



REPUBLIC OF KENYA.
MINISTRY OF HEALTH



KENYA MEDICAL LABORATORY TECHNICIANS AND TECHNOLOGISTS BOARD

ANTI-CORRUPTION POLICY

*Pursuant to the Medical Laboratory Technicians and Technologists Act, CAP 253 A
Laws of Kenya.*

KMLTTB Quality assurance services


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1. FOREWORD AND COMMITMENT

The Kenya Medical Laboratory Technicians and Technologists Board (KMLTTB) is a statutory body established under Section 3(2) of the Medical Laboratory Technicians and Technologists (MLTT) Act, 1999 (CAP 253A). Our mandate includes the general supervision and control over training, business, practice, and employment of medical laboratory technicians and technologists, as well as validation of in-vitro diagnostics (IVD) under Legal Notice No. 113 of 2011. The Board recognises that corruption in the health sector directly threatens patient safety and undermines public trust in the regulation of laboratory medicine.

Our Vision: “That the Health of every Kenyan will be fully protected through effective regulation of the practice of laboratory medicine.”

Our Mission: “To Exercise General Control and Supervision over training, business, employment and practice of Laboratory Medicine and Advise the Government on all related matters.”

Our Core Values: Integrity; Selfless service; Innovation and open-mindedness; Sense of belonging; Pride in what we do.

This Anti-Bribery and Anti-Corruption Policy demonstrates KMLTTB’s absolute commitment to zero tolerance for corruption in all its operations, including the eCitizen portal (kmlttb.ecitizen.go.ke). It is anchored on the Constitution of Kenya, 2010 – specifically Article 10 (National Values and Principles of Governance) and Chapter Six (Leadership and Integrity) – and fully aligns with the National Ethics and Anti-Corruption Policy (Sessional Paper No. 2 of 2018), which provides the overarching national framework for preventing and combating corruption. KMLTTB further recognizes the United Nations Convention against Corruption (UNCAC), which Kenya ratified in 2003, as an international standard that guides our preventive measures.

The Board approved this policy on.....(Yet to be approved as the Board’s tenure ended in August 2025 before tabling and approval of the policy).It is binding on all Board members, staff, third parties, and regulated entities. The Corporation Secretary, is responsible for the drafting and periodic review of this policy. The Board calls upon every person bound by this policy to embrace it not merely as a compliance document, but as a reflection of our shared commitment to integrity and the protection of the health of every Kenyan.



2. POLICY STATEMENT AND ZERO-TOLERANCE PRINCIPLE

KMLTTB has zero tolerance for bribery, corruption, and unethical conduct. The Board commits to:

- Promoting a culture of integrity, transparency, and accountability as required by Article 10 of the Constitution (patriotism, national unity, sharing and devolution of power, the rule of law, democracy, participation of the people, human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, protection of the marginalised, good governance, integrity, transparency, and accountability).
- Upholding Chapter Six of the Constitution (Leadership and Integrity) which demands that State and public officers behave in a manner that avoids conflicts of interest, does not compromise public good, and demonstrates honesty and accountability. Specific constitutional provisions include:
 - Article 73 – Responsibilities of leadership (respect for the people, service to the public, objectivity, impartiality, honesty, accountability, discipline, commitment to the rule of law).
 - Article 75 – Conduct of State officers (financial probity, restriction on gifts, declaration of assets and liabilities).
 - Article 76 – Restriction on activities of State officers (no self-enrichment, no improper use of office).
- Preventing, detecting, and responding to all forms of corruption in the regulation of laboratory medicine.
- Ensuring full compliance with the Anti-Bribery Act, 2016 (Cap 79B), the Anti-Corruption and Economic Crimes Act (Cap 65), the Leadership and Integrity Act (Cap 182), and the National Ethics and Anti-Corruption Policy (Sessional Paper No. 2 of 2018).
- Protecting whistleblowers and any person who reports corruption in good faith.
- Ensuring that the health of every Kenyan is protected through corruption-free regulation of laboratory practice.
- Fostering an environment where all stakeholders—staff, regulated entities, and the public—can confidently report corruption without fear of reprisal.
- Committing to continuous improvement of anti-corruption systems, including regular reviews of this policy, risk assessments, and technological controls.
- Cooperating fully with national and international anti-corruption agencies in the investigation and prosecution of corruption offences.



No staff member, Board member, or third party shall offer, give, solicit, or receive any bribe, kickback, or undue advantage in connection with any KMLTTB function. Violation of this zero-tolerance principle will result in severe consequences, including criminal prosecution and lifetime debarment from regulated activities.

3. CONSTITUTIONAL AND LEGAL FRAMEWORK

This policy derives its authority from the following instruments. The right-hand column highlights specific constitutional provisions and sections of Sessional Paper No. 2 of 2018. KMLTTB also takes cognizance of the United Nations Convention against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption, which Kenya has ratified, and which inform the preventive and enforcement approach of this policy.

[See the full table in the complete policy document mapping Laws/Instruments to Key Provisions and Relevance to KMLTTB, including: Constitution of Kenya 2010; National Ethics and Anti-Corruption Policy (Sessional Paper No. 2 of 2018); MLTT Act, 1999; Anti-Bribery Act, 2016; Anti-Corruption and Economic Crimes Act, 2003; Ethics and Anti-Corruption Commission Act, 2011; Leadership and Integrity Act, 2012; Public Procurement and Asset Disposal Act, 2015; Witness Protection Act, 2006; Legal Notice No. 113 of 2011; and The Bribery Regulations, 2022.]

4. DEFINITIONS – EXPANDED GLOSSARY

The following terms are defined for the purposes of this policy:

Advantage: Any gift, loan, fee, reward, commission, valuable security, property, interest in property, contract, service, favour, forbearance from demanding a right, or any other benefit (monetary or non-monetary).

Bribery: Offering, promising, giving, accepting, or soliciting any advantage as an inducement for an action that is illegal, unethical, or a breach of trust (Anti-Bribery Act, Section 2).

Corruption: Abuse of public office for private gain, including fraud, embezzlement, extortion, favouritism, nepotism, influence peddling, and abuse of power (Sessional Paper No. 2, glossary).



Corruption Prevention Committee (CPC): Committee established under Section 6 of this policy, responsible for oversight of corruption prevention (Sessional Paper No. 2, Chapter 4.1.5).

Integrity Assurance Officer (IAO): Officer appointed to coordinate day-to-day integrity activities, maintain registers, liaise with EACC (PSIP guidelines).

Public Officer: As defined in Article 260 of the Constitution – includes any person holding a public office, including all KMLTTB staff, Board members, and any person acting in an official capacity.

Third Party: Any person or entity doing business with or on behalf of KMLTTB, including IVD vendors, training institutions, laboratory operators, suppliers, consultants, contractors, and distributors.

Whistleblower: A person who reports corruption or unethical conduct in good faith, internally or externally (Witness Protection Act, Section 2).

Conflict of Interest: A situation where a public officer's private interests (financial, family, or personal) interfere or appear to interfere with the impartial performance of their official duties (Leadership and Integrity Act, Section 16).

Lifestyle Audit: The process of verifying whether the known assets and lifestyle of a public officer are commensurate with their lawful income (Sessional Paper No. 2, Chapter 4.7.4(c)).

Facilitation Payment: A small payment made to secure or expedite a routine government action (e.g., processing a licence). Such payments are illegal under Kenyan law and are considered bribery.

Kickback: A form of bribery where a person returns a portion of a contract payment to the person who awarded the contract.

Influence Peddling: Using one's position or connections to obtain an advantage from another person in exchange for payment or favour.

Protected Disclosure: A report of corruption made in good faith by a whistleblower, which is protected by law from retaliation.



Private Gain: Any benefit, financial or otherwise, that accrues to an individual or a related party as a result of corruption, whether or not the public body suffers a loss.

Collusion: A secret agreement between two or more persons to defraud or deceive a public body, often involving bid-rigging in procurement.

Sextortion: A form of corruption where sex, rather than money, is the currency of the bribe. It is a gross abuse of power and is strictly prohibited.

Money Laundering: The process of concealing the origin of money obtained illegally by passing it through a complex sequence of banking transfers or commercial transactions.

Due Diligence: An investigation or audit of a potential third party or business partner to identify and mitigate corruption risks before entering into a relationship.

Red Flag: An indicator or warning sign of potential corruption, such as an unusually high commission, a request for payment in cash, or a third party with a reputation for unethical conduct.

5. SCOPE, APPLICABILITY, AND ONLINE SERVICES

5.1 Persons Bound

This policy applies to:

- All Board members (including advisory committees).
- The Ag. CEO / Registrar and all staff (permanent, temporary, contract, interns, volunteers, and secondees).
- Third parties acting on behalf of KMLTTB, including IVD vendors, training institutions, laboratory operators, suppliers, consultants, and contractors.
- Students, trainees, and licensees (individuals and entities) interacting with KMLTTB in official capacities.
- Any other person who, by virtue of a contract or agreement, performs any function on behalf of KMLTTB.



5.2 Covered Operations (including all online services)

The policy applies to all KMLTTB functions, whether performed manually or through the eCitizen portal (kmlttb.ecitizen.go.ke), including but not limited to: Registration of professionals; Licensing of laboratories; Accreditation of training programmes; IVD product validation; Annual licence renewals; Document verification / good standing; Examination applications; Procurement and supply chain; Human resource management; Financial management; and Complaints and feedback.

KMLTTB operates a robust digital ecosystem to minimise human discretion and opportunities for corruption. The eCitizen portal employs automated checks, audit trails, and role-based access controls. Any manual override of an automated decision requires dual authorization—by the Ag. CEO and the Integrity Assurance Officer—and must be accompanied by a written justification stored in the system. All online transactions are logged with immutable timestamps and IP addresses to facilitate forensic audits. The Data Protection Act, 2019, also applies to the handling of personal data collected through these platforms.

5.3 Extraterritorial Application

This policy applies to conduct outside Kenya where a KMLTTB officer or third party acts on behalf of KMLTTB. All officers must comply with this policy regardless of location, and any act of bribery of a foreign public official is expressly prohibited under Section 7 of the Anti-Bribery Act.

6. CORRUPTION PREVENTION COMMITTEE (CPC) – COMPOSITION, MANDATE, AND OPERATIONS

6.1 Legal Basis

Established pursuant to Section 11(1) (g) of the EACC Act, the Public Service Integrity Programme (PSIP), and Sessional Paper No. 2, Chapter 4.1.5(d) which requires “introducing Integrity Committees in public departments”.

6.2 Composition

The CPC shall consist of seven (7) voting members appointed by the Board upon nomination by the Disciplinary Committee:

1. Chairperson – nominated by the Disciplinary Committee from among its members (Voting)



2. Human Resource Manager (Ex officio voting)
3. Legal Officer (Ex officio voting)
4. Quality Assurance Officer (Ex officio voting)
5. Head of Laboratory Registration (Ex officio voting)
6. Member nominated by the Disciplinary Committee (technical expert – e.g., ICT security) (Voting)
7. Member nominated by the Disciplinary Committee (external ethics expert from civil society or academia) (Voting)

The Integrity Assurance Officer (IAO) serves as the Secretary (non-voting).

Tenure: Three years, renewable once.

Quorum: Four voting members including the Chairperson or Vice-Chairperson.

Vice-Chairperson: Elected by the CPC from among its voting members.

6.3 Mandate (Expanded)

The CPC shall:

1. Conduct annual Corruption Risk Assessments (CRA) for all KMLTTB functions, including online services, using the EACC-approved methodology. The first risk assessment shall be completed within 60 days of the approval of this policy.
2. Develop, implement, and monitor the Anti-Bribery and Corruption Mitigation Plan, updating it quarterly and reporting progress to the Board.
3. Receive, record, and investigate internal corruption reports (or refer to IAO for preliminary assessment).
4. Recommend disciplinary actions to the Board or refer criminal matters to EACC with a detailed evidence pack.
5. Review conflict of interest declarations submitted by staff and Board members and advise on recusal or mitigation measures.
6. Oversee the maintenance of the Bribery and Anti-Corruption Register and Gifts and Hospitality Register.
7. Prepare and submit quarterly reports to EACC in the prescribed format.
8. Coordinate capacity building on ethics and integrity for all staff and Board members.
9. Liaise with the Disciplinary Committee on cases that involve both integrity breaches and professional misconduct.
10. Promote whistleblower protection by ensuring confidentiality and non-retaliation.
11. Monitor the implementation of EACC recommendations from previous assessments.



12. Maintain a risk register that tracks corruption risks over time.

13. Review and approve the communication strategy for the policy.

6.4 Meetings and Reporting

- Ordinary meetings: Quarterly (January, April, July, October) – at least four per year.
- Special meetings: As called by the Chairperson or upon request of the Ag. CEO/Registrar (minimum 48 hours' notice).
- Minutes: Draft within 7 days, approved at the next meeting.
- Annual report to the Board: Summarizing all CPC activities, risk assessment outcomes, mitigation progress, and recommendations.

7. DETAILED ROLES AND RESPONSIBILITIES

7.1 Board of Directors

- Approve this policy and any amendments, demonstrating leadership commitment to integrity.
- Appoint CPC members (on nomination by Disciplinary Committee) and IAO.
- Ensure adequate budgetary allocation for anti-corruption activities.
- Receive quarterly CPC reports and take appropriate action.
- Model ethical leadership: sign annual integrity attestations (Annex A) and submit conflict of interest declarations.
- Ensure compliance with Chapter Six of the Constitution and Sessional Paper No. 2.
- Review and act on any EACC recommendations within 30 days of receipt.
- Protect the independence of the CPC and IAO from undue influence.
- Periodically commission external integrity audits.

7.2 Ag. Registrar

- Serve as accounting officer for anti-corruption compliance and bear overall responsibility for implementation.
- Ensure the IAO is resourced and functional; the IAO shall have direct access to the Ag. CEO.
- Report serious corruption matters to the Board and, where required (bribery), to EACC within 24 hours.
- Ensure all staff sign integrity attestations and conflict declarations annually.
- Oversee integrity of eCitizen services; authorize any manual override only with IAO countersignature.



- Present quarterly compliance reports to the Board.
- Take disciplinary action against any staff who violate this policy.
- Foster an open-door policy where staff can raise integrity concerns directly.
- Ensure that all contracts and MoUs with third parties include the mandatory anti-bribery clause (Annex I).

7.3 Corruption Prevention Committee (CPC) – see Section 6

7.4 Integrity Assurance Officer (IAO)

- Appointed by Ag. CEO with Board ratification.
- Maintain Bribery and Anti-Corruption Register (Annex E) and Gifts Register (Annex C).
- Receive and acknowledge all corruption reports within 24 hours.
- Conduct preliminary assessment within 5 working days.
- Refer matters to CPC or directly to EACC if bribery (mandatory 24-hour referral).
- Liaise with EACC, ODPP, DCI, and other agencies.
- Organize annual training for staff and Board.
- Prepare quarterly reports for EACC in consultation with CPC.
- Monitor implementation of the Mitigation Plan.
- Collect and review conflict of interest declarations annually.
- Maintain the whistleblower protection log.
- Serve as secretariat for CPC meetings.
- Keep abreast of changes in anti-corruption legislation.

7.5 All Staff (including temporary and contract)

- Comply with this policy and all related procedures.
- Sign annual integrity attestation (Annex A) and conflict of interest declaration (Annex B).
- Report any suspected corruption promptly.
- Declare any conflict of interest immediately (within 24 hours) to the IAO.
- Avoid accepting gifts or hospitality that could influence official duties.
- Never perform manual overrides without dual authorization.
- Attend mandatory annual anti-corruption training.
- Cooperate fully with any investigation.
- Refrain from discussing investigation details with colleagues.

7.6 Third Parties (IVD vendors, training institutions, laboratory operators, etc.)



- Sign a Third-Party Anti-Bribery Clause (Annex I) in every contract.
- Submit annual conflict of interest declaration if total contract value exceeds KES 1 million per year.
- Report any bribery attempt or solicitation by KMLTTB staff to the IAO immediately.
- Cooperate fully with any investigation.
- Implement their own anti-corruption controls.
- Non-compliance may lead to: immediate contract termination; debarment for 5 years; publication of name on KMLTTB website; referral to professional bodies.

8. COMPREHENSIVE CORRUPTION RISK ASSESSMENT MATRIX – BLANK TEMPLATE

Note: KMLTTB has not yet conducted a formal Corruption Risk Assessment. The CPC shall complete the first assessment within 60 days of the approval of this policy using the EACC-approved methodology.

Risk scoring guide:

- Likelihood: 1 (Rare – less than 5% probability),
2 (Unlikely – 5-20%),
3 (Possible – 21-50%),
4 (Likely – 51-80%),
5 (Almost Certain – >80%).
- Impact: 1 (Insignificant), 2 (Minor), 3 (Moderate), 4 (Major), 5 (Catastrophic).

The matrix template covers: Registration of professionals; Laboratory licensing; IVD product validation; Procurement and supply chain; Human resource management; Financial management; Examination administration; eCitizen portal operations; Stakeholder engagement / conflicts; and other functions as needed.

Instructions for CPC: For each function, identify specific corruption risks, score likelihood and impact, multiply to get risk score, propose mitigation measures, assign an owner, and determine residual risk. Update annually and whenever a new risk is identified. Present completed matrix to the Board for approval within 75 days of policy approval.



9. PROHIBITED CONDUCT – EXTENSIVE LIST WITH LEGAL CITATIONS

The following acts are strictly prohibited and constitute grounds for disciplinary action, criminal prosecution, or both. The list is non-exhaustive. An attempt to commit any of these acts is treated as the completed offence.

Bribery: Offering, giving, receiving, or soliciting any advantage to influence official action (Anti-Bribery Act, Section 6).

Bribery of foreign public official: Bribing a foreign official to obtain an advantage for KMLTTB (Anti-Bribery Act, Section 7).

Fraud: Knowingly using false documents for registration (Penal Code, Section 320).

Embezzlement: Misappropriation of KMLTTB funds or property (ACECA, Section 48).

Abuse of office: Using official position to obtain a private benefit (ACECA, Section 46).

Conflict of interest (undisclosed): Participating in a decision where the officer has a direct financial interest (Leadership and Integrity Act, Section 16).

Nepotism: Preferential treatment of relatives in recruitment or promotion (Leadership and Integrity Act, Section 14).

Extortion: Demanding a payment or favour under threat of adverse official action (Penal Code, Section 301).

Misuse of information: Using confidential KMLTTB data for personal gain (ACECA, Section 46).

Falsification of records: Altering, destroying, or concealing official documents, including online audit logs (ACECA, Section 49).

Obstruction of justice: Interfering with an EACC investigation or retaliating against a whistleblower (ACECA, Section 59).

Examination malpractice: Leaking exam questions, altering marks, or impersonation (MLTT Act, Section 20).

Substandard product approval: Approving an IVD or laboratory accreditation without proper verification (MLTT Act, Section 17).

Unauthorized manual override: Bypassing automated controls in the eCitizen portal without dual authorization (EACC guidelines).

Facilitation payment: Any payment to expedite a routine government action



(Anti-Bribery Act, Section 2).

Collusion in procurement: Secret agreement between bidders or between a bidder and a procurement officer to rig a tender (ACECA, Section 46; PPADA, Section 66).

Sextortion: Demanding sexual favours in exchange for an official action or inaction (ACECA, Section 46).

Money laundering: Concealing the proceeds of corruption through KMLTTB-related transactions (Proceeds of Crime and Anti-Money Laundering Act).

10. GIFTS, HOSPITALITY, AND CONFLICTS OF INTEREST – DETAILED RULES, THRESHOLDS, AND CASE STUDIES

10.1 Gifts and Hospitality Rules

General rule: No staff or Board member shall accept any gift, hospitality, or benefit that could reasonably be perceived as influencing their official duties.

Nominal value exception: Gifts of KES 5,000 or less may be accepted, but must be declared to the IAO within 7 days using Annex C. The cumulative value of gifts from the same source within a calendar year must not exceed KES 5,000.

Gifts from regulated entities: Zero threshold – any gift, regardless of value, must be declared. Acceptance is presumed prohibited unless approved in advance by the IAO.

Hospitality: Meals, travel, or accommodation offered by a regulated entity are prohibited during active procurement, inspection, accreditation, or licensing processes. Outside of those, hospitality valued above KES 5,000 must be declared.

Cash or cash equivalents: Absolutely prohibited, regardless of value.

Gifts during festive seasons: Unsolicited gifts of perishable items valued at less than KES 2,000, shared among the office, may be accepted but must be declared.

Refusal of gifts: When a gift is refused, the staff member must inform the giver of the policy and report the offer and refusal to the IAO.

Gifts Register maintained by IAO, available for inspection by EACC at any time.



10.2 Conflict of Interest – Detailed Rules

Annual declaration – Annex B by 31 January each year, including ownership, directorship, family interests, and other conflicts.

Ad hoc declaration – Any conflict arising during the year must be declared immediately (within 24 hours) to the IAO.

Recusal – A person with a conflict must recuse themselves from all related discussions, decisions, and access to confidential documents.

Management of conflict – The CPC may decide on additional measures (transfer, restriction, and divestment).

Penalty for non-disclosure – Disciplinary action up to dismissal, and referral to EACC.

10.3 Lifestyle Audit

KMLTTB reserves the right to request a lifestyle audit for any staff or Board member where there is reasonable suspicion of unexplained wealth. Indicators include: sudden acquisition of assets disproportionate to income; frequent expensive travel; anonymous tips; and living beyond means. All staff and Board members must cooperate fully.

11. REPORTING MECHANISMS (INTERNAL AND EXTERNAL) – STEP-BY-STEP GUIDES

11.1 Internal Reporting Channels

- Integrity Assurance Officer (IAO): [Insert email and phone]; physical office at ACK Gardens House, 4th Floor, Room 405. Working hours. Preferred channel for most reports.
- CPC email: cpc@kmlttb.go.ke. 24/7 (monitored during working hours). For reports the reporter wants the full committee to see directly.
- Anonymous suggestion boxes: Two boxes outside IAO office and at reception. 24/7. For reporters who fear identification.
- Online reporting portal: <https://kmlttb.ecitizen.go.ke/report>. 24/7. Optional anonymity. For digital-savvy reporters.

11.2 Step-by-Step Guide for Using Internal Channels

1. Choose a channel – If comfortable, contact the IAO directly. If fearing retaliation, use anonymous box or online portal.



2. Provide as much detail as possible – Who, what, when, where, why, and any evidence.
3. Preserve evidence – Do not investigate on your own, but safely preserve documents, screenshots, and recordings.
4. Receive acknowledgment – For non-anonymous reports, the IAO will acknowledge within 24 hours and provide a reference number.
5. Protection – The IAO will keep your identity confidential. You will not suffer retaliation.

11.3 External Reporting Channels

- Ethics and Anti-Corruption Commission (EACC): info@integrity.go.ke; 0709 781000; www.eacc.go.ke. Any bribery or corruption; mandatory within 24 hours for bribery.
- Office of the Director of Public Prosecutions (ODPP): complaints@odpp.go.ke. Criminal prosecution matters.
- Commission on Administrative Justice (Ombudsman): complaints@ombudsman.go.ke. Maladministration or unfair treatment.
- DCI / Kenya Police: 999; nearest police station. Urgent criminal matters.

11.4 Mandatory Reporting Obligation for KMLTTB Officers

Under Section 14 of the Anti-Bribery Act, 2016, any person in a position of authority who becomes aware of or suspects bribery must report to EACC within 24 hours. Failure to report is an offence punishable by fine not exceeding KES 2 million or imprisonment for up to 5 years, or both.

12. WHISTLEBLOWER PROTECTION – FULL PROTOCOL

12.1 Protection Principles

- Confidentiality: The identity of a whistleblower shall not be disclosed without written consent, except to law enforcement where required. Access limited to IAO, CPC Chairperson, and Ag. CEO. Breach of confidentiality is a serious offence.
- Non-retaliation: No whistleblower shall be subjected to adverse action (dismissal, demotion, suspension, harassment, intimidation, discrimination, transfer, denial of training, unfair performance evaluation, or any other detrimental treatment).
- Protection extends to: Employees, Board members, contractors, suppliers, volunteers, and any member of the public. Also protects those who participate in investigations or refuse to engage in corruption.
- Anonymous whistleblowers: Protected to the extent possible. If an anonymous



whistleblower later reveals their identity, full protection applies.

- Burden of proof: If a whistleblower suffers retaliation, the burden shifts to KMLTTB to prove the adverse action was not due to the protected disclosure.
- Psychological support: KMLTTB will provide or facilitate access to counselling where feasible.

12.2 Prohibited Retaliatory Acts

Termination or non-renewal of contract; denial of promotion, transfer, or training; unfair negative performance evaluation; assignment to undesirable location; threats, intimidation, or physical harm; victimization through excessive scrutiny; filing false disciplinary charges; ostracism or social exclusion.

12.3 Remedies for Retaliation

A whistleblower may file a complaint with: the CPC (within 30 days); the Board (if CPC implicated, within 30 days); or directly with EACC (recommended within 90 days).

KMLTTB shall: reinstate the whistleblower; pay back wages, benefits, and financial losses; provide compensation for emotional distress where appropriate; and take disciplinary action against the retaliator (up to dismissal and criminal referral).

12.4 False or Malicious Reports

knowingly making a false report with intent to harm is an offence (Penal Code, Section 318). Such conduct will result in disciplinary action and may be reported to police. Good-faith reports that turn out unsubstantiated are NOT penalized.

13. HANDLING AND INVESTIGATION OF CORRUPTION REPORTS – DETAILED PROCEDURAL FLOWCHART

The following steps shall be followed for every corruption report received. All actions must be documented, and confidentiality maintained throughout.

Step 1: Report received via any channel. Responsible: IAO or designee.

Immediate. Log receipt in Annex D.

Step 2: Acknowledgment sent to reporter (unless anonymous), with unique reference number. Responsible: IAO. Within 24 hours.

Step 3: Enter report into Bribery and Anti-Corruption Register (Annex E) with unique reference number (format: KMLTTB/REP/YYYY/XXX). Responsible: IAO. Within 48 hours.



Step 4: Preliminary assessment by IAO: credibility, urgency, category (A: bribery; B: other corruption; C: ethics breach; D: unfounded). Responsible: IAO. Within 5 working days.

Step 5: If Category A (bribery) – IAO reports to EACC immediately (within 24 hours of receipt). Provide all evidence.

Step 6: If Category B (serious corruption) – IAO refers to CPC for investigation.

Step 7: CPC appoints investigation team (2-3 members). Responsible: CPC Chairperson. Within 3 working days of referral.

Step 8: Investigation team gathers evidence: documents, system logs, emails, interviews. All evidence logged in chain-of-custody register. Timeline: 14 working days (extendable).

Step 9: Accused person given written notice of allegations and 7 working days to respond in writing.

Step 10: Investigation team submits final report to CPC with findings and recommendations. Within 7 working days after response.

Step 11: CPC reviews report and decides: (a) no case; (b) disciplinary action; (c) criminal referral; (d) systemic improvement. Within 7 working days.

Step 12: Whistleblower informed of outcome in general terms. Within 14 days of CPC decision.

Step 13: If criminal referral, IAO transmits all evidence to EACC. Within 48 hours of CPC decision.

Step 14: Disciplinary action implemented by HR/Disciplinary Committee. Within 30 days of CPC decision.

Step 15: Systemic improvements implemented. As per Mitigation Plan timeline.

If EACC or DCI takes over the investigation: KMLTTB shall provide full access to documents, premises, and staff. No internal action shall prejudice the external investigation.

14. DISCIPLINARY AND CORRECTIVE MEASURES

14.1 For KMLTTB Staff and Board Members

Minor: Failure to declare a gift below KES 5,000 within 7 days; late submission of conflict declaration (1-30 days late).

Sanctions: Written warning; mandatory retraining; notation in personnel file for 12 months. Due process: Written explanation; right to appeal to HR within 14 days.



Moderate: Undisclosed conflict of interest without financial gain; unauthorized access to confidential data without improper use; accepting a gift above KES 5,000 without declaration.

Sanctions: Suspension without pay (up to 30 days); demotion; financial restitution; performance improvement plan. Due process: Formal disciplinary hearing with legal officer present; right to appeal to Board within 21 days.

Serious: Bribery, embezzlement, fraud, examination malpractice, substandard product approval, willful destruction of evidence.

Sanctions: Summary dismissal; criminal prosecution; asset recovery; report to professional body for deregistration; lifetime debarment from any public office. Due process: Immediate interdiction; full investigation; recommendation to Board for dismissal; right to appeal to Employment and Labour Relations Court within 90 days.

Interim measures: The Ag. Registrar, upon recommendation of the CPC, may interdict the staff member immediately pending investigation.

Additional consequences for Board members: Removal from Board; declaration as unfit for public office; publication of name in the Kenya Gazette.

14.2 For Third Parties

offering a bribe: Immediate contract termination; debarment for 5 years; report to EACC and PPRA. Additional: Name published on KMLTTB website; referred to professional body; criminal prosecution.

Submitting falsified documents: Debarment for 3 years; cancellation of existing certificates. Additional: Report to law enforcement; publication of name.

Failure to cooperate: Suspension of all pending contracts; debarment pending full cooperation. Additional: Deduction of penalties from pending payments; legal action for obstruction.

Pattern of corrupt conduct (two or more proven violations): Permanent debarment; referral to international anti-corruption databases. Additional: Public announcement; blacklisting by other government agencies.



14.3 Asset Recovery

KMLTTB will cooperate fully with EACC and the Asset Recovery Agency (ARA) to trace, freeze, and recover any public funds or assets lost through corruption. Any person found liable may be ordered to pay restitution plus interest. KMLTTB will also pursue civil recovery even if criminal prosecution is not possible.

15. TRAINING, AWARENESS, AND CAPACITY BUILDING – ANNUAL PLAN

15.1 Mandatory Training Programmes

All new staff (including Board members): Induction on this policy, Code of Conduct, reporting mechanisms, whistleblower protection. Upon hire. 4 hours. In-person or online module + test (pass mark 80%).

All existing staff (annual refresher): Corruption risks at KMLTTB, case studies, updated EACC guidelines, conflicts of interest. Annually (Q1). 3 hours. In-person workshop led by IAO or external facilitator.

CPC members: Advanced corruption risk assessment (EACC methodology), investigation techniques, evidence preservation, EACC quarterly reporting. Annually (Q2). 2 days (16 hours). External facilitator (EACC Integrity School or certified trainer).

IAO: Register maintenance, EACC liaison, handling protected disclosures, lifestyle audit basics. Annually. 2 days (at EACC or approved provider). External training.

Board members: Leadership and integrity (Chapter Six), fiduciary duties, handling conflicts, board-level corruption risks. Upon appointment and annually. 2 hours initial, 1 hour refresher. Facilitated by IAO or external expert.

ICT and IT staff: eCitizen portal audit trails, manual override controls, data integrity, forensic readiness. Annually. 3 hours. In-house by IAO + ICT Manager.

Third parties: Anti-bribery obligations, reporting bribery attempts, consequences of non-compliance. Once per contract (or annually for long-term contracts). 1 hour. Online module + signed training acknowledgment.

Training materials shall be reviewed and approved by the CPC annually. Internal trainers must have completed EACC Integrity School or equivalent. External



trainers must be from EACC, recognised professional bodies, or institutions with demonstrable expertise.

15.2 Public Awareness Campaigns

- Publish simplified guides (English and Kiswahili) on “How to report corruption at KMLTTB” on the website and eCitizen portal.
- Annual stakeholder forums (laboratory associations, training institution heads, IVD manufacturers) covering the policy and obligations.
- Use social media (Twitter, LinkedIn) and KMLTTB newsletter to highlight corruption prevention tips and recent disciplinary actions (anonymized). At least two integrity-related posts per quarter.
- Radio spots in partnership with EACC and NACCSC, especially targeting hard-to-reach areas.
- Posters displayed prominently at KMLTTB offices and during outreach events.

15.3 Training Records

The IAO maintains a training database (Annex K) with: name, position, date of training, topic, test score, and certificate of completion. Training records are submitted to EACC as part of quarterly reports. Failure to attend mandatory training without valid reason is a disciplinary offence (written warning after first offence, suspension after second).

16. MONITORING, REVIEW, AND QUARTERLY REPORTING TO EACC

16.1 Internal Monitoring

- Daily: IAO reviews the Bribery Register for any new reports.
- Weekly: IAO checks the online reporting portal and physical suggestion boxes (opened in presence of two officers).
- Monthly: ICT Manager and IAO review eCitizen audit trails for anomalies using Annex J checklist.
- Quarterly: CPC meets, reviews Mitigation Plan progress, updates risk assessment, reviews retaliation complaints, assesses training completion.
- Annually: Internal Audit conducts independent review of anti-corruption controls and reports to the Board.

16.2 Policy Review

This policy shall be reviewed: Annually (by the Board, based on CPC recommendations); within 30 days of any significant change in anti-corruption



laws or EACC guidelines; and within 30 days of a major corruption incident. The review shall involve the CPC, IAO, Legal Officer, and may include external experts. Staff and third-party feedback will be solicited through anonymous surveys.

16.3 Quarterly Reporting to EACC (22nd Cycle Requirement)

KMLTTB shall submit a report within 15 days after the end of each quarter (by 15 April, 15 July, 15 October, 15 January). The report shall include:

1. CPC meeting minutes (signed by Chairperson)
2. IAO activity log
3. Bribery and Anti-Corruption Register (anonymized)
4. Training conducted
5. Status of the Anti-Bribery and Corruption Mitigation Plan
6. eCitizen portal integrity audit summary
7. List of matters referred to EACC or other agencies
8. Implementation status of any EACC recommendations
9. Whistleblower protection log
10. Financial report (budget and expenditure)

The report shall be endorsed by the CPC Chairperson and the Ag. REGISTRAR, then submitted via email to the EACC Preventive Services Directorate (preventive@integrity.go.ke) with a copy to the local EACC regional office. The report is also tabled at the next Board meeting.

17. COMMUNICATION AND PUBLICATION OF THE POLICY – MULTI-CHANNEL STRATEGY

Effective communication is essential to ensure that all persons bound by this policy are aware of their obligations. KMLTTB will employ a multi-channel strategy to disseminate this policy and related integrity messages.

This policy shall be:

- Published on the KMLTTB website (www.kmlttb.org) in a dedicated “Integrity / Anti-Corruption” section, with a prominent link on the homepage. Available in PDF and accessible HTML formats.
- Integrated into the eCitizen portal (kmlttb.ecitizen.go.ke) – every applicant must tick a box acknowledging they have read and understood the policy before submitting any application. A summary version (one page) is displayed at the point of transaction.



- Distributed to all staff and Board members (hard and soft copies) with a signed acknowledgment form (Annex L). The acknowledgment form is kept in the personnel file. New staff receive the policy as part of their induction pack.
- Included in staff induction packs and third-party contracts as an appendix. For third-party contracts, Annex I (Anti-Bribery Clause) takes precedence.
- Displayed on notice boards at KMLTTB offices (ACK Gardens House, 4th Floor, Bishops Road, Upper Hill) in both English and Kiswahili, including a simplified “Do’s and Don’ts” poster.
- Referenced in public awareness materials (brochures, flyers, social media posts, radio announcements).
- Annually, the Board shall issue a message of commitment to the policy, published on the website and circulated to all staff.
- Discussed during staff meetings and departmental meetings at least twice a year.
- Internal email reminders sent quarterly to all staff, highlighting a specific section of the policy.
- The KMLTTB intranet (if available) will feature a dedicated integrity page with the policy, reporting forms, and FAQs.
- Computer screensavers and wallpapers on KMLTTB devices will periodically display key integrity messages and the IAO contact details.

18. ANNEXES (15 detailed templates – to be developed separately)

The following annexes form part of this policy and shall be maintained by the IAO. Each annex is a template that KMLTTB will complete and use operationally.

- Annex A: Annual Integrity Attestation Form (one page, with signature block)
- Annex B: Conflict of Interest Declaration Form (listing types of interests – shares, family, etc.)
- Annex C: Gifts and Hospitality Register (table: date, giver, value, description, action taken, IAO signature)
- Annex D: Confidential Corruption Reporting Form (for reporters to fill – includes anonymity option)
- Annex E: Bribery and Anti-Corruption Register (for IAO/CPC use – tracks each report from receipt to closure)
- Annex F: Corruption Risk Assessment Template (EACC-aligned, with likelihood/impact matrix and scoring guide)
- Annex G: Anti-Bribery and Corruption Mitigation Plan Template (actions,



responsible, deadlines, status, KPIs)

- Annex H: Whistleblower Protection Protocol (detailed internal procedure, including confidentiality agreements)
- Annex I: Third-Party Anti-Bribery Clause (to be inserted into all contracts, with acknowledgment signature)
- Annex J: eCitizen Portal Integrity Audit Checklist (monthly – ICT use)
- Annex K: Training Database Template (for IAO to record all training)
- Annex L: Policy Acknowledgment Form (for staff and Board members)
- Annex M: Lifestyle Audit Initiation Form (internal use, confidential)
- Annex N: Quarterly Report to EACC – Template (filled each quarter)
- Annex O: Ethical Dilemmas Quick Reference Card (one-page summary for staff) – optional

ANNEXURES/FORMS TO BE RECOMMENDED BY EACC AND CO-OPTED APPROVAL BY THE BOARD

19. APPROVAL, SIGNATURES, AND EFFECTIVE DATE

This policy is submitted for approval by the Finance, Human Resource and Administration Committee and the Disciplinary Committee of the Kenya Medical Laboratory Technicians and Technologists Board, in accordance with the Board’s governance structure and the requirements of the EACC 22nd Cycle Corruption Prevention Indicator assessment.

Upon approval by the Committees, this policy shall be tabled before the full Board of Directors for final ratification. The policy shall become effective on the date of Board approval and shall remain in force until reviewed or replaced.

Committee / Body: Finance, Human Resource and Administration Committee – Action: Review and recommend approval

Committee / Body: Disciplinary Committee – Action: Review and recommend approval; nominate CPC members

Committee / Body: Board of Directors – Action: Final ratification and approval

APPROVED by the Board of Directors of the Kenya Medical Laboratory Technicians and Technologists Board on this _____ day of _____ 2026.

Name: _____



Title: Chairperson,

KMLTTB Board Signature: _____

Date: _____

Name: _____

Title: Ag. Registrar Signature: _____

Date: _____

Name: _____

Title: Corporation Secretary

Signature: _____

Date: _____

Policy Effective Date: _____

Next Review Date: _____ (one year from effective date)

