Vision 2030 2. Hold ministry workshop for sensitization to policy matters. 3. Consensus building e.g. money laundering

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			Preventing and Combating Corruption being prepared by the EAC Partner States.			

## 3.2 CIVIL SERVICE

### 1. *Cumbersome and complex government procedures*

<ol style="list-style-type: none"> <li>1. Study, simplify and implement appropriate rules, regulations and procedures</li> <li>2. Develop and implement Customer Care Charters in all Ministries, Departments, parastatals and Institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Head of Public Service</li> <li>2. DPM</li> <li>3. Accounting Officers</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of Service Charters in public institutions</li> <li>2. The Discipline Manual has been revised and made more elaborate and simple</li> <li>3. Developed online application process for civil service jobs</li> <li>4. Computerized majority of operations for civil service jobs</li> <li>5. Continued with placement of advertisements on the website</li> <li>6. Embraced Short Messaging Service (SMS) System for communication with job applicants</li> <li>7. Held sensitization workshops for civil service</li> <li>8. Conducted customer satisfaction surveys to enable it to improve service</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of customer charters by ministries and departments</li> <li>2. Implementation of IFMIS to simplify and expedite processing of transactions in Public Institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of Service Charters</li> <li>2. Automation of operations by Ministries, Departments &amp; Agencies</li> </ol>	<ol style="list-style-type: none"> <li>1. Some service charters do not have comprehensive standards for all services offered.</li> <li>2. Some institutions do not adhere to the standards spelt in their charters</li> </ol>	<ol style="list-style-type: none"> <li>1. Support implementation of service charters in Public service institutions</li> <li>2. Review of service charters to focus on standards and develop a standard format</li> </ol>
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### 2. *Ineffective controls*

<ol style="list-style-type: none"> <li>1. Enforce procedures and sanctions strictly</li> <li>2. Review and improve control mechanisms</li> <li>3. Punish those who violate/disregard existing controls</li> <li>4. Once monies are given, deviation be limited to 10% only</li> <li>5. Elevate plans to a legal status</li> <li>6. Create sanctions for violations of plans</li> </ol>	<ol style="list-style-type: none"> <li>1. Head of Public Service</li> <li>2. DPM</li> <li>3. Accounting officers</li> <li>4. Interest Groups</li> <li>5. KACC</li> </ol>	<ol style="list-style-type: none"> <li>1. Introduction of Integrated Financial Management Information Systems (IFMIS) in 30 Ministries</li> <li>2. Roll out of the NIMES system</li> <li>3. M&amp; E standards prepared</li> <li>4. Capacity building of DDO and staff of CPPMUs on M&amp;E</li> <li>5. Draft Monitoring and Evaluation Framework for all Public Service Reforms developed</li> <li>6. Sensitization workshops held for civil servants</li> </ol>	<ol style="list-style-type: none"> <li>1. Rolling out of IFMIS to the remaining Ministries.</li> <li>2. Draft M&amp;E framework being finalized</li> </ol>	<ol style="list-style-type: none"> <li>1. IFMIS Operational</li> <li>2. NIMES operational</li> </ol>	Capacity constraints, including limited manpower, financial and physical resources and technological capabilities.	<ol style="list-style-type: none"> <li>1. Adopting a risk based internal audit approach including Ministerial audit committees to provide oversight.</li> <li>2. Accelerate the implementation of IFMIS and make it operational in four spending Ministries including health and education.</li> <li>3. Testing of M&amp;E tools for reforms in the next contract period</li> </ol>
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### 3. *Disregard for or lack of professional ethics and standards*

<ol style="list-style-type: none"> <li>1. Establish code of ethics where they do not exist</li> </ol>	<ol style="list-style-type: none"> <li>1. Head of Public Service</li> </ol>	<ol style="list-style-type: none"> <li>1. Enforcement of Code of Conduct and Ethics by each responsible Commission</li> </ol>	Training	<ol style="list-style-type: none"> <li>1. Enhanced capacity</li> </ol>	Responsible Commissions under the	<ol style="list-style-type: none"> <li>1. Strict enforcement of the Codes of Conduct by</li> </ol>
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
2. Implement codes of conduct where they exist 3. Enforce POEA 4. Strictly enforce and monitor compliance with the Codes of Conduct 5. Discipline errant professionals 6. Blacklist and publish deregistered professionals widely to the public 7. Disqualify deregistered professionals from holding public office 8. Require professional public servants be members of professional bodies before and during their tenure of office 9. Vet entrants into the public service 10. All entrants in the public service should go through an anti-corruption induction programme 11. Implement the Public Service Integrity Programme 12. Ensure professionals in public sector comply with codes of conduct of respective professional associations	2. DPM 3. Public Service Commission 4. Accounting officers 5. Civil Society 6. Professional bodies 7. Responsible commissions	2. Registration of senior HR Managers with the Institute of Personnel Managers of Kenya (IPMK) 3. Ministerial Training Committees established and operational. 4. Succession management policy		through training 2. Enforcement of code of conduct & ethics	POEA have not been actively enforcing the Act and also their respective Codes of Conduct and Ethics.	responsible Commissions under the POEA 2003 2. Link promotions to attainment of additional professional qualifications. 3. Continuous professional education

4. *Inadequate legal provisions*

1. Ensure all creations of administrative structures are authorized by law. 2. Ensure policies, decisions and actions are based on laws and approved plans	1. Attorney-General 2. DPM 3. Public Service Commission 4. Accounting Officers 5. Civil Society	1. Implementation of Performance Contracting in the entire public service 2. Implementation of relevant circulars from the Head of Public Service and Treasury 3. Establishment of Parliamentarian Committee of Implementation 4. Establishment of TJRC, IIIBC, COE through Acts of Parliament	1. Implementation of KENAO reports 2. Constitutional review process	1. Government Ministries, Departments & Agencies under performance contracting 2. Legal and institutional	Lack of legislative backing to planning and implementation of plans	1. Sensitization of public officers on the need to ensure compliance with the rule of law on all decisions made 2. Legislative reform to give legal backing to planning and implementation of approved plans
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	6. Professional Associations			framework for compliance with the Law & determination of boundaries		3. Regular review of the Code of Regulations (COR) 4. Review of the Constitution
<b>5. Wide and unchecked discretionary powers</b>						
1. Amend laws to remove unnecessary discretionary powers 2. Establish guidelines to regulate the exercise of discretionary powers where they are necessary	1. Parliament 2. Head of Public Service 3. DPM 4. Civil Society 5. Private Sector 6. Professional Associations 7. KACC	1. Implementation of transport policy 2. Implementation of the East African Community Customs Management Act (CMA) reduced the number of exemptions that can be granted by the Minister at discretion. 3. Enforcement of telephone policy	1. Disposal of excess government vehicles ongoing 2. Development of objective criteria for granting tax exemptions and waivers	Transport policy operational	Implementation of transport policy by all ministries	Amend laws to reduce areas of excessive discretion
<b>6. Poor terms and conditions of service</b>						
1. Enhance and harmonise terms and conditions of service 2. Carry out regular job evaluation to determine optimum staff levels 3. Ensure employment and promotion are based on merit 4. Relate pay to performance and cost of living	1. Head of Public Service 2. DPM 3. Accounting officers 4. PSC	1. Salary harmonization instrument for civil service salaries 2. Implementation of pay policy 3. Improvement of terms of service for civil servants 4. Enhanced retirement age from 55 to 60	1. Adjusting various grades in the Public Service to match what is provided for in the Banding System structure and Job evaluation Report. 2. Adjusting salary levels to match Harmonization Instrument. 3. Integrating salary adjustments into Government projected allocation in the budget period. 4. Guiding CBA negotiations to be based on productivity and performance 5. Legislation of a central Salary Review Board 6. Instituting regular job evaluation to determine job worth at different times 7. The Government is	Improved terms of service	1. Financial constraints 2. Demands in the collective bargaining agreements 3. Decentralized multiple points for reviewing salaries for various organizations within the Public Service thus causing disparities in payment of remuneration among comparable jobs making rational, equitable, and harmonized realization of sustainable remuneration for Public Service difficult. 4. Developing a remuneration system that is based on productivity and not	1. Implementing the recommendations of the Permanent Public Service Remuneration Review Board 2. Rationalize and Harmonize Public Service benefits 3. Introduce contributory Pension that is sustainable 4. Introduce concept of performance based remuneration and appointment and promotion based on performance and merit 5. Ensuring that the Government gets value worth from the Consultancy Services on Remunerations 6. legislate the legal framework of the Permanent Public Service Remuneration Review Board to enable it effectively undertake its mandate 7. Authorized officers to make proper human resource requirement projections and



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
			<ul style="list-style-type: none"> <li>working towards validating allowances and fringe benefits payable to Public Servants</li> <li>8. Auditing of schemes of service</li> </ul>		<ul style="list-style-type: none"> <li>just cost of living.</li> <li>5. Recruitment in positions hitherto abolished.</li> <li>6. Identification of professionally competent, Patriotic and Ethical consultants in the field of Remuneration.</li> <li>7. Requests for waivers of provisions under the schemes of service.</li> <li>8. Some authorized officers are yet to develop schemes of service for their employees or review outdated ones</li> <li>9. Huge disparities in pay awards/salaries for similar jobs</li> </ul>	<ul style="list-style-type: none"> <li>initiate succession management strategies.</li> <li>8. Authorized officers to review schemes of service for their employees and initiate schemes where they do not exist</li> </ul>

**7. Lack of transparency and accountability**

<ul style="list-style-type: none"> <li>1. Establish and implement sectoral codes of conduct</li> <li>2. Enforce and adhere to rules and regulations</li> <li>3. Surcharge individual officers for corrupt practices during and after service</li> <li>4. Hold individual officers accountable for financial actions and decisions during and after service</li> <li>5. Strictly enforce the penal law and adhere to financial rules and regulations</li> <li>6. Monitor compliance and enforcement of the law</li> </ul>	<ul style="list-style-type: none"> <li>1. Attorney-General</li> <li>2. Parliament</li> <li>3. Head of Public Service</li> <li>4. DPM</li> <li>5. Accounting officers</li> <li>6. Interest Groups</li> <li>7. PSC</li> <li>8. KACC</li> </ul>	<ul style="list-style-type: none"> <li>1. Ministerial Code of Conduct</li> <li>2. Results Based Management and Performance Contracting.</li> <li>3. Preparing and publishing external audit reports of the Controller and Auditor General in a timely manner in accordance with the Public Audit Act, 2003</li> <li>4. Enforcement of POEA</li> <li>5. Enforcement of PPDA &amp; PPDAR</li> <li>6. Implementation of RRI</li> </ul>	<ul style="list-style-type: none"> <li>1. Results Based Management</li> <li>2. Performance Contracting</li> </ul>	Performance Contracting operational	Weaknesses in processes, systems and procedures within public entities.	<ul style="list-style-type: none"> <li>1. Preparing and publishing external audit reports of the Controller and Auditor General in a timely manner in accordance with the Public Audit Act, 2003</li> <li>2. Strengthen internal controls</li> </ul>
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>8. Patronage in appointment and promotion of officers</b>						
1. Ensure all job recruitments are open and competitive 2. Appoint public servants on contractual terms 3. Retrench all unsuitable appointees	1. Head of Public Service 2. DPM 3. Accounting officers 4. Professional associations 5. Interest groups 6. PSC 7. Boards of Parastatals	1. All the schemes of service submitted have been approved and implemented 2. Implementation of Performance Appraisal System	Sensitization of responsible Commissions on their obligations under the POEA to enforce the Act and also their Codes of Conduct and Ethics	Performance Appraisal System operational	1. Discretionary powers 2. Lethargy on the part of some responsible Commissions in the enforcement of the Codes of Conduct and Ethics and also the POEA	1. Ensure transparent and objective appraisal of Officers 2. Proper assessment and evaluation of officers performance for appointment renewal 3. Job advertisement, open and competitive selection of officers
<b>9. Poor customer relations (Overbearing attitude)</b>						
1. Enactment of law on public service code of ethics 2. Implementation of the PSIP 3. Establish a complaints committee and redress mechanism 4. Enforce POEA	1. Parliament 2. Head of Public Service 3. Interest groups 4. PSC	See: Responses under <i>The Executive: General Issues Affecting the Executive (above)</i> , Issue No. 1 on "Lack of clear information to the Public on existing services, processes and procedures)"	See: Responses under <i>The Executive: General Issues Affecting the Executive (above)</i> , Issue No. 1 on "Lack of clear information to the Public on existing services, processes and procedures)"		See: Responses under <i>The Executive: General Issues Affecting the Executive (above)</i> , Issue No. 1 on "Lack of clear information to the Public on existing services, processes and procedures)"	See: Responses under <i>The Executive: General Issues Affecting the Executive (above)</i> , Issue No. 1 on "Lack of clear information to the Public on existing services, processes and procedures)"
<b>10. External interference</b>						
1. Strictly enforce and adhere to rules and regulations 2. Punish offenders	1. Head of Public Service 2. DPM 3. Accounting officers 4. Interest Groups	Issuance of circulars by Ministry of Public Service	Implementation of POEA		Poor enforcement of the POEA and the relevant Codes of Conduct and Ethics	Strict enforcement of POEA and the relevant Codes of Conduct and Ethics by responsible Commissions
<b>11. Lack of deployment guidelines</b>						
1. Develop rational guidelines on deployment 2. Identify corruption prone areas for programmed rotation of officers 3. Define suitable duration of stay at a station for specialized positions 4. Carry out regular routine and impromptu checks	1. Head of Public Service 2. DPM 3. Accounting Officers 4. PSC 5. KACC	Staffing and deployment norms being developed	All secretaries/clerks in Ministries who have stayed in one Ministry for 5 years have been redeployed.		1. Need to embrace dynamic human resource management practices 2. In adequate funding for training	Continue with redeployment until skills and competencies are clearly realized
<b>12. Poor or lack of proper planning</b>						
1. Inculcate a culture of	1. Head of Public	1. Revitalisation of the Ministry of Planning,	1. Resubmission of Cabinet	Implementation	1. Lack of adequate	1. Implementation of MTP



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
planning 2. Develop and implement proper plans 3. Enforce rules and regulations strictly 4. Base all activities and decisions on Law, policy and plans 5. Evaluate all planned activities	Service 2. DPM 3. Permanent Secretaries/ Chief Executives 4. Interest Groups 5. Professional bodies	National Development and Vision 2030. 2. Planning units have been created in all ministries 3. Planning officers employed in the districts 4. A standard format of development plans has been issued 5. Implementation of Medium Term Plan(MTP 2008-2012) 6. The concept paper on Kenya School of Government developed 7. Evaluation of the Economic Recovery Strategy	Memo on DFRD 2. Working with clusters as described in the Vision 2030 to support them in delivering <i>Results for Kenyans</i> 3. Development of strategies for Local Government and Street families	of Vision 2030 and Medium term Plan 2. Several Acts of Parliament in place governing operations of devolved funds that may conflict with provisions of DFRD 3. The PSR&PC Strategic Plan anchored on the MTP being developed 4. Strategy on Transformative Leadership being developed 5. The capability Reviews deliberately designed to identify gaps in skills and competencies	2. Lobby for inclusion of planning in the constitutional review 3. Slow pace in supporting the Ministries in this process to allow them incorporate interventions in the strategic plans, Annual Work Plans and Performance Contracts 4. Finalize the Strategic Plan 5. Provide support for the 64 Ministries already on the ICB program 6. More involvement of planning officers in the decision making process 7. Launch of the Vision 2030	

13. *Public ignorance of the functions and services offered by various Government agencies*

1. Display and disseminate information showing services and charges 2. Develop and implement Customer Service Charters and staff performance pledges in all Ministries, Departments, Parastatals and Institutions 3. Publish and avail manuals and regulations for staff and public information 4. Compile and publish regular operations reports	1. Head of Public Service 2. DPM 3. Accounting officers 4. Professionals societies 5. Interest Groups	See: Responses under <i>The Executive General Issues Affecting the Executive (above)</i> , issue No. 1 on "Lack of properly articulated national vision and aspirations,"	See: Responses under <i>The Executive General Issues Affecting the Executive (above)</i> , issue No. 1 on "Lack of properly articulated national vision and aspirations,"	1. Stakeholders and implementers i.e. Ministries, Local Authorities, the police and Prisons not fully acquainted with the regulations. 2. POEA procedures not yet reviewed 3. Some service charters do not have comprehensive standards for all services offered. 4. Some institutions do not adhere to the standards spelt in their charters 5. Program slowed	1. Review of regulations on POEA to accommodate amendments to ethics Act 2003. 2. Recommendations on wealth declaration analysis to be implemented 3. Recommendations for further amendment to the Public Officer Ethics Act 2003 4. Support implementation of service charters in Public service institutions 5. Review of service charters to focus on standards and develop a standard format 6. Continuation of program included in the 2008/2009 PC 7. Undertake RRI in 32
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
					<p>down after change in leadership</p> <p>6. Training provided not sufficient to produce effective coaches.</p> <p>7. A few institutions not yet on board e.g. National Bank of Kenya, etc.</p> <p>8. Some institutions not complying with the PAS</p> <p>9. The PAS needs to be reviewed</p>	<p>institutions in the following contract year.</p> <p>8. Support still being provided by the RRI coaches from the PSR&amp;PC.</p> <p>9. Place tertiary institutions on PC</p> <p>10. Place the institutions in the executive arm on PC</p> <p>11. Plan to place the Judiciary on PC</p> <p>12. Coordinate the implementation of the New Performance Appraisal System in the remaining State Corporations and Local Authorities</p> <p>13. Support the review of the New Performance Appraisal System</p> <p>14. Regular briefings and reports on on-going government programmes/projects.</p>

14. Excessive secrecy and personalization of information, documents and office

<p>1. Provide official information to all those who are entitled</p> <p>2. Decentralise management functions to appropriate levels and offices</p> <p>3. Update and avail security manual to all staff for implementation and observance</p> <p>4. Repeal Official Secrets Act</p>	<p>1. Head of Public Service</p> <p>2. DPM</p> <p>3. Permanent Secretaries/ Chief Executives</p> <p>4. Interest Groups</p> <p>5. PSC</p>	<p>1. Most government activities have been decentralised up to district level</p> <p>2. Performance Contracting and Performance Appraisal System</p> <p>3. Communication Amendment Act, 2008</p>	<p>Freedom of Information Bill</p> <p>See: Responses under <i>The Executive General Issues Affecting the Executive (above)</i>, issue No. 1 on "Lack of properly articulated national vision and aspirations,"</p>	<p>Amendment of the Communication</p>	<p>1. Lethargy on the part of some responsible Commissions in the enforcement of the Codes of Conduct and Ethics and also the POEA</p> <p>2. Government circulars do not reach the target audience.</p>	<p>1. Enactment of the Freedom of Information Bill</p> <p>2. Repeal or propose amendments to the Official Secrets Act</p> <p>3. Set up a panel to update the security manual</p> <p>4. Avail the security manual to staff and educate them on the same</p> <p>5. Put general Government circulars in ministerial websites.</p> <p>6. All PCs and Accounting officers to cascade circulars to all officers below</p>
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15. Lack of accountability in decision making

<p>1. All officers who make decisions should be</p>	<p>1. Head of Public Service</p>	<p>1. Elaborate systems and procedures inbuilt in the Government Financial Management Regulations</p>	<p>Continuous sensitisation of public officers on the</p>	<p>1. Performance Contracting</p>	<p>Lax leadership of CPCs</p>	<p>1. Review of PSIP</p> <p>2. Introduce legislation to curb</p>
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
severally and jointly liable for their decisions and actions while in office 2. Base all decisions and actions on laws, policies and plans	2. DPM 3. Accounting Officers 4. Interest groups 5. PSC 6. KACC	and Processes 2. Under the POEA, all decisions must be based on policies and plans 3. Corruption Prevention Committees (CPC's) in Ministries/Departments/Parastatals 4. Implementation of anti-corruption strategies is one of the requirements of Accounting Officers in performance contracting	provisions of the POEA and the ACECA.	operational 2. Legislative framework on accountability 3. Mainstreaming of anti-corruption strategies in performance contracting		abuse of powers.
<b>16. Low social and moral values</b>						
1. Introduce anti-corruption modules and elements in formal curricula 2. Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary, tertiary and informal education 3. Introduce co-curricula anti-corruption activities	1. KACC 2. Ministry of Education, Science and Technology 3. Kenya Institute of Education (KIE) 4. Kenya National Union of Teachers (KNUT) 5. Parents Teachers Associations (PTAs) 6. Music, drama and Cultural Foundations	1. See generally: NACP Progress Report under the Education Sector, 2007/2008 2. Government has introduced guidance and counselling in the Public Service. 3. Guidance and Counselling highly applied in schools. 4. Curriculum support materials on ethics and integrity have been developed for schools	1. See generally: NACP Progress Report under the Education Sector 2. POEA Provisions on ethics and integrity are under implementation by various responsible commissions 3. PSIP under implementation		See generally: NACP Progress Report under the Education Sector	1. See generally: NACP Progress Report under the Education Sector 2. Avail information on availability of counsellors within the Government 3. Finalize and launch Guidance and Counselling Policy in the Public Service. 4. Mainstream ethics & integrity in schools
<b>17. Political influence in project selection and implementation</b>						
Ensure the proper coordination between planning and finance, and disallow unprocedural priority changes.	1. Ministry of Planning and National Development 2. MOF 3. Professional associations 4. Civil society 5. Interest groups	1. MTEF entrenched in the budgeting process to align planning and budgeting. 2. Budget Strategy Paper ceilings 3. Performance based budget	1. Implementation of the MTEF budgetary process 2. Establishment of a committee to review Constituency development Fund	Performance based budgeting	1. Improving the utilization of development funds especially for externally funded projects. 2. Improving expenditure projections to reflect detailed costing of projects/programmes.	1. Allocate budgetary resources based on sector priorities 2. Strict adherence to project selection criteria
<b>18. Violation of financial and procurement rules and regulations</b>						
1. Strictly enforce and adhere to Financial	1. Attorney-General	1. Enforcement of the Public Audit Act, 2003. 2. Gazettement of procurement rules and	1. Conducting expenditure tracking	Legislative and institutional	Lack of adequate capacity and effective	1. Finalize the expenditure tracking survey report.

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
Management Act, Public Procurement and Disposal Act and other related laws, rules, regulations and procedures 2. Review and improve Financial Management Act and Public Procurement and Disposal Act 3. Establish and implement Code of Conduct 4. Punish offenders	2. Parliament 3. MOF and Planning	procedures. 3. Ministerial Code of Conduct developed. 4. Establishment of the Public Procurement and Oversight Authority 5. Annual Public Expenditure Review conducted 6. Quarterly Budget Reviews	surveys to inform budget implementation 2. PER reports 3. Quarterly Budget Review (QBRs)	framework (PPDA & PPDAR)	coordination among institutions responsible for fighting corruption.	2. Prepare and publish external audit reports of the Controller and Auditor General in a timely manner in accordance with the Public Audit Act, 2003. 3. Posting on Ministries website all information on contracts, including names of contractors, decisions of the Procurement Appeals Board, bidders, and tender outcomes and contractors' performance. 4. Improve compliance levels with legislation

### 3.3 STATE CORPORATIONS

#### 1. Flouting of the:-

(i). State Corporations Act, Cap 446;

(ii) Other laws and regulations relating to financial management, procurement, recruitment; etc.

1. Appointment of Boards of Directors and management of high integrity 2. Implementation of Public Investments Committee (PIC) recommendations 3. Undertake a comprehensive review of the State Corporations Act, Cap. 446 to reflect current trends in corporate governance to facilitate effective management and performance contracting and provide for rewards and penalties in	1. The Head of Public Service 2. Respective Boards 3. Controller and auditor-General 4. KACC 5. MoF 6. Line Ministries 7. Attorney General 8. Inspector General State Corporations	1. The strengthening of the Kenya National Audit Office established under the Public Financial Management Act 2004 resulted in clearance of the accumulated audit backlog. 2. Competitive hiring of Chief Executives of parastatals. 3. Establishment of the PPOA 4. Draft Bill to amend State Corporations Act prepared 5. All PIC sessions attended as required; briefs with lawyers continue to be held as per need and SCAT and court hearings attended as required 6. Implementation of the Government circulars, through the Permanent Secretary, Secretary to the Cabinet and Head of Public Service, on state corporations	1. Compilation of Treasury Memo on 14th Report. 2. Modalities for administration of rewards and sanctions in connection with performance contracts being worked out. 3. Routine inspections on-going	1. Improved performance of some state corporations 2. Legislative framework on procurement	1. No feedback from AG and KACC <sup>1</sup> 2. Turf protection 3. Lengthy time taken by court cases to complete 4. lack of framework to undertake necessary harmonization of enabling instruments of State Corporations 5. Limited budgetary allocation	1. Preparing and publishing external audit reports of the Controller and Auditor General in a timely manner in accordance with the Public Audit Act, 2003 2. Introduce a framework and schedule for review and harmonization of enabling instruments.
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
<p>connection therewith</p> <p>4. Participate in consultations to harmonize the various State Corporations enabling instruments with Cap. 446.</p> <p>5. Undertake routine inspections and management audits/ad hoc investigations in State Corporations and strictly enforce laws, rules and regulations</p> <p>6. Visible punishment and blacklisting of errant officers</p> <p>7. Visible blacklist of corrupt suppliers</p> <p>8. Effective sanctions</p> <p>9. Attend all PIC sessions and implement recommendations of the 13<sup>th</sup> PIC report;</p> <p>10. investigate surchargeable cases and issue surcharge certificates;</p> <p>11. Hold brief with lawyers and attend SCAT and Court hearings as scheduled.</p>						
<b>2. Weak internal control systems</b>						
<p>1. Strengthen internal control systems</p> <p>2. Continuous re-view of systems</p> <p>3. Establish Board Audit Committees as per the relevant Treasury Circular</p> <p>4. undertake a training for all Board Audit Committee members in</p>	<p>1. Respective Boards</p> <p>2. Controller and auditor-General</p> <p>3. KACC</p> <p>4. MoF</p> <p>5. Line Ministries</p> <p>6. Attorney General</p> <p>7. Inspector General</p> <p>State Corporations</p>	Enforcement of the Audit Act (KENAO)	Clearing the backlog of audited accounts	1.	<p>2. Capacity constraints including personnel and financial resources.</p> <p>3. No budgetary allocation</p>	<p>1. Preparing and publishing external audit reports of the Controller and Auditor General in a timely manner in accordance with the Public Audit Act, 2003.</p> <p>2. Provide a budget in subsequent financial periods.</p>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
State Corporations						
<b>3. Nepotism, political patronage, etc</b>						
1. Political goodwill needed 2. De-link appointment of CEOs from Ministers 3. De-politicize appointment of CEOs and Boards 4. Promote a culture of professionalism, fairness and equity	1. Head of Public Service 2. Lime Ministers 3. Treasury 4. Attorney General	1. Government has granted autonomy to Boards of State Corporations to recruit CEO's competitively 2. Appointment of members of Boards of State Corporations and their CEO's is published in the <i>Kenya Gazette</i>	Sensitization of State Corporations on principles of good corporate governance and compliance with the provisions of the ACECA and POEA	Autonomy of State Corporation Boards	1.Meeting the high demand for appointment to state corporations as board members, CEO's or employees. 2.How to build trust and loyalty to Kenya as a nation, rather than people groups 3.Determining the question as to whether opportunities should be shared out on the basis of competition as opposed to patronage	1. State Corporations should be run in a professional and business like manner 2. Appointment to state corporations should be based on professionalism, integrity and equity 3. Affirmative action for benefit of marginalized groups
<b>4. Current criteria of appointing Boards is political, in many cases, leading to weak and incompetent Boards</b>						
1. Comprehensive review of the State Corporations Act and other enabling legislations to depoliticize appointments and put in place a more transparent and competitive method of appointing Board members 2. Treasury and other shareholders to appoint the Board.	1. Head of Civil Service 2. Attorney General 3. Treasury	1. Introduction of Performance Contracting. 2. Board Members recommended by stakeholders in some Boards 3. Draft State Corporations Act amendment Bill ready	Implementation of the Government circulars, through the Permanent Secretary, Secretary to the Cabinet and Head of Public Service, on state corporations on appointment of State Corporations CEOs and Boards members	1. All State Corporations under performance contracting 2. Guidelines on appointment of CEOs and boards members	Political interference.	1. Implementation of the State Corporations Act. 2. Implementation of circulars by the Head of Public Service on State Corporations. 3. Review of the State Corporations Act. 4. Application of good corporate governance principles in the management of state corporations.
<b>5. Micro-management of state corporations by Line Ministries</b>						
1. Have a clear separation between ownership (Treasury), Policy (line Ministries) and management (State Corporation) and streamline reporting	1. Head of Civil Service 2. Attorney General 3. Treasury	1. Boards trained in principles of corporate governance 2. All PS/T representatives in boards trained in corporate governance 3. Insurance Regulatory Authority (IRA) operational 4. Strengthening of the Capital Markets Authority	1. Training in corporate governance of boards 2. The Government has granted autonomy to state corporations to be run in a professional and businesslike manner with		Competition for few vacancies in the boards and management cadres of state corporations.	1. Review of the State Corporations Act. 2. Application of good corporate governance principles in the management of state corporations



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
(oversight) lines 2. Dismiss all corrupt and inept directors		(CMA)	<p>the role of line ministries being limited to policy issues only.</p> <p>3. The State Corporations Advisory Board offers guidance on the management of state corporations as and when necessary</p> <p>4. Under the performance contracting system, the management (CEOs) of state corporations are answerable to their respective boards not to the ministries. The boards then enter into performance contract with the line ministries.</p>			
<b>6. Lack of consequence of bad management (people getting away with misdeeds)</b>						
<p>1. Apply appropriate sanctions on corrupt individuals</p> <p>2. Ensure equitable and transparent application of the law</p> <p>3. Undertake routine inspections and managerial audits/ad hoc investigations in State Corporations and strictly enforce rules and regulations.</p> <p>4. Attend all PIC sessions and implement recommendations of the 13<sup>th</sup> PIC report</p> <p>5. Investigate surchargeable cases and issue surcharge certificates</p> <p>6. Hold briefs with lawyers</p> <p>7. Attend SCAT and Court hearings as scheduled</p>	<p>1. Head of public Service</p> <p>2. Treasury</p> <p>3. Inspectorate of State Corporations</p> <p>4. KACC</p> <p>5. Attorney General</p>	<p>1. A number of state corporations have been privatized.</p> <p>2. Enforcement of the Privatization Act, 2005</p> <p>3. Privatization Commission operational</p> <p>4. Insurance Regulatory Authority (IRA) operational</p> <p>5. Strengthening of the Capital Markets Authority (CMA)</p>	Restructuring and Privatization process	Privatization Commission operational	Problems with local partnerships in case of large state corporations.	Continued Restructuring and rationalizing the public sector.

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>7. Unnecessarily large public sector thereby creating more opportunities for corruption</b>						
1. Enhance the pace of Privatization of non-strategic State corporation 2. undertake a comprehensive public enterprise reform 3. Sustained improvements in corporate governance as part of National governance	1. The Treasury 2. The state corporations Advisory Committee 3. The Attorney General 4. KACC	Privatization Commission operational	1. Restructuring and Privatization process 2. Preparation of Reform Framework for State Corporations	Privatization Commission operational	1. Problems with local partnerships in case of large state corporations. 2. Political interference	Continued Restructuring and rationalizing the public sector.
<b>8. Manual processes</b>						
Formulation and implementation of a National ICT Policy	1. Head of Public Service 2. Ministry of Information and Communication 3. Treasury	1. National ICT policy developed. 2. E-Government Strategy under implementation	1. Computerization of various state corporations 2. E-Transaction Bill being developed	Automation of operations	Capacity constraints including financial resources, manpower and technological capabilities.	Computerization and automation of processes.
<b>9. Public sector culture</b>						
1. Nurture the spirit of nationalism and patriotism 2. Enhance professionalism 3. Enhance the implementation of performance based management 4. Undertake quarterly and annual performance contract evaluation for all participating State Corporations and report thereon. 5. Participate in public enterprise reform matters e.g. restructuring, retrenchment, privatization etc.	1. Head of public service 2. Line ministries 2. Individual state corporations 3. The Treasury 4. Inspectorate of state corporations	1. Performance contracting. 2. Introduction of incentive & sanctions system 3. Introduction of Code of Conduct 4. Implementation of a Governance Action Plan. 5. All performance evaluations done as per schedule 6. Performance Assessment Review of the one year Governance Action Plan	1. Enhance the implementation of performance based management 2. Sensitization programmes	All State Corporations under performance contracting	1. Change of culture requires long periods. 2. Inadequate budgetary provision	1. Developing systems for performance management. 2. Integrated performance appraisal. 3. Performance audits and monitoring and evaluation.
<b>10. Capacity constraints (Financial, HR, operational infrastructure etc)</b>						
1. Privatization 2. public enterprise reform 3. Introduction of Public	1. The Treasury. 2. Parent Ministries 3. State Corporations	1. A number of state corporations have been privatized. 2. Enforcement of the Privatization Act, 2005.	1. Draft PPP Policy and Institutional Framework developed and cabinet partnership	Increased public private partnership	Financial constraints	1. Further privatization 2. Finalize Public Private partnership Policy



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
Private Partnerships		3. Privatization Commission operational	memo sent to the Cabinet Office 2. Privatization work plan 3. Further stakeholder consultations on draft PPP framework			

## 4. LOCAL GOVERNMENT

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>1. Ignorance of the law and by-laws and lack of information to the public</b>						
<ol style="list-style-type: none"> <li>Adequate training of civic leaders and officers</li> <li>Pursue implementation of laws and by-laws</li> <li>Regular revision and improvement of handbook, Resource book and training manual (3 years)</li> <li>Provide official information to those entitled</li> <li>Clearly and adequately document what should be done and implement it</li> <li>Streamline information systems and decision making processes</li> <li>Decentralise management functions to appropriate levels and offices</li> <li>Develop, issue and enforce information classification and dissemination manual</li> </ol>	<ol style="list-style-type: none"> <li>MLG</li> <li>ALGAK</li> <li>Civic leaders</li> <li>Other interested parties</li> </ol>	<ol style="list-style-type: none"> <li>IEC Materials developed</li> <li>Most Local Authorities have workplans</li> <li>Procurement Plans in place</li> <li>Cash flow plans</li> <li>Decentralization to the councils-physical planners &amp; engineers</li> <li>Decentralization through LATF, LASDAP, Fuel levy</li> <li>Rural Poverty Fund-EU grant to 63 Local Authorities</li> <li>22 Councils penalized for late LATF submission due to post election violence</li> <li>Resource book on roles of civic leaders</li> <li>Training Manual operational</li> <li>Media briefings</li> <li>Local Authorities Budget Day</li> </ol>	<ol style="list-style-type: none"> <li>Induction</li> <li>Implementation of by laws</li> <li>Rural Poverty Fund-EU grant financial audit and value for money</li> <li>Participation in the public service week</li> <li>Communication through the media on new by laws.</li> <li>Regular meet the councillors and chief officers tour by the Deputy Prime Minister and Minister for Local Government</li> <li>Kenya Councillors Handbook operational</li> </ol>	<ol style="list-style-type: none"> <li>Increased dissemination of information on by laws.</li> <li>Increased public participation in Local Authorities activities</li> </ol>	<ol style="list-style-type: none"> <li>Structural problems in Local Authorities</li> <li>Central Planning Unit lack sufficient manpower</li> <li>Weak financial base</li> <li>Misapplication of resources</li> <li>Inadequate resources</li> </ol>	<ol style="list-style-type: none"> <li>Review of LGA, support from MOLG</li> <li>Training of civic bodies</li> <li>Bylaws should take account of other related laws</li> <li>Local Authorities Open Day</li> </ol>
<b>2. Negligence in enforcing the law and by-laws</b>						
<ol style="list-style-type: none"> <li>Take disciplinary measures against negligent officers</li> <li>Increase staff capacity where it is not adequate</li> <li>Intensify supervision at the Ministry and Local Authority level</li> <li>Enforce law and by-laws strictly</li> <li>Enforce Codes of Conduct</li> <li>Amend Local Govt. Act to give more autonomy to LA</li> <li>Staff rationalization</li> </ol>	<ol style="list-style-type: none"> <li>Ministry of Local Government</li> <li>Chief Officers/ LA</li> <li>Public Service Commission</li> <li>Civil Society</li> <li>Association of Local Government Authorities of Kenya</li> <li>Media</li> <li>PLGO</li> <li>Civil Leaders</li> </ol>	<ol style="list-style-type: none"> <li>Disciplinary action against Chief Officers</li> <li>Code of conduct for Councillors developed</li> <li>Freeze on employment of scales 10-20</li> <li>Regular inspections</li> <li>Empowering Provincial Local Government Officers</li> <li>MLG strategic plan being cascaded to the Local Authorities</li> <li>Enforcement of budget process (surplus accounts)</li> <li>Treasurers forum formed</li> </ol>	<ol style="list-style-type: none"> <li>Regular inspections</li> <li>Regular circulars</li> <li>Proposals for Amendments to LG Act</li> <li>Proposal for inclusion of ALGAK in the LG Act</li> </ol>	Measures in place to handle laws and by-laws	<ol style="list-style-type: none"> <li>Huge staff establishment at the bottom</li> <li>Resistance by MPs to empower local authorities</li> <li>ALGAK registered under Societies Act</li> <li>Staff rationalization not done</li> <li>Resistance by the union on retrenchment</li> <li>Conflict of interest</li> <li>Ghost workers</li> <li>Corruption</li> </ol>	<ol style="list-style-type: none"> <li>Increase professionalism in the local councils</li> <li>Encourage by laws which add value to the councils</li> <li>Vacant posts to be filled competitively</li> <li>Finalize gazettement of Code of conduct by IIECK</li> <li>Lobby MPs &amp; relevant house committee to support amendments to LG Act</li> <li>Staff rationalization policy</li> </ol>
<b>3. Irregular and illegal allocation of public resource (land, houses, stalls etc.)</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>Streamline the procedures of application and allocation of public resources</li> <li>Establish adequate, clear allocation records systems and make it accessible to public at all times</li> <li>Allocate public resources openly and legally</li> <li>Publish and implement the Omamo report</li> <li>Repossess public resources irregularly allocated</li> <li>Sue for fair compensation where repossession is not possible</li> <li>Implement the recommendations of Ndungu Report</li> <li>Take action against errant officers</li> <li>Strict enforcement of the law and by-laws</li> <li>Remove direct allocation of LA land from the Commissioner of Lands</li> </ol>	<ol style="list-style-type: none"> <li>MLG</li> <li>Parliament</li> <li>LA</li> <li>Civil Society</li> <li>Media</li> <li>Interest Groups</li> </ol>	<ol style="list-style-type: none"> <li>Some plots repossessed</li> <li>Records updated</li> <li>Circular on guideline for allocation of land by LA.</li> <li>Direct allocation of land disallowed</li> <li>Physical planners recruited in 87 councils</li> <li>Land Advisory Committee established and operational</li> <li>Direct allocation of LA land removed from the Commissioner of Lands</li> </ol>	<ol style="list-style-type: none"> <li>Cases in court for recovery of irregularly acquired plots</li> <li>Discipline &amp; take action on errant officers</li> <li>Enforcement of the laws</li> <li>Ndungu Report on irregular allocations</li> </ol>	<ol style="list-style-type: none"> <li>Initiatives established to handle irregular/illegal land allocations</li> <li>Reposition of illegally acquired land</li> </ol>	<ol style="list-style-type: none"> <li>Political interference</li> <li>Court injunctions against repossession(Embu)</li> <li>Trust land vested in county councils</li> <li>Lack of records in a few councils-Nairobi</li> </ol>	<ol style="list-style-type: none"> <li>ALGAK to liaise with MOLG and SLO</li> <li>Enforce circulars on land allocations</li> <li>Clarify land ownership between municipal &amp; county councils</li> <li>Post physical planners to the local authorities</li> </ol>
<b>4. Inadequate decision making latitude at the local authority level</b>						
<ol style="list-style-type: none"> <li>Publish and implement the Omamo report</li> <li>Review existing laws to increase decentralization / delegation/devolution of certain decision making to LA</li> <li>Enact Local Authority Act Amendment</li> <li>Implement other LG recommendations</li> <li>Lobby for the enactment of the LG Act amendments</li> </ol>	<ol style="list-style-type: none"> <li>Parliament</li> <li>MLG</li> <li>ALGAK</li> <li>Interest Groups</li> </ol>	<ol style="list-style-type: none"> <li>Sub-committee set up to address decentralization</li> <li>Reading of budgets in public</li> <li>Decentralization policy developed</li> <li>Proposals to review LG Act</li> <li>Decentralization included in MTP Vision 2030</li> </ol>	<ol style="list-style-type: none"> <li>Finalize decentralization</li> <li>Finalize the amendments to LG Act</li> </ol>	Policy on decentralization developed	<ol style="list-style-type: none"> <li>Lack of documentation on such irregular allocations e.g. the Ndung'u report</li> <li>External interference</li> <li>ALGAK is a voluntary lobby group</li> </ol>	<ol style="list-style-type: none"> <li>Provide decentralization in the new constitution dispensation</li> <li>Lobby for favourable adoption of the proposed amendments</li> <li>Amend CAP 265 to allow for direct election of Mayors &amp; Chairpersons of county councils</li> </ol>
<b>5. Poor prioritisation and planning of resource use</b>						
<ol style="list-style-type: none"> <li>Publish and implement the Omamo report</li> <li>Review and rationalize the planning and systems in the LA</li> <li>Issue guidelines on prioritisation and planning of resource use</li> <li>Provide adequate planning officers and facilitators</li> </ol>	<ol style="list-style-type: none"> <li>MLG</li> <li>Individual LA</li> <li>Interest Groups</li> </ol>	<ol style="list-style-type: none"> <li>Physical planners in place in 87 councils</li> <li>Central Planning Units at headquarters</li> <li>Strategic Plans developed in Local authorities (90%) aligned to MTP and Vision 2030</li> <li>Service Charters in place</li> <li>Inventory of assets in place</li> <li>Report on LATF Evaluation</li> <li>LASDAP</li> <li>A scheme of service for seconded staff to LATF</li> <li>Strict guidelines on disposal of idle assets</li> </ol>	<ol style="list-style-type: none"> <li>LASDAP</li> <li>Local government awareness week</li> <li>Local Authorities Budget Day</li> <li>Regular circulars</li> </ol>	<ol style="list-style-type: none"> <li>Enhanced capacity in physical planning</li> <li>Las activities/programmes guided by Strategic Plans</li> <li>LAs Open Budget Day</li> </ol>	Inadequate LATF resources	<ol style="list-style-type: none"> <li>Review LATF Regulations</li> <li>Involve local communities in project planning</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>6. Poor and inadequate resource and financial base</b>						
1. Publish and implement the Omamo report 2. Assign responsibility for the implementation of recommendations 3. Closely monitor utilization of resources 4. Review the number of councillors and staff appropriate to each council 5. Review the criteria for creation of LA to ensure viability 6. Define LATF term period 7. Collect and recover all the revenue dues 8. Revive LG Loans Authority 9. Enforce the laws and regulations on procurement	1. MLG 2. Parliament 3. Councils 4. Civil Society 5. Media	1. LASDAP 2. Regular inspections 3. Draft amendments to cap 265 4. Cabinet paper on merging/downgrading /abolition of LAs 5. 22 cases out of 175 penalized for late submission of LATF 6. Auditing backlog cleared 7. LATF Advisory Committee is in place to advise MoF 8. Recommendations on reviving LA Loans Authority	1. LASDAP 2. LATF 3. LATF Advisory Committee 4. Establishment of a Reform Department.	1. Enhanced financial base through devolved funds. 2. Enhanced monitoring of resource use	1. Lack of Political goodwill to dissolve/merge/do wngrade non viable councils 2. Penalties by statutory authorities for late non/submissions 3. Local Government Loans Authority consultations	1. Lobby for political goodwill 2. Negotiate with statutory bodies to reduce penalties 3. Expand the mandates of LATF Advisory Committee 4. Diversify revenue base 5. Dispose idle assets as per PPDA 6. Councils still indebted beyond 2009 not eligible for LATF 7. Enhance auditing capacity at local authority level 8. Develop standard templates for auditable accounts 9. Dispose unserviceable assets 10. Revive LG Loans Authority 11. Initiate proposals for investment authority 12. Initiate discussions & lobby for MoLG to take over officers on scales 1-9 13. Enforce sanctions for misapplication 14. Sue for recovery/enforce sanctions
<b>7. Inadequate technical manpower and facilities</b>						
1. Facilitate systems review and modernize operations 2. Recruit manpower with appropriate skills 3. Carry out regular training of staff	1. MLG 2. Individual LAs	1. 87 physical planners employed to local authorities with planning challenges 2. 103 Engineers employed 3. Ministerial Training Committee in place 4. Ministerial transfer committee	1. Training & induction 2. Implementation guidelines of Public Private Partnership 3. Recruitment of 7 procurement assistant and 7 ICT officers	Enhanced technical capacity through training	1. Inadequate finances 2. Untrainable cadre 3. Reluctance of some staff to train	1. Staff rationalization 2. Continuous training
<b>8. Disregard and abuse of existing procurement procedures and regulations</b>						
1. Carry out proper research and study of	1. MLG	1. Training of clerks & treasurers	1. PPOAOA in place	Establishment of	1. Lack of resources for	1. Staff rationalization



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<p>problems and implement corrective measures</p> <p>2. Monitor and evaluate procurement systems regularly</p> <p>3. Ensure that procurement tenders are sufficiently publicised at all times</p> <p>4. Ensure wide and inclusive representation on boards that adjudicate tenders</p> <p>5. Punish errant individuals</p> <p>6. Implement the Act</p>	<p>2. LA</p> <p>3. Controller and Auditor-General</p> <p>4. Interest Groups</p>	<p>2. Guidelines issued on procurement under PPDA operational</p> <p>3. Provision of publishing tenders</p> <p>4. Procurement &amp; Tender Committee operational for all local authorities</p> <p>5. Draft report by Public Procurement Oversight Authority on capacity of LAs to implement PPDA</p>	<p>2. Team formed &amp; collecting information on challenges faced by procurement committees</p>	<p>Procurement Committees in Local Authorities</p>	<p>councils to employ qualified officers to meet PPDA requirements</p> <p>2. Financial base doesn't allow for more employees</p>	<p>2. Central government to take over scales 1-9</p>
<b>9. Haphazard employment</b>						
<p>1. Develop and implement selection and recruitment policy</p> <p>2. Identify staffing needs and develop appropriate staff establishment</p> <p>3. Develop and implement schemes of service</p> <p>4. Carry out continuous job evaluation and analysis</p> <p>5. Retrench unnecessary or unsuitable staff</p> <p>6. Implement Performance Contracting</p> <p>7. Carry out staff rationalisation at LA</p> <p>8. Enhance the professional staff capacity of LA</p>	<p>1. MLG</p> <p>2. DPM</p> <p>3. Public Service Commission</p> <p>4. LA</p> <p>5. Interest Groups</p>	<p>1. Physical planners &amp; engineers hired</p> <p>2. LAs under Performance Contracting</p> <p>3. Report submitted to the Permanent Public Service Remuneration Review Board</p> <p>4. Freezing of employment of staff in scale 10-20</p>	<p>1. Developing retrenchment policy</p> <p>2. Revise Schemes of service</p>	<p>1. Draft Revised Schemes of Service for LAs</p> <p>2. Performance Contracting</p>	<p>Lack of a Local Authority Service Commission</p>	<p>1. Abolish/Merger /downgrade councils</p> <p>2. Proposal for a local Government Service Commission</p> <p>3. Finalize scheme of service</p> <p>4. PSC to supervise recruitment in liaison with MLG</p> <p>5. Develop a selection and recruitment policy</p>
<b>10. Poor remuneration</b>						
<p>1. Improve remuneration under the LA reform programme</p> <p>2. Implement ALGAK/LA recommendations</p>	<p>1. MLG</p> <p>2. ALGAK</p> <p>3. Kenya Local Government Workers' Union</p> <p>4. Professional bodies</p>	<p>1. Report submitted to the Permanent Public service Remuneration Review Board</p> <p>2. Review of councillors allowances completed</p>	<p>Justification by MLG for payment of salaries of officers in scales 1-9</p>		<p>Lack of a Local Authority Service Commission</p>	<p>1. Formation of a Local Authority Service Commission and review of terms to make the Local Government attractive</p> <p>2. Review of councillors allowances forwarded to parliament</p> <p>3. Delinking council management from unions</p>
<b>11. Lack of Codes of Conduct and Ethics</b>						
<p>1. Make mandatory disclosure of personal interests</p> <p>2. Regularly review efficacy of Codes of Conduct</p> <p>3. Set up monitoring mechanisms to ensure enforcement of Codes of Conduct</p>	<p>1. MLG</p> <p>2. ALGAK</p> <p>3. KLGWU</p> <p>4. Professional Associations</p> <p>5. Interest</p>	<p>1. Code of conduct for Councillors complete</p> <p>2. Code of conduct for local authorities staff circulated</p>	<p>1. Implementation of code of conduct</p> <p>2. Finalize code of conduct for LA staff</p>	<p>Code of conduct for councillors in place</p>	<p>Adherence to the code of conduct</p>	<p>1. lobby IIEC to Gazette code</p> <p>2. Disseminate the code of conduct</p>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
4. Launch and implement Codes of Conduct for civil Leaders by ALGAK 5. Develop Code of Conduct for LA 6. Apply sanctions 7. Avail Code of Conduct Document to all employees and civic leaders	Groups					
<b>12. Poor/lack of proper planning</b>						
1. Develop and implement proper plans 2. Put in place mechanism of planning and plans approval 3. Enforce rules and regulations strictly 4. Create a culture of planning 5. Base all activities and decisions on approved plans Evaluate all planned activities 6. Follow the plans and apply sanctions	1. LA 2. MLG 3. Interest Groups	1. Physical planners in place 2. LASDAP in place 3. Enforcement of rules and regulations 4. Annual reports 5. Inspection reports 6. Planning unit to service local authorities in place at the Ministry of Local Government 7. 90 % of Las have Strategic Plans	1. Implementation of strategic plans 2. Inspections 3. Sanctions 4. Review of LASDAP guidelines 5. Development of Urban Development Policy & market development strategy	Enhanced capacity in physical planning	Capacity to implement the plans	1. Continuous implementation of Plans 2. Local Authorities week
<b>13. Negative work ethic</b>						
1. Enact law and implement public service code of ethics 2. Implement public service integrity Programme 3. implement ALGAK education programme	1. MLG 2. LA	1. Integrity training 2. Corruption Prevention Committees established & operational 3. Ministerial Ethics Committee 4. Public Service Code launched 5. Integrity Assurance Officers trained	1. Local Authorities to support ALGAK in terms of Annual subscriptions 2. Regular CPC meetings 3. Enforcement of POEA	Corruption Prevention Committees established	1. Lack of adequate funds on part of ALGAK 2. Not all local authorities are members of ALGAK	1. Encourage LA's to be members of ALGAK 2. ALGAK to sensitize local authorities
<b>14. Making of erratic decisions based on sentiments and not facts</b>						
1. All officers who make decisions should be severally and jointly liable for the decisions and actions they make and take while in office 2. All decisions and actions must be based on and be consistent with plans, policies and laws 3. Develop an elaborate performance contracting details	1. LA 2. MLG 3. Attorney-General 4. Professional Associations 5. Interest Groups 6. Prime Minister Office	1. POEA & ACECA to check abuse of office 2. All LAs under Performance Contracts 3. Performance indicators for 2008/09 negotiated & stakeholders involved 4. Institutional arrangements of making decisions	1. Enforcement of POEA and ACECA 2. Performance Contracting		1. External interference 2. Illiteracy in civil leaders	1. Support ALGAK in programme for good governance in LA 2. Involve Councils in determining performance indicators for 2009/10 3. Set minimum qualification/educational standards for civil leaders
<b>15. Public ignorance of the functions and services offered by LA</b>						
1. Issue updated periodic statements on functions and services rendered 2. Develop and implement customer service charters and staff performance pledges for	1. MLG 2. LA 3. Heads of Department	1. Participation in the public service week 2. Service Charter developed 3. Customer help desks established 4. Quarterly returns	1. Planning for the LG week 2. Suggestion boxes 3. Consultants	Increased public awareness on functions of Local Authorities.	1. Lack of community awareness in their role in participatory activities	1. Local Authorities week 2. Sensitization of the community in their role in the participatory



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
all departmental services 3. Provide customer Help Desks, and offices 4. Arrange regular Residents days and fora with Councillors and officers 5. Establish independent multi-sectoral representative Complaints Committee in every council	4. Interest Groups	5. LASDAP 6. Suggestion boxes 7. Councils regularly consults PLGOs 8. LAs Budget day 9. IEC strategy in place			2. Lack of accountability by LAs 3. Post information on councils websites 4. Local Government week	approach 3. Actualize policies to make councils accountable and more public friendly. 4. Cascade IEC strategy to Local Authorities
<b>16. Lack of account-ability</b>						
1. Base all decisions and actions on plans, policies and the law 2. Punish errant officers 3. Include Community-Based Assessment of projects, programmes and services 4. Monitor and evaluate systems and programmes regularly 5. Enforce the Acts 6. Automate feedback mechanisms by service users	1. Ministry of Local Government 2. Chief Officers/LA 3. Public Service Commission 4. Professional Associations 5. Interest Groups	1. LASDAP 2. No Regular inspection 3. Reports 4. E-mails in 175 LAs 5. Websites in 46 LAs 6. Audit committees established 7. Local Government Sector Reforms strategy developed	1. Regular Inspections 2. Examination of systems, policies & procedures on LATF 3. Training on procurement by KACC 4. Enforcement of PPDA, GFMA and LG Act 5. Annual budget day	1. Local Authorities Budget Day 2. Accountability measures in place	1. Inadequate capacity for effective supervision by the Ministry of Local Government 2. Misapplication of resources by some LAs	1. Enhance effective supervision 2. Take corrective measures against defaulters 3. Creation of a web portal to enable access & sharing of inform among LAs, LG & stakeholders 4. Train councillors who are members of audit committees
<b>17. Abuse of discretionary powers</b>						
1. Lobby for clear definition of discretionary powers vested on individual officers 2. Set up guidelines and criteria for exercising discretionary powers 3. Remove all unnecessary discretionary powers 4. Abuse of office now a crime under the law	1. Parliament 2. Attorney-General 3. MLG 4. Civil Society	1. Proposals to LG Act ready 2. PSC(local authority officers ) regulations revised 2007	Enforcement of PPDA		1. 216 powers vested in the Minister under the LG Act 2. Resistance to reduce the ministers powers	1. Lobby for amendment CAP 265 to Cabinet and Parliament 2. Continue lobbying for guidelines on exercising discretionary powers
<b>18. Institutionalized corruption in LA</b>						
1. Sensitise the public on the evils and consequences of corruption 2. Strictly enforce laws and by-laws 3. Punish errant officers 4. Develop Corruption Prevention Plans for LAs 5. Implement performance contracting 6. Implement ALGAK education/ sensitisation program	1. Parliament 2. Attorney-General 3. KACC 4. Ministry of Local govt 5. Media 6. Civil Society 7. Private Sector 8. Interest Groups	1. IEC Materials developed & displayed to discourage the vice 2. Copies of NACP distributed to all LAs 3. Regular reports on NACP implementation 4. Integrity training 5. Some councils have corruption prevention plans 6. Performance contracts in all LAs	Quarterly returns on NACP	1. CPP developed 2. Implementation of the NACP	1. Resistance to adhere to correct procedure 2. Financial outlays to engage procurement officers 3. Political patronage 4. Moral decadence in our society	1. Develop corruption prevention plans for those without 2. Lobby for more corruption prevention indicators in the PCs 3. Mainstream anti-corruption programmes & activities in all operations 4. Improve terms & conditions of service of staff above survival wages 5. Change of attitude by

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
						sensitization across the board 6. Ensure Quarterly reports on NACP are submitted 7. Encourage whistle blowing
<b>19. Instability at management level (High turnover)</b>						
1. Key officers should be in a particular station for at least 3 years 2. Smooth transfers 3. Localise appointments where appropriate	1. MLG 2. ALGAK 3. Civil society 4. PSC	1. Ministerial Committee established to deal with transfers 2. Regular transfers	1. Regular transfers 2. Regular meetings of Ministerial Committee on transfers	Establishment of a Ministerial Committee to handle transfers	1. Political interference 2. Nepotism/Tribalism 3. Over establishment in the non professionals 4. Under establishment in management level 5. Regular transfers	1. Establishment of a Local Government Service Commission 2. Sustain freeze at lower levels 3. Staff rationalization 4. Management staff transfers be kept as low as possible
<b>20. Lack of scheme of service in LA</b>						
1. Develop schemes of service for LA 2. Update and implement scheme of service	1. MLG 2. ALGAK 3. Civil society	Revised Draft Schemes for various cadres developed	Consideration of the schemes of service	Draft Revised Scheme of Service for LAs developed	1. Implementation of the revised schemes 2. Terms of service are poor 3. Political nature of ALGAK	Establishment of Local Government Service Commission
<b>21. Inadequate supervision leading to bad billing systems / Incorrect reading, illegal connections</b>						
1. Enhance supervision 2. Computerize all processes 3. Introduce pre-paid water services 4. Apply laws, by-laws strictly 5. Introduce integrated payment systems	1. MLG 2. ALGAK 3. Civil society 4. PSC	1. Water companies established to provide water 2. Decentralized payment system	Computerization	Improved billing and payment system	1. Resistance from beneficiaries of fraud both within and without LAs 2. Illegal connection	Prioritization of computerization of all billing systems/points
<b>22. Unregulated water vending</b>						
Develop and enforce water vending guidelines	1. MLG 2. Ministry of Water Development and Irrigation	1. Water boards formed 2. Water vending guidelines, NCC	Implementation of the guidelines, NCC	NCC water vending guidelines in place	1. Illegal connections, leakages etc 2. Water rationing 3. Corruption	1. Proper management of the water companies/ boards 2. Increased surveillance and inspection 3. Enforce the guidelines 4. More engagement with the public
<b>23. Inadequate revenue collection</b>						
1. Set clear performance 2. Develop and implement a monitoring system	1. MLG 2. LA 3. Interested groups	1. Implementation of revenue enhancement plans 2. 81 local authorities have carried out Rapid Results Initiatives	Implementation of the Rapid Results Initiative	Enhanced revenue generation	1. Corruption 2. Inelastic revenue base 3. Over dependence of fiscal transfers	1. Rewards and sanctions strategy 2. Regular monitoring and evaluation 3. Strengthen audit committee



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
						4. Creation of revenue link between Central Government and LAs
<i>24. Political interference in LA activities</i>						
1. Implement the POEA 2. Sensitize political leaders on law, by laws and regulations 3. Strengthen Governance structures with the council 4. Review Local Government Act	1. MLG 2. LA 3. Interested groups	1. Gazettement of by laws 2. Proposals to amend LG Act e.g. NCC parking by laws 3. Competitive recruitment of Town Clerks/NCC	1. POEA being implemented 2. Sensitization		1. Lack of a criteria to set minimum qualifications for Councillors 2. Political interference	1. Introduce the LG amendment Bill 2. Develop minimum qualifications criteria for Councillors
<i>25. Lack of management information system</i>						
Develop and implement IT policy	1. MLG 2. LA 3. Interested groups	1. 175 councils on email 2. Web portal in established 3. 46 councils have websites 4. 63 Local Authorities have Integrated Financial Operational Management System 5. IEC strategy in place 6. Development of Local Government Human Resource Strategy	1. Continuous LAIFOMS implementation 2. Development of websites for other councils 3. Updating websites 4. Development of ICT strategy	Improved ICT infrastructure	Inadequate capacity at LA level to implement various IT activities	1. Finalize the ICT Strategy for the Local Government sector. 2. Capacity building in LAs for ICT adoption & utilization

## 5. KENYA ANTI-CORRUPTION COMMISSION (KACC)

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Inadequate legal framework and instruments</i>						
<ol style="list-style-type: none"> <li>1. Amend the Anti-Corruption and Economic Crimes Act (ACECA) to give KACC prosecution powers</li> <li>2. Enact Whistle-Blowers and Witness Protection Bill</li> <li>3. Amend ACECA and POEA</li> </ol>	<ol style="list-style-type: none"> <li>1. Attorney General</li> <li>2. Parliament</li> <li>3. KACC</li> <li>4. Relevant Government Departments</li> <li>5. Civil Society</li> <li>6. Media</li> <li>7. MOJCA</li> </ol>	<ol style="list-style-type: none"> <li>1. Witness Protection Regulations formulated and a Witness Protection Unit established</li> <li>2. The Commission participated in the drafting of the Mutual Legal Assistance (MLA) Bill, 2009. The Bill has been published and is awaiting debate in Parliament</li> <li>3. The Commission made submissions on the proposed amendments to the Criminal Procedure Code (CPC) to include provisions on plea bargaining made to the Parliamentary Committee on the Administration of Justice and Legal Affairs</li> <li>4. The Criminal Procedure Code (Amendment) Bill 2008 was passed and the CPC amended to make provision for Plea Agreements and the procedures applicable thereto</li> <li>5. The Commission spearheaded a compliance review (Gap Analysis) of the Kenyan legislative, institutional and administrative framework to ascertain the degree of compliance with the requirements of the United Nations Convention against Corruption (UNCAC) and prepared a report and an Implementation Action Plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. Operationalization of the Witness Protection Unit.</li> <li>2. The Commission is involved in the ongoing process to study the POEA with a view to making proposals for amendments and formulation of Regulations by the Minister for enforcement of the POEA</li> <li>3. The Commission is involved in the ongoing project spearheaded by the Kenya Law Reform Commission on the review/amendments of the Law of Evidence. Provincial consultative workshops have been held in Mombasa and Kisumu.</li> </ol>	Strengthened legislative framework	<ol style="list-style-type: none"> <li>1. Possibility of adverse amendments to the laws by parliament</li> <li>2. Plea bargaining is yet to be tested</li> </ol>	<ol style="list-style-type: none"> <li>1. Establishment of a lobbying mechanism by the Commission</li> <li>2. Lobbying Parliament to pass the proposed amendments and legislation</li> <li>3. Launch of the Gap Analysis Report</li> <li>4. Implementation of the Action Plan of GAP Analysis</li> </ol>
<i>2. Insufficient knowledge of Anti Corruption Laws</i>						
<ol style="list-style-type: none"> <li>1. Exposition of anti-corruption laws to implementing officers</li> <li>2. Simplify these laws (translation &amp; paraphrasing)</li> <li>3. Distribute simplified laws.</li> <li>4. Discuss and clarify the laws in public forums</li> <li>5. Continue with public education</li> </ol>	<ol style="list-style-type: none"> <li>1. Attorney-General</li> <li>2. Parliament</li> <li>3. KACC</li> <li>4. Relevant Government Departments</li> <li>5. Civil Society</li> <li>6. Media</li> <li>7. Judiciary</li> <li>8. National Council for Law Reporting</li> </ol>	<ol style="list-style-type: none"> <li>1. Continued with the distribution of produced Simplified Anti-Corruption and Economic Crimes Act, Public Procurement and Disposal Act, Public Officer Ethics Act, Case Studies based on the three statutes, and illustrative posters on the anti-corruption laws. During the year under review the following materials were distributed: <ul style="list-style-type: none"> <li>▪ 3000 bags with messages on whistle blowing</li> <li>▪ 163,160 Posters</li> <li>▪ 8,295 On the frontline</li> <li>▪ 5,585FAQs</li> <li>▪ 4,825 ACECA</li> <li>▪ 5,152 POEA</li> <li>▪ 4,695 PPDA</li> <li>▪ 4,513 Case studies</li> </ul> </li> <li>2. 8,116 persons sensitized on anti corruption, ethics, integrity and good governance as follows: 4,416 from public sector institutions; 129 from private sector institutions; 3,571 from civil society institutions. This</li> </ol>	<ol style="list-style-type: none"> <li>1. Translation of assorted IEC materials into Kiswahili</li> <li>2. VCD/CD-ROMs and radio programs highlighting anti-corruption issues from Islamic and legal perspectives in the process of being developed.</li> <li>3. Distribution of new and current IEC materials</li> <li>4. Opportunity lectures in public, private and civic spheres.</li> </ol>	Increased awareness of anti corruption laws, ethics, integrity and governance	<ol style="list-style-type: none"> <li>1. Inadequate resources</li> <li>2. Lack of strategy on distribution of IEC materials</li> </ol>	<ol style="list-style-type: none"> <li>1. Plans are underway to translate these documents into Kiswahili and distribute them countrywide as part of the broader community outreach.</li> <li>2. The process of procuring translators is underway</li> <li>3. Impact assessment of KACC external training programmes</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		<p>was the result of planned training and sensitization and opportunity lectures.</p> <p>3. Training on ethics and good governance included:</p> <ul style="list-style-type: none"> <li>▪ 200 middle level managers of the Ministry of Agriculture from Nairobi province</li> <li>▪ 24 Provincial Directors of Agriculture and Heads of Department drawn from the Headquarters of the Ministry of Agriculture in Nairobi</li> <li>▪ 30 Rural Electrification Authority officers</li> <li>▪ 58 officers of the Athi Water Service Board</li> <li>▪ 35 employees of the Kenya Institute for Public Policy Research and Analysis (KIPPRA).</li> <li>▪ 92 chief officers of 3 examined institutions (Pensions and National Registration Bureau , Nairobi City Council)</li> <li>▪ 835 Integrity assurance officers(IAOs) from 151 public institutions</li> <li>▪ 624 members of Corruption Prevention committees from 146 public institutions trained</li> <li>▪ (40) Senior members of staff of Egerton University</li> <li>▪ 65officers(Chief Executives and claims managers ) of the Association of Kenya Insurers (AKI)</li> </ul> <p>4. Opportunity Lectures on anti-corruption sensitization, and education included:</p> <ol style="list-style-type: none"> <li>a. 305 Imams and Ulamaa, from Nyanza Western, Coast, Rift valley, Eastern, Central,, North Eastern Provinces)</li> <li>b. 3,000 student leaders trained at the International Fellowship of Evangelical Students Conference</li> <li>c. 1268 managers in the education sector, senior managers of public institutions</li> </ol> <ul style="list-style-type: none"> <li>▪ 100 Treasurers and Business Managers of the Seventh Day Adventist from nine countries in East and Central Africa.</li> <li>▪ 30 newly posted clerical officers and secretarial personnel of the Ministry of Lands.</li> <li>▪ 80 members of staff of the Public Service Commission</li> <li>▪ 50 Kenya Army captains based at the School of Armory in Isiolo</li> <li>▪ 60 officers from the Ministry of Tourism</li> <li>▪ 120 members of staff of Kenya Institute of Administration</li> <li>▪ 25 Senior Officers of the Ministry of Finance</li> </ul>				

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>3. Inadequate specialized skills</b>						
<ol style="list-style-type: none"> <li>1. Train officers in specialized areas</li> <li>2. Recruit more specialised staff</li> <li>3. Continued capacity building</li> <li>4. Increase the number of professional staff</li> <li>5. Anti-corruption and legal outreach clinics</li> </ol>	<ol style="list-style-type: none"> <li>1. KACC</li> <li>2. Partners</li> <li>3. Stakeholders</li> <li>4. MOF</li> </ol>	<ol style="list-style-type: none"> <li>1. Trained 203 officers in Investigations, Asset Tracing &amp; Recovery, Operations review and general management</li> <li>2. Recruited 11 officers; 7 of these were in Investigations, 1 in Legal Services and 3 in Administration.</li> </ol>	<ol style="list-style-type: none"> <li>1. Capacity building activities run continuously</li> <li>2. Filling of vacant posts as and when necessary.</li> </ol>	Enhanced capacity to carry out its mandate through recruitment and training	<ol style="list-style-type: none"> <li>1. Limited budget to undertake desired trainings</li> <li>2. Staff deficit relative to the wide mandate of the Commission.</li> </ol>	<ol style="list-style-type: none"> <li>1. Donor support to be enhanced beyond what is secured through the KISGG-ADB Project.</li> <li>2. Continue lobbying for additional funding to expand staff complement</li> <li>3. Skills gap analysis for staff in post</li> <li>4. Expand staff complement</li> </ol>
<b>4. Limited facilities and inadequate equipment</b>						
<ol style="list-style-type: none"> <li>1. Acquire appropriate communication and information technology (IT)</li> <li>2. Establish a modern Resource Centre</li> <li>3. Acquire adequate physical facilities including field offices</li> </ol>	<ol style="list-style-type: none"> <li>1. KACC</li> <li>2. MOF</li> <li>3. Partners</li> </ol>	<ol style="list-style-type: none"> <li>1. Acquisition of appropriate communication and information technology (IT) platforms e.g. WAN and Internet connectivity, Network Security and Detection Systems installations etc.</li> <li>2. All KACC offices interlinked</li> <li>3. The Resource Centre modernisation programme is ongoing.</li> <li>4. Mombasa field Office established</li> <li>5. Designs on KACC HQS finalised and construction to commence in new FY</li> </ol>	<ol style="list-style-type: none"> <li>1. Storage Area Network to facilitate back up and Disaster Mgt Program</li> <li>2. Network Security Enhancement of systems installed</li> <li>3. Modernisation and expansion of the Resource Centre is ongoing.</li> <li>4. Development of KACC HQs</li> <li>5. Arrangement to open other regional offices</li> <li>6. Equipping of a resource centre</li> </ol>	Enhanced capacity	Inadequate resources	<ol style="list-style-type: none"> <li>1. Additional budgetary resources for the resource Centre modernisation</li> <li>2. Construction of KACC HQs to continue</li> <li>3. Lobby for funding to open up other regional offices.</li> <li>4. In the interim, start up mobile clinics to enhance ground presence</li> </ol>
<b>5. Absence of a strategic plan in 2005</b>						
<ol style="list-style-type: none"> <li>1. Develop and launch a strategic plan by 2006</li> <li>2. Implementation of strategic plan</li> </ol>	<ol style="list-style-type: none"> <li>1. KACC</li> <li>2. Partners</li> </ol>	<ol style="list-style-type: none"> <li>1. Review of 2006- 2009 Strategic Plan.</li> <li>2. Consultant hired to help the Commission develop the next strategic plan</li> </ol>	<ol style="list-style-type: none"> <li>1. Strategic Plan under implementation up to June 2009</li> <li>2. Development of the 2009-2012 strategic plan</li> <li>3. Procurement of a consultant to develop a monitoring and evaluation framework</li> </ol>	2006 - 2009 Strategic Plan implemented	<ol style="list-style-type: none"> <li>1. Lack of a M &amp; E system as part of the strategic plan</li> <li>2. First strategic plan not informed by experience</li> </ol>	<ol style="list-style-type: none"> <li>1. End term evaluation of current plan</li> <li>2. Finalize M &amp; E framework</li> <li>3. Finalize and implement 2009- 2012 strategic plan</li> </ol>
<b>6. Lack of Coordination of various anti-corruption and governance agencies</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>1. Launch and implement NACP</li> <li>2. Establish a coordinating mechanism including NACP Secretariat</li> <li>3. Clarify the role and functions of the various agencies</li> </ol>	<ol style="list-style-type: none"> <li>1. MOJCA</li> <li>2. NACP</li> <li>3. KACC</li> </ol>	<ol style="list-style-type: none"> <li>1. The 3rd Annual Integrity Review Conference held 16<sup>th</sup> &amp; 17<sup>th</sup> July 2008</li> <li>2. For the 3<sup>rd</sup> year, the Commission continues to finance the NACP Secretariat</li> <li>3. The Secretariat organized 12 planning workshops for the sectors</li> <li>4. The Secretariat organized 14 NACP Progress Review workshops for the sectors</li> <li>5. NACP Progress Review Report July 2007 – June 2008 Published</li> <li>6. A Task team established to prepare a proposal on KIF structure and functions</li> <li>7. NACP monitoring and evaluation survey: Sector Assessment at Operational Level Report published</li> <li>9. Inter-Agency Forum of law enforcement agencies operational</li> </ol>	<ol style="list-style-type: none"> <li>1. Presentations of sector implementation progress reports</li> <li>2. NACP monitoring and evaluation survey: Sector Performance Assessment by external experts/consultants</li> <li>3. Monthly meeting of inter-agency forum</li> <li>4. Training workshops for judicial officers, prosecutors and KACC investigators underway</li> <li>5. Regular NACP Coordinating Committee meetings</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of NACP by sectors</li> <li>2. Enhanced collaboration with law enforcement and anti-corruption agencies</li> </ol>	<ol style="list-style-type: none"> <li>1. Some sectors have not held planning meetings.</li> <li>2. Absence of an electronic inter-agency sharing platform.</li> <li>3. Non-adherence to agreed guidelines on tasking and information sharing.</li> <li>4. Lack of budgetary provision by partner agencies</li> </ol>	<ol style="list-style-type: none"> <li>1. Continue to closely work with sectors to integrate NACP activities in their work plans and cascade them to the operational levels</li> <li>2. Partner agencies to commit resources for operations of the Inter-Agency Forum</li> <li>3. Partners to mobilise resources for establishment of an electronic information sharing platform</li> <li>4. Partner agencies to develop specific guidelines for conflict resolution</li> <li>5. Enhance collaboration</li> </ol>
<b>7. Lack of anti-corruption curriculum/materials in the education system</b>						
<ol style="list-style-type: none"> <li>1. Development of anti-corruption curriculum support materials</li> <li>2. Sensitization through music and drama</li> <li>3. Capacity Building</li> <li>4. Sensitization of education managers</li> </ol>	<ol style="list-style-type: none"> <li>1. KACC in collaboration with</li> <li>2. KIE</li> <li>3. JKF</li> <li>4. KLB</li> <li>5. MOE</li> <li>6. KNEC</li> <li>7. Learning Institutions</li> <li>8. TSC and</li> <li>9. KESI</li> </ol>	<ol style="list-style-type: none"> <li>1. A series of materials developed (booklets, bookmarks, brochures, bags, and songs).</li> <li>2. Mainstreaming of ethics and integrity in learning institutions through collaborative efforts between KACC and Ministry of Education.</li> <li>3. Many schools continue to participate in the Anti-corruption category of music festivals,</li> <li>4. Through partnership between KACC and Kenya Institute of Education a question on 'Ufisadi' was included in the Kiswahili Insha paper of the 2008 Kenya Certificate of Secondary Education examination.</li> <li>5. Anti-corruption songs and verse recorded in DVD and CD.</li> <li>6. 3000 Quality Assurance Officers, District Education Officers, College Board members, primary, secondary, and college heads and lecturers sensitized.</li> </ol>	<ol style="list-style-type: none"> <li>1. procurement of printing works</li> <li>2. IEC Materials disseminated to many schools during training seminars, school and college visits and national drama and music festivals</li> </ol>	<ol style="list-style-type: none"> <li>1. Integration of Ethics and Integrity issues in examinations, drama and music</li> <li>2. Increased awareness of ethics and integrity in educational institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Disseminate IEC materials</li> <li>2. Evaluate IEC materials</li> <li>3. Stand-alone Integrity and Ethics curriculum to be embarked on in the next financial year.</li> <li>4. Engage universities</li> </ol>	
<b>8. Lack of local &amp; regional networks &amp; outreach programmes</b>						
<ol style="list-style-type: none"> <li>1. Establish partnerships &amp; networks</li> <li>2. Media programmes</li> </ol>	<ol style="list-style-type: none"> <li>1. KACC</li> <li>2. MOF</li> <li>3. Partners</li> </ol>	<ol style="list-style-type: none"> <li>1. Built networks with Evangelical Alliance of Kenya, FOCUS, SDA and Kenya Council of Imams and other religious sector institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Continued collaboration with public, private and faiths sector institutions</li> </ol>	<ol style="list-style-type: none"> <li>Enhanced partnerships/networks</li> </ol>	<ol style="list-style-type: none"> <li>1. Nurturing and sustaining networks</li> <li>2. Lack of regional anti-</li> </ol>	<ol style="list-style-type: none"> <li>1. Enhance networking</li> <li>2. Design programmes</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
3. Establish partnerships & networks 4. Carry out outreach activities through mobile clinics 5. Commemoration of the World Anti-Corruption Day		2. 116 community based anti-corruption monitors trained by KACC for outreach services 3. KACC/Public Procurement Oversight Authority (PPOA)/Ministry of Local Government (MOLG) collaboration on Local Authorities programme on good governance in the procurement processes implemented in 3 provinces 4. KACC/PPOA collaboration- Corruption Prevention Guidelines on Procurement completed. To be launched jointly. 5. Pursuant to partnership with Performance Contracting Secretariat the Report format on the performance indicators in public performance contracts and Guidelines on conduct of corruption survey completed and circulated to public institutions 6. KACC sponsored and participated in the nomination of winners of the 2008 Integrity Awards 7. Pursuant to a partnership on records management KACC participated in the completion of the Draft National Policy on Records by Kenya National Archives and Documentation Services( KNA&DS) in collaboration with other stakeholders.-Through KACC/Association of Professional Societies of East Africa (APSEA) partnership-Two institutions (National Nurses of Kenya (NNAK ) and Kenya Society of Physiotherapists (KSP) assisted to complete Codes of Conduct 8. KACC/Institute of Certified Public Accountants of Kenya (ICPAK)Memorandum of Understanding finalized 9. Several activities started at the East African Anti Corruption Agencies (EAACA-) development of manuals on investigations, prevention, and legal services to guide officers in the region. 10. KACC has been involved with other members of EAAACA in holding workshops and trainings on cooperation in Asset Tracing and Recovery(1st training held in February 2008 in Arusha Tanzania & 2nd training held in Mombasa in March 2009	2. developing of anti-corruption, ethics and integrity scripts and messages 3. PPOA/MOLG/KACC programmes to continue 4. Professional Associations developing draft codes 6. Planning for the 2009 World Anti-Corruption day 7. Development of a code of conduct for EAAACA 8. Development of Corruption Prevention Manual		3. Sustainability of Community based Anti-Corruption Monitors	with existing partners e.g ICPAK 3. Adoption of East African anti-corruption protocol 4. Develop East African anti-corruption protocol 5. Implement outreach clinics 6. Enlist institutional based anti corruption monitors
9. <i>Lack of entrenchment in the constitution</i>						
1. Increased lobbying 2. Amendment of the constitution	1. KACC 2. Parliament 3. MOJCA 4. Interest groups	Draft of the proposed bill for entrenchment of KACC in the constitution prepared for presentation to the Committee of Experts on Constitutional Review.	Consultations ongoing		Possibility of resistance to proposals	Intensify lobbying



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
10. <i>Effect resolution 13 of the 2<sup>nd</sup> Annual Integrity Review Conference</i>						
1. Update governance instruments 2. Operationalize Integrity Committee 3. Conduct Systems Review/ Audit and adopt best practices 4. Develop Customer Service Charter	KACC	1. Updated Governance Manual in place 2. Integrity Committee operationalized 3. Mapping/ Profiling for CRA done 4. Service Charter adopted.	1. Monitor implementation and identify areas for review and development of policy guidelines 2. IC planning a CRA and development of a CPP. 3. Operationalization of Service Charter	Service Charted	Governance framework likely to be affected by changes in legislation	1. Disseminate and implement the charter to other stakeholders 2. Continue aligning governance framework to the law. 3. Commission wide examination will be conducted under the auspices of the IC which shall entail a CRA in order to identify and seal corruption loopholes.

## 6. ENFORCEMENT

### 6.1 POLICE

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
1. (a) Lack of security of tenure of the office of the Commissioner of Police.						
(b) Insufficient criteria and procedures in the appointment of staff in the Police Force						
1. Establish Police Service Commission with permanent secretariat 2. Provide for constitutional security of tenure for a specified time for the Commissioner of Police 3. Amend section 108 of constitution to provide for Nominees for the appointment as Commissioner to be vetted by Parliament. 4. Advertise vacant senior positions in the Police Force for competitive recruitment	1. Public Service Commission 2. Parliament 3. Commissioner of Police	Force standing orders in place which provides recruitment criteria	National Task Force on Police Reforms	Establishment of the National Task Force on Police Reforms	1. External interference 2. Lack of security tenure	1. Convenor of the Executive Sector to pick the issue to be included in the proposed constitution 2. More consultants 3. Borrow best practices
2. Inadequate adherence to job descriptions and deployment procedure						
1. Enhance appropriate job description and adhere to deployment procedures 2. Establish performance evaluation benchmarks	1. Public Service Commission 2. Commissioner of Police 3. DPM	1. Adherence to job descriptions in the Police force 2. There is a board which deals with transfers and promotions 3. Police under performance contracting 4. Developed own Performance Appraisal System	1. National Task Force on Police Reforms 2. Performance Contracting 3. Regular meetings on both promotions and transfers	Results based management system in place	Socializing the appraisal system to staff	Sensitize staff on PAS
3. Lack of code of conduct and ethics for the police force						
1. Include Ethics and Code of Conduct in the Force Standing Orders and establish monitoring mechanism 2. Establish a code of regulations specific for the police force 3. Encourage public to speak out and report to the Police Commissioner. 4. Educate police on human rights	1. Commissioner of Police 2. DPM 3. Public Service Commission	Police training curriculum revised to include human rights issues	1. Review of police force standing orders 2. National Task Force on Police Reforms	Revised curriculum	Non adherence to Force Standing Orders	1. Review FSO and incorporates concerns in the POEA 2. Revamp community policing
4. Acquisition of sub-standard equipment and stores for the Police Force.						
1. Empower Commissioner of Police to participate in determining Equipment/Stores required together with the specifications 2. Ensure strict compliance with Procurement legislation and relevant	1. Commissioner of Police 2. Treasury	Quota system of recruitment operational	1. Procurement guided by PPDA 2. Police collaborating with KEBS on quality control	Collaboration with KEBS for quality control	Police Commissioner has no Authority to Incur Expenditure	Convenor of the Executive Sector to pick the issue of the Police Commissioner to be an Accounting unit



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
regulations 3. Make the Police an Accounting unit						
5. <i>Absence of clear guidelines in the application of quota system with regard to recruitment and promotion</i>						
1. Establish transparent and equitable guidelines for application of a quota system in recruitment and promotion based on merit 2. Observe merit and qualifications during promotions	1. Public Service Commission 2. Commissioner of Police	The Police is applying a transparent and equitable recruitment criteria to represent the demographic status of the nation	Recruitment criteria under review implementation	Quota system in recruitment operational	Implementation of 30 % gender parity in some regions	Finalize review recruitment criteria
6. <i>Unwillingness of officers to serve in Training Institutions</i>						
1. Implement the recommendations 2. Develop and implement a scheme of service for police instructors 3. Recruit Trainers directly for Police Training institutions 4. Evaluate and categorise Police Training colleges in line with other Government Training Institutions	1. MOF 2. Commissioner of Police 3. DPM	1. Police trainers are paid special allowances 2. Draft scheme of service for police trainers	A scheme of service awaiting authorization by the Ministry of State for Public Service	Improvement in allowances		
7. <i>Poor remuneration</i>						
Implement the recommendations on salary review	1. Government 2. DPM 3. Commissioner of Police	1. The salaries increased 2. Introduction of risk allowance	National Task Force on Police Reforms	Improve remuneration		1. Implement medical and comprehensive insurance cover 2. Police Hospital
8. <i>Poor office and residential facilities</i>						
1. Provide market-rate based house allowance for all staff 2. Provide adequate and better housing and office accommodation for the Force where mandatory 3. Complete the unfinished housing and office accommodation projects	1. Head of Public Service 2. Commissioner of Police 3. Treasury 4. Interest Groups	1. Construction of some houses completed 2. Completed houses allocated to officers 3. 893 repair & rehabilitation projects have been undertaken 4. 16 stalled projects completed 5. 3,231 new units completed 6. 294 residential houses purchased 7. 44 new administration blocks with modern standardized cells 8. 3 divisions, 32 police stations & 61 police posts 9. 240 flats completed 10. 245 units bought from Kenya Breweries (Ruaraka & Kisumu)	1. Construction of houses for the police officers 2. Leasing houses for the police officers. 3. Negotiations with KPA to acquire KPA Beelevie Estate	Improved working and living conditions	Inadequate funds	1. Lobby for more funds to increase housing capacity 2. Revisit the Cabinet Paper on 27,000 houses
9. <i>Poor image of the Police Force</i>						
1. Conduct Public Relations Programmes	1. Commissioner	1. A customer care desks has been established	1. A public relation	Public relations	Sustained negative	1. Roll out the training

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
to enhance image of the Police Force 2. Train Police officers in Public Relations and Customer Care 3. Establish Customer Care Desks in all Police Stations 4. Ensure all officers respect the public (their employer) and respond promptly to calls 5. Ensure impartiality at all times	of Police 2. Police Colleges 3. Media 4. Religious organisations 5. Individual Police officers	all over the country 2. A public relation office has been established and has on-going programmes 3. Pilot gender desks in select places 4. 150 officers trained on culture & attitude change (TOTs)	programmes 2. Community Policing	mechanisms established	reports of police	through out the country (Culture & attitude change) 2. Review of community policing 3. Borrow best practices 4. Police Open days 5. Strengthen public relations office
<b>10. Selective enforcement of the law</b>						
1. Conduct regular training programmes 2. Encourage public to complain against mistreatment and partiality 3. Establish an independent police Complaints Commission	1. Office of the President (OP) – Internal security 2. Commissioner of Police 3. Civil Society 4. Parliament	Public Complaints Standing Committee	1. National Task Force on Police Reforms 2. Re-training of the police to enhance professionalism 3. The public relations office encouraging public to report complaints	Mechanism for receiving complaints of police in place	Operationalization of the Police Oversight Board	Convenor of the Executive Sector to pick the issue of Independent Police Oversight Board
<b>11. Deliberate delay in investigations</b>						
1. Train police staff in customer care 2. Define duration and standards within which investigation should be concluded 3. Establish a monitoring mechanism to ensure compliance with set duration and standards 4. Encourage complaints by affected parties	1. Commissioner of Police 2. OP 3. Attorney-General 4. Interest Groups	1. Police Service Charter developed 2. An inspection unit at both Police and CID headquarters conducts regular impromptu inspection to ensure that investigating officers have performed as per requirement. 3. Annual inspection is done by OCPD, PPO and at the Police Headquarters	1. Training of investigators 2. Sensitization of police charter 3. Implementation of the Service Charter 4. National Task Force on Police Reforms	Monitoring mechanisms in place	1. Inadequate resources 2. Lack of comprehensive investigations by the Police 3. Uncooperative witnesses/ complainants	1. Enhance supervision 2. Compile trend analysis data on investigations 3. Strengthen and cascade Criminal Justice System Committee 4. Planned workshop for CJS agencies
<b>12. Inadequate resources for staff development</b>						
1. Provide adequate funding 2. Refurbish training facilities 3. Revive existing provincial training centres 4. Enhance training for instructors 5. Provide training programmes for paying clientele	1. Commissioner of Police 2. Treasury 3. Police training Institutions 4. Development Partners 5. Interest Groups	1. Kenya police staff college established 2. Extra barracks constructed at Kiganjo Police College to accommodate over 1,000 trainees 3. Barracks for GSU college constructed	1. CID Training School in the process of introducing new programmes that are up to date with the current technology 2. Operationalize Kenya police staff college	Expanded capacity in police training institutions	Inadequate resources	Develop a policy on alternative security arrangements for senior Government officials
<b>13. Ratio of Police to population is far below international standards</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>Undertake a study to establish suitable ratio of police to the Kenyan population</li> <li>Take measures to bridge the gap between the existing ratio of police to the required ratio</li> <li>Plan and source for resources to achieve the required ratio</li> <li>Legalise and institutionalise community policing</li> </ol>	<ol style="list-style-type: none"> <li>Government</li> <li>Commissioner of Police</li> <li>Community</li> <li>Development Partners</li> <li>Interest Groups</li> </ol>	<ol style="list-style-type: none"> <li>The current ratio of police to population is 1:850 against UN ratio of 1: 450.</li> <li>The police have been authorized to recruit over 3,000 police officers this financial year.</li> </ol>	Developing a national crime prevention strategy and intelligence led policing model	Improved Police Population ratio	<ol style="list-style-type: none"> <li>Turn over of the police officers is high.</li> <li>High attrition rate</li> <li>Inadequate resources</li> </ol>	<ol style="list-style-type: none"> <li>Regular recruitment</li> <li>Acquisition &amp; expansion of training facilities</li> <li>Implement police reforms in full</li> <li>Recall all police officers from non-core duties</li> </ol>
<b>14. Deliberate delays in prosecution of cases in court</b>						
<ol style="list-style-type: none"> <li>Establish a supervisory mechanism to ensure efficient prosecution of cases</li> <li>Encourage complaints by affected parties</li> <li>Punish errant officers</li> </ol>	<ol style="list-style-type: none"> <li>Commissioner of Police</li> <li>Interest Groups</li> <li>Judiciary</li> <li>AG</li> </ol>	<ol style="list-style-type: none"> <li>Senior police officers in charge of prosecution.</li> <li>Appropriate action against errant officers</li> <li>Public encouraged to complain to the Police headquarters</li> <li>Prosecution policy and code of conduct in place</li> <li>Inspection units at police and CID headquarters</li> <li>FSO very clear on dealing with errant officers</li> </ol>	Development of National Prosecution Police (AG)	Enhanced compliance of Code of Conduct for Prosecutors	Police prosecutors sometimes have no control of prosecution	Finalize the National Prosecution Policy
<b>15. Failure to adopt modern management information systems</b>						
<ol style="list-style-type: none"> <li>Adopt modern management information systems</li> <li>Train officers on records management</li> </ol>	<ol style="list-style-type: none"> <li>Commissioner of Police</li> <li>DPM</li> </ol>	<ol style="list-style-type: none"> <li>In house IT training programme in place</li> <li>Acquired a special machine that identifies criminal by fingerprints &amp; other records</li> <li>Cyber crime lab at CID headquarters</li> <li>Police Headquarters, CID, Kigango Police College, CID Training and GSU networked</li> <li>GSU Training School an examination centre for ICT</li> </ol>	Computerization process on-going	<ol style="list-style-type: none"> <li>IT infrastructure established</li> <li>ICT Training</li> </ol>	Inadequate resources	<ol style="list-style-type: none"> <li>Continuous improvement of infrastructure</li> <li>Establishment of law reform committee within police to capture emerging new crimes</li> <li>Develop M &amp; E Framework to track progress</li> <li>Personalized ICT training</li> </ol>
<b>16. Collusion between police and driving schools on driving testing</b>						
<ol style="list-style-type: none"> <li>Identify another body to administer driving testing while police enforces</li> <li>Regulate driving schools to ensure minimum standards are met</li> </ol>	<ol style="list-style-type: none"> <li>OP</li> <li>Police</li> <li>Interested groups</li> </ol>	<ol style="list-style-type: none"> <li>Transfer of police officers in driving test unit done as per existing policy</li> <li>Frequent operations on illegal driving schools carried out and operators charged in court</li> </ol>	<ol style="list-style-type: none"> <li>The police is developing a curriculum to be applied to all driving schools to ensure minimum standards</li> <li>A section to supervise driving licensing and testing has been established</li> </ol>		Corruption	<ol style="list-style-type: none"> <li>Police to consult the Ministry of transport for harmonization process</li> <li>Consider contracting out driving test examination to private sector</li> <li>Enhance supervision</li> </ol>
<b>17. Theft/Frisking of suspects by police on patrol</b>						

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Encourage public to speak out and report to the police 2. Educate police on human rights 3. Empower the public to resist police excesses 4. Establish external committee/commission/office to receive and act on complaints against police	1. OP – Internal Security 2. Police 3. KNCHR 4. Pressure groups	1. Human rights syllabus has now been introduced as a basic compulsory subject 2. Members of the public encouraged to report complains 3. Punishment of errant officers	1. Training on human rights 2. Public Complaints Standing Committee	Enhanced human rights training	1. Poor image/reception of police 2. Operationalization of Police Oversight Board	1. Publicize to the public that a complaints system exists 2. Integrity testing mechanism needed to rid police of bad characters 3. Need for mentoring and coaching programme

18. *Framing of innocent citizens by police*

Fully implement community policing programme	1. OP – Internal Security 2. Police 3. Pressure groups 4. KNCHR	1. Community policing is fully operational 2. The police have adopted surveillance technology 3. Cameras have been installed in some areas to monitor any criminal activities		Community Policing Policing on human rights	1. Inadequate funds 2. Inadequate facilities Want of integrity	1. Lobby for more funds 2. Continuous training
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19. *Inadequate/ incomplete investigation by police*

1. Review investigation and prosecution laws 2. Introduce performance contract 3. Capacity building through training for investigating officers 4. Holding police officers responsible for certain zones/areas 5. Acquire Forensic Investigation Equipment	1. OP 2. Police 3. Pressure groups	1. Finger prints: Cyber Crime Lab. 2. Training of investigators	1. National Task Force on Police Reforms 2. Performance Contracting		1. Inadequate facilities 2. Impunity 3. Corruption 4. Interference 5. Refusal by some witness to cooperate	1. Executive Sector to pick the issue of inadequate funding 2. Enforcement of Witness Protection Act 3. Pass Mutual Legal Assistance
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## 6.2 ATTORNEY GENERAL

1. *Public ignorance of the functions and services offered by Office of the Attorney-General*

1. Issue periodic updated statements on functions and services rendered 2. Implement a customer service charter and staff performance pledges	1. Government 2. Attorney-General 3. Heads of Department 4. Interest Groups	1. Service Charters all Departments in State Law Office operational 2. Customer Service Survey 3. Service charter translated to Kiswahili 4. SLO & Judiciary open day 5. Departmental regional visits – Advocates Complaints Commission	1. Establishing regional SLO in Provinces and some districts e.g Muranga, Garissa, Lamu, Kericho & Eldoret (DPP, Civil Litigation, Public Trustees & Registrar General) 2. Customer satisfaction survey 3. Implementation of	Increased awareness of State Law Office	1. Inadequate resources 2. Inadequate capacity	1. Further decentralization of SLO 2. Implement feedback from customer satisfaction surveys 3. Develop a communication strategy
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			Service Charter			
<b>2. Poor Terms and Conditions of Service</b>						
1. Improve Terms and Conditions of Service 2. Base employment and promotion on merit	1. Solicitor-General 2. DPM 3. PSC	Terms of service adjusted		Improved terms of service	1. Inadequate budget allocation 2. High staff turnover	1. Review terms of service proposals for state counsels 2. Lobby for competitive terms of service (AG & Executive) 3. Lobby for a comprehensive medical cover(AG & Executive)
<b>3. Violation of financial and procurement rules and regulations</b>						
1. Strictly enforce and adhere to Financial Management Act, Public Procurement and Disposal Act and other related laws, rules, regulations and procedures 2. Review and improve Financial Management Act and Public Procurement and Disposal Act 3. Establish and implement Code of Conduct 4. Punish offenders	1. Attorney-General 2. Parliament 3. MOF and Planning	1. Code of conduct developed 2. Corruption prevention policy developed 3. Corruption prevention plan developed 4. Integrity Assurance Committee established 5. 9 IAOs trained	1. Ministry of Finance expected to identify the weaknesses of the relevant legislation for Attorney General to make requisite amendments 2. Integrity Assurance Committee operational 3. Enforcement of PPDA	1. Code of conduct 2. Corruption prevention policy 3. Adherence to procurement regulations		1. Train more IAOs 2. Disseminate & Implement code of conduct 3. Train members of Integrity Assurance Committee 4. Establish mechanisms to bar brokers.
<b>4. Lack of financial accountability</b>						
1. Enforce Code of Conduct 2. Strictly enforce the penal law and adhere to financial rules and regulations 3. Monitor compliance and enforcement of the law	1. Attorney-General 2. MOF 3. Watchdog Agencies 4. Parliament 5. KACC	1. Clerical staff transferred leading to increased revenue 2. Company Registry introduced direct banking	1. Enforcement of POEA 2. Public Service Commission code of conduct	Increased revenue	Brokers	1. Integrity testing 2. Further automation of registration to reduce human contact
<b>5. Poor management of records</b>						
1. Develop an effective records system 2. Provide proper physical facilities for keeping records 3. Recruit and train personnel in records management	Solicitor-General	1. Department of Registrar General fully automated (Companies Registry) Civil Department Registry modernized 2. Mobile cabinets acquired 3. 200 clerical officers recruited	1. Process of automation on-going in Departments of Public Prosecutions, Public Trustee 2. All officers in State Law Office being trained in IT	1. Progress in automation of registries 2. Increased capacity in records keeping through training	1. Inadequate funds to cascade automation 2. Back up of information	Lobby for funds to buy equipment & train field officers
<b>6. Outdated equipment and technology</b>						

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Acquire adequate modern equipment and technology 2. Train staff on modern technology	1. Solicitor-General 2. DPM	1. Computers acquired for all Departments 2. Installation of internet at State Law Office	1. Officers being trained on IT 2. Internet to be extended to stations		1. Lack of IT strategy 2. Inadequate resources	1. Lobby for funds to buy equipment & train field officers 2. Acquisition of ICT equipment
<b>7. Low performance standards</b>						
1. Provide continued education and training of officers 2. Improve staffing ratios 3. Establish clear performance standards and guidelines 4. Regularly appraise staff performance 5. Implement performance contracting	1. Attorney-General 2. DPM	1. State Law office under Performance Contracting 2. Annual staff appraisal 3. Feedback mechanism in place (brochures) 4. Court users committees 5. Kenya Copy Rights Board established 6. National Crime Research Centre established	1. Training programme for officers in SLO 2. Regular workshops to enhance inter agency co-operation 3. Periodical performance returns by all officers 4. Sensitization of client ministries	1. Results Based management system 2. Establishment of crime reference centre 3. Establishment of Copyright Board	Retention of professional staff due to poor terms of service	1. Periodic customer satisfaction survey 2. Strengthen court users committee 3. Interactive website
<b>8. Excessive bureaucracy in dealing with criminal and civil cases</b>						
1. Delegate and decentralize authority for expeditious services 2. Provide clear guidelines on cases to be dealt with at various levels	Attorney-General	1. Decentralized civil litigation(Kisumu, Mombasa, Eldoret, Nyeri Meru) 2. 81 state counsels hired	Hiring of more counsels under way to deal with backlog of cases	1. Increased capacity of state counsels 2. Decentralized litigation services	1. Criminal and Civil Justice System involve several players not just Attorney General 2. Inadequate facilities	1. SLO to take pro-active role in tackling various legal problems to enhance preventive measures 2. Increase capacity
<b>9. Lack of respect for clients</b>						
Establish and implement a "customer charter"	1. Attorney-General 2. Solicitor-General 3. Interest Groups	1. Customer Service Charted in place 2. Customer Care & Complaints desk established 3. Induction of newly recruited counsels 4. SLO badges 5. Prosecutors code of conduct developed	Sensitization of counsels on communication	Improved public relations	Resistance to change	1. Enforce the code of conduct 2. Public relation training 3. Conduct customer satisfaction survey
<b>10. Poor planning</b>						
1. Inculcate a culture of planning 2. Develop and implement relevant and appropriate plans 3. Develop legal framework for national planning and policy formulation	1. Attorney-General 2. Solicitor-General	1. SLO strategic plan (2008 – 2012) formulated in line Vision 2030 2. Training on ISO certification complete	Implementation of strategic plan	SP developed and being implemented	Inadequate resources to implement SP	Implementation of the strategic plan liaise with other ministries in enforcement
<b>11. Poor work ethics</b>						
1. Inculcate a serious work ethic 2. Implement public service integrity programme (PSIP) 3. Strictly enforce POEA	1. Attorney-General 2. DPM 3. Solicitor-General	1. SLO is strictly enforcing the public officers Ethics Act. (POEA) 2. Integrity Assurance Committee established 3. Code of conduct developed 4. Corruption prevention policy developed	1. Code of conduct being implemented 2. Performance Contracting	1. Good Governance measures in place 2. Enhanced	Resistance to change	Enforce the code



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	4. Responsible Commissions	5. Corruption prevention plan developed 6. 9 IAOs trained		training		
<i>12. Excessive secrecy and personalization of office</i>						
1. Provide official information to all those who need to know 2. Decentralize management functions to appropriate levels and officers 3. Update and avail security manuals to all staff 4. Amend Official Secrets Act 5. Enact Freedom of Information Bill	1. Attorney General 2. Solicitor General	1. State Law Office Service Charters in place showing the services offered by respective departments 2. Succession management Circular by HPS 3. Performance Contracting	1. Filling of returns 2. Decentralization of Civil Litigation		Official Secrets Act not amended	1. Lobby the responsible house committees 2. Lobby for enactment of information bill (Ministry of information)
<i>13. Lack of accountability</i>						
Base all decisions and actions on plans, policies and the law	1. Attorney-General 2. Solicitor-General 3. KACC	1. Mechanisms in place to ensure accountability 2. Performance contracting in place in line with the AG's legal mandate	Strategic planning in line with performance contract.	Enhanced legislative capacity	Inadequate supervision at all levels	Enforce accountability mechanisms
<i>14. Poorly drafted Bills</i>						
1. Provide officers to Parliamentary Counsel to analyse all Bills and advise MPs in Parliament 2. Recruit well-trained draftsmen for the Attorney-General's office	1. Attorney-General 2. Parliament 3. Relevant Ministries & stakeholders	1. 14 parliamentary counsels hire 2. 3 counsels seconded to Ministry of Local Government, Trade and Immigration	Training of parliamentary counsels	Enhanced capacity in legislative drafting	1. High turnover of officers due to poor terms of service 2. Inadequate financial resources 3. Low morale	1. Improve terms of service 2. Recruit more draftsmen 3. Training in draftsmanship 4. SLO to push for better terms for drafters
<i>15. Poor identification of legislative proposals</i>						
1. Assign legal officers to ministries and departments 2. Clearly define and clarify role of legal officers in the ministries and departments 3. Report annually on suitability of the laws being implemented	Respective Accounting officers	1. Counsels seconded to Ministry of Local Government, Trade and Immigration 2. Law reform committee in the Department of Public Prosecution 3. Kenya Law Reform Commission 4. Companies Bill, partnerships and Insolvency bill drafted	1. SLO is in the process of hiring & posting state counsel with drafting experience to various Ministries to deal with challenges 2. Collaboration with KLRC on draft bills	Enhanced capacity to prepare legislative proposals	Availability of funds for hire and training of more state counsel	1. Enact the bills 2. Build capacity of Ministries & Departments to prepare clear legislative proposals
<i>16. Delays in prosecution of cases</i>						
1. Ensure adequate staffing levels in the Director of Public Prosecution (DPP) office 2. Implement performance contracting 3. Enhance capacity of public prosecution office	1. Attorney General 2. Judiciary	1. Special prosecutors hired on contractual basis 2. Prosecution policy and code of conduct for prosecutors in place 3. Training curriculum for prosecutors developed 4. Witness protection Act in place	1. SLO in the process of hiring and training more prosecuting Counsel 2. Operationalization of the witness protection	Enhanced legal & institutional framework for prosecution	1. Inadequate resources 2. Police prosecutors sometimes have no control of prosecution	1. SLO to develop and enforce the plea bargaining regulations 2. Codify Alternative Dispute Resolution Mechanisms in the Civil Procedure Act

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		5. Witness protection unit established under the SLO 6. Plea bargaining under criminal procedure code 7. Organized crimes bill	3. unit Alternative Dispute Resolution Mechanisms			3. Phase out Police Prosecutors 4. Institute Judicial reforms

## 6.3 KENYA REVENUE AUTHORITY

1. Tax Evasion						
1. Implement terms of Charter 2. Enforce Code of Conduct 3. Monitor Compliance of Charter and Code of Conduct 4. Initiate and implement public education programme 5. Literature developed on frequently asked questions 6. Balanced scorecard to evaluate performance 7. Sensitization of various groups on tax compliance 8. Bringing more players on the tax net 9. Bonus payout 10. Developing a Corporate Plan	1. KRA 2. Civil Society 3. Professional Bodies 4. Government	1. Charter launched & terms of Charter implemented. 2. Implementation of KRA Internal Standards in line with performance contract 3. Code of Conduct enforced 4. Tax payers education including integrity matters 5. Monthly public education on various taxes for all recruited tax payers 6. Literature on frequently asked questions (FAQs) on all taxes and programmes developed and disseminated to taxpayers through various channels. 7. Cumulatively, during the current FY <ul style="list-style-type: none"> <li>▪ taxpayers recruited for VAT</li> <li>▪ taxpayers recruited for Income Tax</li> </ul> 8. Bonus is paid to staff whenever KRA surpasses target 9. 4 <sup>th</sup> KRA Corporate plan developed 10. Extensive reforms and automation of systems	1. Compliance with Charter and Internal standards incorporated in performance contract and evaluated quarterly 2. Continuous enforcement of the Code of Conduct 3. Monthly reporting to management on performance through balance score card 4. Continuous sensitization of various groups on compliance 5. Review code of conduct to include penalties	1. Strategies to deal with tax evasion developed 2. Increased tax revenue 3. Increased public education on tax compliance	1. Incomplete returns and entries filed which cannot be processed on time. 2. Fake claims which necessitate auditing and investigation 3. All Kenyans should pay tax 4. KRA is not the primary source of Key data bases needed in revenue collection. How reliable are these data 5. lack of collaboration with other stakeholders on enforcement of tax laws	1. Continue to educate taxpayers to understand the requirements for tax compliance. 2. Awareness on KRA'S 2% incentive on inform leading to tax recovery 3. Frequent transfers of Revenue Officers to disrupt corruption networks 4. Intensify & mainstream integrity testing on all officers susceptible to corruption 5. Need for ascertaining the integrity of data systems in govt institutions 6. Link PIN with registration of persons & Registrar of companies
2. Non-compliance with Tax Laws						
1. Educate Public on Importance of Compliance 2. Make it a condition that provision of services and contracts will be on compliance to tax laws	1. KRA 2. Civil Society 3. Media 4. Professional Bodies 5. Stakeholders 6. Judiciary	1. Nationwide taxpayer education during Taxpayers Week 2. – Tax clinics conducted during this FY (Stakeholder sensitization) 3. It is a requirement to obtain a tax clearance certificate from KRA before you supply to government	1. Continuous Tax Clinics 2. Sponsoring Tax themes in different categories during the schools Music Festivals. Sponsored choir, choral verse in English and Kiswahili for Primary, secondary and Colleges. Sponsored branded Certificates,	Increased tax payers education/ sensitization	1. Inculcating the compliance to tax laws countrywide 2. How to enlist the support of the public in enforcing compliance especially in VAT. 3. How to promote subscription to	1. Need for all government agencies to require all dealing with them to produce tax compliance certificate 2. Need to compel taxpayers to enlist under umbrella associations



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			<p>programme for national Music Festival and T-shirts amounting to Kshs. 2.5 million.</p> <p>3. Continuous engagement with stakeholders on integrity matters</p> <p>4. All newly licensed clearing agents must go through integrity sensitization</p> <p>5. Discussions with KIE to include taxation in school curriculum</p>		broader umbrella associations such as LSK, ICPAK, KIFFWA etc that could have sanctions for tax defaulting members	
<b>3. Abuse of discretionary Powers</b>						
<p>1. Establish and enforce monitoring mechanisms to check on compliance</p> <p>2. Reduce discretionary powers which should be exercised only in public interest</p>	Treasury KRA	<p>1. Most of the discretionary powers vested with KRA were removed. The few i.e. exemptions and remissions are now bestowed on the Minister for Finance</p> <p>2. Guidelines have been developed i.e. with regard to compounding Electronic Tax Register (ETR) offence (after trader admits liability-DTD Commissioner abandons the Court process and fines the trader) in order to curb abuse of discretionary powers.</p> <p>3. Criteria for the exercise of discretion developed &amp; adopted</p>	Continuous reviews of discretionary powers	<p>1. Guidelines on discretionary powers operational</p> <p>2. Reduction of discretionary powers</p>	Monitoring abuse where the law allows exercising of discretionary powers i.e. in exemptions and remissions	<p>1. As far as possible do away with discretionary powers.</p> <p>2. Provide clear guidelines on what may attract what taxes and duties</p> <p>3. Strictly adhere to the discretion criteria.</p>
<b>4. Weak and Inadequate legal provisions for revenue collection</b>						
<p>1. Improve and strengthen additional and appropriate legal provisions</p> <p>2. Widen the bracket of the tax paying public</p> <p>3. Develop and Establish mechanisms to monitor compliance</p>	<p>1. Parliament</p> <p>2. KRA</p> <p>3. AG</p> <p>4. Judiciary</p>	<p>1. Policy and legislative proposals on recognition of electronic signatures &amp; determining of fines among others</p> <p>2. Conducted a symposium with the Judiciary, Police and MPs</p>			<p>1. Need for Laws that recognize the automated environment i.e. electronic signatures</p> <p>2. Courts stopping KRA from collecting taxes and failure to issue corresponding orders of preserving the litigants funds under dispute</p> <p>3. Need for Judiciary</p>	<p>1. Continue to collaborate with stakeholders to appreciate the need to maximize revenue collection and the inherent challenges</p> <p>2. Lobby for legislation to cover electronic transactions &amp; cyber crime</p> <p>3. Intensify Stakeholder collaboration involving Kenya Legal Reforms, AG, KRA and the Judiciary</p>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
					to protect Government revenue by meeting out strict penalties to tax evaders	
<b>5. Cumbersome and Inappropriate Tax Administration Procedures</b>						
<ol style="list-style-type: none"> <li>1. Simplify and rationalize tax administration procedures</li> <li>2. Develop and Implement user friendly, efficient and cost effective tax administration system</li> <li>3. Taxation (duty) to be done at source or point</li> <li>4. Timely reimbursement off tax VAT</li> </ol>	<ol style="list-style-type: none"> <li>1. KRA</li> <li>2. MoF</li> <li>3. Executive</li> </ol>	<ol style="list-style-type: none"> <li>1. Automation of Operations in all Departments done</li> <li>2. Implemented Simba System in Customs Services Department (CSD) which has enabled taxpayers to lodge documents on line</li> <li>3. The Document Processing Centre operates on a 24 hour basis daily</li> <li>4. Taxation, registration and issuance of logbooks of motor vehicles done at source – i.e. vehicle registration &amp; issuance of logbooks done at Mombasa.</li> <li>5. VAT monthly refunds (Reimbursements) have been enhanced from Kshs. 900million to kshs 1,014 million.</li> <li>6. Officers given <ul style="list-style-type: none"> <li>✓ Targets of cases to be processed</li> <li>✓ First in first out (FIFO) basis of processing</li> <li>✓ More staff engaged</li> </ul> </li> <li>6. KRA obtained International Organization for Standardization (ISO) 9001:2000 Certification</li> <li>7. Integrated Tax Management System (ITMS) introduced that allows the taxpayers to process PIN on-line and file Income tax returns on-line</li> <li>8. Collapsed the various registration numbers to the PIN which is now used as the single identifier</li> </ol>	<ol style="list-style-type: none"> <li>1. Development of ITMS underway which will allow taxpayers to file returns online</li> <li>2. To fast track VAT refunds – Risk Profiling framework developed and is being automated to sort out which cases require auditing.</li> <li>3. Linkage of ITMS with other databases to authenticate and validate PIN issuance and broaden the tax base</li> <li>4. More modules of ITMS that will enable taxpayers to interact and query their tax status online</li> </ol>	<ol style="list-style-type: none"> <li>1. Automation of operations</li> <li>2. Adoption of ICT in tax procedures</li> <li>3. Increased revenue</li> </ol>	<ol style="list-style-type: none"> <li>4. Resistance by some taxpayers with support of politicians who prefer the status quo and do not want change.</li> <li>5. Problem with consolidators</li> </ol>	<ol style="list-style-type: none"> <li>1. Need for more education and positive pronouncements by leaders</li> <li>2. Continue to collaborate with stakeholders to appreciate the need to maximize revenue collection and the inherent challenges</li> <li>3. Intensify tax refunds on insurance premiums</li> <li>4. Executive to pick the issue of illegal business of Eastleigh</li> </ol>
<b>6. External Interference</b>						
<ol style="list-style-type: none"> <li>1. Strictly enforce rules, regulations and laws</li> <li>2. Strengthen the system with a view to sealing loopholes and opportunities that encourage interference</li> <li>3. Establish and enforce effective codes of conduct and ethics</li> <li>4. Punish errant officers</li> </ol>	<ol style="list-style-type: none"> <li>1. KRA</li> <li>2. Ministry of Finance</li> </ol>	<ol style="list-style-type: none"> <li>1. Rules, regulations and laws strictly enforced through regular external and internal audits. Audit reports are prepared &amp; follow up made monthly</li> <li>2. Systems have been automated and discretionary powers minimized</li> <li>3. Code of Conduct enforced</li> <li>4. Errant officers punished – number punished?</li> </ol>	Deterrent measures on errant officers taken	Deterrent measures on errant officers	<ol style="list-style-type: none"> <li>1. Lack of Security of tenure for Commissioner General (CG) to discharge duties without fear of favour.</li> <li>2. Enforcement</li> </ol>	<ol style="list-style-type: none"> <li>1. Review KRA Act to provide security of tenure of CG</li> <li>2. Carry out a systems review to eliminate loopholes</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
5. Give Commissioner General Security of Tenure		5. All concluded disciplinary cases published and circulated internally within KRA			linkages with other stakeholders 3. External interference	
<b>7. Inadequate Identification of Taxpayers and under collection</b>						
1. Efforts to have a permanent number or PIN for all purposes 2. efforts to link PIN with National Registration System 3. Setting higher standards	1. KRA 2. Parliament 3. Ministry of Finance 4. Ministry of Immigration & Registrar of Persons	1. PIN already used as the single reference for tax purposes 2. All KRA systems linked and using PIN as base 3. Higher targets are set – KRA collected 481 billion in 2008/09 compared to Kshs. 413 billion in 2007/08 FY, Kshs. 360 billion 2006/07 FY, Kshs.298 billion 2005/06 FY, Kshs. and Kshs. 229 billion in 2003/04 FY. 4. Staff given targets which form part of performance contract and BSC 5. Sacks on average about 50 officers per year on integrity issues	1. PIN to be linked to National Registration System. PIN is currently used in most transactions i.e. PIN is a MUST for all traders dealing with Government institutions, Land transactions & motor vehicle transfers among others 2. Staff have targets which form part of performance contracts and BSC	Increased tax revenue	National Registration System will link birth, ID and death registrations with KRA system	1. Link PIN to National Registration 2. Need for KACC to compel all stakeholders to operate Codes of Conduct with clauses on corruption and proper sanctions on defaulting members 3. KRA to pursue further integration with other institutions
<b>8. . Inadequate and/or Complex Systems, Processes and procedures</b>						
Computerized driving licences and other issuances	1. MOT & C 2. KRA 3. Treasury	1. Linked motor vehicle registration with importation and both logbook and number plates issued at Mombasa 2. New look logbook with enhances security features in place. 3. Collapsed most of the systems and established KRA online as a portal for all services to the taxpayer. 4. Introduced New Number plates for motor cycles, tractors & tuk tuk to	1. Computerization of driving licence on-going 2. Integrated Tax Management System for domestic taxes being developed which will allow online filling of returns and business transactions 3. Call Centre (Customer inquiry desks) procured and is now awaiting delivery	On line services in place	The limited capacity of Kamiti G.K Prison's to cope with the increased demand of number plates.	Production of number plates need to be liberalized and opened to the market
<b>9. Narrow Tax Base</b>						
1. Implement unified tax system 2. continue tax Education	1. KRA 2. Parliament 3. Treasury 4. LA 5. Ministry of Trade & Industry 6. Other	1. Implementation of Turn Over Tax. Turnover Tax (TOT) at 3% for taxpayers with turnover above Kshs. 500,000 and below Kshs. 5 million 2. Implementation of VAT on non-residential buildings	Taxpayer Education on-going	Widened tax base	1. Obtaining voluntary compliance among the small traders 2. Transport licensing placed under Ministry of Finance and Transport	1. Need to supplement the taxpayer education conducted by KRA 2. Need for pronouncements and encouragement from all leaders /stakeholders 3. Lobby for transport licensing to be in the Ministry of

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	Stakeholders					Finance only
<i>10. Inadequate Border Surveillance</i>						
1. Procure patrol Boats 2. Improve collaboration with security forces and community border points 3. Collaborating with neighboring countries under the East African Revenue Authorities forums and conducting joint verification and boarder patrols	1. KRA 2. Immigration 3. Police	1. Four boats procured, one already delivered in Kisumu, 3 for Mombasa on the way. 2. KRA has recruited and trained 240 Graduate Border control officers since last year 3. Additional 4 K9 dogs have been procured 4. 24 hours operations at port and border points 5. Electronic cargo tracking operational	1. 4 Boats being purchased 2. Implementation of a cargo tracking system	Increased surveillance capacity	1. Long Porous borders. 2. Instability in neighbouring countries 3. Limited collaboration of other stakeholders to ensure that their staff are also working on 24 hrs 4. General insecurity	1. Increased collaboration with both security forces and border officers within and with neighbouring countries 2. Issue of Eastleigh & porous borders be discussed at the Inter-agency Forum as a matter of national security and trade 3. Executive to pick the issue of the port – 24 hour operation for other Government Departments & the issue of border surveillance
<i>11. Patronage in appointment and promotion of officers</i>						
1. All appointments open and competitive 2. Senior staff already on contract 3. Maintain an effective monitoring mechanism to ensure compliance appointment criteria 4. CG will require security of tenure in order to adequately resist interference	1. KRA 2. Ministry of Finance	1. All vacancies advertised internally & externally 2. Interviews competitively held with interdepartmental panels 3. Performance Contracts (PC) Evaluations done quarterly	Working on how to monitor adherence to appointment criteria.		Ethnic considerations during appointments	Observe affirmative action and quota system in appointments in order to achieve equity and fairness



## 7. WATCHDOG AGENCIES

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Failure to attract and retain quality personnel</i>						
<ol style="list-style-type: none"> <li>1. Give autonomy to all watchdog agencies in appointment and promotion of staff</li> <li>2. Provide security of tenure for the Chief Executives of the Watchdog agencies</li> <li>3. Continuously improve terms and conditions of service</li> </ol>	<ol style="list-style-type: none"> <li>1. Government</li> <li>2. Watchdog agencies</li> <li>3. Parliament</li> </ol>	<ol style="list-style-type: none"> <li>1. Some improvement in the terms and condition of service implemented – KENAO</li> <li>2. Selection and recruitment of staff from the private sector – KENAO</li> <li>3. Autonomy in appointment and promotion of staff in accordance with delegated authority</li> <li>4. Internal Auditor General and Deputies elevated by one job group – IAG</li> <li>5. Proposal to review terms and conditions of service completed – EMU</li> <li>6. Draft Scheme of Service submitted to the Ministry of State for Public Service – IAG</li> <li>7. 6 Chief Internal Auditors, 24 auditor 111 recruited - IAG</li> <li>8. 13 professionals recruited by EMU</li> <li>9. Job evaluation exercise completed – KEBS</li> <li>10. New scheme of service - KEBS</li> <li>11. PPOA Board established</li> </ol>	<ol style="list-style-type: none"> <li>1. Review of terms &amp; conditions of service 2009/2010 F.Y – KENAO</li> <li>2. Recruitment of chief internal auditors (40) and principal internal auditors (16) to be advertised – IAG</li> <li>3. Review of terms &amp; conditions of service – EMU</li> <li>4. Recruitment of 49 professional staff to be re-advertised – EMU</li> <li>5. Follow up for comprehensive upgrading of all staff – IAG</li> <li>6. Staff establishment being reviewed- KENAO</li> <li>7. Merging of IAG, Cooperatives Audit, Local Government Inspectorate &amp; School audit to enhance efficiency</li> <li>8. Establishment of organizational structure &amp; recruitment of CEO-PPOA</li> </ol>	<ol style="list-style-type: none"> <li>1. Increased budget allocation</li> <li>2. Enhanced capacity in watchdog Agencies through training</li> </ol>	<ol style="list-style-type: none"> <li>1. Still losing staff to private and lucrative public sectors – KENAO &amp; IAG</li> <li>2. No security of tenure of the Internal Auditor General – IAG</li> <li>3. Lack of autonomy in the appointment &amp; promotion of staff – IAG/EMU</li> <li>4. Out of 665 staff establishment only 444 are in place – IAG</li> <li>5. Out of a staff establishment of 115, only 33 are in place EMU</li> <li>6. Out of Audit Staff establishment of 1095, only 676 are in place. - KENAO</li> <li>7. Terms of service not attractive enough to recruit and retain staff - IAG/EMU/KEBS/KENAO/ISC</li> <li>8. Requirements for the jobs in terms of qualifications a challenge? Diploma requirement which is offered by KCA University – IAG.</li> <li>9. Lack of financial autonomy – EMU</li> <li>10. Upgrading of staff not all inclusive – IAG</li> <li>11. Lack of Organizational structure</li> </ol>	<ol style="list-style-type: none"> <li>1. Financial Implications included in 2009/10 Estimates – All</li> <li>2. Improved terms of service – IAG/EMU</li> <li>3. Initiate the review of the schemes of service for Inspectorate of State Corporations</li> <li>4. Seek waiver for the Scheme of service Diploma requirement (IAG)</li> <li>5. Seek legal mandate – EMU</li> <li>6. Seek security of tenure - IAG</li> </ol>
<i>2. External Interference with the watchdog agencies</i>						
<ol style="list-style-type: none"> <li>1. Adhere to strict enforcement of rules and regulations and laws</li> <li>2. Strengthen the system with a view to sealing loopholes and</li> </ol>	<ol style="list-style-type: none"> <li>1. Watchdog Agencies</li> <li>2. Government</li> <li>3. Parliament</li> <li>4. Attorney General</li> </ol>	<ol style="list-style-type: none"> <li>1. Adherence to the Public Audit Act, 2003 – KENAO</li> <li>2. Operate under Government Financial Management Act (GFMA), 2004. – IAG</li> <li>3. Regulations to operationalize the Act developed - IAG</li> </ol>	<ol style="list-style-type: none"> <li>1. Organic Budget Bill in parliament - IAG</li> <li>2. Implementation of Public Audit Act, 2003</li> <li>1. Review of Standards Act - KEBS</li> </ol>	<p>Enforcement of relevant laws and regulations e.g PAA, GFMA</p>	<ol style="list-style-type: none"> <li>1. Director of Budget has not formulated the rules to operationalize the GFMA 2004</li> <li>2. The regulations to operationalize the GFM Act not yet gazetted due to non-</li> </ol>	<ol style="list-style-type: none"> <li>2. Follow up the gazette of the regulations – Executive</li> <li>3. Updating of the enabling circulars/instruments establishing IAG.</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
opportunities that encourage interference 3. Punish errant officers		4. Reviewed Treasury Circular no. 4 of 2008-on mandate of IAG			<p>submission by Director of Budget</p> <p>3. External interferences with regard to operations, - KEBS</p> <p>5. Resisting interference is difficult.</p> <p>6. Punishment of errant officers is difficult.</p> <p>7. Non-compliance with circulars and respective laws by State Corporations</p> <p>8. Conflicting Acts/Regulations - KEBS</p>	<p>4. Strict enforcement of rules and regulations where existing.</p> <p>5. Rules and regulations to be formulated where lacking.</p> <p>6. Follow Guidelines on recruitment of CEO's in parastatals as per circular No.OP/CAB 9/21/2A/III/43 dated 23/11/2004</p> <p>7. Draft organic Budget Bill with the A.G</p> <p>8. harmonize laws of various agencies</p> <p>Enhance inter-agency collaboration</p>
<b>3. Insufficient budgetary allocation to programme for some watchdog agencies</b>						
<p>1. Source sufficient funds for specific planned and rationalised programmes</p> <p>2. Use funds for planned specific projects</p> <p>3. Establish monitoring mechanisms to ensure funds are used for planned programmes</p>	<p>1. Watchdog agencies</p> <p>2. The Treasury</p>	<p>1. Budgetary allocations increased in 2008/2009 financial year (remuneration, training and facilities such as computers, laptops vehicles etc) - KENAO</p> <p>2. Budget allocation for partitioning - EMU</p> <p>3. Value for money audit reports completed and under clearance. 5 studies currently under process- KENAO</p>	<p>1. Review of budgetary allocation 2008/2009- KENAO</p> <p>2. Requested for additional funding in 2008/2009- IAG/EMU</p> <p>3. Continuous Performance/Value for Money Auditing - KENAO/IAG</p> <p>4. Continuous Performance Review for allocated funds utilization - KEBS</p> <p>5. Continuous routine Management Audits - EMU</p> <p>6. Partitioning on-going - EMU</p>	Improved budget allocation	Budgetary allocation still insufficient - All	<p>1. Continue lobbying for additional funding in 2009/2010 financial year.</p> <p>2. Monitoring mechanisms for usage of funds.</p>
<b>4. Lack of accounting and financial information by Institutions and organizations</b>						
<p>1. Make it a legal requirement that relevant bodies compile, publish and avail Audited Accounts to the public as required by law.</p>	<p>1. Permanent Secretaries/ Chief Executives</p> <p>2. Parliament</p> <p>3. KENAO</p> <p>4. Attorney</p>	<p>1. Adherence to the Public Audit Act, 2003 - KENAO</p> <p>2. Government IPPD systems implemented</p> <p>3. IFMIS partially implemented</p> <p>4. Financial reporting template issued by the Deputy Prime Minister and Minister for Local Government.</p>	<p>1. Government Financial Information Systems being implemented - IFMS, G-pay</p> <p>2. Continuous adherence to Public Audit Act, 2003</p> <p>3. Review of the Public Audit Act, 2003.</p>	Accounting and financial information systems operational	<p>1. Delays in submission of accounts still experienced especially by Local Authorities - KENAO</p> <p>2. Lack of capacity in accounting &amp; finance and poor record keeping &amp; accounting systems</p>	<p>1. Plan the review for Public Audit Act, 2003- KENAO to provide for the information to go public as soon as C&amp;AG signs.</p> <p>2. Capacity building and systems improvement -</p>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
2. Strictly enforce the law 3. Review the Public Audit Act 2003 to specify and impose penalties for non-compliance by officers	General 5. OOP-e-government	5. Circular by the Permanent Secretary Ministry of Local Government on reporting procedures 6. LAIFOMS partially implemented	4. Sharing information - Inter-Agencies Forum – 11 Government Agencies		functions by clients – KENAO 3. Compliance with laws and regulations by clients lacking in some cases –KENAO 4. The will to follow up recommendations of audit reports on financial malpractices is lacking 5. Inadequate follow up of procurement reviews – PPOA 6. Submission of unauditible accounts	KENAO 3. Lobbying for review/amendments of Public Audit Act 2003 - KENAO 4. Issues of penalties for non-compliance and amendment of State Corporations Act Cap 446 to be discussed between KENAO and Inspectorate of State Corporations 5. Inter-Agencies Forum to pick up issues that are relevant to their mandate. 6. Fast-track implementation of e-government (OOP) 7. Initiate review of the sanctions from institutions to responsible officers like accountants, treasurers & clerks in order to make them directly accountable

5. *Audit Backlog*

1. Carry out regular, surprise checks on organisations 2. Institute and enforce stiff penalties for failure to observe audit requirements 3. Action Plans being prepared to clear backlogs	1. Watchdog agencies 2. Individual organisations 3. Parliament	1. 2007/2008 Central Government Audit completed tabled in parliament– KENAO 2. 191 out of 197 State Corporations 2007/2008 accounts certified– KENAO 3. 93 out of 175 Local Authorities' 2005/2006 and prior years Accounts certified. 4. 55 out of 175 Local Authorities' 2006/2007 Accounts certified. 5. 1 out 175 of the 2007/2008 Local Authorities Accounts certified – KENAO 6. Local Authorities and Funds Accounts Parliamentary Committee established 7. Regular checks undertaken in revenue, projects sites and delivery points – IAG 8. Annual Audit Plans – KENAO & IAG 9. Strategic Plan 2007-2012 – being implemented – KENAO 10. Draft 3 years Strategic Plan ready – IAG	1. Reviewing & certifying the balance as submitted for Local Authorities & State Corporations – KENAO 2. Implementation of Strategic Plan 2007-2012 – KEBS 3. Review of the Public Audit Act 2003 – KENAO	Progress in clearance of audit backlog	1. Determination of cut off period for Local Authorities – KENAO 2. Submission of unauditible Accounts – KENAO 3. Inadequate transport in field offices affecting regular checks on revenue, project sites and delivery points – IAG 4. No provision in the Public Audit Act 2003 to enforce penalties for failure to observe audit requirements 5. Inadequate capacity	1. Collaboration with MoLG & Reform Programme for carrying out due diligence 2. Lobbying for adequate and suitable vehicles to ensure annual plans are implemented – IAG 3. Proposal for review of State Corporations Act Cap 446 to incorporate issue of penalties 4. Strengthen capacity
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>6. Lack of corruption pre-emptive intervention in regular transactions</b>						
<ol style="list-style-type: none"> <li>1. Pursue financial independence</li> <li>2. Enhance systems and provide random audits on high risk areas</li> <li>3. Introduce checks and balances and scheduled inspection and audit for all large transactions</li> </ol>	<ol style="list-style-type: none"> <li>1. Watchdog Agencies</li> <li>2. Parliament</li> <li>3. Chief Executives</li> <li>4. IAG</li> <li>5. KACC</li> </ol>	<ol style="list-style-type: none"> <li>1. Adoption of risk-based audit approach - IAG</li> <li>2. Introduction of Audit Committees in Ministries /Departments - IAG</li> <li>3. Continuous monitoring and auditing - EMU</li> <li>4. Counterfeits Act in place - KEBS</li> </ol>	<ol style="list-style-type: none"> <li>1. Use of risk-based audit approach - IAG</li> <li>2. Compliance audit-PPOA</li> <li>3. Continuous monitoring and auditing - EMU</li> <li>4. Pilot Quality Assurance review on effectiveness of Audit Committees - IAG</li> <li>5. Compliance with pre-shipment verification conformity ((PVOLC) guidelines being implemented - KEBS</li> <li>6. Automation of an integrated clearance system between KRA, KPA and KEBS being implemented - KEBS</li> <li>7. Operationalize the Counterfeits Act</li> </ol>	<p>Regular checks, audits and monitoring of transactions</p>	<ol style="list-style-type: none"> <li>1. Inadequate capacity - IAG</li> <li>2. Lack of independence of Audit Committees - IAG</li> <li>3. Inadequate financial and human resources - EMU</li> <li>4. Turnover in membership of audit Committees very high</li> <li>5. Various forms of corruption especially through collusion difficult to detect quickly</li> <li>6. Inadequate capacities of procurement officers</li> <li>7. Delay in operationalizing the Counterfeits Act</li> </ol>	<ol style="list-style-type: none"> <li>1. Capacity building-IAG</li> <li>2. Restructure Audit Committees to include membership from the private/civil sectors - IAG</li> <li>3. Additional resources required IAG/EMU</li> <li>4. Operationalize the Counterfeit Act</li> </ol>
<b>7. Abuse of Discretionary powers</b>						
<ol style="list-style-type: none"> <li>1. Lobby for clear definition of discretionary powers vested on individual officers and remove those unnecessary</li> <li>2. Monitor and evaluate systems and programmes regularly</li> <li>3. Set up guidelines and criteria for exercising discretionary powers</li> <li>4. Review and amend all laws that allow for discretionary powers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Parliament</li> <li>2. Attorney-General</li> <li>3. KACC</li> <li>4. Inspectorate of State Corporations</li> <li>5. Respective institutions</li> <li>6. KRA</li> <li>7. Ministry of Finance</li> </ol>	<ol style="list-style-type: none"> <li>1. Introduction of the East African Community Customs Management Act (CMA) reduced the number of exemptions that can be granted by the Minister at discretion - KEBS, KRA</li> <li>2. Ministry of Finance developed discretionary guidelines levels.</li> </ol>	<p>Development of objective criteria for granting tax exemptions and waivers - KEBS, KRA</p>	<p>Ministry of Finance Guidelines on discretionary powers in place</p>	<ol style="list-style-type: none"> <li>1. No clear guidelines on waivers - KEBS, KRA</li> <li>2. No clear guidelines on extension of service for retiring staff</li> <li>3. All countries of East Africa not embracing the integration well.</li> </ol>	<ol style="list-style-type: none"> <li>1. Activities to be reviewed in future plans</li> <li>2. Review and amend legislation to regulate the exercise of discretionary powers and curb abuse of power.</li> <li>3. Continue to implement administrative measures on discretionary powers</li> <li>4. Implement Ministry of Finance guidelines</li> </ol>
<b>8. Disregard of or/ and non existence of Professional Ethics and practices</b>						
<ol style="list-style-type: none"> <li>1. Lobby for strengthening of enforcement of professional standards and ethics</li> <li>2. Establish and implement</li> </ol>	<ol style="list-style-type: none"> <li>1. Professional bodies</li> <li>2. Government</li> <li>3. KACC</li> <li>4. Service</li> </ol>	<ol style="list-style-type: none"> <li>1. Internal auditors have professional Code of Conduct and are also bound by the Ministry of Finance Anti-corruption Code of Conduct June 2006 - IAG</li> <li>2. Currently using Public Service Code of</li> </ol>	<ol style="list-style-type: none"> <li>1. Customer satisfaction Survey (Internal &amp; external)- KEBS</li> <li>2. Customer satisfaction Survey (internal) - EMU</li> </ol>	<p>Adherence to professional ethics and practices</p>	<p>Resistant to change</p>	<ol style="list-style-type: none"> <li>1. Ensure enforcement of various Code of Conducts and Service Charters KENAO/KEBS/EMU/IAG</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
very clear codes of conduct and ethics 3. Set up monitoring mechanism to ensure enforcement of codes of conduct 4. Regularly review efficacy of codes of conduct 5. Encourage reporting and complaints on non-professional conduct	consumers 5. Relevant enforcement institutions 6. Courts 7. Individual Professionals	Conduct & Public Officers Ethics Act - EMU Service Charter - Ministry of Finance - IAG 4. Code of Conduct developed and being used together with Public Service Code of Conduct & IFAC/INTOSAI Code of Ethics - KENAO 5. Code of Conduct and Service Charter introduced - KEBS 6. Quality Assurance Units established - KENAO/IAG/KEBS 7. Service Charters developed - EMU/KENAO				2. Conduct customer satisfaction surveys 3. Implement recommendations of customer satisfaction surveys - KENAO/EMU/KEBS/IAG 4. Require professionals to be members of their respective Professional Associations 5. Watchdog Agencies to review efficacy of codes of conduct 6. Sensitization on change management

9. *Inadequate Management Information Systems*

1. Develop, establish and implement IT systems 2. Implement in-built monitoring systems 3. Implement the E-Govt Strategy	1. Government 2. DPM 3. Auditor-General 4. Professional IT bodies 6. IAG	1. Internet and intranet connectivity for some offices - KENAO 2. Internet connectivity for all offices - EMU/IAG 3. Trained 50 officers on the use of IDEA software - IAG 4. Have acquired 30 licenses for Audit Management Software Teammate and trained 101 officers - KENAO 5. Websites - KENAO, KEBS, IAG, PPOA 6. Have acquired 20 licenses for Audit Management Software, Teammate and trained 15 Champions - IAG 7. Internet connectivity in Nairobi completed-IAG 8. Internet & Intranet connectivity -PPOA	1. Improving and posting more information in the website - KENAO 2. Trained staff on Teammate and ready for piloting- IAG 3. Integrated online release system being implemented - KEBS 4. Liaising with E-government on implementation of regulatory licenses (one stop shop) on information about licenses - KEBS 5. Training an additional 10 staff on CISA - KENAO	1. Enhanced management Information systems 2. Enhanced capacity on management Information systems	1. Provision of Internet and intranet connectivity to other officers - KENAO 2. Lack of adequate capacity for use of audit software - IAG 3. Legal constraints on release of audit reports before tabling in parliament - KENAO	1. Provision of additional funds in the 2009/2010 estimates - KENAO 2. Internet & intranet connectivity to all offices 3. Lobbying for the relevant laws to be amended appropriately - KENAO 4. Strengthen capacity
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10. *Lack or limited independence of watchdog Agencies from the Executive*

1. Widen KACC powers to include prosecution. 2. Widen Auditor Generals Powers to include forensic Auditing 3. Provide for a legal framework for the establishment of other	1. Professional bodies 2. MOJNCCA 3. KACC 4. Service consumers 5. Relevant enforcement	1. Planned activity No.1 has been handled by KACC in their progress report. 2. IAG recognised under Government Financial Management Act 2004 3. Staff sensitized in forensic audit - KENAO 4. PPOA operational 5.	1. Lobbying for legal framework - EMU 2. Staff to be trained in forensic audit - KENAO 3. Standards Act being reviewed afresh to take cognizance of current developments - KEBS 4. Consultations on	PPOA established and operational	1. Lack of specialized skills e.g. forensic auditing - KENAO 2. GFMA regulations not yet gazetted 3. Lack of independence/autonomy from the executive- EMU 4. Commencement date and the	1. Build capacity on forensic auditing - KENAO 2. Continue Lobbying for legal framework - EMU 3. Operationalize Counterfeit Act 4. Establish Counterfeit Agency
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
independent watchdog agencies.	institutions 6. Courts 7. Individual Professionals		commencement date and establishment of the Agency for operationalizing the Counterfeit Act - Ministry of Industrialization		Agency for operationalizing the Counterfeit Act not gazetted - KEBS	
<i>11. Lack of professional capacity for some watchdog agencies to discharge their mandate</i>						
<ol style="list-style-type: none"> <li>1. Allocate more resources to watchdog agencies</li> <li>2. Improve their technical capacity to enforce their mandate</li> <li>3. Provide professional eligibility criteria for hiring professionals including appointment to boards in public institutions.</li> </ol>	<ol style="list-style-type: none"> <li>1. Government</li> <li>2. Watchdog agencies</li> <li>3. Other stakeholders</li> </ol>	<ol style="list-style-type: none"> <li>1. Increased budgetary allocation - KENAO</li> <li>2. Continuous training of staff - All</li> <li>3. Recruited 37 additional auditors -IAG</li> <li>4. Recruited 19 additional auditors III &amp; 1 Deputy Director -KENAO</li> <li>5. Recruited 127 - KEBS</li> <li>6. Additional Division established to cater for water service providers/companies - KENAO</li> </ol>	Recruitment of additional staff- All EMU/IAG/KENAO/KEBS	Enhanced professional capacity of Watchdog Agencies	<ol style="list-style-type: none"> <li>1. Retention of staff recruited - KENAO/IAG/KEBS/EMU</li> <li>2. Creation of new districts/parastatals/ministries has led to requirement of additional staff - IAG/KENAO</li> </ol>	<ol style="list-style-type: none"> <li>1. Improve capacities of watchdog agencies</li> <li>2. Improve &amp; harmonize terms &amp; conditions of service for watchdog agencies</li> <li>3. Review staff establishments.</li> <li>4. Request for additional funding - IAG</li> <li>5. Carry out capacity building needs assessment</li> </ol>



## 8. MEDIA

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>1. Deliberately false or sensationalized reporting</b>						
1. Enforce and implement a Code of Ethics & Conduct for both journalists and the media establishments and apply penalties as provided in the Code 2. Sensitise staff on anti-corruption measures 3. Establish mechanisms to facilitate listeners, viewers, readers & Government to complain if offended. 4. Consider employing ombudsmen or public editors 5. Publish nature of action taken against journalists	1. Attorney -General 2. Kenya Union of Journalists (KUJ) 3. Media Owners 4. Civil Society 5. Media training institutions 6. KACC 7. Media Council of Kenya 8. Ministry of Information & Communication (MOIC) 9. Communication Commission of Kenya (CCK)	1. Media Council of Kenya (MCK) fully operational 2. Accreditation and registration of journalists in place by MCK and backed by the law 3. MCK complaints Commission operational 4. Media training manual	1. Enforcement of the Media Act 2. Media Monitoring 3. Ongoing journalists training 4. MCK annual Journalist of the year Award for excellence in development reporting 5. Continuous in house training by media houses 6. Review Media Act	Increased investigative journalism	1. Personality of bureau chiefs 2. In adequate resources at the Council 3. The Act prohibits MCK from getting funds from certain donors 4. Alternative media	1. Involve editors in training of journalists 2. MCK should act on gutter press 3. Aggressively enforce the Media Act 4. Encourage media houses to train their celebs presenters on ethics 5. MCK to act on irresponsible press
<b>2. Suppression of information</b>						
1. Develop Code of Ethics 2. Establish a professional Media Association 3. Internal sensitisation of staff on anti-corruption measures 4. Discourage abuse of discretionary powers of Senior Editors	1. Media Owners Association (MOA) 2. Editors 3. KUJ 4. Media training institutions 5. Media council	1. Code of Conduct backed by the Media Act 2. MCK fully operational 3. Complaints Commission operational	1. In house training programmes 2. Editors peer review established by the Editor's Guild 3. Media submissions to the constitutional review		1. Suspension of live broadcasting by the government 2. Lapsing of FOI and ICT Bills in the last Parliament	1. Lobby for the Bills to be re introduced in Parliament and are fast tracked 2. Lobby for removal of unfriendly clauses in the Bills
<b>3. Blackmail and harassment by impostors</b>						
1. Improve and strictly enforce accreditation guidelines by issuing authority 2. Sensitise the public on importance of verification of identity 3. Report intimidation to Media Council and KACC 4. Alert the Police	4. Attorney -General 5. Media Owners 6. Editors 7. KUJ 8. Media training institutions	Journalists accreditation and registration in place	Accreditation and registration of journalists	Accreditation of journalists by MCK	1. Accreditation fees could be high for correspondents and journalists 2. Lack of capacity to monitor harassment by journalists	1. Aggressive enforcement of the code 2. Revive MCK public debates 3. Public sensitization 4. Report corrupt incidences to KACC
<b>4. Inadequate licensing policies, procedures and guidelines</b>						
1. Develop and implement comprehensive guidelines for licensing and evaluation	1. Attorney- General 2. Media Owners	CCK's mandate widened by the Communications Amendment Act 2008	1. CCK in the process of repossessing idle	Widening of CCK's mandate to	Failure to pass FOI and ICT Bills in the	1. Lobby for the Bills to be re introduced in

Planned Activities	Responsibility	Progress of Implementation		Achievements/Outcomes	Problems/Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
2. CCK to levy a fee for all frequency holders 3. Discourage speculators from hoarding by setting a time limit within which to start a broadcasting station	3. KUJ 4. Editors Guild 5. CCK 6. MOIC	including Broadcast Content Advisory Board	1. Enforcement of the Media Act 2.	handle broadcast content	last Parliament	Parliament and are fast tracked 2. Monitor CCK's issuance of licences 3. Establishment of the Content Board
<b>5. Unethical solicitation of advertising business</b>						
1. Apply sanctions in Codes of Ethics against errant members 2. Sensitize advertisers and consumers 3. Media houses to include clauses in business documents on disallowed behaviour 4. Formulate, publicise and display a Customer Charters and quality service standards 5. Seek redress 6. Establishment & enforcement of broadcasting regulation mechanisms	1. Media houses 2. Marketing Society of Kenya 3. Advertising agencies 4. CCK 5. Ministry of Information and Communication	Media houses vetting	1. Media houses vetting adverts before accepting to publish 2. Some houses have developed guidelines for advertising.	1. Corporate organizations/Government withdrawal adverts if negative story written against them 2. Monopoly by advertising agencies 3. Pressure by advert agencies 4. Journalists becoming victims of adverts over their stories 5. Bulldozing media houses over adverts	1. Standardize advert guidelines 2. MOA should unite against intimidation by advertisers	
<b>6. Inadequate allocation of resources to Journalists</b>						
1. Provide Journalists adequate resources like transport, meals, equipment, etc 2. Improve their remuneration 3. Accreditation of journalists be strict	1. Media houses 2. Marketing Society of Kenya 3. KUJ 4. Media Council 5. Government	1. Some media houses have greatly improved the working conditions of their journalists. 2. Strict accreditation process established by the Media Council 3. MCK Complaints Commission operational 4. Kenya Journalists Association 5. Kenya Parliamentary Journalists Association	There are ongoing discussions over formation of a syndicated information dissemination where correspondents can sell their stories without being attached to any media house	1. Establishment of Kenya Journalist Association 2. Improved quality of media products	1. CBA's have collapsed 2. Weak union/wrangles 3. Not all media houses are members of Media Owners Association	1. Rejuvenate KUJ 2. Consult with MOA on how to improve journalists resources 3. Finalization of syndicated information bureau
<b>7. Poor quality of personnel</b>						
1. Involve media houses in journalism curriculum development 2. Establish, enforce and maintain high professional standards 3. Train journalists in specialised areas like governance and anti-corruption	1. Media training institutions 2. KUJ 3. Media houses 4. Civil Society 5. Ministry of	1. In house trainings by some media houses 2. Media Act defines journalist 3. Media Educators, Trainers Association (META) operational	1. Enforcement of the Media Act 2. Inspection & certification of media training institutions 3. MCK monitoring exercise	1. Enhanced capacity building of journalists through in-house training 2. Enhanced	3. Stakeholders not yet agreed on minimum standards 4. Lack of a uniform curricula	MCK should publicize to the public colleges it has accredited



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
4. Establish minimum criteria for media training institutions 5. Vet all media training institutions 6. Media houses to set up specialized desks	information and Communication 6. Other stakeholders 7. Media Council		4. In house trainings 5. Communication for development project to provide training opportunities to journalists 6. MCK in consultations with media training institutes over establishment of a national media examination body	institutional framework		
<b>8. Lack of minimum entry level qualifications for the industry</b>						
1. Establish professional qualifications and certificates for all grades 2. Make it compulsory for journalists to have certificates before practising 3. Develop and implement a Code of Conduct for the media sector 4. Establish minimum professional qualification and certification 5. Make legal requirement for regulated practising licences for journalists 6. If untrained staff are hired, they be trained within 6 months	1. Media training institutions 2. KUJ 3. Media houses 4. Civil Society 5. Ministry of information and Communication	1. Media Act 2007 mandates MCK to set up minimum standards for media training colleges 2. Act defines a journalist	1. Journalist registration and accreditation 2. Media training Colleges accreditation 3. Consultations are going on over setting up minimum entry level 4. Formation of a working committee to look into possibilities of establishing a National Media Examination Council 5. Survey on minimum entry level for journalists		High annual registration fee for unemployed journalists	
<b>9. Lack of accountability among journalists</b>						
1. Establish a professional regulatory body that will adequately monitor and regulate journalism to ensure responsibility and accountability to society 2. Encourage complaints by affected parties 3. Proper supervision of journalists 4. Media houses & journalists to take full responsibility for their actions 5. Media houses should socialize their editorial policies widely 6. Encourage objective and fair reporting	1. Media training institutions 2. KUJ 3. Media houses 4. Civil Society 5. Media council 6. Professional Association	1. Enforcement of Code of Conduct 2. MCK complaints commission actively operational 3. Several media houses have established corruption reporting networks (e.g. Nation Media)	1. Continuous training workshops 2. In house trainings 3. Journalist accreditation	Enhanced institutional Framework	1. Vernacular FM stations that promote tribalism 2. Financial journalism 3. Negative ethnicity 4. Partisanship 5. Corruption amongst journalists 6. Inadequate capacity for MCK to monitor	1. Continues training on negative ethnicity 2. Bring religious media houses together 3. Seek amendment to the Media Act

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>10. Poor Remuneration</b>						
1. Streamline terms and conditions of service 2. Improve emoluments among public service journalists 3. Establish salaries & wages arbitrations' board 4. All unionizable staff should be allowed to join the union if they choose	1. Media owners 2. KUJ 3. Professional Association 4. Civil Society 5. Ministry of information and Communication	1. Some media houses have improved the general working terms for their journalists 2. KUJ entered into a CBA	MCK plans to have a hotline to report journalists who extort money	Improved quality of media products	1. Lack of a strong union 2. Most media house hire only on contract basis 3. Correspondents still being paid very little per centimetre of their stories	1. Encourage dialogue on improved terms of service with MOA 2. Advocate for a stronger union 3. Encourage staff to join union 4. Enforce labour laws
<b>11. Lack of access to information</b>						
1. Enact legislation to allow access to certain information for the public 2. Proper classification of public information 3. Digitize all records 4. Repeal some of the existing restrictive laws that hinder free flow of information	1. Parliament 2. Attorney-General 3. Media Owners 4. KUJ 5. Media training institutions		1. FOI Bill to be reintroduced in parliament 2. Lobbying going on	3.	1. Its difficult to predict parliamentary calendar 2. Unfriendly legislation 3. Mistrust between Media Houses and the Government	1. Lobby for FOI Bill to be reintroduced and fast tracked in parliament. 2. Scrutinize Bill to avoid mischief 3. More engagement between media houses and the Government 4. Consultations with Ag and other stakeholders
<b>12. Intimidation and harassment of journalists</b>						
1. Encourage monitoring and reporting of violations by both local and international watchdogs 2. Develop and implement sensitisation programmes for law enforcement agencies, judiciary, politicians and the public at large on the role of journalists 3. Seek legal redress 4. Educate the public on the role of journalists 5. Educate journalists on acceptable etiquette	1. KUJ 2. Media Houses 3. Public 4. KACC 5. Civil Society 6. Judiciary 7. Law enforcement agencies 8. Professional Association	1. Enforcement of Code of conduct as provided in the Media Act 2. MCK Complaints Commission operational, so journalists can lodge complaints whenever they are harassed in the course of their work 3. Monitoring of journalists at work 4. Issuance of press cards 5. Training journalists on Parliamentary procedures 6. Legal education to journalists on their rights 7. Some media houses have gender policy to check harassment based on gender	1. Training 2. Media and parliament project to educate MPs and journalists	Enhanced institutional framework	1. Bias against certain media houses in certain areas 2. Not all media houses have a gender policy	1. Ongoing training on journalists rights 2. Lobby to all media houses to have policies 3. More engagement of media houses and the public
<b>13. Inadequate and incompetent treatment of corruption issues</b>						
1. KACC to publicize its services 2. Carry regular feature articles on	1. KACC 2. Media Houses	KACC publishes annual reports on corruption in the country	1. Termination of corrupt journalists services by		1. Corrupt journalists killing corruption	1. MOA should formulate policy on reporting



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
corruption 3. Train journalists on investigative and specialised journalism 4. Creation of a Journalists' Association 5. Educate the public to change cultural values which encourage corrupt practices 6. Introduce technology in public institutions	3. Civil Society 4. Religious organisations 5. Individual journalists 6. Interest Groups 7. Professional Association		media houses 2. Training on investigative reporting 3. Communication for development project (Reporting on development)		stories for money or other gains 2. Compromised editors 3. Exposing corruption is risky 4. Some corrupt companies deny media houses that report them advert revenue 5. Corrupt media owners 6. Intimidation by the corrupt 7. Fear of criminal libel by the media	corruption 2. Carry regular article on corruption 3. Establish a protection fund for journalists who expose corruption 4. Encourage distribution of IEC materials 5. Invest more on investigative journalism to report corruption 6. Invite KACC and organize workshops on corruption with them 7. Train journalists on positive reporting.
<b>14. Unregulated and obnoxious programme content</b>						
1. Broadcasting Act to regulate commercial broadcasting 2. Media houses to establish a mechanism to vet programme content	1. Ministry of Information and Communication 2. Attorney General 3. Civil Society 4. Professional Association 5. NACADA 6. Parliament 7. MOA	1. Enforcement of Code of conduct 2. MCK Complaints Commission operational 3. CCK's mandate widened (Kenya Communications (amendment) Act 2008 to include regulation of broadcast services in relation to programme content 4. CCK empowered to prescribe a programming code 5. Act empowers broadcasters to establish a procedure through which the public can complain against any broadcaster	1. Lobby for re introduction of ICT Bill 2. MCK receives complaints 3. Continuous media monitoring	Enhanced institutional framework	1. lapsing of Bills in parliament 2. Enforcement of the Media Act 3. Celebs employment	1. Lobby for ICT Bill to be passed 2. Lobby for media houses to have a timeline for certain high rate programmes 3. Enforce the Media Act 4. Review Media Act 5. Improve MCK's capacity 6. Lobby for thorough scrutiny of the Bill
<b>15. Lack of an information &amp; communications policy</b>						
1. Develop and implement information and communication policy 2. Enact information and communication law 3. Implement the policy 4. Enact freedom of information law	1. Attorney General 2. Parliament 3. Min. of Information and Communication 4. Interest groups		Lobby for the reintroduction of FIO and ICT bills in parliament			1. Continuous lobbying for re introduction of the two policies 2. Check status of the media policy
<b>16. Negative reporting</b>						
1. Profile role models to encourage positive behaviour change	1. Ministry of information and	1. Media Act 2007 operational 2. Code of conduct in place backed by the	1. Ongoing media monitoring	1. Enhanced investigative	1. Inadequate resources	1. Continuous training of journalists

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
2. Re-orient journalist training in seeing news worthiness in positive development	communication 2. Media houses 3. MOA 4. Media Council 5. Media training institutes 6. Government	law 3. MCK has more powers to act on complaints 4. MCK Complaints Commission operational 5. Promotion of development journalism	2. Ongoing trainings	journalism 2. Enhanced institutional framework	2. Sensationalism 3. Ethnical, tribal and personal biases	2. Encourage development journalism as opposed to personality journalism
<b>17. Election Coverage</b>						
1. Sensitization of journalists/media on unethical corrupt practises 2. Lobby for inclusion in training curricular 3. Coverage of opinion polls Corruption monitors 4. Development and distribution of IEC materials 5. How to ensure safety of journalists during elections 6. Emergency training during conflicts and post -trauma counselling	MCK	1. Training manual on lection reporting 2. Enforcement of code of conduct for election violence	1. Task force to analyze how media performed during the general elections 2. Journalist counselling	Enhanced capacity of journalists through training	1. Polarization of journalists 2. Threats to journalists 3. Technological challenges (SMS, Internet) 4. Lack of legislation to punish internet & SMS culprits	Training of journalists



## 9. PRIVATE SECTOR

### 9.1 BUSINESS COMMUNITY

Planned Activities	Responsibility	Progress of Implementation		Achievements / Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Low awareness about the cost of corruption</i>						
<ol style="list-style-type: none"> <li>1. Conduct corruption perception surveys</li> <li>2. Carry out integrity workshops</li> <li>3. Encourage investigative journalism in business</li> <li>4. Develop and implement corruption prevention plans for the private sector</li> <li>5. Promote international cooperation and attend conventions</li> </ol>	<ol style="list-style-type: none"> <li>1. KEPSA</li> <li>2. Business associations</li> <li>3. Professional institutions</li> <li>4. Media Owners Association</li> <li>5. Corporate sector</li> <li>6. Research Institutions</li> <li>7. Consumer information network</li> </ol>	<ol style="list-style-type: none"> <li>1. Member Associations have conducted internal workshops that target raising integrity in their respective organizations.</li> <li>2. A reasonable percentage of Members have established measures to curb corruption and are implementing the same.</li> <li>3. KACC has signed co-operation agreement with E.A partners on fugitives from justice</li> <li>4. KACC has worked with the Business community to create awareness</li> <li>5. AUCCPC &amp; UN Convention Against Corruption signed &amp; ratified</li> <li>6. SACCO Act, 2008 operational</li> <li>7. KEPSA has established Ethics and Governance Committee to spearhead governance issues</li> <li>8. Business Community engaged a consultant to work on domestication of UNCAC – GAP Analysis</li> <li>9. KEPSA official participated in the technical committee of Gap Analysis</li> </ol>	<ol style="list-style-type: none"> <li>1. Modalities to implement the investigative journalism in business are being studied</li> <li>2. Domestication of UNCAC in process.</li> <li>3. Several laws enacted to deal with corruption are being implemented</li> <li>4. Matatu Welfare Association undertaking a Corruption Perception Survey</li> <li>5. KACC National Enterprise Survey on Corruption</li> <li>6. AGM of Cooperatives movement where audited accounts are presented</li> <li>7. TI &amp; KEPSA partnered to sensitize MSE members on public procurement</li> <li>8. Implementing findings of the National Enterprise Surveys</li> </ol>	<p>Increased awareness on ethics, integrity &amp; governance</p>	<ol style="list-style-type: none"> <li>1. Lack of technical and financial support in conducting the informative surveys.</li> <li>2. Lack of good will from the enforcement agencies to enforce new laws against corruption</li> <li>3. Cost of corruption to the nation has not been dramatised for people to appreciate the enormity of corruption</li> <li>4. Non-involvement of the private sector on international conventions &amp; conference</li> </ol>	<ol style="list-style-type: none"> <li>1. To organize and conduct surveys of our different sectors e.g. transport to gather data on the cost of corruption To carry out awareness campaigns on the cost of corruption amongst members Identify &amp; give incentives to encourage positive investigative journalism likely to expose corruption.</li> <li>4. Kenya should encourage other countries to sign &amp; ratify international conventions.</li> <li>5. Establish number of companies with anti-corruption policies</li> <li>6. Develop a feedback mechanisms on anti-corruption activities</li> <li>7. Enhance close collaboration between private sector and the Government on international conventions &amp; conferences</li> <li>8. Disseminate available research information</li> <li>9. Implement recommendations from corruption research findings touching private sector.</li> </ol>
<i>2. Bad Corporate Governance</i>						
<ol style="list-style-type: none"> <li>1. Establish Codes of Conduct, Ethics</li> <li>2. Implement best practices in work place</li> <li>3. Provide full financial disclosures</li> <li>4. Form sectoral and regional anti-corruption units or committees</li> <li>5. Conduct sensitisation programmes</li> <li>6. Hold auditors responsible for false audit reports</li> </ol>	<ol style="list-style-type: none"> <li>1. Individual organizations</li> <li>2. Business associations</li> <li>3. Consumer organisations</li> <li>4. Shareholders</li> <li>5. Consumer information network</li> </ol>	<ol style="list-style-type: none"> <li>1. Some NCBDA members have Codes of Conduct</li> <li>2. Some private sector has established Codes of Conduct or Best practices for their members.</li> <li>3. ICPAK has tightened disclosure for members.</li> <li>4. A private sectoral anti-corruption committee operational.</li> <li>5. Members have established continuous</li> </ol>	<ol style="list-style-type: none"> <li>1. The regional anti-corruption committees to be instituted</li> <li>2. The auditors who issue false reports are held responsible through an on-going programme being conducted by ICPAK</li> <li>3. More organizations are</li> </ol>	<p>Strengthened governance measures</p>	<p>Inadequate resources Inadequate capacity Weak enforcement of laws</p>	<ol style="list-style-type: none"> <li>1. Encourage others to practice best practices</li> <li>2. Cascade COYA concept to other levels</li> <li>3. Assess implementation of good governance programme in the cooperative sector</li> <li>4. Review of Company's Act (Private companies, partnerships &amp; individual traders)</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements / Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		education programmes to be carried out amongst their members to sensitize them against corruption. 6. Developed training modules on good governance for the cooperative sector – Centre of good governance Artist Forum have developed core values 7. Financial disclosure included in the cooperative and SACCO Acts 8. ISO certification for Safaricom & Coca cola 9. ICPAK publishes and disseminates its members to the stakeholders annually 10 Baseline survey carried out	encouraged to develop Codes of Conduct and Ethics as well as pursue ISO Certification 4. KEPSA working with KACC on code of conduct for itself and members 5. Kenya National Federation of Cooperatives has \$20,000 to train 18 institutions on corporate governance targeting 1500 members, board and staff)			5. Formation of sub – sectoral committees 6. Capacity building for decision makers and implementors
<b>3. Undue Government controls over the economy</b>						
1. Lobby for further deregulation 2. Continue to agitate/lobby for liberalization programmes 3. Lobby to ensure competitive procurement of goods and services for Public Sector 4. Strengthen public private partnership	1. Tender Boards 2. Government 3. Business Community 4. Interest Groups	1. The AKI lobbied & pushed for the development of a standard tender document for the procurement of insurance and brokerage services to stamp out corruption arising in respect of procurement for insurance services by public bodies. 2. 3 Prime Minister Round Table meetings have been held to discuss the concerns of the private sector towards improving business environment. 3. Private sector lobbied and out of 1300 over 600 licenses have been reviewed. 4. Establishment of Business Regulatory Reform Unit in Treasury 5. Public private partnership guidelines issued	1. National Doing Business Indicators programme 2. Sub National Doing Business Indicators programme 3. The Public Procurement & Disposal Act 2005 and regulations are in place and being implemented. 4. Public private partnership policy 5. KEPSA & TI capacity building programme for MSE on public procurement	1. Improved regulatory framework 2. Public Private Partnership 3. More liberalization of the economy 4. Standard document developed for insurance services	1. Lack of coordination between the central government and Local authorities continues to cause the licensing to be revenue tool. 2. Inadequate capacity 3. Reluctance of some organization to take advantage of liberalization	1. KEPSA to lobby further for the coordination of the Central Government and Local Authority. 2. Sensitization 3. Capacity building 4. Lobby for one stop shop for business registration 5. Lobby for further divesture including BOT arrangement 6. lobby for mainstreaming PPP guideline 7. Lobby for amendment of procurement guidelines
<b>4. Tax Evasion</b>						
1. Lobby for simplification of taxation process 2. Lobby for removal of loopholes for tax evasion 3. Partner with other stakeholders to educate members on the obligation to pay taxes 4. Encourage business community to	1.KEPSA 2.Business Members Organizations	1. KRA has done well & brought many under tax bracket 2. KRA has intensified their Integrity Programme raising the standards of doing business & making organisations less prone to corruption 3. KEPSA submitted a memorandum on review of tax regime	Business Community participating in budget hearings (MTEF)	1. More tax compliance leading to increased revenue 2. Increased participation of the	High penalties may lead to high corruption levels to evade taxation	1. Continuous education for taxation process for SMEs 2. Advocate and lobby Government to provide quality services 3. Continue involvement in policy formulation and Monitoring and Evaluation of Government programmes



Planned Activities	Responsibility	Progress of Implementation		Achievements / Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
report errant persons or firms to KACC or KRA 5. Lobby the Government to provide service commensurate with taxation 6. Lobby for indiscriminate enforcement of all tax laws		4. UBA received reports from several of its members and forwarded to the relevant authorities for necessary action 5. A National Taxpayers Association has been established to track utilization of devolved funds		private sector in the budget process		4. Anonymous reporting/ BKMS awareness/ sensitization 5. Identify and lobby for review of tax laws
<b>5. Bribery in the Private Sector</b>						
1. Establish, implement and monitor anti-corruption policies 2. Lobby for inclusion of anti-corruption statements and pledges in business contracts and documents both in public and private sector 3. All past and intended future payments to third parties must be discussed at the bidding stage and formally recorded and reported during the execution stage by the successful bidder with appropriate certification by the Managing Director 4. Managing Directors to personally be accountable to all payments to third parties so that they do not disclaim knowledge of malpractice, as had always been the case 5. Establish self-regulation 6. Sectoral complaints committees 7. Introduce a mechanism for the blacklisting of corrupt corporate organizations	1. Kenya Institute of Management (KIM) 2. Kenya Association of Manufacturers (KAM) 3. Kenya National Chambers of Commerce and Industry (KNCCI) 4. Individual organisations 5. Professional institutions 6. Business associations 7. KEPSA 8. Interest Groups 9. Federation of Kenya Employers (FKE)	1. Codes of Conduct and Ethics as well as Best Practices have been adopted by sizable number of associations 2. Firms have codes of conduct and are implementing the same. 3. National Federation of cooperatives in collaboration with Centre of Corporate Governance developed codes of conduct 4. Some Private Sector firms have attained ISO certification 5. Professionals Trainers Association of Kenya established under Industrial Training Act Cap 237	1. Awareness creation to curb bribery by the business community 2. Artist Forum Development Art Council in place 3. SACCO Regulatory Authority being set up	Good governance measures in place	1. The legal systems are lengthy and time consuming leading to compromise. 2. Inadequate legal framework 3. Vested interest	1. Blacklisting of Corrupt corporate organizations 2. Emphasize on the need of Codes of Conduct 3. Lobby for specific reference to private sector in anti-corruption legislation 4. Finalize proposal of integrity awards for performing firms 5. Develop and implement anti-corruption policies 6. Disclosure of parties involved to be included in contracts 7. Establish sector complaints committee under KEPSA Ethics and Governance Committee 8. Urge corporate members to incorporate mechanisms for blacklisting 9. Strictly enforce PPDA
<b>6. Abuse of Discretionary powers</b>						
1. Lobby for clear definition of discretionary powers vested on individuals 2. Monitor and evaluate systems and programmes regularly 3. Involve business community and others in setting up guidelines and criteria for exercising discretionary powers 4. Penalize businesses which are incriminated in the abuse discretionary	1. Individual organisations 2. Consumers 3. Civil Society 4. Professional Bodies & Associations	Private sector representation in state corporation boards	1. M & E on going in various Associations 2. Regular meetings with the public sector	Increased public private partnership		1. Strengthen National M&E systems 2. Involve Private Sector in the National M&E system 3. Lobby for more inclusion in decision making

Planned Activities	Responsibility	Progress of Implementation		Achievements / Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
powers 5. Business and other sectors to be members of committee on exercising of discretionary powers						
<b>7. Institutionalized corruption</b>						
1. Develop and implement sustainable members education programmes 2. Develop partnerships and network with stakeholders 3. Conduct Integrity Surveys 4. Codes of conduct to include corruption	1. Parliament 2. Attorney General 3. Individual corporate organisations 4. Business Associates 5. Professional Organisations 6. Civil society 7. Media	1. KACC has conducted enterprise survey 2009 2. KACC has carried out sensitization and education programmes 3. KAM has carried out a survey on cost of doing business 4. Codes of Conduct addresses issues of ethics, integrity, & governance 5. Business community has worked with KACC on sensitization programmes governance	1. Continue to advocate for strengthening of anti corruption laws 2. KEPSA KACC draft MOU 3. UBA has established partnership with police force		1. Discourage merchants from following vouchers & collecting cheques from government offices 2. Negative corruption perception	1. Intensify public education on Anti- Corruption 2. Implement private sector Gold medal programme 3. Implement recommendations of the KACC Enterprise Survey 4. Encourage whistle blowing
<b>8. Trans-national Corruption</b>						
1. Lobby for setting up of a competent body to address the issue of trans-national corruption 2. Enforce the Foreign Judgement Act (Reciprocal enforcement Ch. 45) and Arbitration foreign award (Order of 1960 laws of Kenya) 3. Review the monopolies Act 4. Domestication and implement relevant international conventions 5. Facilitate Mutual Legal Assistance	1. The executive 2. Parliament 3. Business Community 4. Interest groups	1. Private-Public Partnerships are on course through Ministerial Stakeholders' Forums 2. Regional co-operation agreement has been signed between East Africa countries. 3. KEPSA participated in UNCAC Gap Analysis 4. Formation of East Africa Association of Anti-Corruption Authorities 5. Mutual Legal Assistance Bill in Parliament	1. Continue to advocate for strengthening of anti corruption laws 2. Domestication of UNCAC under process	More engagement with parliament/Ministries	The process of domestication is long and costly	1. Lobby for enforcement of the Foreign Judgment Act 2. Propose to review the Monopolies Act. 3. Through the East Africa Business Council set up a body to address transnational corruption 4. Identify and prioritize domestication of other international treaties, conventions and protocols 5. Support the mutual legal assistance
<b>9. Unethical business practices</b>						
1. Blacklist those who breach the code of conduct & practice 2. Apply sanctions against offending organisations 3. Lobby for private sector participation in policy making 4. Sensitization and education among the business community and their clients 5. Develop and improve business code of conduct and ethics	1. Business associations 2. Relevant Government Agencies	1. Ministerial Stakeholders Forums (MSF) have been formed with 24 ministries to enhance and/or enable private sector to participate in policymaking. 2. Public private partnership engagement 3. Business Advocacy Fund trains BMOs on institutional competencies 4. ILO-WEDGE trains women entrepreneur Associations on ethics & governance 5. ILO Coop Africa Challenge Fund supporting	1. Public Sector Support Programme Policy in draft. 2. Sensitisation on ethical business practices is on-going among the business community & their clients 3. Business codes of conduct have been established and are undergoing	1. More involvement of private sector in policy making process 2. Enhanced capacity on governance	The legal systems are lengthy and time-consuming leading to compromise.	1. Blacklisting of Corrupt corporate organizations 2. Emphasize on the need of Codes of Conduct 3. Lobby for specific reference to private sector in anti-corruption legislation



Planned Activities	Responsibility	Progress of Implementation		Achievements / Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		<p>governance issues in the cooperative sector</p> <p>6. KEPSA has participated in the following policy making</p> <ul style="list-style-type: none"> <li>• Micro Small and Medium Enterprises Bill 2009</li> <li>• National Land Policy</li> <li>• Anti Counterfeit Bill 2008</li> <li>• National Agricultural Sector Extension Policy</li> <li>• National Agricultural Research System Policy</li> <li>• Cooperative Development policy</li> <li>• Review of the Company's Act</li> <li>• Local Government Review Act</li> <li>• Public Private Partnership Policy</li> <li>• j, TIVET Bill</li> <li>• k, Higher Education / University Bill</li> <li>• Science Technology and Innovation Bill</li> <li>• Kenya Communication Amendment Bill etcCounterfeit Act</li> </ul>	<p>implementation as well as improvement.</p> <p>4. Sensitization programme to members - Kenya Association of Women Entrepreneurs</p>	<p>3. Increased Public Private Partnership</p>		

## 9.2 PROFESSIONAL ORGANISATIONS

Planned Activities	Responsibility	Progress of Implementation		Achievements/	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<i>1. Sub-standard delivery of professional services</i>						
<ol style="list-style-type: none"> <li>1. Establish and strictly enforce codes of conduct for various professions</li> <li>2. Introduce compulsory continuous professional education</li> <li>3. Develop and implement professional standards</li> <li>4. Educate the public to demand quality services</li> <li>5. Discipline corrupt members</li> <li>6. Enforce law against quacks</li> <li>7. Enact a law to bar corrupt professionals from holding public office</li> <li>8. Review of entry qualification</li> </ol>	<ol style="list-style-type: none"> <li>1. The individual Professional Institutions</li> <li>2. Association of Professional Societies in East Africa (APSEA)</li> <li>3. Enforcement Agencies</li> <li>4. Individual professionals</li> <li>5. Parliament</li> <li>6. Regulatory bodies</li> <li>7. Interest groups</li> </ol>	<ol style="list-style-type: none"> <li>1. A generic code of conduct has been developed and is available to all members.</li> <li>2. APSEA and the Institute of Policy Analysis and Research (IPAR) have designed a prototype Knowledge Network (<a href="http://www.kenyagrinary.or.ke">www.kenyagrinary.or.ke</a>) that gives information on professionals to educate the public.</li> <li>3. APSEA in Collaboration with the Makerere Centre for Applied Ethics has designed a curriculum for teaching applied ethics to professionals initially for the Architects and Nurses but eventually to all APSEA Members.</li> <li>4. Corrupt members have been disciplined by being suspended by ICPAK.</li> <li>5. At ICPAK, a bar has been placed on corrupt professionals by recommendations being made in various legislations to appoint only members in good standing</li> <li>6. ICPSK has placed a desk officer at the Companies' Registry, Sheria House, to ensure that only qualified and registered company secretaries are in practice.</li> <li>7. Code of Ethics and Conduct for NNAK and KSP completed and launched</li> <li>8. Nursing Council of Kenya has a mandatory requirement for renewing of practicing licenses for nurses</li> <li>9. KSP must register members for them to practice.</li> <li>10. Review of entry qualification done at KSP.</li> <li>11. 11 quacks convicted in the year 2008 and 6 more cases pending as at March 31st 2009 at ICPAK.</li> </ol>	<ol style="list-style-type: none"> <li>1. Codes of Ethics and Conduct are under review at ICPAK, ICPSK and AAK.</li> <li>2. Reviewing of professional standards on accounting to comply with international standards- ICPAK</li> <li>3. Commenced audit quality review programme-ICPAK</li> <li>4. Entry qualifications are under review to comply with international requirements on professional training and experience at ICPAK and ICPSK</li> <li>5. Review of entry qualifications via consultations in conjunction with KASNEB and the Ministry of Education to have the minimum qualification for accountants be a degree.</li> <li>6. The ICPSK continuously develops professional standards for use by members.</li> <li>7. Introduction of pupilage requirement for members before they can be issued with practicing certificates is in progress at ICPAK and ICPSK.</li> <li>8. Discussions are on going between KSP and universities to formulate curriculum for a Bachelors degree In Physiotherapy</li> </ol>	<ol style="list-style-type: none"> <li>1. Enhanced professional ethics</li> <li>2. Improved professional services</li> <li>3. Enhanced Regulatory framework</li> <li>4. Enhanced collaboration of professional associations &amp; training institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. No legal framework exists to enforce their codes of conduct except through the boards of registration</li> <li>2. Professional Government employees find it difficult to fund their CPE</li> <li>3. APSEA's challenge is to have all professionals under one umbrella</li> <li>4. Ensuring all employed professionals renew &amp; maintain their practising licences</li> <li>5. Funding the NACP campaign</li> <li>6. Shortages of staff affecting public education</li> <li>7. Limitation of funds to carry out regular inspections</li> <li>8. Professional Associations are still reluctant in sharing out information about their members.</li> </ol>	<ol style="list-style-type: none"> <li>1. To ensure all professionals have functional &amp; live codes of conduct</li> <li>2. Lobby Government to consider funding CPEs for the professionals</li> <li>3. Lobby Employers to pay for Renewal of Professional Practicing licenses.</li> <li>4. Identify potential partners/donors to fund programmes</li> </ol>
<i>2. Weak business and professional ethics</i>						
<ol style="list-style-type: none"> <li>1. Update guidelines and registers of professionals</li> <li>2. Establish codes of conduct</li> </ol>	<ol style="list-style-type: none"> <li>1. Individual professional institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. A generic code of conduct has been developed for use at APSEA..</li> <li>2. ICPAK has reviewed college curriculum in</li> </ol>	<ol style="list-style-type: none"> <li>1. APSEA members are providing annual register of members eg SORK, ICPAK,</li> </ol>	<ol style="list-style-type: none"> <li>1. Governance measures operational</li> </ol>	<ol style="list-style-type: none"> <li>Some Professional bodies are reluctant to release registers of their</li> </ol>	<ol style="list-style-type: none"> <li>Mainstreaming integrity in training institutions &amp;</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
3. Introduce compulsory continuous professional education 4. Educate the public to demand quality service 5. Discipline corrupt members 6. Review the existing Acts and Codes of conduct 7. Review the Curriculum in colleges	2. Association of Professional Societies in East Africa (APSEA)	3. ICPAK has introduced compulsory, continuous professional education with effect from January 2000. 4. ICPAK has reviewed the Accountants Act. 5. APSEA carried out Sectoral workshops for mainstreaming ethics among associations	2. ICPAK has introduced compulsory, continuous professional education with effect from January 2000.	2. Enhancement of legal framework for accountants 3. Enhanced professional training for accountants & certified public secretaries	members	member associations
<b>3. Flawed system of procurement of goods and services</b>						
1. Introduce strict control systems 2. Introduce and enforce stiff penalties 3. Provide consumer education to customers and suppliers 4. Sensitization of the Professionals to the provision of the Act 5. Operationalise the procurement law 6. Establish regulatory body for the professions 7. Enact law to protect whistle blowers 8. Widen Public Procurement and Disposal Act to cover private sector 9. Widen wealth declaration law to cover all sectors	1. Professional organizations 2. Consumer organizations 3. Parliament 4. Public 5. KACC 6. KNAO 7. Other relevant agencies	1. ICPSK has conducted a number of training programs on the Public Procurement and Disposal Act. 2. APSEA organized a forum for 200 professionals to seek their views on proposed amendments to the procurements Act.	1. KISM is seeking to amend the Supplies Practitioners Act to strengthen its operations. 2. APSEA is partnering with PPOA to organize regional forums to sensitize professionals on the procurement law. 3. Lobbying for the review of PPDA 4. Sensitization of members on the procurement act continuing under the Continuous Professional Education Programme.	1. Increased sensitization on procurement 2. Procuring entities offering better services 3. PPDA has reduced intermediaries in procurement of goods and services 4. Fair competition in professional service providers/equal opportunity	1. PPDA does not distinguish between provision of services, goods & procuring professional services 2. PPDA in its present format is in conflict with other existing acts for provision of professional services	1. Initiatives in place by APSEA to have the PPDA revised 2. Private sector needs to be made to comply with minimum ethical standards 3. Harmonize conflicting laws on procurement
<b>4. Poor remuneration for professionals</b>						
1. Develop regulations and policy on expatriate employment 2. Legislate charges for all professional services 3. Lobby for improvement of remuneration for professionals	1. Parliament 2. Government 3. Employers associations 4. Professional Organizations 5. Respective Boards of management	1. A Taskforce has been formed at ICPAK to engage with the Ministry of immigration. 2. Accountants have made amendments to CMA, insurance and banking regulations requiring accounting officers to be members of ICPAK	1. Continuing lobbying to discourage infiltration of non core expatriate 2. Continuing lobbying for improved salaries 3. ICPSK developing a Scale of Fees for members		Disparities of pay	Lobby for better terms for professionals
<b>5. Low standards of professional skills</b>						

Planned Activities	Responsibility	Progress of Implementation		Achievements/	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>1. Introduce capacity building programmes and activities</li> <li>2. Encourage professionals to attend capacity building activities and programmes</li> <li>3. Provide continuous professional education and assessment</li> <li>4. Establish an ethics development centre to provide consultancy services and special anti-corruption training programmes</li> <li>5. Review entry criteria for registration as professionals</li> </ol>	<ol style="list-style-type: none"> <li>1. Professional institutions</li> <li>2. Association of Professional Societies in East Africa (APSEA)</li> <li>3. Individuals</li> <li>4. Organization</li> <li>5. Respective Government Institutions</li> <li>6. Regulatory bodies</li> <li>7. Parliament</li> <li>8. Training institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Continuous Professional Education is being emphasized as a key requirement for professional associations. The NNAK has introduced mandatory CPD programmes.</li> <li>2. ICPAK - CPE programme expanded and specialist training modules introduced</li> <li>3. CPE compliance monitoring enhanced with practicing members required to be in compliance to be in good standing</li> <li>4. Ethics development center launched by KCA University</li> <li>5. ICPSK - Continuous Professional Development programs for members being executed.</li> <li>6. ICPSK has incorporated a Consultancy Company called the Institutional Consultants Limited (ICL) to offer consultancy services to the Public on various areas including Ethics.</li> <li>7. Reviewed ICPAK &amp; ICPSK under the new syllabus</li> </ol>	<ol style="list-style-type: none"> <li>1. Continuous professional education is being provided</li> <li>2. Encourage more professional bodies to conduct CPE</li> <li>3. ICPAK - implementation of audit quality review programme and audit manual.</li> <li>4. ICPAK has a staff training policy in place that is being implemented.</li> <li>5. CPE programmes in place and ICPAK members required to obtain 40 hours in a year to be in good standing.</li> <li>6. Ethics seminars have been held but development centre yet to be established due to resource constraints</li> <li>7. Development of Professional Standards for members being done.</li> </ol>	Enhanced capacity of professionals through training	<ol style="list-style-type: none"> <li>1. Inadequate resources</li> <li>2. Lack of up to date training capacity</li> </ol>	Need to encourage professional bodies to conduct CPE
<b>6. Inadequate IT and Communication Technology Systems</b>						
<ol style="list-style-type: none"> <li>1. Upgrade systems of IT</li> <li>2. Develop adequate software</li> <li>3. Enact legislation on ICT</li> <li>4. Lobby for reduced tariffs on IT equipment</li> <li>5. Develop national IT Policy</li> <li>6. Encourage local manufacturing of ICT equipment</li> </ol>	<ol style="list-style-type: none"> <li>1. Parliament</li> <li>2. Professional Institutions</li> <li>3. Government</li> <li>4. Individual professionals</li> </ol>	APSEA website has been revamped and made more interactive	<ol style="list-style-type: none"> <li>1. Lobbying for reduced tariffs on software</li> <li>2. Encourage local production of ICT equipment</li> <li>3. ICPSK has made proposals for review of the Companies Act to include use of ICT in convening and conducting meetings</li> <li>4. ICPSK advocating automation of the Companies Registry to enable online searches and filing of documents</li> </ol>		Prohibitive cost of software	Create links with member associations
<b>7. Insufficient local employment opportunities and biased recruitment</b>						
<ol style="list-style-type: none"> <li>1. Market Kenyan professionals abroad</li> <li>2. Create small scale business opportunities</li> <li>3. Support small scale business enterprises</li> <li>4. Improve management of</li> </ol>	<ol style="list-style-type: none"> <li>1. Professional institutions</li> <li>2. Association of Professional Societies in East Africa (APSEA)</li> <li>3. Financial institutions</li> </ol>	<ol style="list-style-type: none"> <li>1. Small and medium practitioners committees formed to enhance quality of accounting services being given SMEs.</li> <li>2. ICPAK formed a Public Finance Committee which comes up with budget proposals to the Finance Minister before every annual budget</li> </ol>	<ol style="list-style-type: none"> <li>1. ICPAK is currently marketing Kenyan professionals abroad by adopting Financial Reporting Standards and International Auditing Standards (which has created a huge demand for Kenyan accountants abroad).</li> </ol>	Opportunities for professionals outside the country	Credibility of some of the international professional associations in doubt	<ol style="list-style-type: none"> <li>1. Facilitation for more Kenyans to seek jobs outside required</li> <li>2. Seek mutual accreditation across cooperating</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
economy 5. Sanctions by responsible professional associations 6. Enact Law to deal with professions who commit crimes out of the country 7. Repatriate illegal immigrants	4. Government	3. ICPSK is a member of the International Federation of Company Secretaries (IFCS) and supports the global recognition of the Company Secretary through this forum.	2. Aggressive marketing of the profession within Kenya, East Africa and beyond- ICPSK 3. APSEA is to spearhead the implementation of strategy. The strategy proposes to increase the market for Kenyan professionals regionally and globally.			associations
<b>8. Unaffordable professional Services</b>						
1. Develop national support systems for professionals 2. Professional institutions to regulate charges/fee guidelines 3. Pooling of consultancies and services are necessary 4. More professionals to offer services on pro bono basis	1. Government 2. Professional Institutions 3. Individual professionals 4. APSEA	1. Most professional bodies have developed guidelines for fees. 2. ICPAK have a Pro Bono Services Programme with a minimum demand for experience. 3. Practicing members of ICPSK are available for outsourced services that are more affordable rather than employing full time Company Secretaries 4. National Legal Aid programme- MOJNCCA	1. Encouraging members to offer services on pro bono basis where necessary. 2. Free legal clinics	1. Availability of pro bono services 2. Legal aid programmes 3. Availability of professional services/advice through the media	Awareness of existing guidelines is lacking	1. Provide incentive for professionals to provide pro-bono services. 2. Need to encourage professions to pool resources together 3. Encourage professionals to provide services on pro-bono basis
<b>9. Unfavourable fiscal and macro economic environment</b>						
1. Support all sectors of the economy 2. Improve governance 3. Avail more affordable loan schemes to the public	1. Government 2. Local and International Financial Institutions 3. Professional Associations		Annual proposals into the national budget process	Increased participation of professionals in the budget process	Global financial crisis (GFC)	1. Professionals to come up with a system to access affordable funds 2. Associations to craft a scheme to support newly qualified professionals to access credit through banks.
<b>10. Abuse of discretionary powers</b>						
1. Lobby for clear definition and removal of unnecessary discretionary powers vested on individual officers 2. Monitor and evaluate systems and programmes regularly	1. Relevant professional organizations 2. Civil Society 3. APSEA 4. Relevant Government institutions	1. Introduction of Professional Codes & service charters. 2. Move towards Public-Private Sector Partnerships 3. APSEA mobilized members to raise concerns on Grand Regency Hotel	Lobbying to improve Governance and strengthen public institutions	Enhanced Public Private Partnership	1. Conflicts with government authorities on governance 2. Insufficient guidelines for discretionary powers	1. Lobby for Monitoring & Evaluation systems. 2. Continue engagement to promote good governance

Planned Activities	Responsibility	Progress of Implementation		Achievements/	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
3. Set up guidelines and criteria for exercising discretionary powers	5. KACC 6. Interest groups					
11. <i>Institutionalized corruption</i>						
1. Review anti- corruption and governance laws to cover all sectors 2. Prosecute corrupt individuals	1. Parliament 2. Attorney-General 3. APSEA 4. Individual Professional bodies 5. Interest groups 6. KACC	APSEA continues to champion the strengthening of institutions in the country.	1. Conducting seminars and workshops on Corporate Governance. 2. Most APSEA members have mechanism to discipline members 3. APSEA to make this proposals in the review of the constitution	Increased awareness on corporate governance	1. Prosecutorial powers vested on AG 2. Constitutional references by persons charged with corruption.	1. Lobby for KACC to get prosecution powers 2. Lobby for expeditious settling of cases in the constitutional references courts. 3. Repeal the laws which perpetuate & sustain insitutionalized corruption.
12. <i>Lack of regulatory powers</i>						
1. Legislative powers to regulatory boards 2. Ensure effective management in regulatory boards 3. Establish professional practice tribunal	1. Parliament 2. APSEA 3. Individual Professional bodies 4. Attorney General	ICPAK Biil passed into law	APSEA is developing a proposal for funding to support an Advocacy programme to give associations legislative backing.	Enhanced legal framework for ICPAK	Review of existing laws to empower regulatory boards & associations to discipline errant professionals	Need to lobby for more independent professional regulatory bodies



## 10. RELIGIOUS ORGANIZATIONS

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>1. Bribery and intimidation</b>						
<ol style="list-style-type: none"> <li>Discourage bribery by, Counselling persuasion and Punishment</li> <li>Instil self discipline and role modelling</li> <li>Create awareness through education, religious readings and studies</li> <li>Speak and act against corruption</li> <li>Sack corrupt officials</li> <li>Establish special anti-corruption outreach programmes</li> <li>Provide annual accounts and returns to members/congregations/ the Registrar</li> <li>Establish local religious chapters to act as watchdogs</li> <li>Monitor dissemination of financial information and resource management</li> <li>Religious officials demonstrate accountability to their faithfuls</li> <li>Set clear recruitment guidelines for officials</li> <li>Avoid all forms of bribery</li> <li>Practice religious teachings and principles</li> <li>Empower the faithfuls</li> <li>Develop code of Ethics for every religious organisation.</li> <li>Religious bodies should be registered within laid down laws and regulations.</li> </ol>	<ol style="list-style-type: none"> <li>Religious Organizations</li> <li>Faithfuls</li> <li>The Community</li> <li>Registrar of societies</li> </ol>	<ol style="list-style-type: none"> <li>Corrupt officials barred from standing for any elective post.</li> <li>Some religious organizations are registered within the laid down laws and regulations.</li> <li>Some religious organizations publish audited accounts.</li> <li>Disciplinary courts in some religious organisations use a varied number of action, excommunication, legal redress and disciplinary.</li> <li>Leadership changes are held as per constitution.</li> <li>Civic education- Uraia programme.</li> <li>Religious leaders are members of the Constituency Development Fund.</li> <li>Annual accounts and returns to members / congregations are provided.</li> <li>Clear recruitment guidelines for officials have been set</li> <li>Some religious organizations have developed Code of Ethics</li> <li>Sacked corrupt official</li> </ol>	<ol style="list-style-type: none"> <li>Capacity building and organizational development</li> <li>Leadership changes ongoing as per constitution.</li> <li>Religious leaders demonstrate accountability to their faithful</li> <li>Practise religious teachings and principles</li> <li>Discouraging Bribery by Counselling, persuasion and punishment.</li> <li>Instilling self discipline and role modeling.</li> <li>Creating awareness through education, religious readings and studies. (Through Bible Study Guides, Tithes and Offerings readings).</li> <li>Speaking and acting against corruption.</li> <li>Monitoring dissemination of financial information and resource management.</li> <li>Avoiding forms of bribery.</li> <li>Putting religious teachings and principles into practice.</li> <li>Empowering the faithfuls.</li> </ol>		<ol style="list-style-type: none"> <li>Difficult in proving the allegation of corruption.</li> <li>Suspect acquires sympathetic faithfuls</li> <li>Lack of integrity and unwillingness to abide by the set rules.</li> <li>Appointment of religious leaders in the Constituency Development Fund</li> <li>Vetting systems do not include the faithful</li> <li>Some religious organisations are reluctant to take the faithful to court and the provision is not in the constitutions</li> <li>Lack of confidence in the criminal justice system.</li> <li>Justice system too expensive and complicated</li> <li>Members protect juniors from intimidation.</li> </ol>	<ol style="list-style-type: none"> <li>Empowerment of faithful and employees through capacity building</li> <li>Setting up of audit and financial accountability structures within religious organizations</li> <li>The way the religious leaders are vetted should be improved and should be accountable to the community</li> <li>The inter-religious forum should speak out against blatant actions that lead to the lack of confidence in the criminal Justice system.</li> <li>Ensure that each religious organization has a constitution</li> <li>We need to establish special anti corruption outreach programmes.</li> <li>Inter religious forum to consult MPs &amp; National CDF committee on CDF membership</li> <li>Establish local religious chapters to act as watchdogs.</li> <li>Regular meetings of religious organizations for further consultations</li> <li>Guidance on reporting system</li> <li>Sensitization of religious leaders</li> </ol>
<b>2. Misuse and mismanagement of resources belonging to religious organisations</b>						
<ol style="list-style-type: none"> <li>Enforce laid down regulations</li> <li>Publish audited Financial</li> </ol>	<ol style="list-style-type: none"> <li>Religious organizations</li> </ol>	<ol style="list-style-type: none"> <li>Faith based organizations have developed proper accounting procedures</li> </ol>	<ol style="list-style-type: none"> <li>Continuous capacity building of staff on management and</li> </ol>	<ol style="list-style-type: none"> <li>M &amp; E systems in</li> </ol>	<ol style="list-style-type: none"> <li>Lack of focus in the utilization of the</li> </ol>	<ol style="list-style-type: none"> <li>Explore dialogue with the Attorney General's office.</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/ Activities	On-going Activities			
Accounts 3. Respect and enforce project agreements 4. Punish offenders 5. Set good examples and be role models 6. Employ/engage skilled personnel 7. Provide training in resource management 8. Introduce financial systems 9. Publish donations 10. Build an M&E system within each institution 11. Religious organisations who obtained parcels of land irregularly should return them. 12. Registrar of Societies ensures that all organisations register and submit their returns annually.	2. Workers of religious organizations.	2. Project implementation schedule followed as per specific project 3. Personnel charged in the courts 4. Development of M& E departments 5. Annual returns submitted to the registrar of societies by some religious organizations 6. M & E system within institutions established.	accounting skills 2. Change of some members in the process of improving internal financial systems 3. In built M& E system within each institution 4. Enforcing laid down regulations. 5. Sharing audited financial accounts with stakeholders. 6. Respecting and enforcing project agreements. 7. Punishing offenders 8. Setting good examples and being role models. 9. Employing / engaging skilled personnel. 10. Providing training in resource management. (Strategic planning) 11. Introducing financial systems to enhance accountability. 12. Publishing donations to stakeholders.	place for NCCCK & Catholic Church 2. Irregularly acquired land returned 3. Accountability procedures in place in some faith based institutions	funds 2. Lack of proper audits due to the expenses involved 3. Inability to employ highly qualified staff 4. Resistance to change 5. Some religious organizations not registered and do not belong to inter-religious forum 6. Some religious organization have no accounting systems	2. To cascade training of resource management to the grassroots. 3. Develop draft regulatory mechanism and share with religious leaders 4. Finalize Kenya Inter-Faith Commission discussions

3. *Lack of Integrity among religious workers*

1. Punish errant members 2. Counsel errant members 3. Special outreach programme 4. A recognition mechanism for good behaviour. 5. Withdrawal of recognitions given if the holder is disgraced 6. Initiate and promote anti-corruption activities within the organizations 7. Clear policy/criteria for appointment of religious leaders 8. Design and implement comprehensive codes of conduct 9. Emphasize religious discipline. 10. Government should ensure that registrar of Societies consults religious organizations before registration. 11. Continuous training of religious	1. Religious organizations 2. Community 3. Government	1. Some religious organizations have clear disciplinary procedures 2. Some have set codes of conduct and require integrity as criteria for employment 3. Some have incorporated anti corruption policies/activities in the constitutions 4. Punished errant members. 5. Recognitions withdrawn from disgraced workers. 6. Clear policy / criteria for appointment of religious leaders developed. 7. Codes of ethics and conduct designed and implemented. 8. A recognition mechanism for good behaviour developed	1. Counselling and supervision of officers at all levels 2. Internal appraisal systems 3. Counselling errant members. 4. Conducting special outreach program. 5. Religious discipline is being emphasized. 6. Continuous training of religious workers in corruption awareness.	Some governance measures in place	Errant members moving to other organizations /forming their own religious institutions	1. Emphasize on moral uprightness/ religious teachings 2. Establish the due diligence procedure of how to register religious organization 3. Develop a basic code of conduct for the religious sector and develop best practice. 4. Share and scale up initiatives and promotion of anti-corruption activities within the organizations 5. Develop policy and guidelines on volunteerism.
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
workers.						
<b>4. Donations from undisclosed sources</b>						
Establish and enforce criteria for receiving and vetting donations	Religious organisations	<ol style="list-style-type: none"> <li>1. Some religious scriptures have codes of acceptance of donations</li> <li>2. Financial reporting systems in place</li> <li>3. Criteria for receiving and vetting donations established</li> </ol>	<ol style="list-style-type: none"> <li>1. Clear reporting, fundraising and management procedures</li> <li>2. Development of clear policy terms of engagement</li> </ol>	3.	<ol style="list-style-type: none"> <li>1. Grey areas between organization and individual donations</li> <li>2. Donations should be sourced officially and not through individuals</li> <li>3. Proper accounting of donations</li> <li>4. Some people reclaiming the land that had been earlier donated by their parents.</li> <li>5. religious organizations members not willing to disclose sources of their income</li> </ol>	<ol style="list-style-type: none"> <li>1. Develop codes of acceptance for those religious organizations which do not have the codes of acceptance of donations</li> <li>2. Encourage the government to provide a tax benefit for local donation</li> <li>3. Faith based organizations to design a form whereby those who intend to donate can use in allocating property / assets to the churches.</li> <li>4. Members to be encouraged to write a will/transfer donated property to the religious organizations</li> <li>5. Religious groups to discuss and adopt best practices.</li> <li>6. Encourage members to disclose source of their wealth</li> </ol>
<b>5. Irregularity in registration of religious organizations</b>						
<ol style="list-style-type: none"> <li>1. Initiate and develop clear registration and guidelines</li> <li>2. Set transparent processing standards</li> <li>3. Establish an appeal system</li> <li>4. Set time frames on registration process</li> <li>5. Set a criteria to qualify for registration e.g. size</li> </ol>	Registrar of Societies	Consultative meeting held between religious leaders, AG & Registrar of Societies on registration of religious groups		Process of establishing Kenya Inter-Faith Commission	<ol style="list-style-type: none"> <li>1. Corrupt Government officials who register religious organizations</li> <li>2. Provisions/ways for registering religious organization under different ministries</li> </ol>	<ol style="list-style-type: none"> <li>1. Develop a proposal on establishment of an inter-faith commission</li> <li>2. Bring registration and regulations of religious organizations under one act./harmonization</li> </ol>
<b>6. Lack of/ or poor planning and management</b>						
<ol style="list-style-type: none"> <li>1. Establish a culture of proper planning and enforce</li> <li>2. Establish system of penalties and strictly enforce them</li> <li>3. Ensure all activities and expenditures are based on approved plans</li> <li>4. Ensure periodic release of</li> </ol>	<ol style="list-style-type: none"> <li>1. Religious organizations</li> <li>2. Community</li> </ol>	<ol style="list-style-type: none"> <li>1. Strategic plans for specified periods are in place for some religious organisations</li> <li>2. Development committees exist</li> <li>3. Monitoring and evaluation has been established in some organizations</li> <li>4. A culture of strategic planning is established.</li> <li>5. Periodic release of financial statements and</li> </ol>	<ol style="list-style-type: none"> <li>1. Some organizations are implementing strategic plans</li> <li>2. All activities and expenditures are being based on approved plans</li> <li>3. Participatory development is being encouraged.</li> <li>4. Financial statements and audit report regularly released.</li> </ol>	Planning, implementation, monitoring & evaluation approaches established	<ol style="list-style-type: none"> <li>1. Frequent change of officials</li> <li>2. Many projects undertaken simultaneously</li> <li>3. Fear and reluctance in implementing some penalties.</li> </ol>	<ol style="list-style-type: none"> <li>1. Periodic review of strategic plans</li> <li>2. Develop Strategic Plan for those who do not have</li> <li>3. Policies on all issues to be adhered to in all circumstances.</li> <li>4. Plan budget for emergencies.</li> <li>5. Capacity building in M&amp;E</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
financial statements and audit reports 5. Ensure adequate accountability to the membership for their money 6. Encourage participatory development 7. Build an M&E system 8. Seek professional advice		audit reports ensured. 6. All activities and expenditures are done based on approved detailed implementation and strategic action plans 7. Partnership for Peace Programme	5. Professional advices regularly sought. 6. Many religious organizations adopting strategic plans 7. Working with membership to improve management & capacity building 8. Peer review mechanism set up		4. Emergencies affect planned activities	organizational structure and resource mobilization
<b>7. Lack of adequate consultation with faithfuls</b>						
1. Display clear operational and service information to the community 2. Develop and implement staff performance pledges 3. Establish and enforce clear general codes of conduct and ethics 4. Encourage members to point out corrupt leaders 5. De-link religious leadership from active party politics 6. Ensure prayer houses are used impartially 7. Provide a regular forum for dialogue 8. Establish a self-regulatory complaints committees for religious organisations 9. Punish errant officials 10. Create awareness of the rights of the faithfuls and communities	1. Religious organizations 2. Community	1. Regular meetings with the member institutions and branches are held 2. AGMs, governing councils, general assemblies held 3. Some organizations hold regular business meetings with faithful and reports given 4. Clear operational and service information to the community displayed. 5. Clear code of conduct and ethics established. 6. Members are encouraged to point out corrupt leaders. 7. Regular forums for dialogue are provided. 8. Errant officials are punished. 9. Inter - Religious Forum issues regular statements	1. Some organizations hold business meetings with faithful 2. Relationship between religion & party politics being examined. 3. Interactive sessions held occasionally at institutional and branch levels	Participatory mechanisms between clergy & faithfuls	1. Donors/wealthy members influence the management of the institutions 2. Officials loose morale and interest to continue to genuinely serve 3. Most documents are in either English or Swahili. Local languages are not catered for. 4. Some people want to hold both political and religious offices at the same time 5. Faithfuls displaced due to post election violence remain unsettled	1. Move to have all religious organizations have regular business meetings with their membership 2. To develop a staff performance pledge. 3. Develop policy on clergy participation in politics 4. To create awareness among church members on their rights and privileges 5. Warn faithful on anti social activities of organized groups and their effect on the society
<b>8. Theft and embezzlement of funds</b>						
1. Make periodic financial reports available to all faithful 2. Follow and enforce rules and procedures 3. Encourage competitive bidding in procurement 4. Carry out regular audits of finances and property of religious organizations 5. Put systems to seal loopholes	1. Religious organizations 2. Community	1. Raised funds are given to committees and banked. The amounts collected are published / announced to ensure transparency. 2. Enhance vigilance 3. Established criteria on purchase / disposal of assets / property 4. Periodic financial reports made available to all stakeholders. 5. Tenders advertised to members to bid	Recovery and restitution of embezzled funds and property being done	Improved accounting systems	1. Deliberate delays or manipulation in submission of accounts 2. Quotations invited selectively 3. Lack of qualified staff to carry out audits 4. Leadership capacity 5. Not all stakeholders	1. Restructuring of religious organizations to reflect more clearly their mission and operational standards. 2. International standards of accounting must be kept. 3. Educate stakeholders on understanding financial reports. 4. Reinforcement of policy implementations.



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
6. Recover and make restitution of embezzled funds and property 7. Avoid conflict of interest 8. Punish errant officials 9. Offenders not allowed to take leadership positions again		6. Regular audits of finances and property of the Church and her organizations carried out. 7. Systems to seal loopholes in place. 8. Errant officials punished. 9. Offenders barred to take leadership positions/ex-communicated.			understand financial reports. 6. Conflict of interest on implementation of rules and procedures. 7. Law enforcement not possible from such employees when funds have been embezzled. 8. Announcing collections may attract robbery	5. Reinforce policy on offenders taking leadership positions. 6. Enforce internal audit systems for effective checks and balances 7. Introduce conflict of interest policy 8. Establish and enforce procurement procedures 9. Train staff/hire staff with necessary skills
<b>9. Tax evasion</b>						
1. Clarify non-taxable donations 2. Classify taxable and non-taxable business and property of religious organisations 3. Disclosures of donations which are tax deductible. 4. Religious organisations to set up separate religious agencies to manage taxable investments 5. Tax rebates be legally recommended to those who donate to religious and charitable causes.	1. Religious organizations 2. Attorney-General 3. KRA	1. All employees of established religious organizations pay taxes 2. Some religious organizations have been given tax exemptions 3. Rules of surplus to be clarified to Treasury 4. Some religious organizations have undertaken a tax audit to ensure organisation is in compliance with KRA requirement 5. Clarified non-taxable donations. 6. Disclosures of donations which are tax deductible. 7. The SDA Church has set up separate denominational agencies to manage taxable investments.	1. KRA evaluations 2. Education on taxation 3. Clarify non-taxable donations. 4. Classify taxable and non-taxable business and property of denominational organizations. 5. Disclosures of donations which are tax deductible.		1. Discretionary powers of Ministers are abused 2. Tax laws tend to be cumbersome 3. Lack of clarity on taxable and non-taxable business and property.	1. Avoid the double taxation of religious faithful. They pay tax and contribute to their religious organizations after taxation. 2. Need to engage a tax expert. 3. Need to conduct training seminar and awareness on tax issues for tax related issues. 4. Legally recommend tax rebates to those who donate to the church and charitable causes. 5. Tax exemption to be looked on case by case basis
<b>10. Limited understanding and attention to corruption issues</b>						
1. Encourage clear teaching on corruption including religious rationale 2. Formulate and implement anti-corruption sensitisation programmes 3. Provide and ensure children begin anti-corruption efforts at very early age 4. Develop all season IEC materials 5. Formulate and implement	1. Religious organizations 2. Media owners 3. KACC	1. KACC has sensitised Muslims leaders 2. Media statement by religious leaders on corruption 3. Some have given religious sermons against corruption 4. Developed Materials for the fight against corruption. 5. Internal corruption prevention measures implemented. 6. Bible study guides developed by KACC & EAK	1. Radio talks on anti-corruption by NACCSC 2. ELNET initiative on moral foundation for Vision 2030	Increased awareness on corruption issues	1. Secular humanism and post modernism 2. Lack of religiously based teaching on corruption 3. Failure to own up to corruption within the orgs 4. inadequate resources 5. Inadequate training and learning	1. Regular inter-religious conference - Ufungamano 2. Religious organizations to develop clear teaching 3. KACC to continue to work with religious organizations on corruption prevention 4. Mainstreaming anti-corruption issues in religious bodies activities 5. To formulate and implement

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
special anti-corruption outreach programmes 6. Develop and implement Preachers' outreach programmes 7. Formulate and implement internal corruption prevention measures 8. KACC and all anti-corruption agencies to work with religious organisations to come up with a programme to educate the faithfuls		7. Kabaraka University Students Conference			6. Ethical & moral relativism	anti-corruption & outreach sensitization programmes. 6. To provide for and ensure that children begin anti corruption efforts at an early age. 7. To develop all inclusive ongoing IEC materials. 8. Religious education to include teaching of morals in schools 9. Conduct regular sermons with anti-corruption topics
<b>11. Undesirable tendencies/ practices by some religious organizations by Cultic / extremist Groups</b>						
1. Govt to monitor and intervene as and when necessary to discourage un-toward tendencies. 2. Legal Action to be taken according to the law 3. Training by religious organization on the truth	1. Government. 2. Religious orgs. 3. Interest groups 4. Target leadership	Self-regulation	Process of establishing Kenya Inter-Faith Commission		1. Lack of providing the correct principles and philosophies 2. Lack of spiritual knowledge /basic tenets 3. How to operate in a multi-religious society must be defined and adhered to	1. Promote tolerance & understanding 2. Develop self regulatory mechanisms 3. Propose a registration framework for religious organizations 4. Finalize establishment of Kenya Inter-Faith Commission
<b>12. Noise pollution</b>						
1. Self regulation 2. Sensitisation of members. 3. Churches/mosques built in designated /zoned areas as per Planning Regulations.	1. Government 2. Religious organisations 3. Individual mosques/ churches 4. Respected elders 5. Interest groups 6. NEMA 7. MENR 8. Local Authorities	1. Self regulation through umbrella organizations 2. Members sensitized on proper use of the public address system. 3. NEMA regulations on noise pollution issued		NEMA Regulations	1. Members of public are denied the quiet enjoyment of peace 2. Inappropriate locations for houses of worship	1. Promotion and tolerance for peaceful coexistence of all religions 2. Request for allocation of land for places of worship from the central and local governments. 3. Enforce the law on noise pollution 4. More consultation on noise pollution
<b>13. Non-integration of anti-corruption activities in religious organisations' programmes</b>						
1. Develop and implement anti-corruption programmes 2. Anti- corruption sensitisation	1. Religious organisations 2. Individual	1. KACC, EAK & Muslim leaders sensitization programmes 2. Lenten campaigns by Catholic	Continuous civic education under CJPC/NCCK/IRCK/Lenten campaigns	Increased awareness of anti-corruption	1. Inadequate resource materials on corruption issues.	1. Develop and implement anti-corruption programs 2. NACP issues to be shared at



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
programmes for religious organisations	mosques/ churches	Church		issues	2. Opinionated leaders and members.	grass root levels
14. <i>Lack of self Respect among religious leaders and faithfuls</i>						
Sensitisation through sermons, teachings and training.	Religious organisations	1. Consultations through inter-religious fora 2. Inter-religious Council 3. Ufungamano Initiative	Sensitization through sermons, teachings and training	Enhanced collaboration between Catholics, NCCK & HCK	1. Morally deficient leadership 2. Inadequate resource material on anticorruption issues	1. Counselling 2. To liaise with KACC to acquire materials for sensitization on anticorruption sensitization 3. Inculcate values to the faithfuls
15. <i>Religious organisations' role in society</i>						
Training in moral values, social transformation		1. Transforming the society through sermons 2. Watchdog role to the society	1. Participation in Agenda four (Race & Ethnic Commission, TJRC, Constitutional Reforms) 2. Regular statements on critical issues 3. Talk shows 4. Advocacy and lobbying at policy & grassroots levels		1. Secularism 2. Impunity 3. Moral decadence 4. Partisan interest on national issues by some religious leaders	Organize a conference on the role of religious organization in the society

# 11. CIVIL SOCIETY

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>1. Poor registration procedure</b>						
<ol style="list-style-type: none"> <li>Develop clear registration guidelines</li> <li>Set clear Processing standards with time frames</li> <li>Establish an Appeals System</li> <li>Make registration information and decisions freely available to all</li> <li>Empower the NGOs Council so that it can enforce rules and regulations strictly and put in place surveillance mechanisms to ensure compliance</li> <li>Improve the legal framework for the registration and operation of civil society organisations.</li> <li>Strengthen the NGO Council</li> </ol>	<ol style="list-style-type: none"> <li>Attorney - General</li> <li>NGOs Council</li> <li>NGOs Bureau</li> <li>Parliament</li> <li>NGOs/CSO</li> <li>NSIS</li> </ol>	<ol style="list-style-type: none"> <li>Guidelines developed &amp; posted in the website</li> <li>Registration processing standards developed</li> <li>Draft code of conduct</li> </ol>	<ol style="list-style-type: none"> <li>Opening 2 regional offices</li> <li>Consultative meetings with NSSIS</li> <li>Reviewing of the NGO Act</li> <li>Tracking of vetting reports from NSIS</li> </ol>	<ol style="list-style-type: none"> <li>Improved Registration procedure</li> <li>Draft code of conduct</li> </ol>	<ol style="list-style-type: none"> <li>Delay in vetting by NSSIS</li> <li>Multiple registration regime</li> <li>Corruption</li> </ol>	<ol style="list-style-type: none"> <li>Finalize draft code of conduct</li> <li>Lobby for enactment of the reviewed Act</li> <li>Open additional regional offices</li> <li>All organizations that are charitable in nature to be under one regulatory body</li> </ol>
<b>2. Abuse of office</b>						
<ol style="list-style-type: none"> <li>Strengthen and expand membership of the NGO Council capacity to monitor members</li> <li>Punish errant officials</li> <li>Develop clear checks and balances</li> <li>Deregister NGOs deviating from their stated mission/purpose</li> <li>Develop and implement codes of conduct and ethics</li> </ol>	<ol style="list-style-type: none"> <li>NGOs/SCOs</li> <li>NGO Board</li> <li>NGOs Council</li> <li>Government</li> <li>Parliament</li> </ol>	Draft code of conduct	Guidance workshops for newly registered NGOs		<ol style="list-style-type: none"> <li>Regulatory Committee under NGO Council moribund</li> <li>Divided NGO Council</li> <li>Corruption</li> </ol>	<ol style="list-style-type: none"> <li>Finalize Review of the Act</li> <li>Reactivate the Regulatory committee</li> <li>Finalize draft code of conduct</li> <li>Deregister deviant NGOs</li> <li>Strengthen the NGO Board</li> </ol>
<b>3. Lack of Accountability and Transparency</b>						
<ol style="list-style-type: none"> <li>Strengthen and expand membership of the NGOs Council Regulatory Committee to the grassroots</li> <li>Develop and implement operation guidelines</li> <li>Institute regular joint financial and social audit by NGOs, donor agencies and government</li> <li>Enforce rules and regulations strictly</li> <li>Require and ensure full programme participation by beneficiaries</li> </ol>	<ol style="list-style-type: none"> <li>NGOs/CSOs</li> <li>Government</li> <li>NGO Council</li> <li>NGO Board</li> </ol>	<ol style="list-style-type: none"> <li>Draft audit procedures</li> <li>4 Guidance workshops for NGOs held</li> <li>Terms and conditions attached to registration developed</li> </ol>	<ol style="list-style-type: none"> <li>Guidance workshops for each quarter</li> <li>Tracking of NGOs which don't submit annual returns</li> </ol>	Draft audit procedures	<ol style="list-style-type: none"> <li>Divided Council</li> <li>Inadequate capacity at the Board</li> <li>Different donor reporting requirements/systems</li> <li>Corruption</li> <li>No standard reporting system in place</li> </ol>	<ol style="list-style-type: none"> <li>Circulate draft audit procedures to stakeholders</li> <li>Strengthen NGO Board</li> </ol>
<b>4. Evasion of tax</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>Strengthen and expand monitoring teams</li> <li>Strictly enforce SORAAPs</li> <li>Clarify through legislations exemption grounds for duty waivers and taxes</li> <li>Involve strengthened NGO Council in vetting exemption applications</li> <li>Rationalize taxation of the NGOs</li> <li>Discipline errant NGOs</li> </ol>	<ol style="list-style-type: none"> <li>Attorney-General</li> <li>NGOs Council</li> <li>NGOs Board</li> <li>KRA</li> </ol>	<ol style="list-style-type: none"> <li>Draft audit procedures</li> <li>Min. of Finance guidelines on tax exemption for NGOs</li> </ol>	NGO Coordinating Board disseminating tax exemption guidelines	Guidelines for tax exemptions	The role of NGO Board not defined in the tax exemption guidelines	<ol style="list-style-type: none"> <li>Finalize draft auditing procedures</li> <li>Publicize the tax exemption guidelines</li> <li>The NGO Board role should be clearly defined in guideline since it maintains a register of all NGOs operating in the country</li> </ol>
<b>5. Nepotism, tribalism and racism</b>						
<ol style="list-style-type: none"> <li>Establish and enforce Codes of Conduct for all NGOs and within each NGO</li> <li>Make appointments and promotions competitive and on merit</li> <li>Beneficiaries to participate in monitoring resources</li> </ol>	<ol style="list-style-type: none"> <li>NGOs Council</li> <li>NGOs/CSOs</li> <li>Government</li> <li>Parliament</li> <li>NGO Board</li> </ol>	Draft Code of Conduct	Review of the NGO Act		<ol style="list-style-type: none"> <li>Regulatory Committee of the NGO Council moribund</li> <li>Divided NGO Council</li> <li>Corruption</li> </ol>	<ol style="list-style-type: none"> <li>Lobby for the enactment of the NGO Act</li> <li>Finalize the draft Code of Conduct</li> <li>Strengthen the NGO Board</li> </ol>
<b>6. Limited understanding and attention to corruption issues</b>						
<ol style="list-style-type: none"> <li>All NGOs to mainstream anti-corruption issues in their work</li> <li>Develop and implement public education sensitisation programmes within organizations and countrywide outreach</li> <li>Develop and implement internal corruption prevention measures</li> </ol>	<ol style="list-style-type: none"> <li>NGOs Council</li> <li>NGOs/CSOs</li> <li>Government</li> <li>Private sector organizations</li> <li>KACC</li> <li>NGO Board</li> </ol>	<ol style="list-style-type: none"> <li>Draft Code of Conduct</li> <li>Audit procedures</li> </ol>	Consultative meetings to discuss Draft Code of Conduct & Audit procedures	<ol style="list-style-type: none"> <li>Divided NGOs Council</li> <li>Moribund Registration committee</li> </ol>		<ol style="list-style-type: none"> <li>Enforce audit procedures</li> <li>Finalize &amp; enforce Code of Conduct</li> <li>Sensitize NGOs on anti-corruption issues</li> <li>Strengthen the NGO Board</li> </ol>
<b>7. Public apathy to corruption</b>						
<ol style="list-style-type: none"> <li>Develop and implement public education sensitisation programmes within organizations and countrywide</li> <li>Involve all stakeholders and general public in the fight against corruption</li> <li>Expose all kinds of corruption</li> <li>Strengthen regulatory bodies</li> </ol>	<ol style="list-style-type: none"> <li>NGOs Council</li> <li>NGOs/CSOs</li> <li>Government</li> <li>Private sector organizations</li> <li>Individuals</li> <li>KACC</li> </ol>					
<b>8. Duplication</b>						

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Establish and implement a National Policy on NGO programmes 2. Strengthen and expand membership of the NGOs Council Regulatory Committee by including government, corporate bodies and professionals 3. Establish a central information bank on NGO programmes 4. NGO coordinating organs in each region to identify the needy areas	1. Donors 2. Government 3. NGOs/CSOs 4. NGO Board	Mapping of NGOs in the country done	NGO Board advises newly registered NGOs on the principle of principle of public benefit		NGO sector not guided by the principle of public benefit	1. Publish & release the report on mapping 2. Share with donors information on undeserving & deserving regions
<b>9. Abuse of consultancy services</b>						
1. Tendering for consultancy services be made transparent 2. NGOs to develop and publish schedule of fees, rates for their consultancy. 3. Clarify rules on foreign work permit to prevent extra judicial cancellation or issuance of work permits and Visa	1. Government 2. NGOs/CSOs 3. NGO Council 4. Ministry of Immigrations and Registration of Persons					
<b>10. Abuse of financial controls</b>						
1. Enforcement of SORAAPS 2. Publish annual comprehensive audited reports for public scrutiny 3. Expose all malpractices 4. All corruption to be dealt with as per the law	1. NGO Council 2. Institute of Certified Public Accountants of Kenya (ICPAK) 3. Government	1. Draft audit procedures completed 2. Draft Code of Conduct			1. Divided NGO Council 2. Moribund Regulatory Committee 3. Corruption	1. Create awareness on NGOs activities 2. Share reports with donors to avoid issuing different reports by responsible NGOs
<b>11. Corruption within donor agencies</b>						
1. Make project funding criteria, guidelines and time frames be made freely available from donors 2. Streamline institutional requirements 3. Strengthen regulatory bodies 4. Implement viable evaluation procedures 5. Expose all types of corruption	1. NGO Council 2. NGOs/CSOs 3. Donor Organizations 4. Relevant Government institutions					
<b>12. Lack of comprehensive code of ethics for the sector</b>						
1. Make membership to the NGO Council mandatory and affordable for all NGOs 2. Establish and enforce comprehensive Code of Conduct and Ethics for the sector and within each organization	1. NGOs Council 2. NGOs/CSOs 3. NGO Boards	Draft Code of Conduct	Stakeholders consultations		1. Divided NGO Council 2. Moribund Regulatory Committee	Finalize the draft Code of Conduct



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
3. Share information on errant individuals and organizations and blacklist them publicly					3. Corruption	
<b>13. Lack of accountability to the beneficiaries</b>						
1. Implement Community Based Appraisal (CBA) for accountability to beneficiaries 2. Ensure full accounting to benefactors and full public accounting to beneficiaries	1. Donors 2. Government 3. NGOs/CSOs 4. Community 5. NGO Council					
<b>14. Unjustified recruitment of foreign experts</b>						
1. Streamline & enforce labour and immigration laws 2. Lobby for amendment of employment laws and regulations 3. Establish an independent Complaints Council 4. Encourage complaints to the Independent Complaints Council by affected parties	1. Government, 2. NGOs Council, 3. Parliament 4. Trade Unions 5. Donors 6. NGOs Board	Data bank on foreign experts recommended by NGO Coordination Board	Tracking of foreign experts working in the sector	Data Bank of foreign experts	1. Corruption 2. Uncooperative NGOs	1. Establish a desk at immigration to liaise with NGO Board on work permits for foreign experts in this sector 2. Make it mandatory for foreign experts to be cleared by the NGO Coordination Board before issuance of work permits

## 12. LABOUR

Planned Activities	Responsibility	Progress of Implementation		Achievement/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>1. Employers compromising union officials</b>						
1. Set up a legal/institution framework to reign in the labour movement 2. Self regulation by an adequate code 3. Enactment of reviewed labour laws 4. Government to ratify ILO convention 87	1. Central Organization of Trade Unions (COTU) 2. Individual Unions 3. Ministry of Labour and Human Resource Development 4. Social Partners	1. Implementation of the new labour laws 2. ILO Convention 87 is honoured & Section 80 of the Constitution accommodates it 3. Labour Boards formed & operational 4. Individual unions have amended their constitutions to facilitate good governance	Self regulation through unions attempts to improve governance	1. ILO convention honoured 2. New labour laws in place	1. Legal suits by LSK and FKE 2. Social partners have not built consensus fearing fragmentation of trade unions and employers Organizations 3. Officials being compromised	Trade Unions to come with self regulating codes
<b>2. Unethical practices by union officials</b>						
Develop Codes of Ethics and Conduct for union officials & employers	1. Individual Unions 2. COTU 3. Stakeholders/social partners 4. Individual Unions 5. Employer				1. Sustaining ethical practices 2. Policing the officials	1. COTU to spearhead a draft code 2. Further review to individual union constitutions to make them democratic 3. Hold individual union leaders accountable 4. Peer review mechanism/borrow best practices 5. Liaise with KACC in developing codes of conduct & ethics
<b>3. Fighting among members (Wrangles among officials)</b>						
Employees sensitization	1. Employers 2. Social partners 3. Unions	1. Members education 2. 6 of seminars held at Tom Mboya College 3. New labour laws operational 4. Registrar of trade unions appointed under Ministry of Labour 5. All disputes handled by conciliators & industrial court	Members education at shop level	Establishment of registrar of Trade Unions	Overlapping membership of trade unions/splinter unions	1. Review individual constitutions to allow more democratic space at shop level 2. Socialize the Unions Constitution to the members
<b>4. Bribery to silence workers</b>						
Punish employers who bribe and employees who receive bribes	1. MOLHRD 2. KACC 3. COTU 4. Individual unions 5. Employers 6. Social partners	1. 5 of cases handled 2. 3 Education seminars at Tom Mboya labour College for all union officials		Disputes resolution mechanisms Sensitization	1. Difficult to prove bribery to officials 2. Transfers, promotions of union official	Review the industrial relations charter Continuous sensitization on good governance



Planned Activities	Responsibility	Progress of Implementation		Achievement/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<b>5. Intimidation of workers by union officials</b>						
1. Anti-Corruption programmes 2. Sensitization on rights of employees 3. Sensitization of employers	1. COTU 2. MOLHRD 3. Social Partners 4. Individual Unions 5. KACC	1. Implementation of the new labour laws, which require union officials to come from the industry operational 2. 4 Sensitization seminars	Sensitization of employees	1. Increased sensitization 2. New labour laws 3. Trade union officials must come from the industry	1. Current officials to remain in office till their term expires 2. Finances for special congresses to change officials unavailable 3. Corruption 4. Resistance by current officials to hold special congresses 5. Delays in resolving conflicts make members suffer/lose interest in unions 6. Lack of minimum standards for union officials like education and age limit	Review individual constitutions
<b>6. Human Rights NGOs encroachment/ interference</b>						
1. Timely intervention by relevant authorities when abuses are suspected 2. NGO Council to restrain errant members	1. MOLHRD 2. Attorney General's Office 3. Social partners 4. Interest groups	1. New laws lock out Human Rights NGOs from interfering with unions management 2. Reduction in interference 3. Members education on new labour laws	1. Enforcement of the new labour laws 2. Education of members on the new labour laws	Less interference on running of trade unions	Operations of labour caucus	Social partners to be more effective and vigilant in order to lock out quacks
<b>7. Refusal by some employers to allow/ recognize Unions</b>						
1. Encourage and support employees to join Unions 2. Educate employers on the need for unions 3. Enforce the law	1. Employers 2. COTU 3. Employees 4. Social partners 5. Government	1. Implementation of the new labour laws in dealing with employers who disallow the right to form & join unions 2. Agency fees to boost union membership 3. Recognition agreements	Outsourcing of legal services by trade unions functions	Application of agency fee to boost memberships	1. Health and safety laws require insurance for all staff 2. Compensation for 96 months for employers & another 96 months by insurer heavily contested 3. Low enrolment of workers to unions-21% in the formal sector	1. More education for employers & employees to nurture unions 2. Aggressive recruitment drives 3. Lobby for more recognitions 4. Sensitization
<b>8. Non-enforcement safety laws by labour officials</b>						
1. Enforce the safety laws 2. Sensitization of employees 3. Sensitization of employers 4. Punish culprits	1. Min. of Labour /Government 2. Social Partners 3. Employers	1. National Labour Board operational 2. Convention 81 operational 3. 5 people prosecuted for violations of labour laws	Continuous support to union members by trade unions	Measures to handle violation of labour laws in place	1. Inadequate manpower to enforce labour laws 2. Corruption of labour officials	Regular appraisal of activities of labour inspection by MOL and NLB Strengthen capacity of Ministry of Labour & Human Resource Development
<b>9. Inability of government to control and monitor the manufacture and use of harmful chemicals</b>						

Planned Activities	Responsibility	Progress of Implementation		Achievement/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Enforce NEMA Act 2. Enforce Occupational Health Act 3. Public awareness	1. Min. of Labour 2. NEMA 3. Environmental Pressure groups	1. New labour laws have adequately addressed the safety needs 2. Cases NEMA/MoLHRD has handled	Formation of works committees on occupational safety	New labour laws addressing safety needs	Reluctance by employers to implement new laws	1. Make recommendations for amendment of new laws 2. Enforcement of labour laws
<b>10. Impunity by Investors to law enforcement</b>						
Enforce the law impartially	1. Government 2. MOLHRD 3. Interest groups 4. Unions 5. Social partners 6. Kenya Investment Authority	1. Active trade unions have membership in EPZ sector 2. Sensitization in EPZ	Continuous recruitment of members in the EPZ sector	Opening up of EPZ sector to trade unions	1. Allegations that labour costs are too high 2. Strong unions a challenge to exploitative investors 3. Corruption 4. Reluctance by some EPZ investors to allow unions and signing of CBAs	1. Continuous sensitization in EPZ zones 2. Step up inspection of work places 3. Aggressive recruitment by unions 4. Enforcement of labour laws
<b>11. Deterioration of workers health due to chemicals</b>						
1. Apply sanctions 2. Enforce Occupational & Health Act 3. NEMA Act 4. Educate employees and employers	1. NEMA 2. MOLHRD 3. Social partners 4. Respective LA	1. Environmental police unit set up by NEMA 2. Health & safety provisions in the new labour law 3. No of cases punished 4. Environmental committees established at regional & sectoral level	1. Implementation of the new labour laws 2. Regular environmental committees meetings	Institutional framework established to deal with environmental issues	1. External interference 2. Dishonest workers	
<b>12. Bribery/inducements in the process of union elections</b>						
1. Come up with an electoral Code and enforce it 2. Strict monitoring by observers 3. Enhance democracy in Union elections	1. COTU 2. Individual unions 3. Government 4. FKE 5. KACC 6. ECK	1. Awareness education on corruption 2. New law to remove impostors 3. 3 individual unions constitutions reviewed 4. Registrar of trade unions at Ministry of labour	Continuous education on integrity	Increased awareness	1. Corrupt persons seeking union leadership 2. Lack of minimum standards	1. Educate members on ethical elections 2. Organize sensitization seminars 3. Review individual unions constitutions 4. Encourage trade union elections to have independent observers 5. Trade Union elections to be conducted by the national electoral body 6. Develop electoral code
<b>13. Wage increases not linked to productivity.</b>						
1. Peg wages on productivity & profit 2. Strengthen & empower the Kenya Productivity Centre	1. Employers 2. Unions 3. MOLHRD	1. 13 wage council exists to negotiate terms of service 2. CBAs exist in the formal sector 3. National Productivity Centre operational	1. Training on productivity 2. Operationalization of the productivity centre	1. Wage councils established 2. National productivity	1. Ability to pay competitive wages in doubt 2. Informal sector not organized to benefit from unions & CBAs	1. Reactivation of the wages council by the national labour board 2. Apply productivity instruments 3. Borrow best practices on



Planned Activities	Responsibility	Progress of Implementation		Achievement/ Outcomes	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		4. Productivity measurement instruments developed		y centre established	3. Funds to run the National Productivity Centre	productivity
<i>14. Members not knowing the role of a shop steward</i>						
Intensify workers education on role of trade unions	1. Unions 2. MOLHRD 3. Social partners 4. Employers	1. Programmes/workshops for shop stewards 2. Consultative meetings with COTU Secretary General annually 3. 30 meetings at shop level with respective SGs	1. Training members on role of shop stewards 2. Consultative meetings 3. Workshops for shopstewards	Increased awareness on the role of shopstewards	1. Electing members who are only good at shouting 2. Promotion of shop stewards to management 3. Risk of dismissal of shop stewards from their jobs 4. Stewards looking for favours from management 5. Corruption to undermine unions	Intensify members education at all levels
<i>15. Some Workers ignorant of Code of Regulations/ Ethics at enterprise level</i>						
1. Distribute the Code to workers 2. Sensitize workers on same	1. Individual unions 2. Employers 3. Ministry of Labour and Human Resource Development 4. COTU	1. New labour laws operational 2. Agency fees makes employees union members automatically 3. Seminars/workshops for shopstewards, branch leaders and national leaders	Seminars/workshops for shopstewards, branch leaders and national leaders		Failure to involve workers and unions during formulation of regulations	1. Involve unions in formulation of regulations 2. Issue regulations & codes to staff upon employment 3. In the absence of codes of regulations, CBAs should be used 4. Fast track development of codes of regulations and ethics
<i>16. Lack of Anti-Corruption shopfloor Committees and limited use of relevant legislation</i>						
Each union in corroboration with COTU (K) to sensitize shopfloors & shopstewards committees on role of workers in combating corporate corruption within their levels of jurisdiction	3. COTU (K) 4. Individual unions 5. ACILS/ITUC 6. DANIDA/FES/Sweden to facilitate	12 sensitization workshops /seminars			1. Inadequate financial resourcesability	COTU close collaboration with KACC

## 13. EDUCATION

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Inadequate Resources for provision of education						
<ol style="list-style-type: none"> <li>1. Campaign and lobbying</li> <li>2. More incentives for private sector</li> <li>3. Ask for more funds from Government and other benefactors</li> <li>4. Institutions to generate resources internally</li> </ol>	<ol style="list-style-type: none"> <li>1. MOE</li> <li>2. MOHEST</li> <li>3. Development Partners</li> <li>4. Individual Universities</li> <li>5. SAGAS</li> <li>6. HELB</li> <li>7. KNEC</li> <li>8. TSC</li> <li>9. JKF</li> <li>10. KLB</li> <li>11. KIE</li> <li>12. SEPU</li> <li>13. KMTC</li> <li>14. JKF</li> <li>15. KNATCOM/ UNESCO</li> </ol>	<ol style="list-style-type: none"> <li>1. Market driven programmes for self sponsored students to improve resource base.</li> <li>2. Acquisition of additional income generating properties.</li> <li>3. Establishment of University Company's in UoN, JKUAT, Moi and Maseno for purposes of marketing University products.</li> <li>4. Restructuring of SAGAS complete</li> <li>5. Acquisition of equipment and vehicles by SAGAS</li> <li>6. Application for registration of a scholarship fund lodged</li> </ol>	<ol style="list-style-type: none"> <li>1. Collaboration with private sector, through marketing of University graduates and invitation of the private sector in curriculum development and review.</li> <li>2. Banks have set up or are setting up branches in the Universities e.g. UoN, Egerton and JKUAT</li> <li>3. Teaching University programmes in collaboration with private institutions. E.g. Maseno, KU, JKUAT and Moi University.</li> <li>4. Collaborations with Companies to give and Private Institutions to offer students attachment.</li> <li>5. Universities soliciting grants from Private Companies and Institutions.</li> <li>6. Collaborations with banks and the Red Cross to help in disaster management and Humanitarian assistance and training. E.g. MMUST, JKUAT and UoN</li> <li>7. Receiving donations from private Institutions e.g. grants to students, purchase of books and computers. UoN (Gandhi Samaraj, JKUAT Babaroa Trust)</li> <li>8. Cost cutting measures in place.</li> <li>9. Universities lobbying the Government to fund Universities through differentiated unit costs per programme.</li> <li>10. Cost containment through</li> </ol>	<ol style="list-style-type: none"> <li>1. Increased enrolment</li> <li>2. Increased revenue</li> </ol>	<ol style="list-style-type: none"> <li>1. Inadequate resources.</li> <li>2. Inadequate physical facilities.</li> <li>3. Declining budgetary allocation from the Government - universities.</li> <li>4. Expansion of institutions but with limited resources</li> <li>5. Inadequate support from the Private Sector. .</li> <li>6. Inadequate capacity to commercialize innovations.</li> <li>7. Inadequate marketing of university programmes</li> <li>8. Delays in honouring pledges by development partners</li> <li>9. Delays in releasing Free Primary Education and Free secondary Education funds</li> <li>10. Inadequate ICT/Infrastructure</li> <li>11. With increased enrolment, quality may be comprised</li> <li>12. Inadequate research</li> </ol>	<ol style="list-style-type: none"> <li>1. Encouraging private sector organizations to assist University infrastructures and research activities.</li> <li>2. Improve Government funding.</li> <li>3. Review policies on allocation of SSPS funds particularly on development of facilities</li> <li>4. Equitable allocation of research funds by the Government.</li> <li>5. Collaboration with CDF, LATF and Constituency Bursary Funds for improvement of University facilities</li> <li>6. Establishment of endowment funds in Public Universities.</li> <li>7. Promotion of Science, Research and Industrial, Parks.</li> <li>8. Government to offer tax incentives to Private Sector to fund research activities in Public Universities.</li> <li>9. Government to offer tax incentives to Institutions wanting to establish Universities.</li> <li>10. Government to facilitate easier credit facilities through International and Local lending agencies for expansion and acquisition of income generating investments.</li> <li>11. Universities to Institutionalize fundraising offices.</li> <li>12. Good planning in expansion of Institution.</li> <li>13. Encourage the Alumni to fund</li> </ol>



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			<p>enhanced efficiency. (performance contracts)</p> <ol style="list-style-type: none"> <li>Engaging in income generating activities e.g. Production of goods and engaging in consultancies)</li> <li>Devolved funds used for education</li> <li>Strategic partnerships with other publishers and book sellers in East Africa, Asia and Europe market expansion</li> <li>Process of establishing a fund for scholarship and an association for scholarship beneficiaries on going</li> </ol>			<p>Universities.</p> <ol style="list-style-type: none"> <li>Development partners to meet their pledges</li> <li>Adoption of Rapid Results Initiatives</li> <li>Adopt electronic application and processing system for scholarships</li> <li>Encourage diversification of products and sources of funds</li> <li>Improved financial management practices</li> <li>Upgrade ICT</li> </ol>
<b>2. Non-collaboration with other institutions</b>						
<ol style="list-style-type: none"> <li>Implement the plans and MOUs</li> <li>Intra-university collaboration and linkages</li> </ol>	<ol style="list-style-type: none"> <li>MOE</li> <li>MOHEST</li> <li>Commission for Higher Education</li> <li>Partners</li> <li>Council of Universities</li> </ol>	<p>Establishment of various collaborative joint organs charged with various joint activities between the Universities. These are:</p> <ul style="list-style-type: none"> <li>Anti-Corruption Oversight Committee.</li> <li>Inter Public Universities Consultative Councils Forum (IPUCCF) charged with the responsibility of negotiating staff salaries with the Trade Unions.</li> <li>Joint Admissions Board (JAB)</li> <li>Vice Chancellors Committee</li> <li>KENNET</li> <li>Inter University Council of East Africa (IUCEA)</li> <li>East Africa Bio Technology Network (BIOERN)</li> </ul>	<ol style="list-style-type: none"> <li>Establishment of the Association of Public Universities</li> <li>Establishment of Public Universities Legal Officers Association.</li> <li>Establishment of Public Universities Registrars Association.</li> <li>Egerton University partnership with Open University of Tanzania</li> </ol>	<ol style="list-style-type: none"> <li>Enhanced collaboration</li> <li>Foreign exchange savings</li> <li>Improved joint programmes</li> </ol>	<ol style="list-style-type: none"> <li>Inadequate funds to meet requisite University's Obligations.</li> <li>Problem in Monitoring and evaluation of the collaborations.</li> <li>Lack of legal framework in existing collaborations.</li> </ol>	<ol style="list-style-type: none"> <li>Encourage more collaboration.</li> <li>Establish collaboration offices in all Universities.</li> <li>Need for Government policy on establishment of Industrial/Universities collaborations.</li> <li>Encourage Memorandum of Understandings (MoUs) for intra Universities collaborations.</li> <li>Sensitize the public to be aware of unauthorized collaborations</li> </ol>
<b>3. Delays in processing applications for admission and registration of institutions</b>						
<ol style="list-style-type: none"> <li>Sanctioning for institutions and CHE</li> <li>Embracing ICT</li> <li>Institutionalize Performance contracting</li> <li>Develop Customer and service charter</li> </ol>	<ol style="list-style-type: none"> <li>CHE</li> <li>Individual Institutions</li> <li>Attorney General</li> <li>Universities</li> </ol>	<ol style="list-style-type: none"> <li>Performance contracting</li> <li>Customer and service charters operational - 14 days for registration of a school.</li> <li>Computerized admission by JAB.</li> <li>Achievement of ISO 900: 2001 certification- Kenyatta University and University of Nairobi</li> <li>Primary and Secondary schools have started ICT - E learning</li> </ol>	<ol style="list-style-type: none"> <li>Performance contracting being cascaded to lower levels</li> <li>Embracing ICT as an admission tool.</li> <li>KENNET expansion of bandwidth.</li> <li>ISO 900: 2008 certification for other institutions</li> <li>JAB survey on application for</li> </ol>	<ol style="list-style-type: none"> <li>Improved admission process</li> <li>Faster registration of education institutions</li> </ol>	<ol style="list-style-type: none"> <li>Insufficient funds.</li> <li>Late submission of admission application forms by some secondary schools</li> <li>Late revision of degree programmes</li> <li>KNUT opposition to performance</li> </ol>	<ol style="list-style-type: none"> <li>Institutionalize and strengthen JAB i.e. provide a legal framework.</li> <li>Universities without ISO Certification to strive and achieve certification.</li> <li>JAB to issue free admission forms</li> <li>Delinking Admission forms</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			University admission 6. Summarizing service charters for ease of reference and displaying at service points 7. Training staff on ICT		contracting. 5. ICT not yet developed to assist in efficient processing of applications	from school fees 5. MOE to ensure that secondary schools submit admission forms on time. 6. Review all the processes to ensure efficient and effective accreditation process of programmes and institutions
<b>4. Lack of legal clarity</b>						
1. Set standards 2. Enact the Higher Education Bill (HEB) 3. Be able to inspect all tertiary institutions 4. Sanctioning	1. CHE 2. Parliament 3. Attorney 4. MOE 5. MOHEST 6. Interest Group 7. Universities	Stakeholders' workshop on Universities Bill held and inputs incorporated.	Lobbying for the Universities Bill by the Chancellors and Vice Chancellors.	1. Higher Education Bill 2. University Bill	Conflict between existing University Acts and other statutory regulations. e.g. KMLTTB, ERB	1. Vice Chancellors to lobby for enactment of the Universities Bill. 2. Enactment of the University Bill
<b>5. Inappropriate structure. Non rationalized establishment &amp; org. structure</b>						
1. Redesign organization 2. Define roles 3. Develop policy and implement	1. MOE 2. MOHEST 3. CHE 4. Management 5. SAGAs 6. KIE 7. Universities 8. HELB 9. KNEC 10. TSC 11. JKF 12. KLB 13. SEPU 14. KMTC 15. JKF 16. KNATCOM	1. Human resource audit carried out at UoN, KU, Moi, Egerton, MMUST and some SAGAs. 2. Strategic plans complete in line with Vision 2030 and operational 3. Service charters operational 4. Review of human resource policies 5. Adult Education moved to the Ministry of Education	1. Restructuring to rationalize establishments. 2. Human resource audit taking place, for JKUAT, Maseno and Egerton Universities. 3. Development of schemes of service for non teaching staff. 4. Organization structure redesigned in accordance with the strategic plans. 5. Review of strategic plan in line with Vision 2030 – KISE, JKF, KLB, KESI, KNEC 6. Teachers are able to move to civil service 7. Development of guidelines/framework for chancellors	Improved service delivery	1. Duplication of roles. 2. Lack of appropriate structures. 3. Lack of resources 4. Lack of documented roles for the delegated Chancellor. 5. Lack of consensus among stakeholders. 6. Inadequate personnel to man the Human resources.	1. Review of existing structures. 2. Establishment of Human resource development departments. 3. Implementation of human resource audit
<b>6. Existence of unregulated educational providers</b>						
1. Regulate these tertiary institutions legally 2. Vest the mandate on CHE	1. MOE 2. MOHEST 3. CHE 4. Interest Groups	1. Directory of 600 non-formal centres 2. Curriculum for non-formal education operational 3. Certification of schools. Schools not registered with the Ministry of Education	1. Registration of teachers by TSC 2. Enforcement of the Education Act	Increased compliance with registration process	Inadequate Quality Assurance Officers	1. More recruitment 2. Integration of Early Childhood Development(ECD) to primary Education by 2010



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
		cannot register for exams				
<b>7. Unclear Recruitment Policy</b>						
<ol style="list-style-type: none"> <li>1. Introduce induction/ in service courses</li> <li>2. Strengthen quality assurance bodies</li> <li>3. Establish a professional regulatory body where teachers are registered</li> <li>4. Enhance incentives to mitigate regional disparities</li> <li>5. Recruit qualified and registered teachers</li> <li>6. Recruit competitively</li> <li>7. Establish clear laws and guidelines that govern recruitment</li> </ol>	<ol style="list-style-type: none"> <li>1. MOE</li> <li>2. MOHEST</li> <li>3. TSC</li> <li>4. Kenya Private Schools Association</li> <li>5. Interest groups</li> <li>6. SAGAs</li> <li>7. KIE</li> <li>8. Universities</li> <li>9. HELB</li> <li>10. KNEC</li> <li>11. TSC</li> <li>12. JKF</li> <li>13. KLB</li> <li>14. SEPU</li> <li>15. KMTC</li> <li>16. JKF</li> <li>17. KNATCOM/ UNESCO</li> </ol>	<ol style="list-style-type: none"> <li>1. Maseno, Egerton, JKUAT &amp; Moi have a recruitment policy in place.</li> <li>2. Directorate of Quality Assurance established in Egerton, JKUAT, MMUST and Maseno Universities.</li> <li>3. Staff evaluation &amp; appraisal policy implemented in UoN and JKUAT.</li> <li>4. Clear rules and guidelines for recruitment in place.</li> <li>5. Schemes of service operational.</li> <li>6. Dissemination of the recruitment policy.</li> <li>7. TSC transfer policy – transfer after 5 years</li> <li>8. TSC recruitment policy – School based recruitment policy</li> <li>9. Reward schemes linked to evaluation and appraisal systems. Developed for JKUAT, Egerton and UoN</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of staff evaluation and appraisal instruments.</li> <li>2. Competitive recruitment.</li> <li>3. Development of schemes of service for non teaching staff</li> <li>4. Sensitization of agents and staffing officers.</li> <li>5. Working out national staffing vacancies.</li> <li>6. Dissemination of recruitment policy.</li> <li>7. Establish clear laws and guidelines that govern recruitment.</li> </ol>	<p>Recruitment policies operational</p>	<ol style="list-style-type: none"> <li>1. Lack of scheme of service for non teaching staff.</li> <li>2. Lack of clear modern Human resource practices.</li> <li>3. Discordance between academic and non teaching staff (attitude).</li> <li>4. Attraction and retention of staff due to lack of competitive remuneration vis-à-vis private sector and Government.</li> <li>5. Ethnicization of recruitment in public institutions.</li> <li>6. Lack of adequate information on existing vacancies</li> </ol>	<ol style="list-style-type: none"> <li>1. Finalize schemes of services for non teaching staff.</li> <li>2. Develop recruitment policy for lacking institutions</li> <li>3. Develop an adequate reward schemes linked to evaluation and appraisal systems for lacking institutions</li> <li>4. Review remuneration packages for staff based on functions and skills.</li> <li>5. Require all professionals to be registered by respective professional bodies/associations.</li> </ol>
<b>8. Conflict of Interest.</b>						
<ol style="list-style-type: none"> <li>1. Enact the Universities Bill</li> <li>2. Competitive recruitment</li> <li>3. Council/Board members and staff to declare interest</li> <li>4. Declare your interest as required under POEA</li> <li>5. Make procurement competitive</li> </ol>	<ol style="list-style-type: none"> <li>1. CHE</li> <li>2. MOE</li> <li>3. MOHEST</li> <li>4. Interest Groups</li> <li>5. SAGAs</li> <li>6. KIE</li> <li>7. Universities</li> <li>8. HELB</li> <li>9. KNEC</li> <li>10. TSC</li> <li>11. JKF</li> <li>12. KLB</li> <li>13. SEPU</li> <li>14. KMTC</li> <li>15. JKF</li> <li>16. KNATCOM/</li> </ol>	<ol style="list-style-type: none"> <li>1. Code of Conduct and Ethics for Public Universities in place (Legal Notice No. 170)</li> <li>2. Anti Corruption /Integrity Committees in place - Moi, Egerton . MMUST and JKUAT.</li> <li>3. Tender Committees operational.</li> <li>4. Competitive recruitment practices/ policies in place.</li> <li>5. Operationalization of Corruption Prevention/ Integrity Committees.</li> <li>6. Compliance with the procurement procedures.</li> <li>7. Implementation of the code of conduct and corruption prevention policy.</li> </ol>	<ol style="list-style-type: none"> <li>1. Implementation of Public Procurement and Disposal Act.</li> <li>2. Competitive recruitment.</li> <li>3. Production and distribution of procurement manuals.</li> <li>4. Capacity building on procurement process.</li> <li>5. Development of Administration procedures for wealth declaration – TSC</li> <li>6. Payroll cleansing – TSC</li> <li>7. Action on corrupt officers through anti-corruption framework/discipline procedures</li> </ol>	<ol style="list-style-type: none"> <li>1. Compliance with POEA and PPDA</li> <li>2. Codes of conduct operational</li> </ol>	<ol style="list-style-type: none"> <li>1. Non disclosure of interest by staff and Committee members.</li> <li>2. Inadequate funds for training and sensitization.</li> <li>3. Non compliance with existing laws and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1. Ensure strict adherence to the code of conduct and corruption prevention policies.</li> <li>2. Sensitization of Council, board members and staff.</li> <li>3. Operationalization of corruption and Integrity committees. Moi and MMUST.</li> <li>4. Formulating Anti Corruption Prevention Policies/ Plans/.</li> <li>5. Capacity building</li> <li>6. Punish corrupt officers</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	UNESCO					
<b>9. Poor Internal Communication Systems</b>						
1. Develop Internal communication systems/Strategy 2. Well programmed management meetings 3. Production of update newsletters	1. MOE 2. MOHEST 3. SAGAs 4. KIE 5. Universities 6. HELB 7. KNEC 8. TSC 9. JKF 10. KLB 11. SEPU 12. KMTC 13. JKF 14. KNATCOM/ UNESCO	1. Information gathering and dissemination mechanisms through suggestion boxes, notice boards, newsletters and consultative meetings. 2. Regular Council, Senate and Management meetings. 3. Communication strategy developed. 4. Periodic release of newsletters. 5. Enhanced capacity in the use of ICT by staff. 6. ICT policy in place in UoN, JKUAT, Egerton and MMUST.	1. Implementation of VOIP 2. Implementation of ICT policy. 3. Enhanced capacity in the use of ICT. 4. Institutionalizing open office practice - UoN, Moi and MOE. 5. Acquisition of more equipment/computers. 6. Developing the culture for communication and transparency. 7. Dissemination of the Communication policy to stakeholders. 8. Development of Short Message Services (SMS) software to enable students' access examination results and fee balances. (Egerton, KU and UoN) 9. Periodic monitoring and evaluation of internal communication systems. 10. Integration of ICT in all operations.	Improved communication	1. Inability to purchase appropriate software to facilitate communication due to inadequate funds. 2. Limited access of bandwidth and connection to fibre optic super highway. 3. Negative attitude. 4. Resistance of ICT adoption. 5. Budgetary constraints.	4. Hold regular meetings at divisional and departmental levels. 5. Development of Infrastructure for Email account for all staff and students. 6. Adopt open door office practice. 7. Training of staff in ICT. 8. Acquisition of more computers. 9. Encourage usage of electronic Communication (E-communication). 10. Enhance allocation for ICT projects.
<b>10. Nepotism, Political Patronage etc</b>						
1. Involve stakeholders 2. Insist on merit 3. Enforce the POEA	1. DPM 2. MOE 3. MOHEST 4. Heads Association 5. Parents 6. Universities 7. Interest Groups 8. SAGAs 9. KIE 10. Universities 11. HELB 12. KNEC	1. Competitive promotion criteria for academic staff in place. 2. Vacant posts advertised and filled competitively.	1. Competitive recruitment of Chief Executive Officers, Senior Management and other staff in place. 2. Development of the code of Conduct and corruption prevention policy. 3. Enforcement of Public Officers Ethics Act, 2003. 4. University/Local community development initiatives in progress. 5. Induction and appraisal of newly appointed staff.		1. Resistance by staff to change their attitude 2. Ethnicitization of recruitment in Public Institutions 3. Political interference in the running of public institutions by political leaders. 4. Lack of funds to run and manage the satellite campuses, colleges and	1. Establishment of a Public University Service Commission mandated with recruitment of Senior Management staff. (grades 10 and above) 2. Continued sensitization against nepotism and political patronage. 3. Open up recruitment of staff to all Kenyans on merit. 4. Encourage inter ethnic relations. 5. Need for additional government funding to run



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	13. TSC 14. JKF 15. KLB 16. SEPU 17. KMTC 18. JKF 19. KNATCOM /UNESCO		6. Updating and reviewing of staff records.		constituent colleges. 5. Lack of professionalism. 6. Inadequate education, training and employment opportunities	campuses, colleges and constituent colleges. 6. Implement institutional policy on human resource planning. 7. Expansion of education facilities. 8. Appropriate disciplinary measures. 9. Delink admission to bed space in Universities. 10. Review the relevant laws to facilitate investment in University education (50 acres rule) 11. Reactivate universities committees on appointment of senior officers

11. *Neglect of learners by teachers and parents.*

1. Implement POEA 2. Strengthening of quality assurance 3. Head teachers to increase supervision 4. Employ more lecturers and teachers 5. Expand facilities 6. Establish contact time records and other supervisory tools 7. Put teachers on Performance Contract	1. TSC 2. MOE 3. MOHEST 4. Government 5. Parents association 6. KMTC 7. Universities	1. Quality Assurance Policy in place. 2. Harmonization and implementation of new salary scale for staff. 3. Quality assurance offices in place in UoN KU, JKUAT, MOI, MMUST, Egerton and Maseno. 4. ISO 9001:2001 certification (Ministry of Education, UoN & KU).	1. Physical facilities are being expanded and modernized in Public Universities. 2. Institutions randomly inspected and recommendations communicated. 3. Implementation of service charters. 4. ISO 9001:2001 certification - Egerton, Moi and JKUAT 5. Implementation of Quality assurance and standards policy. 6. Sensitization of learners of the need to be attended by qualified lecturers.(ERB,CLE) 7. Sensitization of head teachers and parents 8. Dissemination of POEA to schools	Regular monitoring through quality assurance officers	1. Running of businesses while in employment. 2. Inadequate funds for physical infrastructure and human capital. 3. Inadequate communication channels between the University and the parents/guardians. (open days, UoN) 4. Use of part time lecturers in teaching whereby their commitment to the students is wanting and quality of teaching is not guaranteed. 5. Under-staffing leading to engagement of part-time lecturers. 6. Poor remuneration of staff leading to low morale, hence affecting the quality of their	1. Additional funds required for physical infrastructure and human capital to enable Universities to engage more lecturers. 2. Implementation of the student/staff evaluation reports. 3. Mandatory Involvement of parents/guardians in student affairs especially in academic progress and disciplinary issues. 4. Put in place a policy requiring lecturers to undertake induction and pedagogy training. 5. Establish fully fledged university counseling centres. 6. Institutionalize open days and other interactive forums between the University and the parents/guardians. 7. Sensitize stakeholders on their roles and responsibilities.
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Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
					services. 7. Resistance by sponsors/parents in involvement to student affairs.	
<b>12. Bribery by Parents for admissions, special attention for some learners.</b>						
<ol style="list-style-type: none"> <li>1. Enforce standards</li> <li>2. Ensure admissions competitive and on merit only.</li> </ol>	<ol style="list-style-type: none"> <li>1. TSC</li> <li>2. School Heads</li> <li>3. Parents Associations</li> <li>4. Universities</li> </ol>	<ol style="list-style-type: none"> <li>1. Admission of students through the Joint Admissions Board</li> <li>2. Information on admission is advertised through University web sites and print media.</li> <li>3. Computerized admission by the Joint Admission Board, TTCs Form I.</li> <li>4. Training of school management committees and BOGs</li> <li>5. Punishment of corrupt officials in secondary schools</li> <li>6. University open days - UoN</li> </ol>	<ol style="list-style-type: none"> <li>1. Streamlining the procedures of admission of students.</li> <li>2. Enforce standards.</li> <li>3. Make admissions competitive and on merit.</li> <li>4. Sensitize staff on avoidance of corruption, reporting and eradication plans.</li> <li>5. Sensitize sponsors on the provisions of the service charter.</li> <li>6. Developing information materials on admission criteria and procedure and disseminate the same to secondary schools through District Education offices. (JKUAT &amp; UoN, Moi, KU)</li> </ol>	Computerized admission	<ol style="list-style-type: none"> <li>1. Inadequate funds to provide more facilities in order to accommodate more students.</li> <li>2. Lack/Inaccessibility of information to Parents/ guardians on admission criteria and procedure.</li> <li>3. Disparity in the admission standards between government sponsored students (JAB) admissions and fee paying (Self Sponsored Students Program)- (SSSP) admissions.</li> <li>4. Delays in processing applications creating opportunity for corruption.</li> </ol>	<ol style="list-style-type: none"> <li>1. Dissemination of information on admission criteria and procedures in local FM radio stations in order to create awareness to parents/Guardians.</li> <li>2. Encouraging career guidance through the establishment of information desks at various locations including District Education Offices, Ministries and local churches.</li> <li>3. Further dissemination of information materials in all secondary schools.</li> <li>4. Fully integrate the teaching of JAB and Self Sponsored Students programmes in the Universities.</li> <li>5. Prosecution of anyone involved in corrupt activities.</li> <li>6. Establishment of university parents association</li> <li>7. Involvement of parents/guardians in students affairs especially in academic progress and discipline</li> <li>8. Implementation of students/staff evaluation</li> <li>9. Induction &amp; pedagogy training for lecturers</li> <li>10. Institutionalize university open days</li> <li>11. Enforcement of the law (ACECA)</li> </ol>
<b>13. Dishonesty, Theft and Examination Cheating by Learners</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
<ol style="list-style-type: none"> <li>Integrate anti-corruption, ethics/integrity issues in school curriculum</li> <li>Make some aspects of integrity examinable</li> <li>Recruit invigilators/supervisors of high integrity</li> <li>Tighten security of preparation, packaging and distribution of exam papers</li> <li>Increase penalties for cheating candidates</li> </ol>	<ol style="list-style-type: none"> <li>MOE</li> <li>MOHEST</li> <li>KIE</li> <li>KNEC</li> <li>KACC</li> <li>Parents</li> <li>TSC</li> <li>Universities</li> </ol>	<ol style="list-style-type: none"> <li>Developed Examination Rules and Regulations.</li> <li>Development of life skills curriculum.</li> <li>Examination Irregularity Committees in place.</li> <li>Integrity issues incorporated in exam materials</li> <li>Policy on handling students caught in examination irregularities in place.</li> <li>Task force on KNEC established</li> <li>Recruitment of invigilators/ supervisors of high integrity</li> <li>Tightened security of preparation, packaging and distribution of exam papers</li> <li>Increased penalties for cheating</li> <li>Ban on use of mobile phones within examination centers</li> </ol>	<ol style="list-style-type: none"> <li>Strengthening of examination sections.</li> <li>Enforcing the Examination Rules and Regulations.</li> <li>Security measures in preparation, packaging and distributions of exam papers have been undertaken.</li> <li>Stiff penalties imposed on students infringing examination regulations in place.</li> <li>Parents/guardians to be invited for Student disciplinary forums in the Universities.</li> <li>Use of teachers for invigilation</li> <li>Increased vigilance and integrity training</li> <li>Enhancement of proper management systems and examination regulations.</li> <li>Sensitization of all stakeholders on how to detect and avoid linkages and packaging procedure &amp; materials</li> <li>Intensified monitoring of examinations</li> <li>Development of record management systems</li> <li>Examinations to be done during morning sessions only</li> </ol>	<ol style="list-style-type: none"> <li>Enforcement of examination rules and regulations</li> <li>Reduced incidences of examination cheating</li> </ol>	<ol style="list-style-type: none"> <li>Large classes in most institutions which makes invigilation difficult.</li> <li>Increased examination irregularities particularly cheating.</li> <li>Overloaded curriculum.</li> <li>Lack of integrity by some lecturers and teachers.</li> <li>Students not prepared for examinations as sometimes teaching and learning does not take place.</li> <li>Lecturers/teachers are not willing to report instances of examination cheating as well as appearing before the students' disciplinary committees.</li> <li>Cost of security</li> <li>Failure to report exam malpractices</li> <li>Failure of DEOs to adhere to recruitment criteria</li> <li>Candidates finding new ways of cheating including use of new technology</li> </ol>	<ol style="list-style-type: none"> <li>Introduce an examinable and compulsory unit on integrity and ethics in all levels of education.</li> <li>Increase the number of invigilators in exam rooms.</li> <li>Introduce CCTV systems in exam rooms to aid in monitoring the examination process.(UoN-library, examination centres)..</li> <li>Sensitization of the staff and students on the vice.</li> <li>Encourage students to speak up on sexual harassment cases in instances where grades are exchange with sexual favours.</li> <li>Establish parents Association for Universities and tertiary institutions.</li> <li>Enforce established standards on contact teaching hours i.e. Full time Staff Teaching Equivalent (FTSE).</li> <li>Review of KNEC Act</li> <li>Regular review of invigilators/supervisors allowances</li> <li>Capacity building</li> <li>Implementation and monitoring of student &amp; staff evaluation.</li> <li>Random pre-testing to detect prior knowledge of examination paper</li> <li>Review recruitment policy &amp; enforcement of the same</li> <li>Enforce penalties for cheating</li> </ol>
<b>14. Mismanagement of education Institutions</b>						
<ol style="list-style-type: none"> <li>Appoint knowledgeable persons preferably with</li> </ol>	<ol style="list-style-type: none"> <li>TSC</li> <li>MOE</li> </ol>	<ol style="list-style-type: none"> <li>Performance contracting operational</li> <li>External and internal auditors conduct</li> </ol>	<ol style="list-style-type: none"> <li>Setting up of Audit committees</li> <li>Performance contracting being</li> </ol>	Enhanced capacity for	<ol style="list-style-type: none"> <li>Resistance by staff on the cascading of</li> </ol>	<ol style="list-style-type: none"> <li>Establish parents/staff association.</li> </ol>

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
background in education to Councils, BOG, SMC and PTA leadership 2. Institute Training in financial and general management for Educational Managers including Council, BOG, SMC and PTA members. 3. Give Parents Association more powers 4. Audit schools/ Institutions accounts frequently by independent and honest auditing firms 5. Institutionalize Performance Contracts in schools	3. MOHEST 4. Government 5. Parents association 6. Interest Groups 7. KESI 8. Universities	annual audits. 3. Training of University Managers on financial and general managements. 4. Tendering process in conformity with the Public Procurement and Disposal Act 5. 4,181 BOG, SMC members trained 6. 84 DEOs trained	cascaded to all levels. 3. Introduction of Rapid Results Initiative. 4. Sensitize stakeholders on financial management. 5. Client satisfaction surveys. 6. Implementation of the Public Officers Ethics Act, 2003, Economic Crimes Act and Public Procurement and Disposal Act, 2005. 7. Adoption of modern management practices e.g. ISO 9001-2001 and Rapid Results Initiative (RRI) 8. Mandatory use of staff identification cards to ensure greater responsibility and accountability. 9. Institutionalized internal audit reporting structure. 10. Use of appraisal tools. 11. More training of stakeholders 12. Implementation of lessons learnt in schools and education offices	BOGs and SMCs through training	Performance contracting to all levels. 2. University Councils are ill placed to advise universities due to inexperience in University management. 3. Limited skills and exposure on institutional management. 4. Non existence of a Parents /Staff Association. 5. Inadequate resources to train education officers	2. Training all University staff on institutional and financial management. 3. Regular sensitization on sound and best practices management to all staff. 4. Revise the criteria of appointment of university council members and base the appointment on relevant past experience as well as value addition and reduce instances of conflict of interest. 5. Institute capacity building programmes at all levels. 6. Establish a clear reward policy and sanction systems to enhance productivity. 7. Allocation of more resources through budgetary process. 8. Continuous independent and inter surveillance audits. 9. Training of staff on integrity. 10. Implementation of code of conduct and ethics. 11. Enhance staff awareness of the Public Officers Ethics Act. 12. Development of skills upgrading programmes for staff. 13. Strict vetting of members of management boards. 14. Develop capacity building for institutional managers to diversify sources of funding, especially at tertiary and University levels. 15. Strengthening of Quality Management Systems at all levels particularly at Universities. 16. Inspect Universities. 17. A calendar of training



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
						programmes
<b>15. Lack of transparency in recruitment for training colleges</b>						
1. Enforce the recruitment criteria 2. Punish the corrupt officials	1. MOE 2. MOHEST 3. KNUT 4. KUPPET 5. KACC 6. Interested Groups 7. KMTCC 8. OOP 9. Parliament 10. KACC 11. CDC	1. Revision of admission criteria for teacher training colleges 2. Computerized pre service teachers intake 3. Staff training need identified 4. Recruitment on merit	Staff training policy being developed	Computerized admission	1. Budgetary constraints 2. Lack of policy to guide the staff training needs requirements 3. Limited vacancies in training institutions 4. Upgrading of teacher training colleges to university colleges	1. Develop staff training policy 2. Increase centres of excellence 3. Discourage taking over of colleges 4. develop market driven university courses 5. Enforce the recruitment criteria 6. Punish corrupt officials
<b>16. Abuse of school bursary and PTA funds</b>						
1. Involve parents and community in identification of needy children 2. Develop and implement criteria and guidelines for bursary allocation at lower administrative units 3. Develop selection criteria based on need and merit 4. Publish beneficiaries names and Chiefs/Assistant Chiefs offices 5. Reform the management of CDF and Bursary Funds	1. MOE 2. MOHEST 3. KNUT 4. KUPPET 5. OOP 6. Parliament 7. KACC 8. CDC	1. Beneficiaries names are published at Divisional HQs 2. Implementation criteria and guidelines for bursary allocation at lower administrative units developed 3. Selection criteria based on need and merit developed 4. Parents and community are involved in identification of needy children			1. Resistance by politicians 2. Little allocations to students 3. Inadequate funds	1. Ministry of Education to distribute bursary funds 2. Establish school based bursary committees
<b>17. Overpricing and low standards in procurement by public institutions.</b>						
1. Review school procurement procedures 2. Surcharge and punish officers 3. Train school managers on PPDA and its guidelines 4. Institute and involve independent audit of school operations	1. MOE 2. MOST 3. KUPPET/ 4. KNUT 5. Treasury 6. National parents Association 7. Parliament 8. Interest groups	1. Enforcement of Public Procurement and Disposal Act, 2005 and Regulations. 2. Tender Committees established. 3. University Managers have been trained on procurement procedures and rules. 4. Adopted Public Procurement & Disposal Act (PPDA) in institutions. 5. Setting up of Audit committees of Council in all the Universities. 6. School tender boards established 7. Procurement manuals printed and	1. Continuous training of all stakeholders in procurement planning and financial management. 2. Development of Procurement plans. 3. Surcharging and punishing officers. 4. Continuous audit by internal and independent auditors. 5. Review of school procurement	Compliance of PPDA	1. Lack of adequate manpower in the area of procurement. 2. Slow procurement process thus generating pending bills in subsequent years. 3. Lack of adequate quality control capacity. 4. Dismantling corruption	1. Implement Government policy on University funding. 2. Implement fee payment on differentiated unit cost. 3. Increase funding to institutions. 4. Support local entrepreneurs by giving them priority in the procurement process. 5. Establish school tender boards with wider representation. 6. Provision of basic

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	9. Universities	distributed to schools.	procedures.		networks.	<p>infrastructure to institutions e.g. Roads, water, electricity. (In Universities and other institutions).</p> <p>7. Capacity building for local entrepreneurs in order to compete effectively</p> <p>8. Lobby as stakeholders for clear framework on sanctions within the Public Procurement and Disposal Act, 2005.</p> <p>9. Introduce training and development of staff in the area of public procurement</p>
<b>18. Registration of schools and other learning and training institutions not meeting the basic requirements</b>						
<p>1. Empower Quality Assurance and Standards Officers to deregister schools</p> <p>2. Sensitize public on registration requirements and process</p> <p>3. Enforce school registration regulations</p>	<p>1. MOE</p> <p>2. MOHEST</p> <p>3. National parents Association</p> <p>4. Parliament</p> <p>5. Pressure groups</p> <p>6. KMTC</p>	<p>1. Registration of schools through District registration Boards</p> <p>2. 14 days rule being observed for registering schools</p>	Continuous assessment of school facilities by QAS Officers		<p>1. Delay in implementation of standard assessment reports</p> <p>2. Some schools still operating with temporary/expired registrations</p> <p>3. Incorrect information by MOE officers on schools</p> <p>4. Bribery by school proprietors</p> <p>5. Inadequate staff</p>	<p>1. Publicize registration guidelines</p> <p>2. Enforce registration regulations</p>
<b>19. Abuse of private tuition</b>						
<p>1. Private tuition should be abolished by law</p> <p>2. Enforce private tuition regulations</p>	<p>1. MOE</p> <p>2. MOHEST</p> <p>3. Pressure Groups</p> <p>4. TSC</p>	<p>1. Ministerial statement released</p> <p>2. Dissemination of TSC code of conduct</p> <p>3. Private tuition banned</p> <p>4. Ranking of schools abolished</p>	<p>1. Sensitization</p> <p>2. Enforce the Ministerial circular on private tuition</p>	<p>1. Official ban of tuition</p> <p>2. Ranking of schools banned</p>	<p>1. Lack of adequate work ethics in public institutions</p> <p>2. Societal expectation/pressure</p> <p>3. Ranking of schools in national Examination</p> <p>4. Parents willingness to pay</p>	<p>1. Encourage remedial teaching in schools</p> <p>2. Enforce ministerial circulars on private tuition and the code of conduct and ethics</p> <p>3. Monitoring and evaluation</p> <p>4. Continue building of partnerships of stakeholders in public and private institutions</p> <p>5. Enforce ban on private tuition</p>
<b>20. Incompetent BOG/Council members</b>						



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
1. Appoint BOG/Council members with additional skills 2. Consider integrity of Board/Council members	1. MOE 2. MOHEST 3. Respective schools 4. Universities	1. The Universities Bill 2. BOG membership guidelines operational 3. 4,181 BOG and SMC members trained 4. Minimum qualifications – o level for BOG members 5. Parents have 3 members in BOG 6. The rule of 1/3 of BOG members being women is observed	Training of Council and Board members	1. Enhanced capacity of BOGs 2. Minimum qualifications of BOG members	1. Delay in the appointment of Council members and failure to stagger their appointments to avoid a situation where there is a vacuum. 2. Council members lack skills to guide Universities on their management. 3. Council members do not undertake their responsibilities seriously e.g. sourcing for funds which is a key responsibility of Council. 4. Large BOG members	1. Appointment of competent Council members. 2. Lobby for enactment of the Universities Act. 3. Staggering of the terms of various Council members. 4. Training of BOG members at district level
21. <i>Wrong recruitment, transfers, and promotion of Staff.</i>						
1. Follow laid down procedures 2. Use scheme of service strictly for promotion 3. Implement the revised staffing norms 4. Punish corrupt officials	1. TSC 2. MOE 3. MOHEST 4. MOSPS 5. Universities 6. KNUT/KUP 7. Interested Groups	1. Recruitment and promotion criteria in place in all Universities for Academic Staff. Maseno University has scheme of service for all staff. Staff review carried out annually. 2. Enforcement of recruitment and promotion procedures. 3. Teachers staffing norms being implemented 4. Recruitment and promotion policy for teachers operational 5. Enforcement of schemes of service 6. P1 teachers proficiency courses 7. Revised staffing norms 8. Punishment of corrupt officials 9. Teachers transfers done once a year – September 10. Newly recruited teachers to serve in an area for 5 years	1. Use of schemes of service for promotion. 2. Implementation of recruitment and promotions criteria 3. Enforcement of staffing norms 4. Enforcement of POEA	Recruitment and transfer policies operational	1. Recruitment of staff in universities has been ethnicized. 2. Inadequate resources to train staff. 3. Resistance to change of attitude by staff. 4. Enforcement of POEA 5. Vested stakeholders' interests 6. Large number of transfer requests	1. Avail scholarships to enable Universities recruit and train potential staff. 2. Public institutions should adopt a national outlook in the recruitment of their employees. 3. Develop recruitment and promotion policies for all cadres of staff. 4. Establishment of distinct Human Resource Departments. 5. Conducting regular training/refresher courses for staff, as well as in service training of lecturers, teachers on pedagogy. 6. Allocation of more funds for human capital development. 7. Implement the new staffing norms. 8. Enforce Code of Conduct and Ethics. 9. Sensitization of both teachers

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
						and agents.
<b>22. Lack of clear Admission criteria to parallel students</b>						
1. Centralize all admissions 2. Develop admission guidelines for parallel degree programmes	1. Universities 2. University Academic Staff Union (UASU) 3. MOE 4. MOHEST 5. Interested Groups	Admission criteria developed and operational	Implementation of admission criteria.	Minimum admission criteria	1. Large number of applicants vis-à-vis the admission capacities in respective Universities. 2. High rate of default in payment of fees by students.	1. Additional physical facilities be provided in order to admit more students. 2. Regular revision of admission criteria. 3. Government to establish an affordable and equitable student loan scheme applicable to all students in the Universities. 4. Government to Increase the capacity of Universities and consider the expansion of this capacity as a national infrastructure.
<b>23. Non-enforcement of certification criteria</b>						
1. Enhancement security marks on certificates, vet and authenticate candidates 2. Enforce the Education Act	1. MOE 2. MOHEST 3. KNEC 4. KACC	1. Enhanced security marks on certificates, vet and authenticate candidates 2. Vetting and authenticating certificates	1. Review of existing security marks 2. In the process of achieving ISO certification	Enhanced security marks	1. Use of technology to copy documents 2. Frequency changes	1. Incorporate global best practices 2. Introduction of temper proof certificate
<b>24. Examination cheating and leakages</b>						
1. Recruit invigilators of high integrity 2. Tighten security of preparation 3. Packaging and distribution of exam paper 4. Increase penalties for cheating candidates	1. MOE 2. MOST 3. KNEC 4. KACC	1. Policy of handling students caught with exam irregularities in place. 2. Examination regulations and management systems are in place. 3. Taskforce on KNEC constituted 4. Recruitment of invigilators of high integrity 5. Tightening of security of preparation, packaging and distribution of exam papers 6. Policy on penalties on examination cheating 7. Ban on use of mobile phones within examination centres	1. Implementation of the policy on handling examination process and irregularities. 2. Enhancement of proper management systems and examination regulations. 3. Security measures in preparation, packaging and distribution have been undertaken. 4. Stiff penalties imposed on students infringing examination regulations in place. 5. Sensitization of all stakeholders on how to detect and avoid linkages and packaging procedure & materials 6. Intensified monitoring of	Reduced examinations cheating	1. Students not properly prepared for examinations as sometimes teaching and learning does not take place. 2. Lecturers are not willing to report instances of examination cheating as well as appearing before the Students disciplinary committees. 3. To win the support of all stakeholders 4. Cost of security 5. Failure to report exam	1. Sensitization of staff and the students on the vice. 2. Introduce an examinable compulsory unit on integrity and ethics at all levels of education. 3. Remunerate Invigilators appropriately. 4. Enforce established standards on contact teaching hours i.e. Full Time Staff Teaching Equivalent (FTSE) 5. Implementation and monitoring of student & staff evaluation. 6. Increase number of invigilators who are of high integrity. 7. Random pre-testing to detect



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
			examinations 7. Development of record management systems 8. Examinations to be done during morning sessions only		malpractices 6. Failure of DEOs to adhere to recruit criteria 7. Candidates finding new ways of cheating including use of new technology	prior knowledge of examination paper 8. Review recruitment policy & enforcement of the same 9. Enforce penalties for cheating
<i>25. Bribery to secure transfer to preferable areas.</i>						
1. Implement the revised staffing norms 2. Punish corrupt officials	2. TSC 3. MOE 4. MOST 5. KNUT/ KUPPET	1. Revised staffing norms 2. Implementation of the revised staffing norms 3. Punishment of corrupt officials 4. Teachers transfers done once a year - September 5. Newly recruited teachers to serve in an area for 5 years	1. Enforcement of staffing norms 2. Enforcement of POEA	Transfer policy operational	Large number of transfer requests	Implement the new staffing norms
<i>26. Poor record keeping by University lecturers and some colleges</i>						
1. Computerize examination departments 2. Require lectures to submit marks/CATS in time	1. MOE 2. MOHEST 3. CHE 4. Universities 5. KMTC	1. Submission of examination /CAT marks within the given time is being enforced 2. Acquisition of ISO 9001: 2008 certification - KU & UoN	1. Enforcement of current requirements on manual record keeping. 2. Implementation of appropriate software to enhance records keeping. 3. Acquisition of ISO 9001: 2008 certification, Egerton, JKUAT, Maseno , Moi and MMUST. 4. Automation of the registry and creation of a centralized documents system.	Automation of records	1. Inadequate computers for use by lecturers. 2. Lack of proper organizational culture. 3. Inadequate funds to purchase of software to manage examinations and other records. 4. Internalization of work resulting in creation of personalized/departmental registries. 5. Resistance to a centralized registry in institutions.	1. Universities to facilitate lecturers to own computers for use by lecturers to enter students' marks individually. 2. Universities to avail offices for all lecturers and in so doing enhance security. 3. Institutionalize performance contracting to avoid delays in work performance. 4. Create a central registry for all files and records.
<i>27. Immoral /unethical relationships between teachers, lecturers and students.</i>						
1. Develop & enforce codes of conduct 2. Punish and publicize participants 3. strengthen guidance and counseling	1. MOE 2. MOHEST 3. Learning institutions 4. UASU 5. UNTESU 6. KUDHEIHA	1. Gender and sexual harassment policy operational in all Universities. 2. HIV/AIDS policy in place. 3. Codes of Conduct developed 4. Enforcement of POEA. 5. Teaching of life skills	1. Continuous sensitization of students on the Sexual Offences Act and the Public Officers Ethics Act. 2. Group such as "I choose life" are existing	1. Evaluation of lecturers by students on standards 2. Administrative frameworks for addressing	1. Lack of courage to report cases due to stigmatization. 2. Inadequate funds to set up Rapid Response Centers 3. Shortage of	1. Continued sensitization to all staff and students. 2. Government to provide funds to set up Rapid Response Centers. 3. Recruit more counselors to curb the rising cases of sexual

Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
	7. Students 8. KMTC 9. Universities			complaints	Counselors.	harassment. 4. Universities should insist on full disclosure from students and lecturers joining their institutions from other similar institutions. 5. Domesticate the Code of Conduct. 6. Enforcement of the gender & sexual harassment policies 7. Peer counselors
<b>28. Lack of strategic plans for schools and other learning institutions</b>						
Develop and implement strategic plans in all institutions	1. MOE 2. MOHEST 3. KNUT 4. KUPPET 5. UASU 6. UNTESU 7. KUDHEHIA 8. Respective institutions 9. Universities	Strategic plans for all public universities are in place.	1. Implementation of various projects identified in the various strategic plans. 2. Revision of strategic plan to incorporate vision 2030.	Strategic plans in place in universities & colleges	1. Inadequate capacity 2. Insufficient resources to implement the various strategic plans.	1. Institutionalize, implement and monitor strategic planning. 2. Government to provide adequate funds to Universities to facilitate implementation of planned activities.
<b>29. Misuse of institutional property, resources and assets.</b>						
1. Enforce the law 2. Prosecute corrupt officers 3. Train school officials on financial management	1. MOE 2. MOHEST 3. KESI 4. Parents 5. TSC 6. Universities	1. Quality assurance manuals in place. 2. Implementation of the Public Procurement and Disposal Act, 2003 and the Regulations. 3. Establishment of audit committee. 4. 1,310 primary school head teachers trained 5. 300 principals of secondary schools trained 6. 1,070 HODs trained 7. 557 deputy principals of secondary schools trained 8. 60 deans & HODs of teacher training colleges trained 9. 1,130 bursars & account clerks trained 10. 1,944 principals trained on management of free secondary education	1. Regular Internal audit by University internal auditors and annual external audits by the Auditor General. 2. Continuing implementation of relevant acts and regulations. 3. Active whistle blowing by trade unions/staff. 4. Establishment of Anti Corruption units. 5. Establishment of the office of the Ombudsman. 6. Training of more institution heads, their deputies, HODs/Senior teachers, bursar/ accounts clerks	Enhanced capacity on management of institutional property, resources and assets through training	1. Shortage of staff with appropriate managerial skills due to poor terms 2. Non disclosure of misuse of University resources and assets by staff. 3. Non compliance of government policies and regulations. 4. Large number of target group members to be trained. 5. Lack of relevant skills. 6. Dismantling corruption networks. 7. Godfather protection for some corrupt staff	1. Adequate training of staff on resource management. 2. Formulate a mechanism that monitors compliance of government policies and circulars. 3. Enforcement of surcharges. 4. Appoint on merit and regularly train CEOs and officers of the Universities. 5. Effective declaration of wealth for all staff. 6. Sensitize staff to be responsible while handling assets assigned by their institutions. 7. Regular monitoring & evaluation 8. Contracting out training



Planned Activities	Responsibility	Progress of Implementation		Achievements/ Outcome	Problems/ Challenges	Way forward
		Completed Programmes/Activities	On-going Activities			
						services
<i>30. Operation of questionable business in public learning institutions.</i>						
1. Enforce the Education Act 2. Out-law non-school related activities in the precincts of learning institutions 3. Increase surveillance including school canteens to ensure no drugs are peddled	1. MOE 2. MOHEST 3. School Managers 4. PTA 5. NACADA 6. Community 7. Interest Groups 8. Universities	Establishment of married quarters (Maseno University and Moi University)	1. Hiring of competent counselors and halls managers. 2. Implementation of the rules and regulations. 3. Regular monitoring of businesses within the Universities in place.		1. Enforcement of the rules and regulations. 2. Obscure businesses. 3. Thesis writing business	1. Enforcement of health and safety rules and regulations. 2. Management should ensure that cooking in halls of residence stops. 3. Recruit mature, competent and skilled janitors, preferably graduates. 4. Continuous students counseling. 5. Establishment of University Parents Association. 6. Encourage parental guidance through the proposed University Parents Association.
<i>31. Lack of Anti-corruption/ governance module for Colleges and Universities</i>						
Integrate anti corruption, ethics/ integrity in the respective Curricula.	Universities and Colleges	Certificate and Diploma courses on corruption and governance introduced in MMUST.	Development of corruption and governance curriculum in the Universities.		Pushing the programmes through Senate.	1. Introduce an examinable and compulsory unit on integrity, governance and ethics at university level education. 2. Lobby to have corruption declared as a national disaster. 3. Develop integrity curriculum