



Biosafety Appeals Board

BIOSAFETY APPEALS BOARD

ANTI - CORRUPTION POLICY

2023



FOREWORD

Corruption undermines the integrity of the organization and erodes public trust. It is a significant barrier to economic growth, sustainable development and the achievement of human rights. A robust anti-corruption policy is essential for any organization that seeks to promote transparency, accountability and good governance.

This policy sets out clear guidelines for preventing and addressing corruption within the Board and serves as a reminder of our commitment to maintaining the highest standards of ethical conduct.

This policy also serves as a clear and comprehensive guide for our organization, outlining our commitment to promoting transparency, accountability, and ethical conduct. It lays out the responsibilities and expectations of all members of our organization, and provides guidance on how to report and address any instances of corruption. Furthermore, in keeping with the government's initiatives to fight corruption, Biosafety Appeals Board has adopted a proactive and structured approach to the fight against this menace by developing this policy in line with the sessional paper no 2 of 2018(National Ethics And Anti-Corruption Policy)and other legislature enacted to fight the vice. This document provides a framework for the prevention, detection and reporting of corruption in the Board. It also defines the structures and systems that have been put in place and which are critical in deterring corrupt practices.

We are committed to creating a culture of integrity within our organization, and will not tolerate any form of corruption. We call on all members of our organization to join us in this effort, and to act with the highest level of ethical conduct at all times.

CHAIRPERSON

ACKNOWLEDGEMENT

Biosafety Appeals Board Anti-corruption policy 2023 on prevention of corruption has been prepared through a participatory process involving the Boards' staff and representative from Ministry of Education, state Department for Higher Education and Research.

I extend my special appreciation to the technical committee that guided and formulated this policy. The Corruption Prevention Committee has been very instrumental in delivering this policy. Your commitment and dedication towards development of this very important policy document is highly appreciated.

It is my belief that in the basis of this policy, the BSAB corruption Prevention committee will be able to prevent and respond effectively to cases of corruption and bribery within the Board. To those not mentioned but contributed in one way or another to the production of this policy.

Finally, the successful implementation of this policy will immensely contribute to the elimination of all forms corruption and bribery at workplace.

ABBREVIATIONS

BSAB- Biosafety Appeals board

PC- Performance Contract

EACC- Ethics and Anti-Corruption Commission

ODPP - The Office of the Director of Public Prosecutions

FRC- Financial Reporting Centre

FIU- Financial Intelligence Unit

NIS - National Intelligence Service

MDAs - Ministries, Departments and Agencies

WPA - Witness Protection Agency

POCAMLA- Proceeds of Crime and Anti-Money Laundering Act

OAG&DOJ- Office of the Attorney General and Department of Justice

PFMA - Public Finance Management Act

AIE - Authority to incur expense

IO- Integrity Officer

CPC- Corruption Prevention Committee

IAO -Integrity Assurance Officer

Table of Contents

FOREWORD	2
ACKNOWLEDGEMENT	3
Abbreviations	4
Definition of Terms	6
PRELIMINARIES	7
CHAPTER ONE:	8
Introduction	8
Background	9
policy Rationale	9
Policy Objectives	10
Policy Development Approach	10
Policy Principles	10
CHAPTER TWO: LEGAL AND INSTITUTIONAL FRAMEWORK FOR FIGHTING CORRUPTION	12
Introduction	12
Institutional Framework	12
Policy Regulatory Institutions	13
Oversight Agencies	14
CHAPTER THREE: STRATEGIES AND IMPLEMENTATION FRAMEWORK FOR FIGHTING CORRUPTION	16
Prevention of Corruption	16
Policy objectives	17
CHAPTER FOUR: MONITORING AND EVALUATION	20
policy Review	20

Definition of Terms

Board- Biosafety Appeals Board

Bribery- The act of taking or receiving something with the intention of influencing the recipient in some way favourable to the party providing the bribe.

Fraud- Wrongful or criminal deception intended to result in financial or personal gain.

Embezzlement and misappropriation of Board's funds -The wrongful or wilful taking of money or property belonging to someone else or for some purpose.

Abuse of office- Dealing with property or persons contrary to law, agreement, and contract of employment or oath.

Breach of trust- Any act which is in violation of duties or trust.

Discrimination- Making a distinction in favour of or against persons or things.

Dishonesty - Misrepresentation of information of any type or in relation to remittances and declaration of income for purposes of tax evasion or election to public office

Inducement - As reward to provide service related to one's official duties. Soliciting or receiving an inducement or reward: to do or not to do something, or in order to show formalism as discrimination. Giving as or gearing to give an inducement or reward to silence: in order to make one do or put to use or do something, in order to make or show favour as discrimination.

Corruption prevention- Detection and elimination of the causes and conditions of corruption through the development and implementation of a system of appropriate measures as well as deterrence of persons from the commission of crimes of corruption

Gift -Something given voluntarily without expectation of payment or anything in return

Integrity- Observing moral convictions and doing the right things in all circumstances

A Whistle-blower -Any person who reports transgression in the Commission (the Whistle Blower is at liberty to either identify him/herself or make anonymous report);

Whistle-blowing - Disclosure based on reasonable belief that a person or group of persons has engaged, is engaging or intends to engage in an improper conduct.

PRELIMINARIES

The Biosafety Appeals Board was established under section 35 of the Biosafety Act 2009, although it came to effect in the year 2014 when the first Board was appointed. The Board is a quasi-judicial body mandated to adjudicate appeals emanating from the decisions made by the National Biosafety Authority (NBA). The Board in its full execution of the Kenyan constitution 2010, has developed the Draft Rules and Regulations which will guide them on how the appeals will be filed and managed.

Vision Statement

A dynamic expeditious Biosafety dispute resolving Board in the world.

Mission Statement

To provide an efficient & effective process for realization of fair Biosafety dispute

Chapter One:

Introduction

Kenyans enacted a Constitution in 2010 which provided a rich foundation on Leadership and Integrity that would enable Kenyans transform their moral fabric. The Constitution gives Kenyans the mandate to initiate reforms that support good governance, integrity, accountability and transparency as stipulated under the national values and principles of governance in Article 10.

The enactment of the Ethics and Anti-Corruption (EACC) Act, 2011 signifies the adoption of ethics as a tool for preventing corruption. The Act mandates EACC to undertake initiatives and actions towards corruption prevention, detection, investigation and resolution. The Commission has initiated various institutional structures to guide public sector agencies in mainstreaming anticorruption mechanisms.

BSAB in line with the government reform agenda on curbing corruption has embarked on establishing policies, structures and strategies on corruption prevention over the years.

Background

Biosafety Appeals Board is established under section 35 of Biosafety Act. No.2 of 2009. The Board's mandate is to receive and adjudicate appeals emanating from decisions of the National Biosafety Authority (NBA).

The Board is in the process of developing Corruption Prevention Policy in order to curb corruption in compliance with the Anti-corruption and Economic Crimes Act and Performance Contract on corruption prevention. This policy will address issues such as fraudulent activities, fake recruitment letters, solicitation of bribes, forgery, identity theft, misuse of public resources, and abuse of office among others. Upon promulgation of the Kenya Constitution 2010, it became necessary to review the policy to align it with the provisions of Chapter Six, Article 10 and 232 of the Constitution as well as comply with the new government guidelines on gifts to public officers, conflict of interest and whistle blowing. It is against this background that this policy has been developed.

This Policy puts in place appropriate mechanisms that promote integrity and accountability among the BSAB employees. It also provides for channels through which employees and members of the public can voice their concerns whenever they experience corruption related practices. Further, it seeks to protect whistle blowers and ensure that employees observe national values and the provisions of the Code of Conduct and Ethics as they deliver services or represent the Commission in official functions.

POLICY RATIONALE

This policy takes into cognizance the provisions of key relevant legislation namely, the Public Officer Ethics Act, 2003, Leadership and Integrity Act, 2012, Leadership and Integrity Regulations 2015 and the Anti-Corruption Economics Crimes Act, 2003 in addition to overall corporate governance of public resources.

The responsibility of addressing corruption and corrupt practices rests with the management, staff and other stakeholders guided by the relevant laws, regulations and the Authority's principles and core values. This Policy, therefore, provides a framework for conformity to legal requirements within the Authority's processes, procedures and mechanisms to prevent the occurrence of corruption.

The management is committed to the fight against corruption through continual sensitization of staff and stakeholders to inculcate the culture of integrity.

In pursuit of this commitment, the management shall deal with corruption fairly, objectively and decisively and those found culpable shall be dealt with under the provisions of this policy and the relevant laws.

It is anticipated that through full implementation of this policy, the Authority will achieve zero tolerance to corruption, it will enhance adherence to the Authority's core values of integrity, professionalism, customer focus, teamwork and innovation.

Policy Objectives

The overall objective of the Biosafety Appeals Board Anti-Corruption Policy is to reduce levels and prevalence of corruption and unethical practices in the Board by providing a comprehensive, coordinated and integrated framework for the fight against corruption and promotion of ethics. The specific objectives of the policy are to:

- (a) To ensure compliance of public bodies with EACC recommendations on corruption prevention.
- (b) To mainstream and institutionalize corruption prevention in all Departments;
- (c) To enhance the capacity of the Board to prevent corruption.
- (d) To simplify systems and procedures and enhance efficiency and effectiveness in service delivery.

Policy Development Approach

This Policy was developed in a consultative, participatory and all-inclusive manner involving key stakeholders. A thematic approach was adopted to ensure that critical thematic issues in the fight against corruption were covered. This entailed formation of thematic working groups to formulate various policy statements. The broad thematic areas were:

- a) Legal and institutional framework;
- b) Implementation and Strategies for fighting corruption;
- c) Monitoring and evaluation.

Policy Principles

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

- (a) **Constitutionalism and the rule of law:** This requires compliance with the Constitution and other laws of the Republic of Kenya.
- (b) **Ethical leadership:** A committed leadership adhering to national values is a pre-condition for good governance and zero tolerance to corruption.
- (c) **Ethics and ethical conduct:** A moral and social norm that requires doing more than just complying with laws and regulations but doing what is right.
- (d) **Responsibility:** The fight against corruption is a duty and responsibility of every citizen irrespective of gender, age, creed or orientation; and institution; (private and public); as the effects of corruption are not discriminatory.
- (e) **Collaboration and co-operation:** The fight against corruption requires development and involvement of strategic partnerships and alliances forming integrity networks that facilitate co-ordination of the activities of all the bodies and stakeholders; exchange of relevant information among major stakeholders; and, provision of assistance to one another.
- (f) **Accountability and transparency:** The involvement of many actors in the fight against corruption calls for strict adherence to codes of conduct that guide working relationships. Among these is the need for a high level of accountability and transparency in the management of public resources.

(g) **Consistency:** The fight against corruption entails effectiveness in the implementation of measures against corruption through continuous oversight, review of the performance of the corruption prevention measures and making regular proposals on enhancing the effectiveness of the measures to the institution that has implementation authority.

(h) **Participation and inclusivity:** All stakeholders will be encouraged and facilitated to participate in all the processes in the fight against corruption.

CHAPTER TWO: LEGAL AND INSTITUTIONAL FRAMEWORK FOR FIGHTING CORRUPTION

Introduction

Legislative and Administrative Requirements/Context

This policy shall be consistent with The Constitution of Kenya 2010 and the following legislation, regulations and internal policies;

- Leadership and Integrity Act, 2012,
- The Leadership and Integrity Regulations, 2015,
- The Bribery Act, 2015,
- The Public Officer Ethics Act, 2003,
- The Anti-Corruption and Economic Crimes Act, 2003
- Public Procurement and Asset Disposal Act, 2015,
- Public Procurement and Disposal Regulations, 2019,
- Witness Protection Act, 2006,
- Public Finance Management Act, 2012,
- Performance Contract,
- Government Circulars,
- Public Finance Management Regulations, 2015,
- Kenya Employment Act, 2007,
- State Corporation Act.

Institutional Framework

The institutional framework for anti-corruption in Kenya comprises of law enforcement agencies, oversight institutions, policy regulatory institutions, as listed below:

- a) **Ethics and Anti-Corruption Commission** is established pursuant to the provisions of section 3 of the Ethics and Anti-Corruption Commission Act, 2011. The mandate of the EACC is to combat and prevent corruption and economic crime in Kenya through law enforcement, asset recovery, preventive measures, public education and promotion of standards and practices of ethics and integrity.
- b) **The Office of the Director of Public Prosecutions** is established under Article 157 of the Constitution of Kenya, and operationalized by the ODPP Act of 2013. The mandate of the ODPP is to institute and undertake criminal proceedings against any person before any court (other than a court martial) in respect to any offence alleged to have been committed.
- c) **The Judiciary** is established under Article 159 of the Constitution of Kenya. The Judiciary is mandated to dispense justice in line with the Constitution and other laws and is expected to resolve disputes in a just manner with a view to protecting the rights and liberties of all.
- d) **National Police Service** is provided for and established under Article 243 of the Constitution as one of the State organs on national security. The NPS consists of the Kenya Police Service and the Administration Police. The Constitution requires the NPS to

prevent corruption, promote and practice transparency and accountability, among others.

- e) **Directorate of Criminal Investigations** the Directorate of Criminal Investigation, is established under Section 28 of the National Police Service Act. The core mandate of the Directorate is to detect, prevent and investigate crimes.
- f) **Kenya Revenue Authority** the Kenya Revenue Authority was established by an Act of Parliament, Chapter 469 of the laws of Kenya, which became effective on 1st July 1995. The Authority is charged with the responsibility collecting revenue on behalf of the Government of Kenya.
- g) **Asset Recovery Agency** the Asset Recovery Agency is established under Section 54 of the Proceeds of Crime and Anti-Money Laundering Act (POCAMLA), 2009. The key function of the Agency is to trace, freeze and confiscate proceeds of all crime, as per the provisions of POCAMLA.
- h) **Financial Reporting Centre** the Financial Reporting Centre (FRC) is Kenya's Financial Intelligence Unit (FIU). The FRC is established under section 21 of POCAMLA. The FRC functions include among others; receipt and analysis of reports of unusual or suspicious transactions submitted by reporting institutions,
- i) **National Intelligence Service (NIS)** The NIS is established under Article 242 of the Constitution of Kenya. The NIS is charged with the responsibility of enhancing national security by providing security intelligence and counter intelligence for all the government Ministries, Departments and Agencies (MDAs).
- j) **Witness Protection Agency** the WPA is established in accordance with the provisions of the Witness Protection Act, 2006 as amended by Witness Protection (Amendment) Act, 2010. The core mandate is the protection of threatened and intimidated witnesses to ensure successful identification, apprehension, investigation and prosecution of perpetrators of serious crimes.

Policy Regulatory Institutions

- a) **The Presidency** the President of the Republic of Kenya is expected under the Constitution to play a very critical role in the fight against corruption by providing the necessary political will for fighting corruption and setting the country's agenda for good governance and anti-corruption
- b) **Office of the Attorney General and Department of Justice** the Office of the Attorney General and Department of Justice which is the Central Authority for Mutual Legal Assistance is one of the key actors in the fight against corruption in Kenya. The **OAG&DOJ** is mandated to, inter alia:
 - Promote the rule of law and public participation.
 - Support Government investment in socio-economic development.
 - Promote transparency, accountability, ethics and integrity.
 - Spearhead policy, legal and institutional reforms.
 - Promote economic governance and empowerment.
 - Promote protect and ensure fulfilment of human rights.
 - Undertake administrative management and capacity building.
 - Enhance access to justice.
 - Provide legal advisory services to the Government
 - Co-ordinate the negotiation of anti-corruption and mutual legal assistance treaties.

- Facilitate the implementation of Kenya's treaty obligations and co-ordinate periodic reporting on Kenya's implementation of its international obligations.

The National Treasury the National Treasury is established under Section 11 of the Public Finance Management Act, 2012 (PFMA). The National Treasury shall, inter-alia, design and prescribes an efficient financial management system for the National and County Governments to ensure transparent financial management and standard financial reporting as contemplated by Article 226 of the Constitution.

Oversight Agencies

Parliament: Parliament is established under Article 93 of the Constitution. It comprises the Senate and National Assembly. Their main mandates are enacting legislation, determining the allocation of national revenue, appropriation of funds, exercising oversight over national revenue and its expenditure and exercising oversight of state organs, among others.

The Office of the Auditor General: The office of the Auditor General is established under Article 229 of the Constitution. The main function of the OAG is to audit and report on each financial year on the accounts of County and National Governments.

The Controller of Budget the Controller of Budget is established under Article 228 of the Constitution. The main mandate is overseeing implementation of the budgets of both National and County Governments.

The Judicial Service Commission (JSC) The JSC is established under Article 171 of the Constitution. The core mandate of JSC is to recommend to the President persons for appointment as judges, review and make recommendations on the conditions of service for judges, judicial officers and staff of the Judiciary and advise the National Government on improving efficiency of the administration of justice, among others.

The Public Service Commission the Public Service Commission is established under Article 233. The functions include establishing and abolishing offices in the Public Service, appointing persons to hold or act in those offices and confirming appointments, disciplinary control over and removing persons holding or acting in those offices, and promoting the values and principles in Article 10 and 232 of the constitution, among others.

The Kenya National Commission on Human Rights (KNCHR) The Kenya National Commission on Human Rights is established under Article 59(4) of the Constitution. Its main mandate is a watchdog of the government in the area of human rights and provision of key leadership in moving the country towards a human rights state.

The Public Procurement and Regulatory Authority the Public Procurement Regulatory Authority is established under Section 8 of the Public Procurement and Asset Disposal Act, 2015. The PPRA is responsible for the regulation of public procurement in Kenya. Even though the Procuring Entities (PEs) are responsible for managing and ensuring that the procurement process is in conformity with the legal and regulatory requirements, PPRA ensures that the PEs do indeed adhere to these requirements.

The Internal Audit Department (National Treasury) The Internal Audit is one of the four technical departments under the Directorate of Accounting Services and Quality Assurance within the Treasury. It supports Accounting Officers and AIE Holders in the Ministries and Departments and Agencies in the effective discharge of their responsibilities by measuring, evaluating and

reporting on the effectiveness of the internal control systems implemented by the Accounting Officers and AIE Holders.

The Commission on Administrative Justice the Commission on Administrative Justice or Office of the Ombudsman is a Constitutional Commission established under Article 59(4) of the Constitution. The Commission's mandate is to investigate any conduct in state affairs or any act or omission in public administration that may be prejudicial or may result in impropriety in any sphere of Government and complaints of abuse of power, unfair treatment, manifest injustice or unlawful, oppressive, unfair or unresponsive official conduct. The Commission is the oversight agency for the right to fair administrative action and the right to access to information as provided for by Articles 47 and 35 respectively of the Constitution, the Fair Administrative Action Act, 2015 (FAA) and the Access to Information Act, 2016.

The Inspectorate of State Corporations the Inspectorate of State Corporations is established by the State Corporations Act Cap 446. Its mandate is to advise the Government on all matters affecting the effective running of state corporations.

CHAPTER THREE: STRATEGIES AND IMPLEMENTATION FRAMEWORK FOR FIGHTING CORRUPTION

Prevention of Corruption

Corruption prevention is the process of detecting, examining and identifying corruption loopholes and opportunities and putting in place measures to minimize those opportunities and seal the loopholes. This involves putting in place checks and balances within public institutions to ensure that the identified corruption loopholes are sealed and opportunities eliminated. It further requires the identification of areas prone to corruption in institutions. To this end, the Board has adopted laws which include the Ethics and Anti-Corruption Commission Act, and the Leadership and Integrity Act, to facilitate corruption prevention and promotion of sound ethical standards and practices in the workplace.

To eradicate and prevent corruption in the workplace, the board has come up with strategies that will guide the process of detecting, investigating and sanctioning corrupt individuals.

Procedure for Investigating a Bribe or a Corruption Incidence;

Begin the Case (respond to complaint) If the case starts with a complaint or report, fully debrief the complainant, getting as much details as possible. If the case starts with the discovery of a red flag, match the red flag to the potential scheme and then look for other red flags of the suspected schemes. An automated, “proactive” search for fraud indicators might be effective if the necessary data is available.

Evaluate the Allegations or Suspicions Determine whether the allegations or suspicions – the “red flags” – are specific and serious enough to justify an investigation, which can be time consuming, disruptive and costly. If you determine that a complaint or report warrants further investigation, try to make a quick, preliminary assessment of the accuracy of the complaint. Use this information to prepare for the follow up interview of the complainant.

Conduct due Diligence Background Checks Check records on the suspect firms and individuals to evaluate the allegations and to look for other evidence of fraud or corruption.

Complete the Internal Stage of the Investigations Complete the collection of documents, data and interviews within the investigating organization. Determine if an early interview of the subject is warranted.

Check for Predication and get organized Review the results of the investigation to date to determine if there is adequate “predication” a sufficient factual basis – to proceed. Decide or refine your initial “Case Theory” and organize the evidence according to the elements of proof of the potential claims.

Begin the External Investigations Conduct interviews of witnesses outside the investigating organization, proceeding from the disinterested, cooperative witnesses to “facilitators” to co-conspirators to the subjects. Request or compel documents from third parties.

Prove Illegal act Determine the best strategy to prove the illegal act.

Obtain Cooperation of an Inside Witness This could be an honest inside observer or a lesser participant in the offense, such as a Middleman or the smaller of several bribe payers. Decide the best strategy to obtain his or her cooperation.

Interview the Primary Subject In a corruption case, conduct a thorough interview of the primary subject, usually the suspected bribe recipient. Record the interview, if possible, and request all relevant records. Determine if there is sufficient evidence to obtain a confession and, if not, try to get helpful admissions and identify possible defenses.

Prepare the Final Report Decide what action to recommend based on the results of the investigation, prepare a concise final report, organized according to the elements of proof for the relevant offenses.

Policy objectives

(a) To ensure compliance of public bodies with EACC recommendations on corruption prevention.

Appoint a corruption prevention committee with the following responsibilities

- Develop corruption prevention plans.
- Implement strategies such as capacity building for the committee members.
- Review of Policy and advise the management.
- Coordinate the formulation and review of Codes of Conduct, rules and guidelines that govern the behavior of the members of staff in the Board.
- Receiving and reviewing reports on corruption cases.
- Receiving and taking appropriate action on corruption reports made by staff and other stakeholders.
- Through the CEO makes any referrals to EACC and other law enforcement agencies for further action.
- Implementing corruption prevention education and preventive measures within the organization in line with identified risks.
- Monitoring and evaluating the impact of corruption prevention initiatives.
- Preparation and submission of quarterly progress performance reports to EACC.

Appoint integrity officer with the following responsibilities

- Guide the committee on constitutional, legislative, institutional and administrative requirements on mainstreaming ethics and integrity.
- Implement the decisions and resolutions of the committee.
- Integrity Officer [IO] is the reference point on all matters regarding anti-corruption and continuously defines values to employees.
- Reports to the CPC on the progress of implementation of plans.
- Co-ordinate integrity/corruption risk assessment and develop appropriate strategies to address the risks.
- Ensure that all initiatives are integrated in BSAB.
- Take action on corruption reports and co-ordinate reports on anti-corruption programs and activities.

- Ensure the organization has instituted systems for corruption prevention, detection, investigation and resolution.

The role of the complaints officer include:

- To inquire into allegations of misuse office, corruption, unethical conduct, breach of integrity, maladministration, delay, discourtesy, inattention, injustice, incompetence, misbehavior, inefficiency and ineptitude, among others.
Any staff, customers and members of the public who are aggrieved can complain to the desk officer. Verbally or in personal visits to the complaints office or through the following email address- complaints@BSAB and through the mobile phone number 0783364819.
- To oversee, coordinate, monitor and follow up specification on channeled complaints.
- To review regulations, codes of conduct, processes and procedures and recommend changes necessary to avoid or reduce complaints.
Reports of received cases will be handled by the committee, referred to relevant departments and other relevant government agencies.
A complaint received by the desk officer should avail the following information- complaints contact information, officer complained against, summary of the complaint, statement on exhaustion of other available means, expected action and any other relevant documentation.

(b) To mainstream and institutionalize corruption prevention in all Departments; to achieve this the board shall;

- Develop a corruption risk assessment and mitigation plan for every department.
- Appoint all departmental heads within the board as members of the Corruption Prevention Committee.

(c) To enhance the capacity of the Board to prevent corruption.

To achieve this the Board shall;

- Provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.
- Clearly communicate anti-bribery and corruption policy and zero-tolerance attitude to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

- Develop Corruption reporting channels; that include: reporting boxes, email, hotlines, and website platforms and informing IAO (Integrity Assurance Officer).
- Develop Whistle blower policy that provide a safe corruption reporting mechanism.

(d) To simplify systems procedures, enhance efficiency and effectiveness in service delivery.

To achieve this the Board shall;

- Embrace technological advancement through automation most of its services
- Enhance business process re-engineering
- Implementing quality management systems

CHAPTER FOUR: MONITORING AND EVALUATION

The Corruption prevention committee members will monitor the effectiveness and review the implementation of this policy, In order to ensure effective implementation of this Policy, the following will be undertaken;

- All employees and stakeholders are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- Employees are invited to comment on this policy and suggest ways in which it might be improved.
- Comments, suggestions and queries should be addressed to the integrity officer.
- Develop a tool for monitoring and evaluating the implementation of the Policy;
- Submit quarterly status reports to the Board and EACC.
- Conduct an annual corruption perception audit to gauge the impact of the implementation of this Policy

POLICY REVIEW

This policy shall be reviewed after every three years and/or when the need arises to incorporate emerging issues and to comply with the government legislative requirements.



APPENDIX I – BSAB CONFLICT OF INTEREST REGISTER

BSAB CONFLICT OF INTEREST REGISTER							
Name	Position	Date Advised of interest	Interest disclosed	Nature of potential conflict and estimate d value (if known)	Action taken/ recommend ation	Date implemented	Review comments



COMMITMENT TO INTEGRITY AND TRANSPARENCY

I.....
(First Name) (Middle Name) (Surname)

Personal No. /ID No:

Designation:

Division/Department/Unit:

Hereby commit myself to uphold integrity and transparency in the course of my duties at all times as stipulated in the BSAB Anti – Corruption Policy.

Signed:on.....day of.....20.....

