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NGEC
National Gender and
Equality Commission

FRAMEWORK FOR THE INCLUSION OF PERSONS WITH DISABILITIES IN ANTI-CORRUPTION PROGRAMMING IN KENYA





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ACRONYMS

| | |
|---------|---|
| AGPO: | Access to Government Procurement Opportunities |
| ARA: | Assets Recovery Agency |
| AUCPCC: | African Union Convention on Preventing and Combating Corruption |
| CRPD: | Convention on the Rights of Persons with Disabilities |
| DCI: | Directorate of Criminal Investigations |
| EACC: | Ethics and Anti-Corruption Commission |
| FRC: | Financial Reporting Centre |
| KRA: | Kenya Revenue Authority |
| MAT: | Multi-Agency Team |
| NACCSC: | National Anti-Corruption Campaign Steering Committee |
| NCPWD: | National Council for Persons with Disabilities |
| NGEC: | The National Gender Equality Commission |
| PWDs: | Persons with Disabilities |
| NIS: | National Intelligence Service |
| ODPP: | Office of the Director of Public Prosecutions |
| UNSDG: | United Nations Sustainable Development Goals |
| UNODC: | United Nations Office on Drugs and Crime |

FOREWORD

It is with great pleasure that I present the “*Framework for Inclusion of Persons with Disabilities in Anti-Corruption Programming in Kenya*”. This document is a culmination of concerted efforts in partnership with the Ethics and Anti-Corruption Commission (EACC), the National Anti-Corruption Campaign Steering Committee (NACCSC), and the National Council for Persons with Disabilities (NCPWD), Organizations of and for Persons with Disabilities, as well as individual persons with disabilities. The framework seeks to remedy the exclusion of Persons with Disabilities (PWDs) in anti-corruption programming in Kenya.

This framework represents a milestone in our collective efforts to promote gender equality and inclusion in the fight against corruption. It acknowledges the unique challenges faced by PWDs in accessing information, navigating legal processes, and engaging with anti-corruption infrastructure, institutions, and personnel. By establishing clear standards for disability-inclusive anti-corruption programming, this document sets the stage for meaningful participation of PWDs in anti-corruption efforts.

The framework is intended to guide anti-corruption policymakers and practitioners in ensuring the inclusion of PWDs development and execution of anti-corruption programs. In making reference to foundational principles of the Convention on the Rights of Persons with Disabilities (CRPD), the framework offers practical guidance to PWDs and their agents with a focus to their ability to contribute to, and benefit from anti-corruption initiatives and measures. It seeks to foster collaboration, coordination, and partnerships between responsible entities and organizations advocating for the rights of PWDs.

I therefore invite all stakeholders, government agencies, Civil Society Organizations, disability rights advocates, the private sector, and the wider community to join us in championing this inclusive approach to anti-corruption efforts in Kenya.

Together, we can work towards a future where PWDs are empowered to participate in the fight against corruption, and contribute to a more equitable and transparent society for all.



Dr. Joyce Mwikali Mutinda, PhD, EBS.
Chairperson

ACKNOWLEDGEMENT

On behalf of the National Gender and Equality Commission (NGEC), I would like to express my appreciation to all individuals and organizations who have contributed to the development of this Framework dubbed, ‘*The Framework for the Inclusion of Persons with Disabilities in Anti-Corruption Programming in Kenya*’.

First, I wish to thank our partners: The Ethics and Anti-Corruption Commission (EACC), the National Anti-Corruption Campaign Steering Committee (NACCSC), and the National Council for Persons with Disabilities (NCPWD) for their support and collaboration in policy and technical processes followed in the development of this framework. Special appreciation to Ms Eunice Ndingo (EACC), Ms. Evalyne Rono (NACCSC) and Mr. Isaac Manyonge (NCPWD) for your invaluable contributions.

Special appreciation to Mr. Lawrence Mute, our facilitator, who guided the process of development the framework. We appreciate your invaluable contributions, passion in the subject, insightful guidance, and dedication throughout the process.

I also wish to appreciate all the stakeholders who shared their expertise, knowledge and experiences during the validation process of this framework. Your active participation, positive criticism, suggestions and thoughts were instrumental in shaping the content and scope of this framework. I express special thanks to organizations of and for Persons with Disabilities, as well as individual Persons with Disabilities, for their contributions and efforts that ensured that this framework carried the voices of all categories of PWDs and that none of PWDs are left behind in the anti-corruption programming in Kenya.

I acknowledge the technical staff of the National Gender and Equality Commission led by Winfred Wambua, Assistant Director, Programs, John Nzomo, Kevin Mpaka, Ruth Njenga, and Joshua Ogembo for your commitment, expertise, and efforts in coordinating and facilitating the development of this framework.

I recognize the role of the Chairperson and Commissioners, and particularly the Conveners of the Disability and Elderly Division namely Dr. Chomba Munyi, PhD, MBS, and Dr Margaret Karungaru, MBS for your policy guidance throughout the task.

Finally, I extend my gratitude to the Ford Foundation for their generous funding of consultations, facilitators, drafting and final printing of this framework. You indeed introduced to the Commission the concept of mainstreaming disability in anti-corruption programs. We appreciate your continued technical and financial support.

Thank you all.



Paul Kuria, OGW

Ag. Commission Secretary/CEO

KEY TERMS AND CONCEPTS

| | |
|--|---|
| Ableism | The discrimination of and social prejudice against People with Disabilities based on the belief that typical abilities are superior. |
| Accessibility | includes access by Persons with Disabilities to the physical environment, to transportation, to information and communication, including information and communications technologies and systems, and to other facilities and services open or provided to the public. Accessibility is a precondition for enabling Persons with Disabilities to live independently and participate fully and equally in society. |
| Communication | includes languages, display of text, braille, tactile communication, signs, large print, accessible multimedia and written, audio, plain-language, easy to read, pictorial, human-reader and augmentative and alternative modes, means and formats of communication, including accessible information and communication technologies. |
| Corruption | means the abuse of public office for private gain. It includes bribery, fraud, embezzlement or misappropriation of public funds, abuse of office, and breach of trust. |
| Disability | includes any physical, sensory, mental, psychological or other impairment, condition or illness that has, or is perceived by significant sectors of the community to have, a substantial or long-term effect on an individual's ability to carry out ordinary day-to-day activities. |
| Disability inclusion | The meaningful participation and involvement of Persons with Disabilities in all their diversity, the promotion and mainstreaming of their rights across all spheres, the development of disability-specific programmes, and consideration of disability-related perspectives, without discrimination and on an equal basis with others, in compliance with national and international human rights standards. |
| Organizations for persons with disabilities | means associations, groups, non-governmental organizations or societies formed for the purposes of rendering services to Persons with Disabilities. |
| Organizations of persons with disabilities | means associations, societies or other membership groups led and controlled by Persons with Disabilities to represent their rights and interests. |
| Persons with Disabilities | include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. |

| | |
|---------------------------------|--|
| Reasonable accommodation | means necessary and appropriate modifications and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to Persons with Disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms. |
| Responsible | include organs, commissions and other state agencies and non-state actors, whether national or devolved, with primary or secondary anti-corruption mandates. |
| Specific Measures | means policies, laws, regulations and practices, including outreach or support programmes; allocation or reallocation of resources; preferential treatment, targeted recruitment, hiring and promotion; numerical goals connected with time frames; and quota systems, designed, adopted and implemented to fulfil the equal enjoyment of rights by Persons with Disabilities. |

PART 1: INTRODUCTION

1.0 Background

The National Gender and Equality Commission (NGEC) is a Constitutional Commission established by the National Gender and Equality Commission (Cap7K), pursuant to Article 59 (4) & (5) of the Constitution of Kenya, 2010. The mandate of the Commission is to promote gender equality and non-discrimination for all persons in Kenya, with a focus on Special Interest Groups (SIGs) that include: Women, Persons with Disabilities (PWDs), Children, Youth, Older Members of Society, Minority and Marginalized groups. The development of the Framework conforms with the functions of the NGEC as provided by the National Gender and Equality Commission (Cap. 7K). In particular, the NGEC:

- a) Monitors, facilitates and advises on the integration of the principles of equality and freedom from discrimination in all national and county policies, laws and administrative regulations in all public and private institutions.
- b) Coordinates and facilitates mainstreaming of issues of gender, persons with disability and other marginalized groups in national development and to advise the Government on all aspects thereof;
- c) Works with other relevant institutions in the development of standards for the implementation of policies for the progressive realization of the economic and social rights specified in Article 43 of the Constitution and other written laws.

Based on this mandate the National Gender and Equality Commission received funding from Ford Foundation to design and execute a project on mainstreaming disability in anti-corruption programs. The project was dubbed *“Building the agency of the disabled persons and their networks to amplify their voices in the fight against corruption in Kenya”*. The objective of the project was to strengthen the participation and contributions of Persons with Disabilities and their networks in national and county anti-corruption programs. One of the activities under the project was the development of a framework through which contributions of the network of Persons with Disabilities are channelled and considered by the national anti-corruption multi-stakeholder forums and other anti-corruption initiatives. Further, the NGEC has committed to integrating practical action-based initiatives that reinforce anti-corruption reform efforts in Kenya within the framework of the Kenya Leadership Integrity Plan 2019-2023¹.

In this regard, the NGEC in partnership with public entities with primary and/or secondary anti-corruption mandates: The Ethics and Anti-Corruption Commission (EACC), the National Anti-Corruption Steering Committee (NACCSC), and the National Council for Persons with Disabilities (NCPWD) facilitated the development of the Framework for Inclusion of Persons with Disabilities in Anti-Corruption Programming in Kenya. The Framework seeks to address the longstanding issue of exclusion and marginalization of Persons with Disabilities in anti-corruption efforts in Kenya. It recognizes that Persons with have been overlooked in the design and implementation of anti-corruption programs, despite being vulnerable to corruption and facing significant barriers in accessing justice and resources. It acknowledges the unique

¹ Kenya Integrity Plan 2019-2023. (2020). Kenya Leadership Integrity Forum.

challenges faced by Persons with Disabilities in accessing information, navigating legal processes, and engaging with anti-corruption institutions.

1.2 About the Partners

1.2.1 Ethics and Anti-Corruption Commission (EACC)

The Ethics and Anti-Corruption Commission (EACC) is a statutory body established under Section 3 (1) of the Ethics and Anti-Corruption Commission Act, 2011. The Commission's mandate is to combat and prevent corruption and economic crime in Kenya through law enforcement, preventive measures, public education and promotion of standards and practices of integrity, ethics and anti-corruption. Its functions include investigating corruption and unethical conduct, preventing corruption, and educating and enlisting the public's support to combat corruption.

1.2.2 National Anti-Corruption Campaign Steering Committee

The National Anti-Corruption Campaign Steering Committee (NACCSC) is established in the Office of the Attorney General and Department of Justice vide Kenya Gazette Notice No. 6707 of 2014. It is mandated to undertake a nationwide public education, sensitization and awareness creation campaign aimed at effecting fundamental changes in the attitudes, behavior, practices and culture of Kenyans towards corruption. The campaign is mainly targeted at the members of the public to fully empower them to fight and prevent corruption. In the implementation of the anti-corruption campaign, NACCSC seeks to mobilize Kenyans to actively fight and prevent corruption, establish and operationalize partnerships and anti-corruption campaign networks, encourage public participation among citizens and, promote National Values as a tool to fight corruption, increase public awareness and information on corruption and carry out research to inform and affirm the campaign.

1.2.3 The National Council for Persons with Disabilities

The National Council for Persons with Disabilities is a state corporation established by an Act of Parliament; the Persons with Disabilities Act No. 14 of 2003 and set up in November 2004. The NCPWD promotes and protects the equalization of opportunities and the realization of human rights for persons with disabilities. Its functions include developing policies and measures to afford persons with disabilities full access to community and social services; and carrying out measures for public information on the rights of persons with disabilities.

1.3 Purpose of the Framework

The overall objective of this Framework is to promote the meaningful participation and involvement of Persons with Disabilities in the fight against corruption. The Framework establishes standards that organs and agencies with primary or secondary anti-corruption mandates, and anti-corruption non-state actors, referred to in this Framework as 'Responsible Entities', will adopt to ensure that their anti-corruption initiatives and programming are disability-inclusive. This Framework will also benefit persons with disabilities, Organizations of Persons with Disabilities (OPDs), organizations for persons with disabilities, and the public generally, as they engage with Responsible Entities in the fight against corruption.

The framework is expected to inform programming work of the United Nations Office on Drugs and Crime (UNODC) in their support of corruption surveys and reporting in Kenya; the Ford Foundation in their continued funding of disability-inclusive anti-corruption activities, and the national multi-agency team (MAT) on corruption that include Ethics and Anti-corruption Commission (EACC), Kenya Revenue Authority (KRA), Office of the Director of Public Prosecutions (ODPP), Directorate of Criminal Investigations (DCI), National Intelligence Service (NIS) (Financial Reporting Centre (FRC), Assets Recovery Agency (ARA) and private sector on their anti-corruption initiatives. The framework shall inform the planning, budgeting and implementation of anti-corruption programs at the devolved units. Finally, the framework shall inform the private sector of the irreducible factors and parameters to consider to effectively involve PWDs in anti-corruption programs as well as key considerations targeting their suppliers, infrastructure and services to reduce corruption in Kenya.

Specific objectives

The specific objectives of the Framework are:

1. To establish standards for guiding Responsible Entities on how to ensure that anti-corruption initiatives and programming are disability inclusive and responsive;
2. To enable persons with disabilities and their representative organizations to exercise their agency meaningfully by contributing to the fight against corruption; and
3. To strengthen collaboration, coordination and partnerships between Responsible Entities and organizations of and for persons with disabilities in the fight against corruption.

1.4 Development process

This Framework was prepared in conformity with the individual and collective mandates of the NGECC and its partners, including the EACC, NACCSC, and NCPWD. The process involved several key steps. First, in November 2022 NGECC facilitated a high-level consultative forum with key actors in the anti-corruption sector to stimulate dialogue on corruption and disability. Secondly, between January and April 2023, it facilitated four regional forums with Persons with Disabilities and their representative organizations to discuss the effects of corruption on Persons with Disabilities and their roles and contributions to the fight against corruption. These forums took place in Murang'a, Uasin Gishu, Kisumu, Mombasa, and Machakos Counties. In November 2023, the Commission convened a technical forum drawn from the NGECC, EACC, NACCSC and NCPWD, which discussed and agreed on the approach and content of this Framework. A consultant then prepared a draft framework which the NGECC and partners reviewed and finalized at another technical meeting in March 2024. A validation meeting took place on March 22, 2024, during which the feedback and insights gathered were incorporated into the final version of the document.

2.0 Intersection between Corruption and Disability

Corruption is manifest in the lives of Kenyans, including persons with disabilities. It undermines the principles of equality, justice, and transparency, posing significant barriers to social and economic development. Kenyans often encounter petty corruption such as bribery when they seek basic services from public institutions, including hospitals, schools, police and licensing authorities as well as when they seek services from the private sector. According to the National Ethics and Corruption Survey (NECS) 2023, corruption was ranked the fourth most pressing problem facing the country after high cost of living, unemployment, and poverty. The Survey² found that 34.4% of respondents who sought government services were asked to pay a bribe. The most common forms of corruption in public offices were bribery (41.0%), abuse of office (20.0%), favoritism (13.6%), tribalism and nepotism (7.5%) and extortion (6.9%), Embezzlement of public funds (4.1%) among others. Kenyans also face the debilitating impacts of grand corruption which prevails in strategic sectors of society, including health, education, security, and infrastructure³.

Corruption and discrimination exacerbate inequality, which is rooted in the abuse of power that, as one study found⁴, is evident in the following four ways:

- i. People who face discrimination are more exposed to corruption and exploitation. Communities that face exclusion and marginalization are liable to become victims of corrupt actors.
- ii. Certain types of corruption can be inherently discriminatory, such as when corruption is used as a vehicle to continue perpetuating discrimination.
- iii. People facing discrimination experience the most impacts of corruption, consequently deepening social inequalities.
- iv. Discrimination blocks efforts to challenge corruption, by preventing victims from pursuing justice and endangering those who wish to resist or report corruption.

Specifically, Persons with Disabilities face discrimination on the basis of disability, which has disproportionate impacts on them. During the consultative process organized by NGEK which resulted in this Framework, Persons with Disabilities highlighted two categories of intersections of disability and corruption⁵.

First, corruption undermines the quality of their livelihoods as Persons with Disabilities: it makes them miss employment opportunities when they fail or cannot afford to bribe potential employers. For example, they do not benefit from Access to Government Procurement Opportunities (AGPO) Programme because non-disabled persons take unfair advantage of their entitlement; and they are even expected to give bribes in exchange for services they are entitled to, such as issuance of documentation for registration Persons with Disabilities. The vicious cycle of corruption and exclusion perpetuates their marginalization by creating and sustaining systemic barriers, in turn making them even more susceptible to corruption.

Second Persons with Disabilities face unusual barriers when they set out to address corruption, for example, by reporting instances of corruption or by proactively participating in anti-corruption initiatives. Anti-corruption information and campaigns are often not available in accessible formats, and anti-corruption facilities are also physically inaccessible to them. Persons with Disabilities also face stigma from the public as well as state bureaucracy which uses ableist laws, policies and practices to question the value of anti-corruption reports or messages that persons with disabilities communicate or disseminate. No doubt, too, some Persons with Disabilities have been witting or unwitting purveyors of corruption.

This is the context within which this Framework establishes standards on how anti-corruption agencies may ensure the meaningful inclusion of persons with disabilities in their initiatives and programming as well as redesign their anti-corruption measures to ensure they are disability inclusive and responsive.

3.0 Legal and Policy Framework

Kenya has elaborated legal and policy framework to combat corruption and promote inclusion and freedom from discrimination for all persons in Kenya including Persons with Disabilities.

The Constitution establishes the foundational normative framework for fighting corruption and promotion of inclusion and freedom from discrimination for all persons in Kenya including persons with Disabilities. Article 1 on National Values and Principles of Governance; Chapter 4 on the Bill of Rights; Chapter 6 on Leadership and Integrity that sets the ethical leadership benchmarks required for holders of State and Public Offices; Article 232 on the Values and Principles of Public Service; Chapter 10 that sets up the Judicial system to address governance, corruption and any other criminal activities that stifle the wellbeing of the people of Kenya; and Article 201 lays out the principles of public finance that include equity, openness, accountability and efficiency in public spending⁶.

Kenya has also put in place several statutory legal instruments for fighting corruption. The principal anti-corruption laws are:

- (i) Anti-Corruption and Economic Crimes (Cap. 65)
- (ii) Public Officer Ethics (Cap. 185B)
- (iii) Ethics and Anti-Corruption Commission (Cap. 7H)
- (iv) Leadership and Integrity (Cap. 185C)
- (v) Bribery Act (Cap. 79B)

² EACC. (2023). National Ethics and Corruption Survey ,2023. Retrieved from <https://eacc.go.ke/en/default/wp-content/uploads/2024/03/EACC-NATIONAL-SURVEY-REPORT-2023.pdf>

³ Africa Centre for Open Governance. (2020). Highway Robbery: Budgeted Corruption as State Capture. Retrieved from <https://africog.org/wp-content/uploads/2020/11/Highway-Robbery-Final.pdf>

⁴ Transparency International and Equal Rights Trust. (2021). Defying Exclusion: Stories and Insights on the Links between Discrimination and Corruption. Retrieved from <https://www.transparency.org/en/publications/defying-exclusion-corruption-discrimination>

⁵ National Gender and Equality Commission. 2024. 'Building the Agency of Disabled Persons and their Networks to Amplify their Voices in the Fight against Corruption in Kenya'.

⁶ GOK. (2010). The Constitution of Kenya, 2010

Other laws which complement the fight against corruption include the following:

- (i) Proceeds of Crime and Anti-Money Laundering (cap. 59A)
- (ii) Commission on Administrative Justice (Cap. 7J)
- (iii) Public Procurement and Asset Disposal (Cap. 412C).
- (iv) Witness Protection (Cap. 79)
- (v) National Police Service (Cap. 84)
- (vi) Public Finance Management (Cap. 412A)
- (vii) County Governments (Cap. 265)
- (viii) Public Appointments (County Assemblies Approval) (Cap. 265B)
- (ix) Public Appointments (Parliamentary Approval) (Cap. 7F) 2011.
- (x) Prevention of Organized Crimes (Cap. 59)
- (xi) Access to Information (Cap. 7M)
- (xii) Election Offences Act, Cap. 66;
- (xiii) Political Parties Act, Cap.7D;
- (xiv) Public Audit (Cap. 412B)
- (xv) The Penal Code (Cap 63).
- (xvi) National Ethics and Anti-Corruption Policy,2020

In addition, Kenya is a signatory to various international and regional convention and treaties against Corruption. They include The United Nations Convention against Corruption; United Nations Sustainable Development Goals (UNSDG),2030, Goal 16; Africa Union Agenda 2063, African Union Convention on Preventing and Combating Corruption (AUCPCC) and East Africa Community Vision 2050.

In regards to inclusion and freedom from discrimination for PWDS, Kenyan Constitution also establishes the basis for the inclusion of Persons with Disabilities. Article 27 prohibits the direct or indirect discrimination of Persons with Disabilities. Article 54 entitles Persons with Disabilities to: *reasonable access to all places, public transport and information; Use Sign language, Braille or other appropriate means of communication; and Access materials and devices to overcome constraints arising from the person's disability.*

Other relevant legislative frameworks include: The Persons with Disabilities Act, Cap. 133, which establishes the NCPWD. Kenya is also party to the Convention on the Rights of Persons with Disabilities, 2006, whose purpose is to promote, protect and ensure the full and equal enjoyment of all human rights by Persons with Disabilities on the basis of equality, the Sustainable Development Goals, Goal 10 on reduced inequalities. It is also party to the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Persons with Disabilities in Africa, 2018, which, however, has still not come into force.

PART II: STANDARDS FOR INCLUDING PERSONS WITH DISABILITIES IN ANTI-CORRUPTION INITIATIVES AND PROGRAMMING

4.0 General Guidelines

- a) Responsible Entities will have regard for the standards set out hereunder to ensure that anti-corruption facilities and services are disability inclusive.
- b) Responsible Entities will prioritize the voices of Persons with Disabilities and their lived experiences of facing and fighting corruption, to ensure that Persons with Disabilities participate meaningfully in anti-corruption initiatives and programming.

4.1 Approach

4.1.1 Twin-track approach

- a) Responsible Entities will use the twin-track approach to ensure the full inclusion of Persons with Disabilities in anti-corruption initiatives and programming.
- b) To that end, they will:
 - i. Ensure that general or thematic anti-corruption initiatives and programming include Persons with Disabilities on an equal basis with others;
 - ii. Take disability-targeted measures towards the full inclusion of Persons with Disabilities;
 - iii. Ensure that the concerns and needs of Persons with Disabilities form an integral dimension to the design and implementation of anti-corruption initiatives and programming; and
 - iv. Build their capacity for providing services to Persons with Disabilities.

4.2 Specific guidelines

4.2.1 Reasonable accommodations and specific measures

- a) Responsible Entities will, while executing their mandates, take account of the requirements of persons with different categories of disabilities.
- b) To this end, they will provide persons with disabilities reasonable accommodations and support services, and take other specific measures, to ensure their full inclusion in anti-corruption initiatives and programming.
- c) Where a Responsible Entity is not able to meet a request for reasonable accommodation, it will explore alternative arrangements with the individual making the request.

4.2.2 Accessibility

- a) Responsible Entities will take measures to ensure that their anti-corruption facilities and services are accessible to individuals with disabilities.
- b) To that end, they will:
 - i. Involve Persons with Disabilities in identifying and determining how to address barriers to access;
 - ii. Ensure that institutional barriers, including laws, practices and processes, do not hinder or undermine persons with disabilities from communicating with or receiving communications from Responsible Entities;
 - iii. Ensure that barriers to the physical environment do not prevent Persons with Disabilities from accessing buildings or other facilities where anti-corruption initiatives and programming are undertaken; and
 - iv. Ensure that protocols, platforms or formats for information and communication, including radio, television, newspapers, books, brochures, websites, online media and social media, are accessible to Persons with Disabilities, and provide them information in accessible formats, as appropriate, including audio-formats, large print, braille, and videos with captions or sign language interpretation.

4.2.3 Awareness-raising for Persons with Disabilities

- a) Responsible Entities will support or implement awareness-raising campaigns for persons with disabilities on the meaning and disproportionate impacts of corruption on Persons with Disabilities
- b) To that end, they will mobilize Persons with Disabilities to participate in anti-corruption campaigns using in-person workshops, virtual meetings, public education, information, education and communication material, radio, television, newspapers, websites, online media and social media.

4.2.4 Public Awareness Raising

- a) Responsible Entities will implement or support awareness-raising for the public on the intersections of corruption and disability, and the disproportionate impacts of corruption on Persons with Disabilities. These entities will aim to change attitudes on corruption with emphasis that corruption is not acceptable and has irredeemable impacts.
- b) To that end, they will educate the public:

- i. Against stigmatizing and stereotyping persons on the basis of disability, and on the negative impacts that such stigmatization and stereotyping have on the fight against corruption; and
- ii. On the crimes, sanctions and penalties in relation to offences commonly perpetrated on persons with disabilities, including abuse of disability entitlements and benefits.

4.2.5 Capacity-building

- a) Responsible Entities will build the capacities of organizations of Persons with Disabilities and organizations Persons with Disabilities to mobilize their networks to undertake anti-corruption initiatives.
- b) To that end, they will:
 - i. Establish general as well as specific national disability inclusive anti-corruption programming;
 - ii. Prepare training manuals and disseminate them in accessible formats;
 - iii. Work with member organizations of Persons with Disabilities; and
 - iv. Work with the private sector to strengthen disability-inclusive anti-corruption services and programming.

4.2.6 Legal Frameworks on Anti-Corruption

- a) Responsible Entities will ensure that legal frameworks on anti-corruption are disability inclusive.
- b) To that end, their review of relevant policies and laws will involve Persons with Disabilities Decision-making
 - i. Responsible Entities will ensure that decision-making on anti-corruption initiatives and programming is disability inclusive.
 - ii. To that end, Corruption Prevention Committees, and (include any other appropriate institutions) will include representation of Persons with Disabilities.

4.2.7 Corruption Reporting Mechanisms

- a) Responsible Entities will ensure that anti-corruption complaints mechanisms are accessible and friendly to Persons with Disabilities
- b) To that end, they will:
 - i. Ensure that anonymous reporting systems, platforms and channels, including complaints made by email, in-person, and through toll-free numbers or hotlines, are disability inclusive; and
 - ii. Anti-corruption mechanisms, including petitions, whistleblowing procedures and practices, and other anti-corruption policies, laws and programmes, will take account of the particular requirements of persons with disabilities.

4.2.8 Cooperation, Collaboration and Coordination

- a) Responsible Entities will establish and or strengthen cooperation, collaboration and coordination across all sectors, stakeholders and all levels of government, to support disability inclusive anti-corruption initiatives and programming.
- b) To that end, they will:
 - i. Establish a National Disability Inclusion Anti-Corruption Consultative Forum;
 - ii. Consider establishing similar forums at the county and sub-county levels; and
 - iii. Establish partnerships with organizations of Persons with Disabilities.

4.2.9 Data and Research

- a) Responsible Entities will undertake or facilitate disability inclusive data collection and research on anti-corruption. They will collaborate with Kenya National Bureau of Statistics (KNBS) on conducting surveys on disability and anti-corruption
- b) To that end, they will:
 - i. Ensure that general anti-corruption surveys and studies are inclusive of Persons with Disabilities
 - ii. Support disability-specific research and surveys; and
 - iii. To the extent consistent with their mandates and subject to data protection protocols, provide disability-disaggregated anti-corruption data.

- i. Ensure that anonymous reporting systems, platforms and channels, including complaints made by email, in-person, and through toll-free numbers or hotlines, are disability inclusive; and
- ii. Anti-corruption mechanisms, including petitions, whistleblowing procedures and practices, and other anti-corruption policies, laws and programmes, will take account of the particular requirements of persons with disabilities.

4.2.8 Cooperation, Collaboration and Coordination

- a) Responsible Entities will establish and or strengthen cooperation, collaboration and coordination across all sectors, stakeholders and all levels of government, to support disability inclusive anti-corruption initiatives and programming.
- b) To that end, they will:
 - i. Establish a National Disability Inclusion Anti-Corruption Consultative Forum;
 - ii. Consider establishing similar forums at the county and sub-county levels; and
 - iii. Establish partnerships with organizations of Persons with Disabilities.

4.2.9 Data and Research

- a) Responsible Entities will undertake or facilitate disability inclusive data collection and research on anti-corruption. They will collaborate with Kenya National Bureau of Statistics (KNBS) on conducting surveys on disability and anti-corruption
- b) To that end, they will:
 - i. Ensure that general anti-corruption surveys and studies are inclusive of Persons with Disabilities
 - ii. Support disability-specific research and surveys; and
 - iii. To the extent consistent with their mandates and subject to data protection protocols, provide disability-disaggregated anti-corruption data.

4.2.10 Implementation and Monitoring.

- a) Responsible Entities will take account of these standards:-The national values and principles of governance established in the onstitution, including human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, and protection of the marginalized;
- b) Their constitutional duty to address the needs of vulnerable groups within society, including Persons with Disabilities; and
- c) The prohibition of direct or indirect discrimination on the basis of disability.
- d) To that end, Responsible Entities will:
 - i. Allocate disability inclusion funding;
 - ii. Ensure that monitoring and evaluation of their programs assesses the extent of disability inclusion; and
 - iii. Hold regular accountability forums.

5.0 Review

1. This Framework may be reviewed from time to time as circumstances require, but not later than every five years.
2. Responsible Entities may establish their own disability inclusion standards which will, in the minimum abide by the standards established in this Framework.

ANNEXES

Annex 1: Checklist for Accessible Anti-Corruption Programming

Physical Environment:

- Proximity to public transport and accessible parking near venues
- Clear signage identifying directions and locations
- Barrier-free pathways
- Wide corridors, doorways, and aisles
- Access by ramps or lifts
- Wheelchair access to forums and working tables
- Reserved front row or priority seating
- Well-lit venues and adjacent areas
- Clear acoustics (public address system, etc.)
- Accessible toilets and bathrooms

Information and Communication:

- Assistive listening devices
- Captioning
- Interpretation in Kenyan Sign Language
- Reserved front row or priority seating
- Large print
- Braille
- Advance copies of slides to be projected
- Clear acoustics (public address system, etc.)
- Accessible communication platforms

Additional Considerations for Accessible Formats:

- Easy-to-read text
- Videos with captions
- Braille materials
- Videos with Kenyan Sign Language interpretation
- Accessible online resources
- Consideration of PDFs and Flash Usage
- Describing images

- Using clear contrasts in colors
- Making navigation easy
- Using images in addition to text

Annex 2: List of Organizations that contributed in the Validation Meeting

| S/NO | NAME OF THE INSTITUTION |
|------|--|
| | MINISTRIES, DEPARTMENTS, AGENCIES |
| 1. | Department of Social Protection and Senior Citizen Affairs |
| 2. | National Council for Persons with Disabilities |
| 3. | National Anti-Corruption Campaign Steering Committee (NACCSC) |
| 4. | Department of National Treasury and Economic Planning |
| 5. | Directorate of Criminal Investigations |
| 6. | Public Procurement Regulatory Authority |
| 7. | Office of the Director of Public Prosecutions |
| 8. | Witness Protection Agency |
| 9. | Kenya Revenue Authority |
| 10. | Kenya Institute of Special Education (KISE) |
| | CONSTITUTIONAL COMMISSIONS AND INDEPENDENT OFFICES |
| 11. | Ethics and Anti-Corruption Commission (EACC) |
| 12. | Public Service Commission |
| 13. | Office of the Auditor General |
| 14. | Commission on Administrative Justice |
| 15. | Kenya National Commission on Human Rights |
| | NON-STATE ACTORS |
| 16. | United Disabled Persons of Kenya (UDPK) |
| 17. | Differently Talented Society of Kenya (DTSK) |
| 18. | Short Stature Society of Kenya (SSSK) |
| 19. | Women Challenged to Challenge (WCC) |
| 20. | The Kenya Pro- Ageing Organization |
| 21. | Kenyan Aged people Require Information, Knowledge & Advancement (KARIKA) |

| | |
|-----|----------------------------------|
| 22. | Gifted Community Centre |
| 23. | Kiambu County Disability Network |
| 24 | Association of the Deaf |

Annex 3: Schedule of High Level Consultative National Forum and Regional Forums

| S/No | Forum | Venue | Date | No. Of Participants | | | Total |
|-----------------------|-------------|--|--|---------------------|----|-----|-------|
| | | | | M | F | PWD | |
| National Forum | | | | | | | |
| 1. | Nairobi | Kenya Institute of Curriculum Development. | 29 th November 2022 | 62 | 50 | 42 | 112 |
| Regional Fora | | | | | | | |
| 2 | Murang'a | Murang'a Teachers College | 17 th to 20 th January 2023 | 55 | 65 | 80 | 120 |
| 3 | Mombasa | Mombasa Beach Hotel | 7 th -10 th February 2023 | 28 | 32 | 45 | 60 |
| 4 | Uasin Gishu | Rift Valley Technical Institute | 21 st to 24 th February 2023 | 36 | 29 | 45 | 65 |
| 5 | Machakos | Machakos University | 3 rd and 7 th April 2023. | 32 | 38 | 45 | 70 |



FORD
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Kisumu Office

Reinsurance Plaza, 3rd Floor, Wing B,
Oginga Odinga Street,
Kisumu Town.

Nakuru Office

Tamoh Plaza, 1st Floor, Kijabe Street,
Nakuru Town.

Garissa Office

KRA Route off Lamu Road, Province,
Garissa Town.

Kilifi Regional Office

Malindi Complex, off Lamu-Malindi Road,
Malindi Town.

Kitui Office

Nzambani Park, off Kitui Referral Hospital Road,
Kitui Town.

Isiolo Office

County Estate along Kiwanjani Road,
next to KRA Offices

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