



**MINISTRY OF TOURISM AND WILDLIFE
STATE DEPARTMENT FOR WILDLIFE**

BRIBERY AND CORRUPTION RISK ASSESSMENT AND MITIGATION PLAN

S. No	Identified Risks	Mitigation/Prevention Strategy	Mitigation Actions / Activities	Responsibility	Resource Requirements (e.g., budget)	Implementation Timeframe
HUMAN RESOURCE DEPARTMENT						
A. Bribery Risks						
1.	Staff soliciting bribes to offer attachment opportunities to students	Review the HR Service Charter to include students' industrial attachment Issue guidelines on industrial attachment	Implementing the guidelines for industrial attachment Strictly adhering to the policies and guidelines on industrial attachment Sensitize internal and external customers on the requirements of Industrial Attachment by issuing notices	Head of Human Resource	Budget MHRMAC	Continuous
2.	Staff bribing to be nominated for training	Adhere to the training policy,2016	Prepare and approve training plan Prioritize training of officers based on identified needs	Head of Human Resource Ministerial Human Resource	Budget	Continuous

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				Management Advisory Committee (MHRMAC)		
B. Corruption Risks						
1.	Favoritism for nomination of a training opportunity	Develop clear training criteria for nomination	Nominate officers based on identified training needs Implement the requirements stipulated on the Training policy	Head of Human Resource	Budget	Continuous
2.	Conflict of interest or favoritism during transfers and deployments	Constitute a committee to undertake the deployment and transfers	Convene meeting and pass resolutions affecting transfers and deployment	Head of Human Resource Heads of Department	Budget	Continuous
3.	Favoritism during the staff appraisal process	Awarding marks based on verified achievements and evidence Adherence to staff performance appraisal guidelines Monitoring the performance appraisal system on GHRIS	Evaluating officers based on achieved targets Supervisors make justifications for the scores awarded	MPMC	Budget	Annually
4.	Unauthorized access in the IPPD system leading to unlawful promotions and salary adjustment which in	Adherence to password guidelines Limit access of the IPPD system to maximum three (3) authorized users	Monitor every access to the IPPD system Conduct routine spot-checks of the payroll system to flag out any anomalies	Head of Human Resource Payroll Manager	Nil	Continuous

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	turn results to misappropriation of funds					
ADMINISTRATION DEPARTMENT						
A. Bribery Risks						
1.	Collusion with service providers during vehicle repairs and servicing leading to substandard services for personal gain.	Identify professional and reliable vehicle service providers Monitoring and evaluating the serviced vehicles Capacity building the transport section Close supervision of the drivers Operationalize a vehicle inspection committee Undertake an impromptu spot check	Service vehicles from reliable service providers Constitute a team for monitoring and evaluating the serviced vehicles after every service Train transport officers on fleet management Sensitize drivers on the need for proper vehicle maintenance Conduct a regular inspection of vehicles	Head of Administration	Budget	Continuous
B. Corruption Risks						
1.	Illegally allocating vehicles to undeserving officers contrary to SRC guidelines	Strict adherence to Salaries and Renumeration Commission on payment of Commuter allowance guidelines.	Issue official vehicles only to officers not earning commuter allowance	Secretary Administration (SA) Head HR	Budget	Continuous
2.	Collusion with service	Identify professional and	Service vehicles from	Head of	Budget	Continuous

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	providers during vehicle repairs and servicing leading to substandard services.	reliable vehicle service providers Monitoring and evaluating the serviced vehicles Capacity building the transport section Close supervision of the drivers Operationalize a vehicle inspection committee Undertake an impromptu spot check	reliable service providers Constitute a team for monitoring and evaluating the serviced vehicles after every service Train transport officers on fleet management Sensitize drivers on the need for proper vehicle maintenance Conduct a regular inspection of vehicles	Administration		
3.	Collusion with the petrol stations to siphon fuel for personal vehicles or exchange for cash	Close supervision when fueling the vehicles	Monitor the fueling cards regularly Set monthly threshold for each vehicle fuel consumption	Head of Administration Staff Involved	Fuel registers Fuel management systems Budget	Continuous
4.	Biased/favoritism in constitution of cross-cutting committees	Adhere to the Constitution of Kenya in composition of committees	Adhere to criteria to appoint members from all sections/departments Ensure appointments reflect Regional, Gender and Minority Representation	Head of Administration	Human Resources	Annually
5.	Lack of effective	Provide secure office	Identification of employees	Head of	Budget	Continuous

S. No	Identified Risks	Mitigation/Prevention Strategy	Mitigation Actions / Activities	Responsibility	Resource Requirements (e.g., budget)	Implementation Timeframe
	security control measures leading to loss of assets	environment	in the State Department through staff badges Issuance of staff badges Locking of office doors properly after working hours	Administration		
INFORMATION COMMUNICATION TECHNOLOGY DEPARTMENT						
A. Bribery Risks						
1.	Bribing of ICT officers to allocate ICT equipment to users in promise for an advantage	Establish a distribution team to allocate ICT equipment based on users' needs.	Strict adherence to recommendation from the ICT distribution team.	Head of ICT ICT Committee	Nil	Continuous
2.	Offering /Giving favors to ICT staff from merchants to accept ICT equipment that do not meet the specifications.	Establish clear procedures and guidelines for inspection of new ICT equipment	Strict adherence to ICT equipment specifications during inspection.	Head of ICT	Nil	Continuous
B. Corruption Risks						
1.	Discretion in allocation of ICT equipment resulting to biased resource allocation	Adhere to the department's procurement plans Identify the sections that require ICT equipment	Issue ICT equipment based on Procurement plans and staff needs	Head of ICT HODs	Budget	Continuous
2.	Collusion to dispose serviceable ICT items for personal gain.	Form an adhoc disposal committee Adherence to the	Proper identification of the disposable items	Head of ICT Asset Disposal Committee	Committee Budget	Continuous

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		Procurement Disposal Act (2015)				
3.	Unauthorized access to information, applications and systems leading to manipulation of information and sabotage of systems and networks	Adherence to password guidelines Installation of anti-virus programs Enforce use of official emails for official communication	Enforce use of strong passwords Regular updating of anti-virus programs by users Sensitization of members of staff on information and computer security measures. Assign official email addresses to users	Head of ICT	Budget	Continuous
4.	Theft of computer parts leading to unplanned expenditure	Secure access control Establish computer ownership guidelines	Sensitize users on computer ownership guidelines Take disciplinary action against those found stealing ICT equipment	Head of ICT Head of Administration Head of Human Resource	Nil	Continuous
ACCOUNTS						
A. Bribery Risks						
1.	Collusion with suppliers of goods and services to inflate invoices leading to loss of money	Use of the IFMIS end to end with procurement to ensure only what is procured is paid	Generation of invoices from the system Segregation of duties	Accountant in charge of invoicing CFO HAU	Computers IFMIS system Stationeries	Continuous
2.	Collusion with members of staff on overpayment of per	Use of the payroll compliment to confirm job groups.	Examination Hierarchy of approval	Examiner Approver	Calculator Circulars Staff Compliment	Continuous

S. No	Identified Risks	Mitigation/Prevention Strategy	Mitigation Actions / Activities	Responsibility	Resource Requirements (e.g., budget)	Implementation Timeframe
	diems leading to loss of funds	Use of SRC circulars to guide on the DSA rates. Different levels of authorization and approval to allow for scrutiny of documents				
3.	Collusion with suppliers to pay for goods/services not delivered for personal gain	Ensure examiners check the availability of authentic inspection and acceptance certificate	Examination of the documents presented for payment by suppliers Adherence to PPADA 2015	HSCMS HAU Accountant in-charge examination	Stationery	Continuous
B. Corruption Risks						
1.	Falsification of documentation for reimbursement of standing imprests leading to loss of funds	Proper examination of the documents presented for claim/reimbursement Strict adherence to different levels of authorization and approval to allow for scrutiny of documents	Examination of the documents presented for claim/ reimbursement to prove authenticity Involvement of Cost Centre, Heads & users in imprest requisition and surrender	Accountant in charge of examination HAU	Budget	Continuous
2.	Nepotism in processing payments to favor friends	Strict adherence to first in first out in processing of payments Aging analysis	Clear assignment of duties and work to ensure prompt payment processes Regularly carryout aging analysis	HAU	Duty allocation schedule Imprest register	Continuous
3.	Misappropriation of cash in the cash office	Daily liquidity analysis at the cash office	Making daily cash book analysis and cashbook	HAU Cashier	Budget	Continuous

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	leading to loss of funds for personal gains	Conducting impromptu checks by the supervisors & or Internal Auditors	posting	Accountant in charge of cash office		
4.	Deliberate overstatement or understatement of financial statements leading to loss of funds	Strengthen the financial reporting function Optimization of the financial functions in the IFMIS system	Conduct internal and external audits Adherence to Accounting Policy Adherence to IPSAS	HAU Accountant in charge of Financial Reporting section	Budget	Quarterly
PROCUREMENT						
A. Bribery Risks						
1.	Substantial change in contract conditions to allow more time and/or higher prices for contracts with a view of benefiting individuals.	Adhere to PPADA 2015	Regular review of contract progress Set up an ad hoc implementation committee to oversee contracts implementation.	Accounting Officer HSCMS Contract Implementation Committee	Budget	Continuous
2.	Collusion with suppliers to purchase goods and services at an inflated price for personal gain	Conducting market survey Adherence to Public Procurement Regulatory Authority market price index	Implement survey recommendations Employ competitive bidding processes	HSCMS HODs	Budget	Continuous
3.	Lack of proper justification for the use of non-competitive procedures leading to	Adherence to The Public Procurement and Asset Disposal Act (PPADA) 2015	Strict compliance to procurement method as per the threshold provided for in PPADA 2015	HSCMS	Budget	Continuous

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	loss of funds and favoritism Abuse of non-competitive procedures based on legal exceptions: contract splitting, abuse of extreme urgency, non-supported modifications leading to loss of funds		Employ competitive bidding processes Evaluate bids before awards			
4.	Conflict of interest and corruption in the evaluation process through: Familiarity with bidders over time Personal interests that may affect objective evaluation such as gifts	Implementation of the Leadership and Integrity Act 2012	Declaration of interest/gifts in all matters of procurement by all participants	Evaluation Committee members	Conflict of interest register Gift register	
5.	Pilferage of obsolete /surplus goods awaiting disposal	Carry out regular stock taking and stock reconciliation of stores Adherence to PPADA 2015	Stock taking Verification of disposal items Disposal of surplus or obsolete items	HSCMS Stores in charge Disposal committee	Budget	Annually

S. No	Identified Risks	Mitigation/Prevention Strategy	Mitigation Actions / Activities	Responsibility	Resource Requirements (e.g., budget)	Implementation Timeframe
B. Corruption Risks						
1.	Failure to adhere to guidelines of procurement planning leading to unnecessary purchases Influence of external actors on SDW staff on procurement decisions	Adhere to procurement plan, State Department annual workplan and Medium-Term Expenditure Framework Transparency - In all stages of the procurement cycle actively ensuring full access to information and open data, along with active and timely responses to request for information, adequate and timely information E-procurement – The use of information and communication technologies to increase transparency and facilitate access to public tenders	Undertake feasibility studies for all new projects Sensitization of all users in the State Department on the importance of planning Implementation of procurement circulars and guidelines on e-procurement	HSCMS User departments	Medium term plans Budget	Annually
FINANCE						
A. Bribery Risks						
1.	Poor prioritization of activities implemented in the state department leading to misappropriation of	Strict adherence to the budget ceilings and the PFM Act 2012	Proper allocation of resources to address the needs of SDW	CFO	Budget Circulars	Annually

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	funds					
2.	Noncompliance to budget process leading to improper allocation of resources	Adherence to guidelines and circulars provided by the National Treasury	Hold meetings with the stakeholders Frequent meetings with the budget implementation committee	PS CFO HODs SAGAs	Budget Circulars	Annually
B. Corruption Risks						
1.	Charging of expenditure in the wrong vote heads leading to misapplication of funds	Strict adherence to the laid down financial management systems	Proper budget planning to cover the SDW activities	CFO All stakeholders	Budget	Continuous
2.	Unauthorized access to the integrated ifmis system for personal gain	Only authorized officers should access the IFMIS system	Identification and sensitization of staff authorized to access IFMIS	CFO	Budget	Continuous
INTERNAL AUDIT						
A. Bribery Risks						
1.	Unauthorized use of audit findings for monetary gains	To be objective and confidential in course of audit activities Timely release of audit findings	Proper planning and report writing	Head Internal Audit	Budget Computer Stationery	Monthly
B. Corruption Risks						
1.	Non reporting on weak internal controls	Provide objective advise to the clients on all audit findings	Objective evaluation and review of documents	Head Internal Audit	Budget Computer Stationery	
2.	Conflict of interest in	Adhere to auditing	Signing of professional code	All auditors	Code of conduct	Continuous

S. No	Identified Risks	Mitigation/Prevention Strategy	Mitigation Actions / Activities	Responsibility	Resource Requirements (e.g., budget)	Implementation Timeframe
	business opportunities in the client's organization	standards	of conduct			
WILDLIFE CONSERVATION						
A. Bribery Risks						
1.	Bribery by Human Wildlife Conflicts (HWC) claimants to fast track their compensation	Adhering to the setup procedures of making claims as per Wildlife Conservation and Management Acts (WCMA) 2013 and making the process known to the public.	Continuously creating public awareness on the compensation process Ensuring the due process of payment is followed to the later	Head of Wildlife Conservation Ministerial Wildlife Conservation and Compensation Committee (MWCCC)	Budget Technical skills	Continuous
2.	Staff receiving bribes from claimants to inflate award to victims	Reviewing all the claims by the MWCCC and giving appropriate recommendations as per the WCMA 2013	Following the set awarding criteria by County Wildlife Conservation and Compensation Committee (CWCCC) to the latter Comparing and verifying awarded amounts vis a vis the amounts specified on the claim forms and the amounts awarded against amounts recommended by the field experts Sensitization of the members of MWCCC to understand the process and their responsibility	Head of Wildlife Conservation MWCCC	Budget Technical skills	Continuous

B. Corruption Risks						
1.	Undue influence on award compensation to the wrong claimant or dependent	Ensuring due diligence before payment is made	Verification of claimants to be paid before disbursement of funds	Head of Wildlife Conservation MWCCC	Budget Technical skills Analytical skills	Continuous
2.	Collusion with interested parties to consider them in supporting their conservancies in terms of training and buying equipment	Adherence to the components in the project documents for Combating Illegal Wildlife Trade to the latter	Training of rangers as per the project documents Buying equipment to beneficiaries as indicated in the project documents Adherence to the product document when buying equipment for the beneficiaries	Project Monitoring Unit (PMU) Steering Committee	Budget Technical skills	Continuous
LEGAL DEPARTMENT						
A. Bribery Risks						
1.	Collusion with Appellants to fast track the cases in their favor for personal gain	Enforcement to the judicial procedures and code of conduct	Training officers to uphold integrity when handling the cases	Head of Legal	Budget	Continuous
B. Corruption Risks						
1.	Influence by Appellants to alter case details for personal gains	Ensure the files are in safe custody Proper and responsible handling of documents	Regular update and maintenance of case files Files kept in secure lockers	Head of Legal	Budget Legal personnel	Continuous
2.	Disclosing matters of an ongoing proceeding with an intention of getting favors from them	Adherence to the code of conduct and secrecy and official secret Act	Safekeeping of files and documents in lockable cabinets Routine training of officers	Head of Legal	Budget Legal personnel	Continuous

			involved on matters of confidentiality			
PLANNING DEPARTMENT						
A. Bribery Risks						
1.	Collusion with members of staff to include “extra staff” in Monitoring & Evaluation and other “ministerial out of station” programs/retreats leading to loss of funds	Only authorized officers to be included in Ministerial programs and plans Different levels of authorization and approval to allow scrutiny of approved staff list for Ministerial programs	Examination & Scrutiny of attendance list	PS DOP	Budget	Continuous
B. Corruption Risks						
1.	Collusion with other stake holders during Monitoring and Evaluation to give a favorable report which may lead to loss of funds	Adherence to Monitoring and Evaluation reporting criteria Putting access control measures in place on project reports that are not signed off	Monitor access control measures Review Monitoring and Evaluation reporting criteria regularly to close the gaps	DOP	Budget Technical skills	Quarterly
2.	Forgery of target achievement during the Ministerial Performance Contract appraisal process	Awarding marks based on verified achievements and evidence Monitoring the performance appraisal system on PCS (Performance Contract System)	Evaluating Departments/Units based on achieved targets SDW - PC Coordinators to make justifications for the scores awarded	MPCC Ministerial Performance Contract Coordinator DOP MPCC	Budget	Quarterly

		Only authorized officers should access the Performance Contract System (PCS)	Identification and sensitization of staff authorized to access PCS	Ministerial Performance Contract Committee		
		Identification and sensitization of staff authorized to access PCS				

Signed:

Date:

Chairperson of the Corruption Prevention/Integrity Committee

Signed:

Date:

Secretary - Corruption Prevention/Integrity Committee