KENYA TSETSE AND TRYPANOSOMIASIS
ERADICATION COUNCIL

(KENTTEC)

CORRUPTION PREVENTION POLICY

2018
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Definition of Terms

**Accountability**: Means the acknowledgement and assumption of responsibility for actions, products, decisions and policies including the administration, governance and implementation within the scope of the role or employment position and encompassing the obligation to report, explain and be answerable for resulting consequences.

**Fraud**: Means deception for personal gain.

**Imprest**: Funds paid in advance to fulfill a specified activity and which has to be accounted for in full thereafter.

**Integrity**: Integrity is the basing of one’s actions on an internally consistent framework of principles.

**Misuse of office**: To use the office wrongly and improperly.

**Risk Areas**: Areas perceived to be prone/susceptible to corrupt practices.

**Transparency**: Implies openness, communication and accountability.

**Bribery**: Benefit that are paid willingly.

**Bribes**

- Paid for what a client has a legal right to receive.
- Paid to receive benefit belonging to others.

**Embezzlement**

- Steal money that you are responsible for or that belongs to your employer
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>CEO</td>
<td>Chief Executive Officer.</td>
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<tr>
<td>COR</td>
<td>Code of Regulations.</td>
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<tr>
<td>CPC</td>
<td>Corruption Prevention Committee.</td>
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<tr>
<td>EACC</td>
<td>Ethics and Anti-Corruption Commission.</td>
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<tr>
<td>IAO</td>
<td>Integrity Assurance Officer</td>
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<tr>
<td>IEC</td>
<td>Information Education Communication</td>
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<tr>
<td>ICT</td>
<td>Information Communication Technology.</td>
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<tr>
<td>KENTTEC</td>
<td>Kenya Tsetse and Trypanosomiasis Eradication Council.</td>
</tr>
<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation.</td>
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</table>
Chairman’s Statement

Corruption is a vice that has over time cost the country millions of shillings every year through draining off scarce resources thus affecting negatively the country’s prospects for development. Distortions generated by corruption result in lower investments and economic growth. It is evident that the results of corruption are disproportionately and are borne by the poor who have no resources to compete with those able and willing to pay bribes or to access alternative services. Corruption in Kenya thus worsens the welfare of the poor citizens and also undermines the efforts to achieve National aspirations. It is a primary obstacle in the effective delivery of Public Services. It also leads to increased inflation and unemployment, further compounding the problem of poverty.

With corruption, there is lack of respect for the rule of law, Lack of confidence in public institutions, disregard for merit in awarding available opportunities, Poor delivery of services, demoralization and de-motivation of honest individuals, Prevalence of insecurity, social unrest and other vices.

It is for these reasons that the Board of Directors of Kenya Tsetse and Trypanosomiasis Eradication Council is committed in the eradication of corruption in the Council. The Board will give all the necessary support to the management in its efforts to create a corruption free institution.

Dr. David Wamamili Wanyonyi
Chairman, KENTTEC
Foreword

The Board and Management of the Kenya Tsetse and Trypanosomiasis Eradication Council (KENTTEC) acknowledge that corruption is a great obstacle to the economic and social development in the Country. It reduces investment, increases costs of goods and services, lowers productivity, and undermines confidence in public institutions and public financial management. The Board and Management recognize that corruption can negatively affect public service delivery, therefore affecting the economic growth and prosperity of the nation through direct loss of finances, mismanagement and wasteful expenditure. To address the issue of corruption in the public service, the Government, designed the public service integrity programme aimed at creating a public service with zero tolerance for corruption. In recognizing that the benefits of fighting corruption which include; increase in domestic and foreign investments leading to job creation and poverty reduction, and an effective, fair and efficient public servants. The government instituted the various legal and administrative mechanisms to ensure zero tolerance to corruption.

It is in support of the government policy on zero tolerance to corruption that the Kenya Tsetse and Trypanosomiasis Eradication Council (KENTTEC) has formulated its corruption prevention policy.

Dr. Pamela Olet (MBS)
Chief Executive Officer
1.0 CHAPTER ONE
1.1 Background
The Kenya Tsetse and Trypanosomiasis Eradication Council (KENTTEC) was established by the government of Kenya through a gazette legal notice no. 77 of July 2012. It is the successor of the pan African tsetse and Trypanosomiasis Eradication Campaign (PATTEC) in Kenya. PATTEC was formed following a Heads of states and government declaration in Lome, Togo in July 2000, AHG/Dec.156 (XXXVI) to free the African continent from the devastating effects of tsetse flies and Trypanosomiasis.

In Africa, thirty eight (38) countries including Kenya are infested with tsetse flies. Tsetse flies transmit a parasite which causes Trypanosomiasis to human and animals. These flies spread Nagana to animals & Sleeping Sickness to humans, both of which are fatal diseases.

In Kenya, tsetse flies infest approximately 138,000 Km² of land affecting 38 out of the 47 Counties with approximately 11 million people at risk of infection. The T&T problem directly affects Agriculture, Public Health and Tourism. The economic loss attributed to tsetse flies and the diseases is estimated at over Kshs. 20 billion annually according to the strategy for T and T eradication in Kenya, 2011-2021.

According to the World Bank (2008) per capita indicator, Africa has 20 of the world’s poorest countries, which are heavily infested with tsetse flies and a high prevalence of Trypanosomiasis, this is why a Tsetse fly is called a poverty insect.

It is for the above reasons that His Excellency the President after a decision by the Cabinet created the Kenya Tsetse and Trypanosomiasis Eradication Council (KENTTEC) through a gazette legal notice no. 77 of July 2012 to sustain the gains and expand the work of PATTEC.

This policy document intends to set out the guidelines for corruption eradication in the Council.
Vision
An institution of excellence in creating a healthy, wealthy nation free of Tsetse and Trypanosomiasis (T&T).

Mission
To eradicate T&T in Kenya through efficient, effective, sustainable and environmentally sound technologies in collaboration with stakeholders.

Mandate
To coordinate Tsetse and Trypanosomiasis eradication activities in Kenya.

1.2 Objectives of the Policy

1.2.1 General Objective
The overall objective of Kenya Tsetse and Trypanosomiasis Eradication Council corruption prevention policy is to sensitize its employees on corruption, the importance of prevention in public services and support Government policy on zero tolerance to corruption.

1.2.2 Specific Objectives
1. Ensure enforcement and adherence to service regulation and codes of ethics by all Council staff.
2. Sensitize staff on causes, risks and consequences.
3. Encourage positive attitude and behavior by the staff.
4. Encourage Council staff to be effective agents of anti-corruption at all times.
5. To eliminate mismanagement and wastefulness of public resources in the council.
6. Ensure there is efficiency, quality cost effectiveness in service delivery.
2.0 CHAPTER TWO

2.1 POLICY STATEMENT

The Council is committed to the implementation of the Public Service Integrity Programme which seeks to establish and sustain transparency, accountability and integrity in the public service through zero tolerance to corruption. The Council established the Corruption Prevention Committee (CPC) in 2012. The committee is expected to undertake anti-corruption sensitization programmes among staff at all levels, facilitate the placement of corruption prevention boxes in strategic location within the Council’s premises. The CPC will also handle corruption decisively.

2.2 LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

The Council corruption prevention policy is anchored on the following legal instruments and institutional mechanisms of Performance Contract. These initiatives include the enactment of the following Acts and measures;

- Constitution of Kenya 2010
- The Public Officer Ethics Act, 2003
- Leadership and Integrity Act, 2012
- The Anti-Corruption and Economic Crimes Act, 2003
- The Public Financial Management Act, 2012; revised 2016
- The Public Procurement and Disposal Act, 2005
- Performance Contracting.

The implementation of the Corruption Prevention Policy will enhance the capacity of the Council to eliminate corruption in the organization since it identifies corruption risk areas and establishes strategies to address corruption prone management processes and practices. This
policy derives its importance from the fact that it explicitly indicates measures to detect, prevent and investigate corruption as well as stipulates penalties against corrupt officers.

Every member of staff must take responsibility to address corruption in the Council and between the Council and its clients.

2.3 APPLICABILITY/SCOPE
This policy shall apply to the Kenya Tsetse and Trypanosomiasis Eradication Council employees at all levels.

2.4 DEFINITION OF CORRUPTION
According to Anti Corruption and Economic Crimes Act 2003 corruption is defined as;

(a) Bribe
(b) Fraud
(c) Misappropriation of public funds
(d) Abuse of office
(e) Breach of trust
(f) An offence involving dishonesty-

(i) In connection with any tax, rate or impost levied under the Act
(ii) Under any written law relating to the elections of persons to public office:

2.5 CORRUPTION RISK AREAS
Information on corruption prone areas is crucial for the Council and if left unchecked may cause irreparable damage and consequences. The Corruption Prevention Committee identified the following as prone to corruption in the Council:

<table>
<thead>
<tr>
<th>Department/Unit</th>
<th>Risk Area</th>
<th>Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procurement</td>
<td>Identification of requirements</td>
<td>• Over estimation of required quantities of goods and Services.</td>
</tr>
<tr>
<td>Phase</td>
<td>Issues</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Preparation of specifications</td>
<td>• Favoring a particular provider.</td>
<td></td>
</tr>
<tr>
<td>Identifying potential supplier/provider</td>
<td>• Restricted Advertising</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Choice of direct procurement</td>
<td></td>
</tr>
<tr>
<td>Evaluation and selection</td>
<td>• Appointment of members to favour certain interest</td>
<td></td>
</tr>
<tr>
<td>Contract award</td>
<td>• Rejection of evaluation recommendation without reasons.</td>
<td></td>
</tr>
<tr>
<td>Contract implementation</td>
<td>• Falsification of quality standards, documentation and certificate of completion,</td>
<td></td>
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<tr>
<td></td>
<td>• Paying for goods and services not received</td>
<td></td>
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<tr>
<td>Stores</td>
<td>• Lack of proper items in stock,</td>
<td></td>
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<tr>
<td></td>
<td>• Failure to account for goods received/ falsifications of records stores for goods not received,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Acquisition and disposal of public asset for private use,</td>
<td></td>
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<tr>
<td></td>
<td>• Lack of independent physical verification</td>
<td></td>
</tr>
<tr>
<td>Tendering</td>
<td>• Advance release of bid documentation to particular suppliers,</td>
<td></td>
</tr>
</tbody>
</table>
| Finance | Budgeting | • Lack of budgets leading to uncontrolled expenditure  
• Noncompliance with budgets,  
• Lack of or poor prioritization of projects,  
• Unjustified supplementary budget, |
|---|---|---|
| Revenue collection and banking | • Non-receipting,  
• Under banking,  
• Use of unofficial receipt,  
• Failure to record the correct amount. |
| Mismanagement of imprest facility | • Non surrenders, delayed surrenders, delayed recoveries, issue of several imprest, fictious surrender |
| False sitting allowances | • Meetings not held, officers does not attend, officers not qualified. |
| Accounting | Accounting record keeping | • Incomplete record keeping,  
• Falsifications of financial records,  
• Malicious destruction of financial records,  
• Intentional non-disclosure of items in the accounts. |
<table>
<thead>
<tr>
<th>Department</th>
<th>Functions/Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Office</td>
<td>Deliberate delay in transferring moneys to account.</td>
</tr>
<tr>
<td></td>
<td>• Receipt of cash</td>
</tr>
<tr>
<td>Imprest Section</td>
<td>Issuance of imprest.</td>
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<tr>
<td></td>
<td>Surrender of imprest.</td>
</tr>
<tr>
<td></td>
<td>Clearance of surrenders</td>
</tr>
<tr>
<td>Examination</td>
<td>- Processing of payments</td>
</tr>
<tr>
<td></td>
<td>- Lack of effective control and supervision</td>
</tr>
<tr>
<td>Field operations</td>
<td>Supplies for T and T control materials</td>
</tr>
<tr>
<td></td>
<td>• Diverting supplies for T and T control</td>
</tr>
<tr>
<td>Human Resource Management and</td>
<td>Registry</td>
</tr>
<tr>
<td>Development</td>
<td>• Retrieval of files</td>
</tr>
<tr>
<td></td>
<td>• Storage of personnel files</td>
</tr>
<tr>
<td></td>
<td>• Circulation of files</td>
</tr>
<tr>
<td>Selection, recruitment, transfers,</td>
<td>Lack of procedures, rules and regulations,</td>
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<tr>
<td>promotion career development,</td>
<td>• Favoritism, nepotism, tribalism,</td>
</tr>
<tr>
<td>discipline</td>
<td>• Political patronage</td>
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<td></td>
<td>• Over employment</td>
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<tr>
<td></td>
<td>• Inefficiency</td>
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<tr>
<td></td>
<td>• Haphazard promotion</td>
</tr>
<tr>
<td>Information Communication and Technology System</td>
<td>Network security</td>
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<td>-------------------------------------------------</td>
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</tr>
<tr>
<td></td>
<td>• Poor network security leading to hacking,</td>
</tr>
<tr>
<td></td>
<td>• Leakage of information.</td>
</tr>
<tr>
<td>Password management</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Unauthorized access</td>
</tr>
<tr>
<td>Transport</td>
<td>Repairs, fuelling, mileage, duty assignments, work tickets</td>
</tr>
<tr>
<td></td>
<td>• Lack or inadequate repairs and services of vehicles,</td>
</tr>
<tr>
<td></td>
<td>• Falsifications of receipts and vehicle work tickets,</td>
</tr>
<tr>
<td></td>
<td>• Selection of drivers to various assignments,</td>
</tr>
<tr>
<td></td>
<td>• Presentation of false fueling receipts,</td>
</tr>
<tr>
<td></td>
<td>• Selective provisions of transport.</td>
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</tbody>
</table>

2.6 COUNCIL POLICY ORIENTATION

2.6.1 PROCUREMENT

There are too many requisition units within the Departments and that one requisition could be photocopied and re-cycled resulting to multiple payments.

In this regard, the Council intends to set-up a Committee to vet requisitions with the view of eliminating unnecessary items. Further, all requisitions should emanate from one office, requisitions serialized and movement register operated from the same office. This practice could eliminate the practice of Suppliers handling documents. All LPOs/LSOs must have original serialized requisitions attached. It was observed that every requisition should contain items of the same category. The Departmental committee shall prepare quarter reports to the CEO.
The Council has noted that there were possibility of delivery of “air” or non delivery of goods and services and the possibility of recycling of deliveries and same goods could be delivered more than once.

In this regard the Inspection and Acceptance Committee will always remain vigilant and be held accountable. Where equipments are delivered, the model and serial numbers must be recorded, while users must sign under other certificate on the payment voucher that they actually received the goods and services.

The Council has noted that there are concerns that few suppliers were being recycled to supply goods and services despite the Procurement unit having a list of several pre-qualified suppliers.

To rectify this situation the procurement unit under the Procurement act is responsible for floating quotations and ensure that there is equal and fair distribution of quotations among suppliers. The Council therefore will hold responsible the Officer in charge of Procurement to ensure that there is equal and fair distribution of quotations among suppliers as per the requirements of the Act. The Head of the procurement unit must be held accountable.

2.6.2 FINANCE

The unnecessary delays contribute to corruption as the customers are tempted to speed up the process through unaccepted means. The Council has noted that the delays are occasioned by the queries raised by the officers in accounts and the same not relayed to the affected officers.

In order to rectify this situation, a desk shall be set aside for rejections and officers from the Departments allocated to check on rejections. It is recommended that the Administrator should sign LPOs/LSOs and imprest only upon certifying that funds are available. This would lessen “lobbying” by the officers for funds thereby creating loopholes for corruption.

2.6.3 FIELD OPERATIONS

The Council has noted that there are possibilities of diverting T & T control materials from the intended purpose. The Council offer free services to the public in the affected areas since tsetse and trypanosomiasis control is a public good. There is therefore the risk of T &T materials supplied finding themselves into the local markets.

In this regard, the supply chain department shall maintain well document records of the supplies to the different regions including serial numbers and batch numbers where applicable. The Council shall come up with a traceability mechanism for all its supplies.
2.6.4 TRANSPORT
There are no proper records for the control purpose of supply and consumption of fuel within the Council. Further, the consumption of fuel was rather high. As for the arrangements where other departments draw fuel at the dealers (petrol stations), there were possibilities of collusion between the drivers and petrol attendants.

*In this regard, fuel shall all times be filled into the vehicles using fuel cards. Proper records must also be kept by the Transport officer and the pump attendant as per the COR regulations and financial orders.*

2.6.4.1 Repairs and procurement of spare parts
There is a risk of using roadworthy vehicles for safari in attempt to be issued with imprest for repair and service or make exorbitant claims on repairs and purchase of spare parts. The Council noted that mechanical inspection estimates from Public Works for repairs of vehicles are usually unreasonably high.

*In this regard, the transport officer shall be totally in charge of repairs and maintenance of vehicles. Before any vehicle is released for safari, the transport officer must satisfy himself that the vehicle is roadworthy. All repairs must be sanctioned by the Transport officer only and therefore officers must at all times consult with the transport officer. The Council will be stocked with the commonly used parts and accessories such as batteries, tyres, jacks, oils and lubricants just to mention a few.*

2.6.5 HUMAN RESOURCE
Human resource area has been identified as another area which may be prone corruption, especially in terms of training, promotions, and recruitment. For example, some officers are always on training at the expense of others, while others officers go out of their way to seek for training opportunities with intention of intimidating the Training Committees to approve their training needs.

*In this regard, The Human Resource Department shall carry out training needs assessment at the beginning of every year for approval by the Board. The Department shall be required to exercise fairness and transparency in terms of the opportunities it avails to officers. Any training outside the approved projections shall be approved only by the Chief Executive Officer.*

2.6.6 INFORMATION COMMUNICATION SYSTEM
The pervasive use of technology has created a critical dependency of information technology that calls for good information technology governance in preventing corruption.
The Council will put in place measures to enhance network security and guard against internal and external hackings into the systems.

2.7 MEMBERSHIP AND COMPOSITION OF THE CORRUPTION PREVENTION COMMITTEE.

The Corruption Prevention Committee shall consist the following members;

1. Chief Executive Officer as the Chairperson
2. Head, Monitoring and Evaluation,
3. Head, Planning and Administration,
4. Head, Technical Department - Member
5. Head Internal Audit - Member
6. Head, Finance and Accounts - member
7. Head, Procurement - Member
8. Head Human Resource Management- Member
9. Head, ICT –Member
10. Integrity Assurance Officer- Secretary

2.8 MANDATE AND CORE FUNCTIONS OF CORRUPTION PREVENTION COMMITTEE

The Corruption Prevention Committees’ responsibilities will be to keep a constant check on organizational operations and procedures and ensure that there are no opportunities for corruption in the Council. The CPC will be coordinated by a trained Integrity Assurance Officer (IAO).

The Core functions of Corruption Prevention Committees will be to-

(a) Prioritize activities in the implementation of corruption prevention programmes;

(b) Ensure that all corruption prevention initiatives are integrated in respective departments/units;

(c) Receive and analyze reports on corruption prevention initiatives and recommend appropriate action;
(d) Co-ordinate corruption prevention strategies in the Council;

(e) Consider and approve training on the Public Service Integrity Programme for staff in respective organizations;

(f) Ensure that all decisions and guidelines on corruption prevention are communicated effectively to staff and all interested parties;

(g) Prepare and submit to the Ethics and Anti-Corruption Commission (EACC) quarterly progress reports on implementation of the programme;

(h) Receive complaints and information on alleged corrupt activities in the Council and thereafter analyze, evaluate and recommend appropriate action; and

(i) Monitor and evaluate the impact of corruption prevention initiatives.

2.9 ROLE OF INTERNAL AUDIT

Internal audit is responsible for assisting in the deterrence of corruption practices and fraud, by examining and evaluating the adequacy and the effectiveness of the system of internal control commensurate with the extent of the potential risk in various segments of the organization’s operations.

In carrying out this responsibility Internal Audit determines whether:

- The organizational environment fosters control consciousness.
- Written policies (e.g. code of conduct) exist that describe prohibited activities and the actions required whenever violations are discovered.
- Appropriate authorization policies for transactions are established and maintained.
- Policies, practices, procedures, reports and other mechanisms are developed to monitor activities and safeguard assets, particularly in high risk areas.
- Communication channels exist to provide the management with adequate and reliable information.

2.10. INTERNAL AND EXTERNAL REPORTING MECHANISMS

The following shall be reporting systems for corruption cases in the Council.

2.10.1 INTERNAL MECHANISMS

(a) Corruption Reporting Boxes in the Building.
Officers and clients are invited to drop complaints into the corruption reporting boxes placed at Council’s premises. Staff should avoid signing names in such correspondence to deter intimidation and harassment. The boxes shall be opened periodically and cases analyzed appropriately.

(b) Reporting to the Chief Executive.

An officer can report directly to the Chief Executive for further investigation of alleged corruption.

(c) Reporting to Integrity Assurance Officers.

An officer may report corruption cases to Integrity Assurance Officers who shall forward the information to the Council’s Corruption Prevention Committee for deliberation.

(d) Writing Anonymous letters.

Anonymous letters on corruption allegations can be written and dropped at strategic points where they can be picked by the relevant authorities for further action.

(e) Sending Third Parties.

One may opt to use third parties to report corruption cases to avoid harassment and victimization.

(f) Council’s anti-corruption website

Incidences of corruption may be reported to the Council’s website, located at www.kenttec.go.ke

2.10.2. EXTERNAL MECHANISMS

(a) Whistle Blowing

This is an internationally certified web based reporting system that guarantees complete and secure anonymous mode of reporting corruption.

The information provided to the Ethics and Anti-Corruption Commission helps in fighting corruption as the whistle blower is protected against victimization.

(b) Reporting Corruption cases directly to EACC

One may directly write to the Ethics and Anti-Corruption Commission to report corruption practices in the Council. Disclosure of one’s identity is optional.
3.0 CHAPTER THREE

3.1 HANDLING CORRUPTION CASES
Corruption cases shall be dealt with expeditiously according to existing laws and regulations without discrimination by the Council’s CPC.

3.2 DISCIPLINARY MEASURES
Any officer found guilty of a corruption offence shall be dealt with in accordance with the provisions of the Public Officer Ethics Act and the Code of Regulations.

3.3 TRAINING ON ANTI CORRUPTION
The Council shall train/sensitize staff at all levels on corruption prevention. Such training shall include sensitization and awareness creation through I.E.C. materials, groups’ lectures and talks.

3.4 REVIEW AND MONITORING OF THE POLICY
In order to keep pace with the dynamic socio-political and economical environment which impacts on the functioning of the Council this policy shall be subjected to a midterm review after three years and end term review after five years or at such intervals as the Management may determine.

3.5 INSTITUTIONAL FRAMEWORK
The implementation of the corruption prevention policy will be within the institutional framework outlined as follows:

The CEO’s office.

Council Corruption Prevention committees will comprise of staff drawn from various departments and divisions.

Specifically, the secretariat will:

- Operationalize the corruption prevention/integrity in the Council.
- Sensitize newly recruited staff on corruption prevention.
- Develop corruption prevention plans.
- Strengthen Departmental Anti-corruption tasks.
- Ensure that all corruption prevention initiative integrated in their respective departments.
• Receive and review reports on corruption prevention initiatives and recommend appropriate actions

• Monitor the impact of corruption prevention initiatives

• Ensure that all decisions and policies on corruption prevention are communicated effectively to all levels of staff and all stakeholders.

Secretary to C.P.C

The Secretary to C.P.C. shall be a trained Integrity Assurance officer.

Corruption Prevention Committee Meetings

a) Convening of meetings

Corruption Prevention Committee meetings will be held regularly, preferably on a monthly basis and at least on quarterly basis. At the beginning of every year the CPC shall set a schedule of meetings for the calendar year, copies of which shall be circulated to members. Scheduled meetings shall not be cancelled or postponed due to the absence of a member or chairperson. In the chairperson’s absence, members present shall appoint a temporary chairperson to preside over the meeting.

The CPCs may hold extra-ordinary or special meetings as needs arise.

All deliberations shall be recorded and minutes circulated to members with a copy to CEO.