



# Kuwait Integrity and Anti-Corruption Strategy

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2019 - 2024





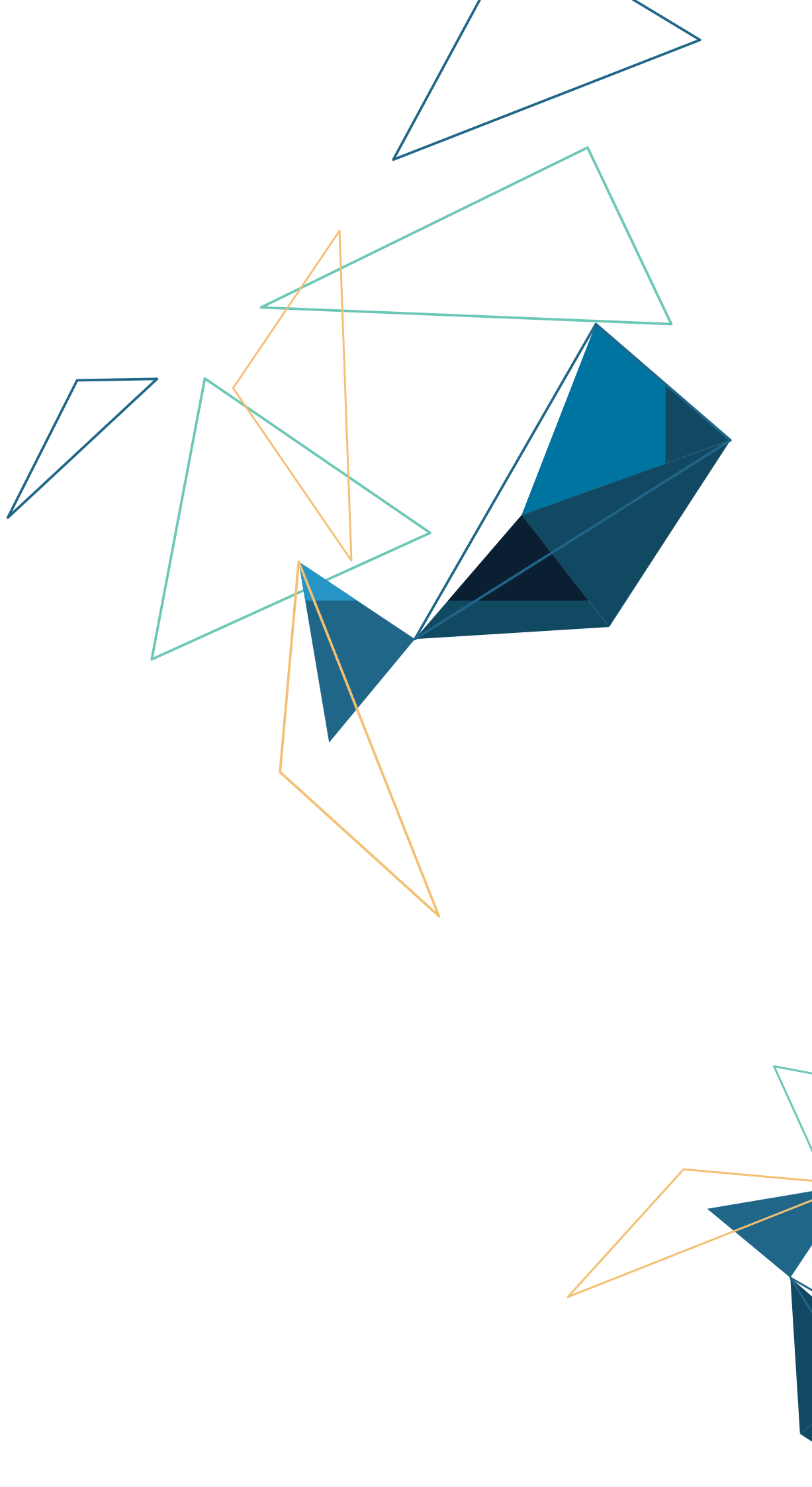


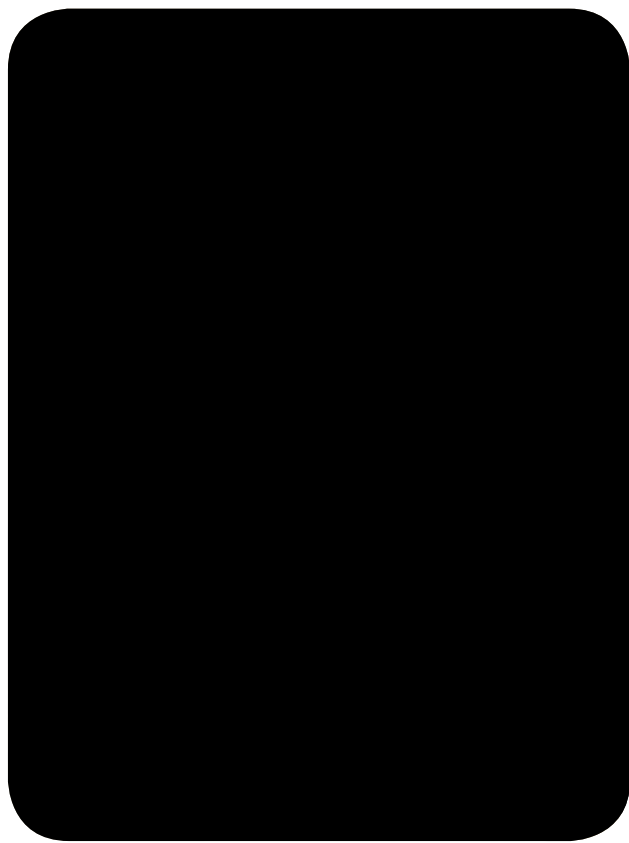
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# **Kuwait Integrity and Anti-Corruption Strategy**

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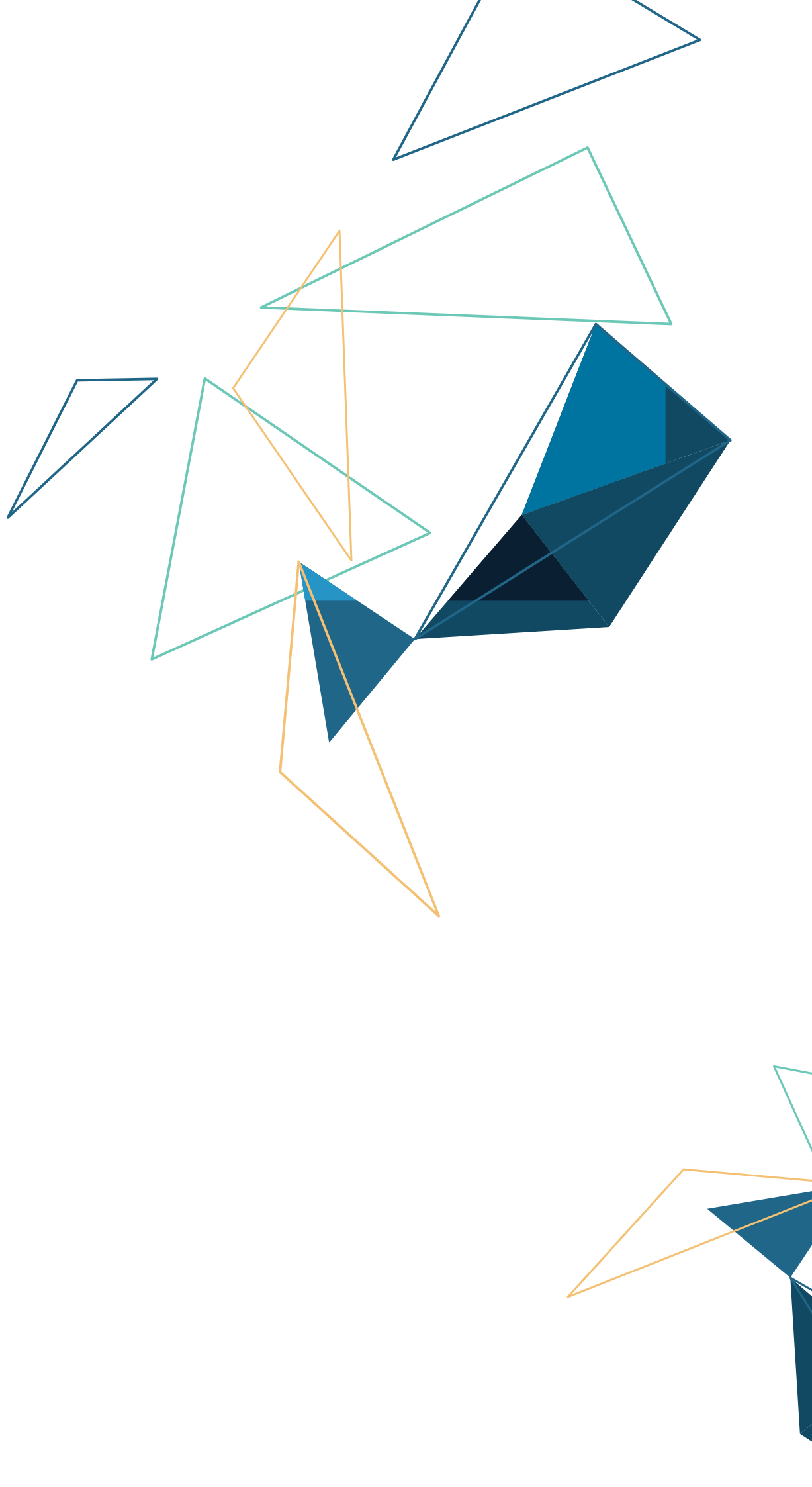
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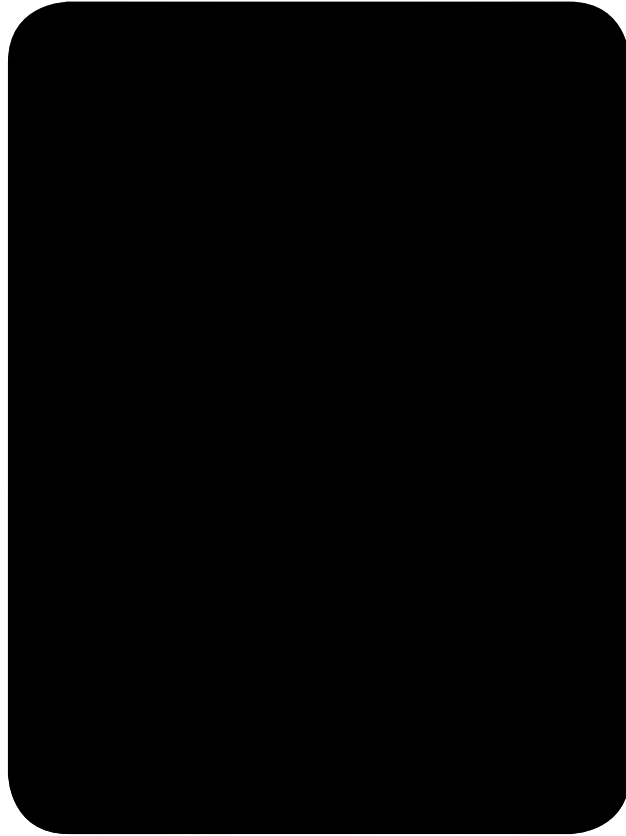




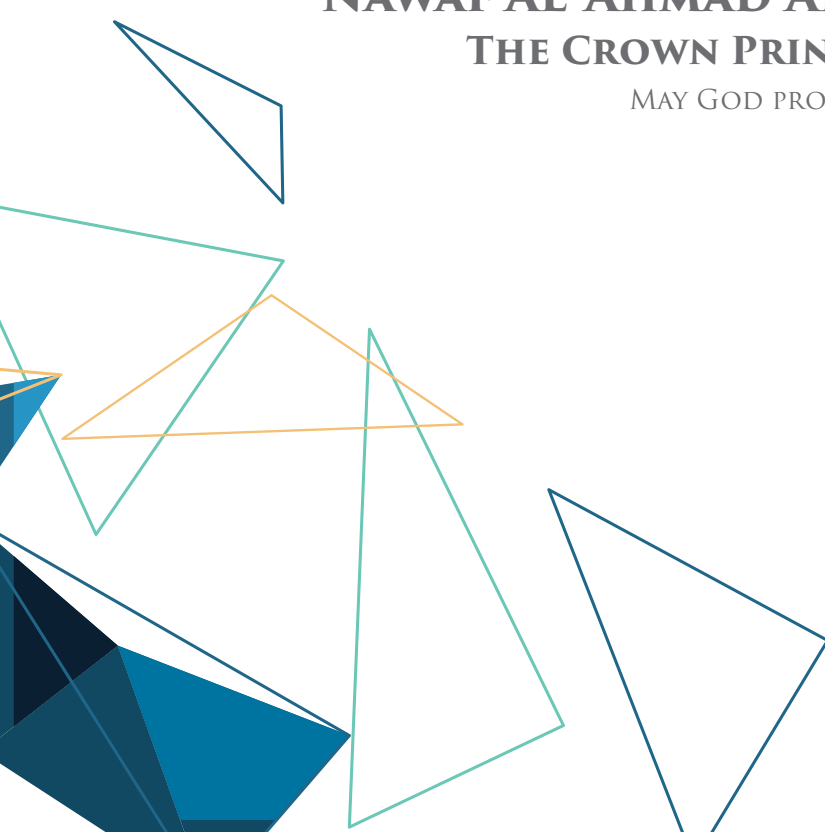
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THE EMIR OF KUWAIT  
MAY GOD PROTECT HIM

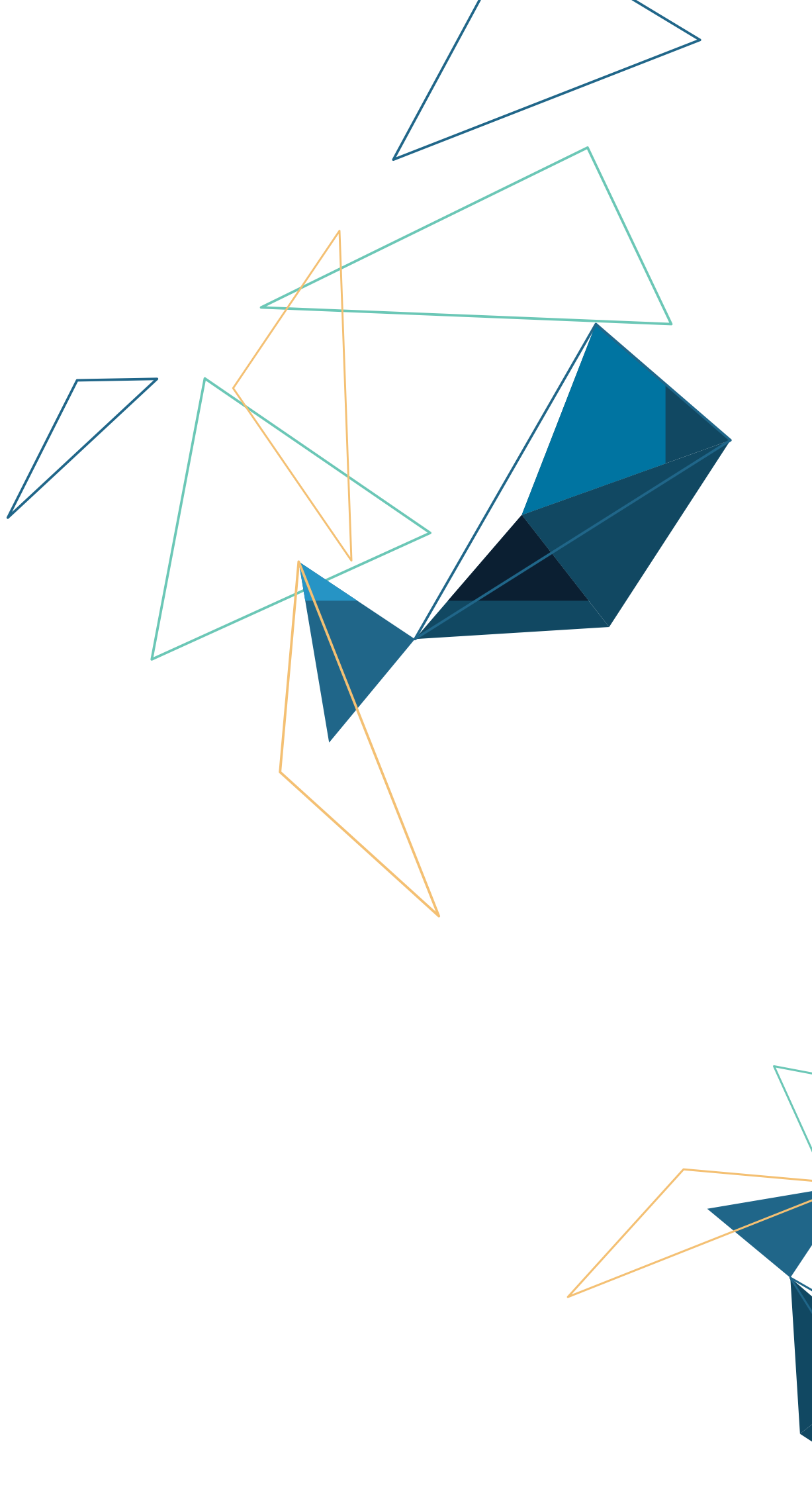


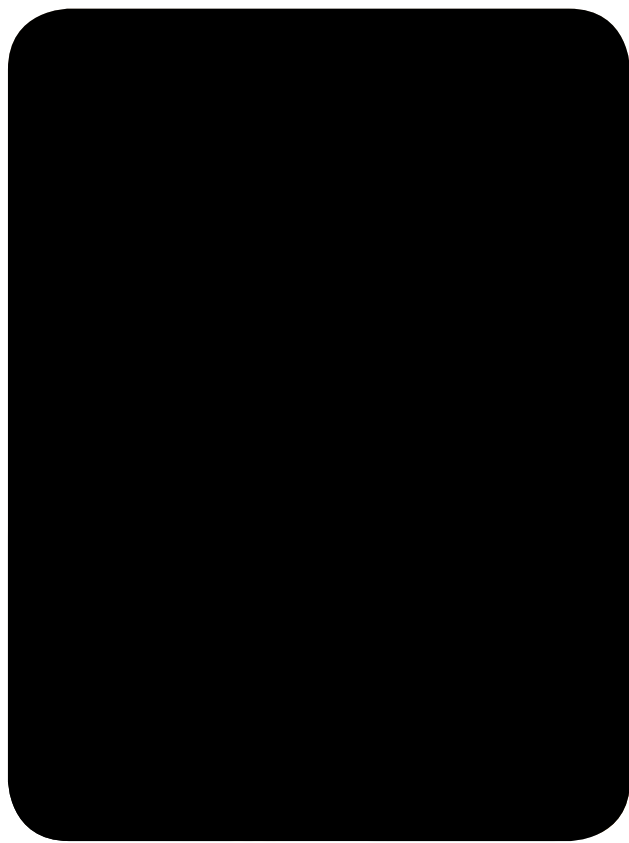




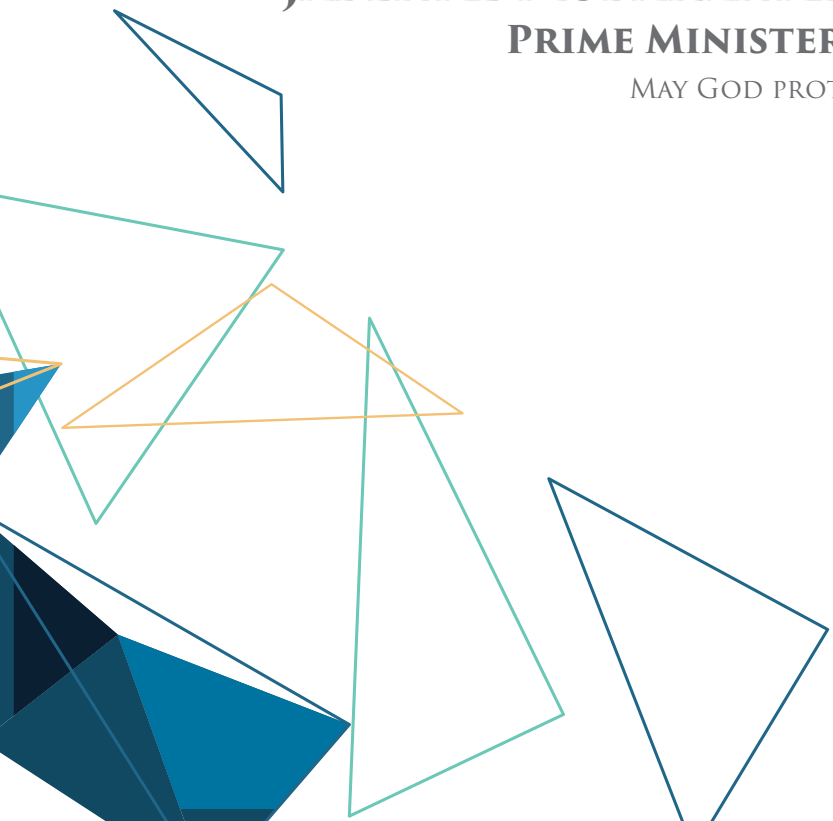
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**NAWAF AL-AHMAD AL-JABER AL-SABAH**  
**THE CROWN PRINCE OF KUWAIT**  
MAY GOD PROTECT HIM

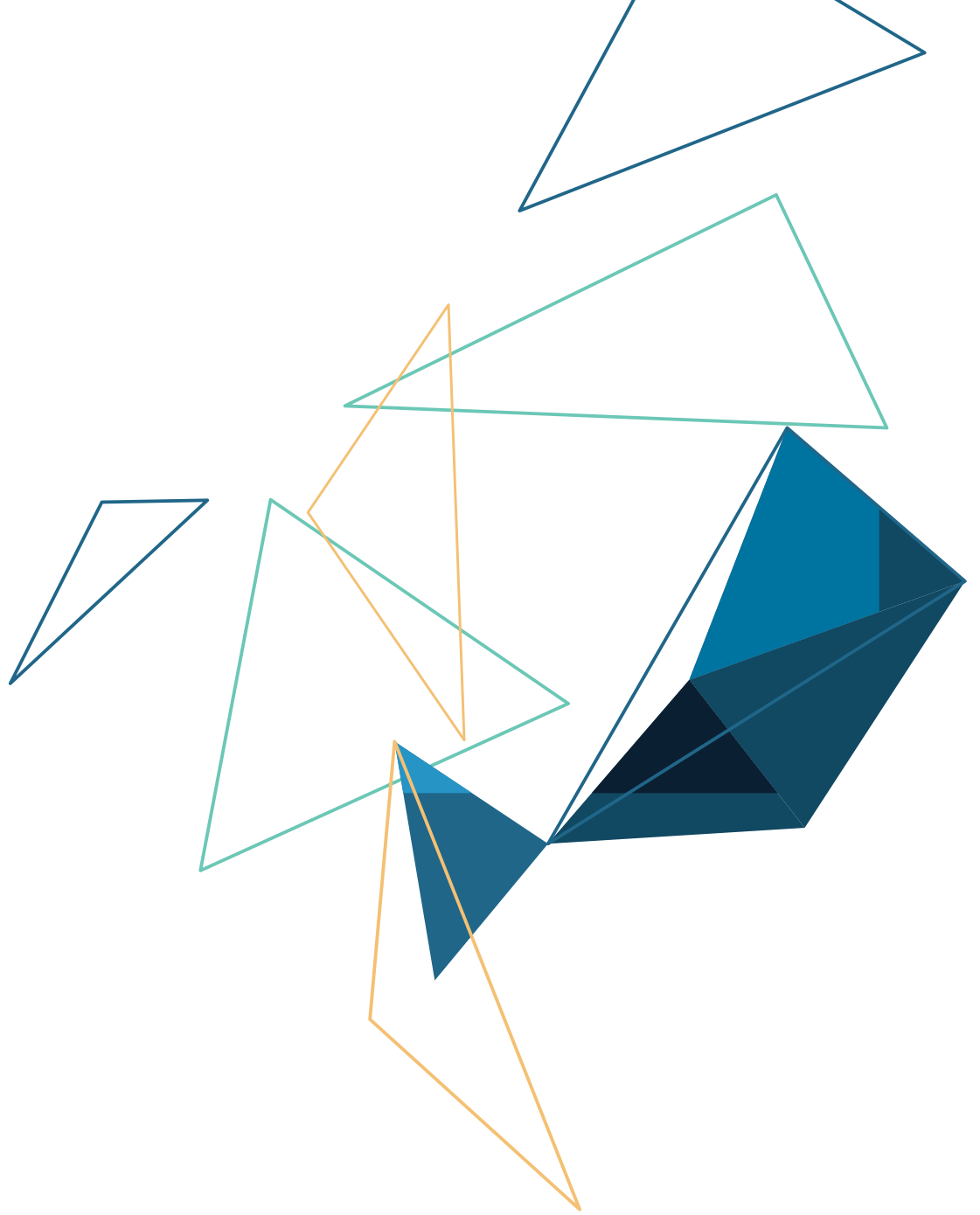






HIS HIGHNESS  
**JABER AL-MUBARAK AL-HAMAD AL-SABAH**  
PRIME MINISTER OF KUWAIT  
MAY GOD PROTECT HIM





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استراتيجية الكويت  
لتعزيز النزاهة ومكافحة الفساد  
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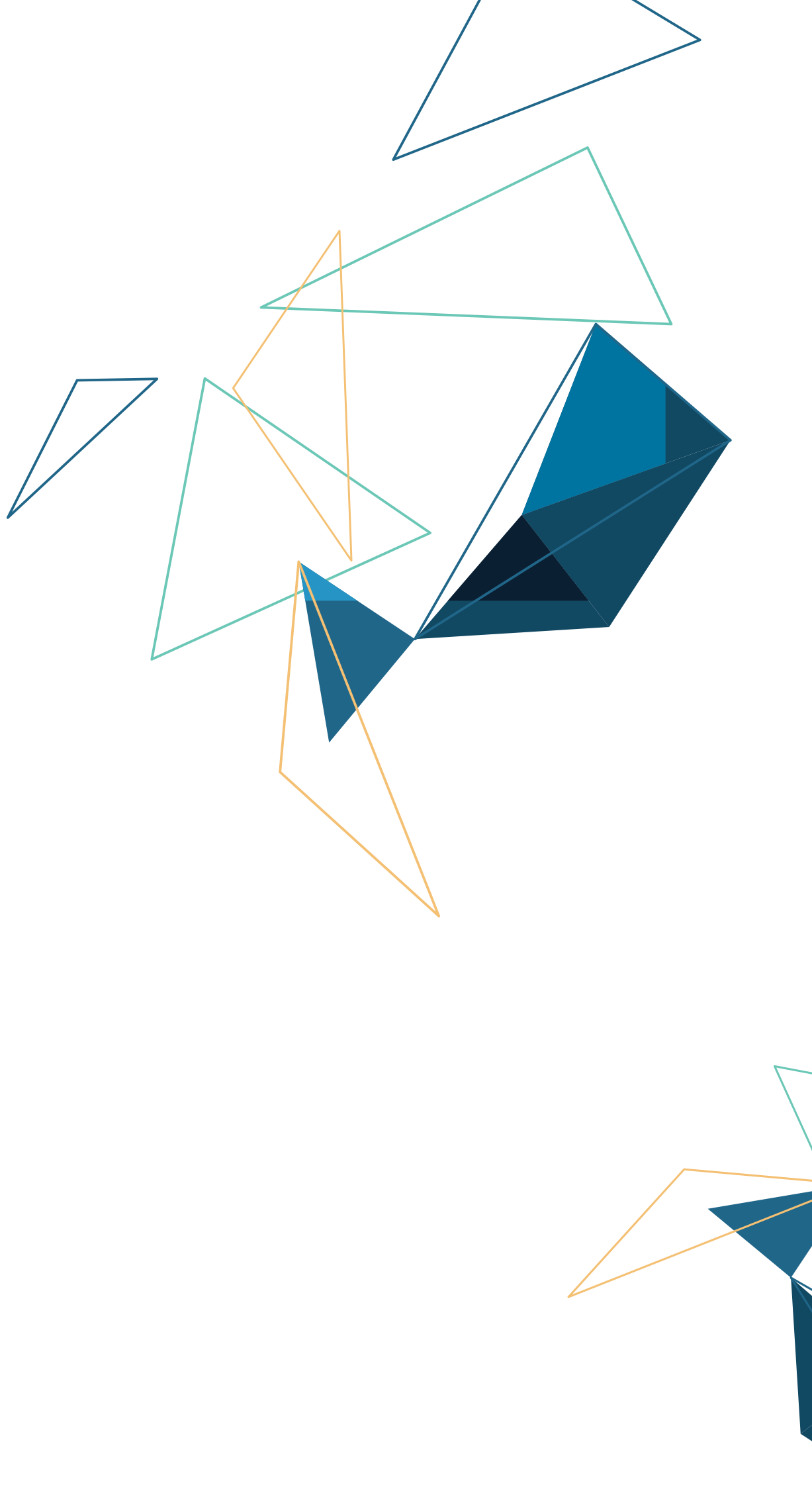
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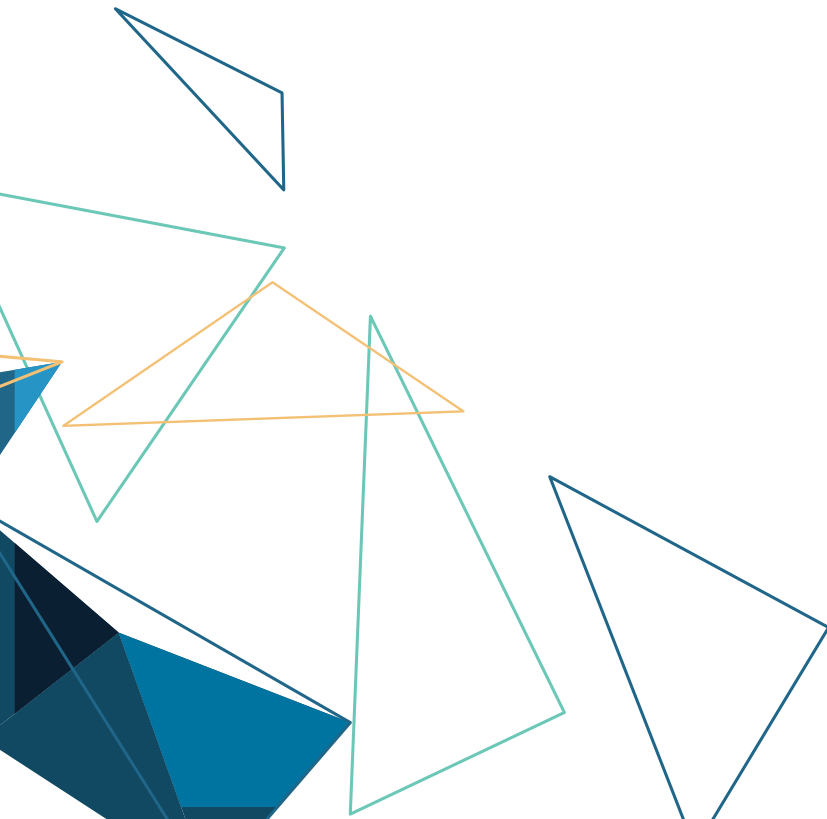
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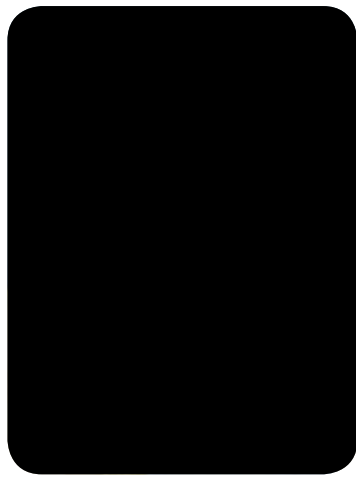
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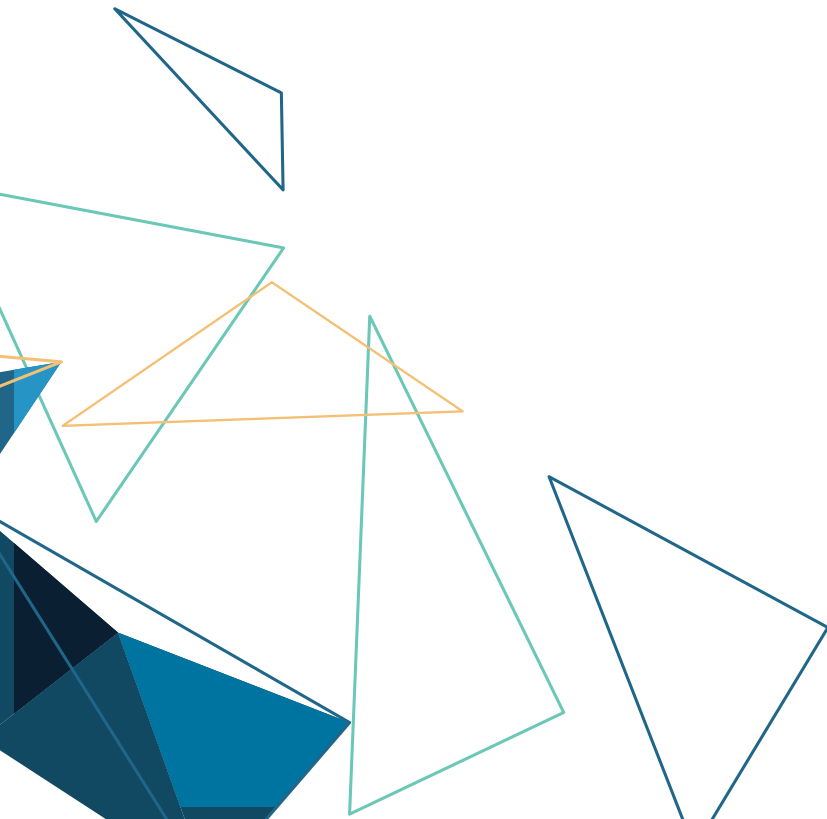
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THE SPEECH OF HIS EXCELLENCY, COUNSELLOR  
**ABDULRAHMAN NEMASH AL-NEMASH**

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Chairman of Kuwait's Public Anti-Corruption (NAZAHA),





In the Name of Allah, Most Merciful,  
Most Gracious

May Allah bless our liege lord Muhammad and give him peace, his family and companions one and all,

Working on the promotion of integrity and anti-corruption is an integral part of the sustainable development and a joint responsibility that requires the availability of the components of the collective action of all parties in the State of Kuwait, including all governmental bodies, companies, societies, citizens and residents in order to succeed.

This firm belief has been our primary motivation to develop Kuwait anti-corruption strategy for integrity and anti-corruption, which is embodying our legal commitment to the application of the text of article 5, paragraph 1 (5/1) of Law No. 2 of the year 2016 on Establishing Kuwait Anti-Corruption Authority and the Provisions on Disclosure of Assets and Liabilities, in addition to article 9 of its the Executive Regulation.

Therefore, out of the keenness of Kuwait Anti-corruption Authority (Nazaha) to present an integrated model of such strategy in line with the priorities and specificities of the State of Kuwait and in conformity with the best international practices and standards, we have sought close cooperation with the United Nations Development Program (UNDP) and the United Nations Office on Drugs and Crime (UNODC) by coordinating with the General Secretariat of Supreme Council for Planning and Development (GSSCPD).

While, the civil society and the public sector are key partners in the efforts of preventing and combating corruption, Nazaha has been keen to consult with them on several occasions during the development of the strategy and engage them in the determination of its themes, objectives, priorities and initiatives. At the same time, our Authority has been keen to put all these agreed upon components

on the right track for actual implementation. Therefore, a mechanism has been developed to monitor and evaluate the implementation in order to measure the level of performance and the actual results, so that this strategy will not be a negative and useless document.

The National Strategy, the first of its kind in the State of Kuwait has sought to achieve a connected chain of specific goals with regard to intergrity and combating corruption, through deliberate priorities and initiatives, the implementaion of which will result in the enhancement of the level of transparency, establishment of the rule of law, promotion of the sense of nationalism, creation of more trust in the governmental efforts, participation in the provision of a better environemnt for business, attaraction of investments and the promotion of economic competitiveness. The success of this endeavor will lead to the upgrading of the classification of Kuwait in the relevant international indexes, including corruption preceptions index. It will also give a drive to the efforts of sustainable development in our country to contribute to the realization of Kuwait Vision 2035 which emanated from the vision of His Highness Sheikh Sabah Al-Ahmad Al-Jaber Al-Sabah, the Amir of Kuwait, may Allah preserve and protect him.

In conclusion, I recognize the the support and assistance extended to us by the Council of Ministers and other government bodies to develop this strategy and issue it in its final form, thanks to the directives of His Highness the Prime Minsiter Sheikh Jaber Al-Mubarak Al-Hamad Al-Sabah, may Allah protect him and his vigorous follow-up to all the efforts in this area.

I pray to His Almighty Allah, to bestow success on us for the good of the dearest Kuwait under the wise leadership of His Highness the beloved Amir of Kuwait, may Allah preserve and protect him and his trustworthy Crown Prince, may Allah preserve and protect him.



## VISION

To build a New Kuwait, on a foundation of trust that would embody the principles of transparency, accountability and the rule of law, with all parties striving in unison to eliminate corruption.



## MISSION

To promote values of integrity and anti-corruption in the public and private sectors and in the society at large, thereby contributing to sustainable development.

# Executive Summary

**Kuwait Integrity and Anti-Corruption Strategy (KIACS)** aims to fulfil the aspirations of Kuwaiti citizens, inspired by the deep-rooted values and morality embedded in the country's culture. The foundation of this strategy is based upon the principles and objectives of the Kuwaiti Constitution, and its themes align with the country's international obligations. **KIACS** was developed based on a specialised scientific methodology, taking a participatory approach through a participatory approach the involvement and expertise of high-level national and international representatives of stakeholders from the public and private sectors and civil society. This collective work reflects the unity and support of all parties for the lofty goal for which this strategy has been developed. It is in line with the international standards and best practices in this field, and the principles of democracy, which will establish the feeling of ownership in this strategy at the national level, thereby positively impacting its implementation.

This strategy spans a period of five years, from 2019 to 2024. It is comprised of four primary themes and objectives, under which there are thirteen priorities distributed over forty-seven initiatives. The design of each initiative is based upon carefully selected activities, standards and indicators, culminating an ambitious vision, fulfilment of a specific mission, and clear principles (Fig. 1).

The responsibility for leading and co-ordinating the implementation of the Strategy, through forging effective partnerships and close co-operation with the institutions and agencies of the executive, legislative and

judicial authorities in Kuwait, lies with the Kuwait Anti-Corruption Authority (NAZAH) (Annex 1). Particular emphasis is placed upon the agencies which are expected play a key role to the implementation of the themes, priorities and initiatives of the Strategy, as detailed herein, while ensuring the active participation of representatives of the private sector, civil society and other stakeholders.

The successful implementation of this strategy will serve to mobilise greater resources and capacities which are necessary for the achievement of the "New Kuwait Vision 2035", allowing Kuwait to achieve a higher degree to commitment and compliance with the provisions of the United Nations Convention against Corruption, including those which pertains to preventive measures, criminalisation of corruption, law enforcement, international co-operation, and retrieval of assets acquired via illicit means and corruption. Furthermore, such success will improve Kuwait's position as per the relevant international indicators, thereby consolidating the pillars upon which Kuwait is founded, strengthen its role in the regional and global arena, and provide the necessary environment for the people to proceed with confidence towards a more prosperous and sustainable future for all.

Fig 1: Overview



• **VISION:** A New Kuwait built on trust and the respect for principles of transparency, accountability and Law sov-ereignty and the participation of all parties in renouncing corruption.



• **MISSION:** To promote values of integrity and anti-corruption in the public and private sectors and at the society at large, thereby contributing to sustainable development.



### The 1st Pillar: **Public Sector**

- Priority 1- Transparency in the Management of Public Finance and Public Affairs
- Priority 2- Recruitment and Promotion in the Public Sector
- Priority 3- Integrity in Public Service Performance
- Priority 4- Accountability in the Public Sector
- Priority 5- Effectiveness and Efficiency in Delivering Public Services



### The 2nd Pillar: **Private Sector**

- Priority 6- Integrity and Accountability in the Private Sector
- Priority 7- Role of the Private Sector in Reporting Corruption



### The 3rd Pillar: **The Society**

- Priority 8- Public Awareness
- Priority 9- The Role of Education
- Priority 10- Cooperation with the Civil Society and the Media



### The 4th Pillar: **Specialized Bodies**

- Priority 11- Capacity Building
- Priority 12- Whistleblowers protection
- Priority 13- Coordination and Cooperation

# Introduction

Kuwait boasts a golden era in its modern history, between the 1940s to the mid-1980s, when it trickled away as the country underwent a period of turbulence born of political and economic challenges. After the decline of this prosperous period, the country emerged stronger and more resilient, and equipped to accelerate the process of modernisation without compromising its national identity whilst retaining the lessons from that period.

Kuwait has one of the highest volumes of oil reserves globally, equipping it with the ability and opportunities to invest in the future, in accordance with the improvement in national education levels and the mechanisms through which citizens can participate in public affairs through elections, parliamentary life and available to NGOs. The country faces a number of challenges and obstacles in the path to achieving the prosperity, security and sustainability its citizens deserve. Corruption - defined as 'the abuse of entrusted power for private gain' - is one of those challenges, as it poses a direct threat to sustainable development for even the most stable of countries, including those that are rich in resources as is the State of Kuwait. Corruption undermines fair competition and hinders entrepreneurship, businesses, foreign direct investment, and full integration with global markets. Its spread is associated with a number of negative phenomena, such as widening of the income gap, deterioration of environmental conditions, decline in the rule of law, and the people's lack of faith in the state's institutions and politicians in general.

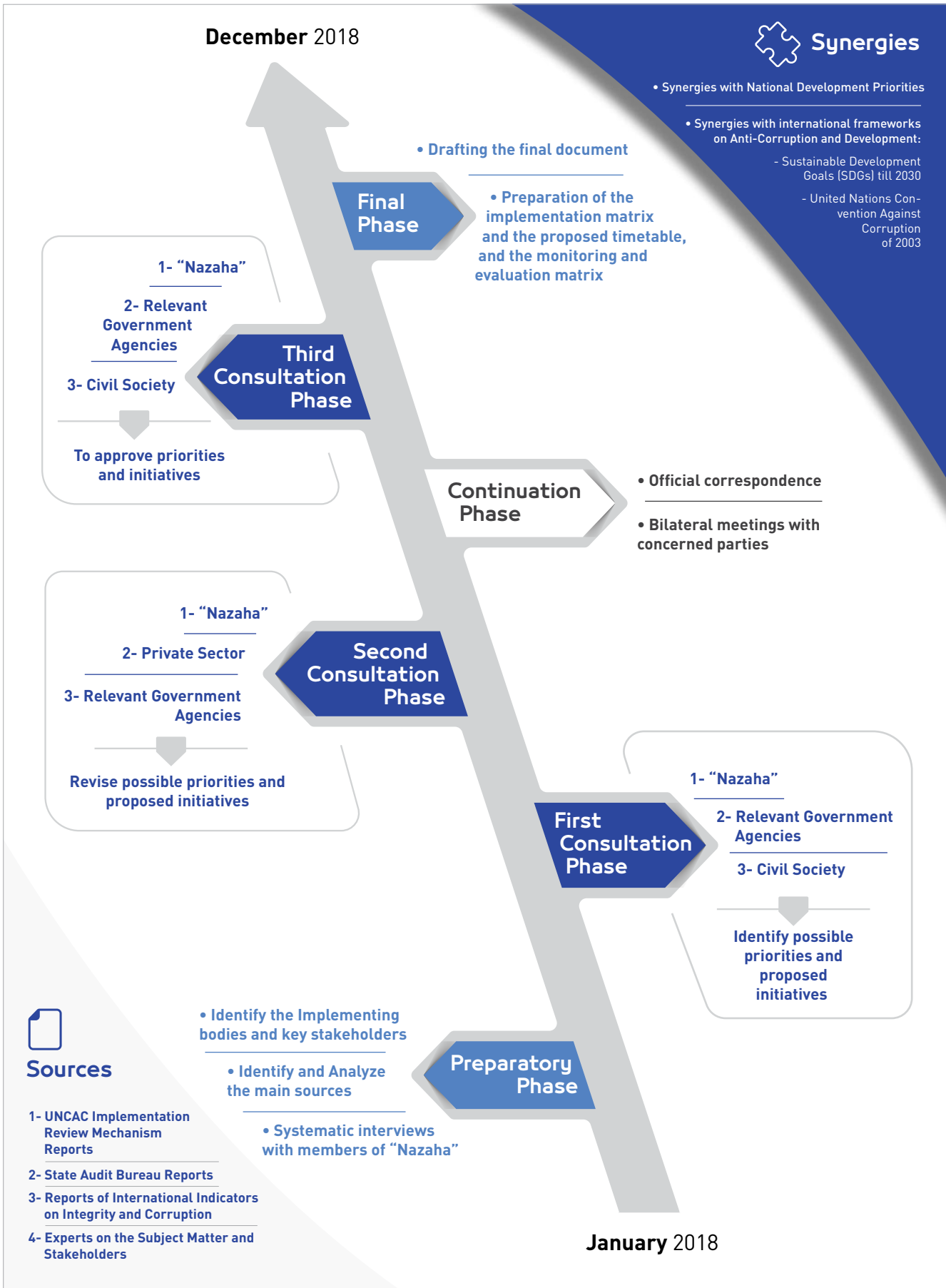
After the warning signs raised by Kuwait's decline in position on the international indicators of integrity and combating corruption and the subsequent circumstances which arose from that, NAZAHA led an unprecedented participatory process, with technical support from the United Nations, that culminated in the establishment of the pioneering nation-

al strategy to promote integrity and combat corruption, the first of its kind in Kuwait's history, thus contributing to the National Development Plan known as the New Kuwait Vision 2035. In acknowledgement of the importance of overcoming all obstacles preventing achievement of the highest level of progress to fulfil the objectives of sustainable development, His Highness the Amir Sheikh Sabah Al-Ahmad Al-Jaber Al-Sabah, commanded the New Kuwait Vision 2035, the aim of which is to "transform Kuwait into a financial and commercial centre attracting investment, in which the private sector leads the economic activity in an environment where competition prevails and production efficiency increases through supportive institutional work. The strategy reinforces the values that preserve the social identity and achieve human development in an integrated and balanced manner, based on sound and strong foundations in its infrastructure and its evolving and attractive business environment."

## Methodology

The development of Kuwait's pioneering national strategy to promote integrity and combat corruption required a year of arduous endeavour and was led by NAZAHA, Kuwait's anti-corruption authority, during 2018, with technical support from the United Nations. This effort involved focused research work, more than 30 bilateral and multilateral meetings, and the contribution of more than 70 officials, activists and experts, as well as stakeholders. These endeavours were organised under a specialised methodology based on a participatory approach that reflects international best practices in the field. Furthermore, it drew on internationally credible scientific sources and ensured it is consistent with national priorities and international frameworks that are relevant to the national strategy (Fig. 2).

**Fig 2: Methodology**



## • Course of Action

The development of **KIACS** began in January 2018, after a Higher Steering Committee was formed for this purpose by Kuwait's anti-corruption authority, NAZAHA. The work was carried out with the co-operation of the United Nations Development Program (UNDP) through the Supreme Council for Planning and Development (SCPD) in collaboration with the United Nations Office on Drugs and Crime (UNODC).

All of the aforementioned parties collaborated in conducting a preliminary survey, the results of which led to directly identifying concerned parties and key stakeholders. The results revealed which key institutions from both the public and private sectors, as well as civil society, were required to participate in the strategy development process. This work coincided with another preliminary survey which identified the main sources that will be used to make diagnosis of the situation and identify the problems to be addressed in the first strategy to promote integrity and combat corruption in Kuwait.

A series of systematic interviews were also conducted with officials from NAZAHA in order to collect necessary information about the work, achievements, and challenges of the Commission. These interviews aimed to conclude an undisputed action plan to prepare the strategy. Thereafter, a review and an analysis of information and data acquired from the aforementioned resources were conducted, leading to the drafting of a set of potential priorities and proposed initiatives. The draft was subject to a three-level consultation, consisting of NAZAHA, concerned public agencies, and civil society representatives, respectively. The consultation took place in February and March 2018, including a consultative meeting with civil society on 19<sup>th</sup> March 2018 and a national workshop for public officials between 20<sup>th</sup> to 22<sup>nd</sup> March 2018.

Based on the initial consultative phase, potential priorities and proposed initiatives were assessed against the views, input and experiences of specialists and stakeholders. The revised version of the content made the first draft of the national strategy. The second consultative phase, which took place between April and May 2018, included additional structured interviews with NAZAHA officials, a consultative meeting with representatives of the private sector on 22<sup>nd</sup> April, and a second national workshop for public officials between 23<sup>rd</sup> to 24<sup>th</sup> April. These consultations coincided with an in-depth study of the reports of the Audit Bureau to identify the main gaps and conclude focused recommendations and proposals to be incorporated into the strategy. This was done on the basis of a workshop held on 14<sup>th</sup> May 2018.

Based on the above, the draft of the national strategy has been amended and a detailed matrix of the agreed-upon priorities and initiatives has been added and made available to all the parties that participated in the two previous consultative phases, in order to acquire their feedback. NAZAHA continued the work by conducting a number of official visits, correspondences, and follow-up meetings from May-October 2018, to ensure agreement amongst stakeholders. These efforts were accompanied by a third consultative phase, consisting of two main meetings, one with representatives of civil society on 9<sup>th</sup> September, and the second on 10<sup>th</sup> September with leaders from the relevant government agencies. With this, the priorities and initiatives of the national strategy were concluded, enabling the High Steering Committee take the lead, with the technical support of UN experts, to incorporate all conclusions into this document, including the implementation matrix (Annex 3), a proposed timetable (Annex 4) and a matrix of monitoring and evaluation (Annex 5).

## • Main Sources

Kuwait's **KIACS** relied on four key scientific sources of international credibility: The UNCAC Implementation Review Mechanism Reports, the reports of Kuwait's State Audit Bureau, the reports of international indicators on integrity and corruption, and the input of experts in the subject matter in addition to NAZAHA officials and the representatives from the public and private sectors, civil society and national and international experts.

**1. UNCAC Implementation Review Mechanism Reports:** These reports highlight discrepancies between legal texts and their applications in Kuwait, and the gap between the standards and measures advocated by the United Nations Convention against Corruption. The comprehensive analysis of the extent to which the Convention can be implemented in Kuwait, including the 2014 national report<sup>1</sup> on criminalisation, law enforcement and international co-operation, served as the basis of this analysis, which is part of the first phase of the international mechanism to review the implementation of the Convention. The self-assessment report which was concluded in 2018 - under Phase II of said mechanism on preventive measures and asset recovery - was relied also referred to<sup>2</sup>.

**2. Kuwait's State Audit Bureau Reports:** These reports illustrate the violations and breaches discovered by the State Audit Bureau and the recommendations and proposals made in relation to them. This is part of the role assigned to it by law. The analysis of these reports issued by the

1- Kuwait's National Report to review its implementation of the Chapters 3 and 4 of UNCAC: [http://www.unodc.org/documents/treaties/UNCAC/CountryVisitFinalReports/2014\\_02\\_06\\_Kuwait\\_Final\\_Country\\_Report\\_Arabic.pdf](http://www.unodc.org/documents/treaties/UNCAC/CountryVisitFinalReports/2014_02_06_Kuwait_Final_Country_Report_Arabic.pdf) (last access on 24 December, 2018)

2- The said report is not available for publication due to the Terms of Reference of the international mechanism to review UNCAC's implementation.

State Audit Bureau was examined in detail from the perspective of combating corruption. The conclusions were subject to direct discussion with the concerned parties, leading to the identification of a number of inter-ministerial and multi-sector problems that are monitored by the State Audit Bureau<sup>3</sup>. Furthermore, a number of relevant observations were drafted to deal with through the National Strategy.

**3. Reports of international indicators on integrity and corruption:** As there are a number of indicators relevant to the subject of the strategy and different methodologies and areas of focus, three key indicators were selected. These indicators provide reference points to the needs that KIACS would address and can also, over time, show the success of the implementation. The three indicators are; **The Corruption Perception Index of Transparency International**<sup>4</sup>, the **Worldwide Governance Indicators** issued by the World Bank Group (in particular the indicator relating to "**Control of Corruption**")<sup>5</sup>, and **The Global Competitiveness Index of the World Economic Forum (WEF)**, (particularly in the first theme of "**Institutions**")<sup>6</sup>. Accordingly, available data and published analyses regarding these international indicators were examined and meetings with relevant experts to explore their views, opinions and proposals were held, in order to produce proposals that could have a direct impact on Kuwait's position on the indicators mentioned.

3- State Audit Bureau's report regarding the results of inspection and review regarding the implementation of the ministries and public agencies budgets and their final accounts and statements. | Ministries and Public Administrations | Financial Year 2016 - 2017. See also, the report of "The most important financial indicators and regulatory phenomenon and updates for the financial year 2016-2017"

4- The Corruption Perception Index of Transparency International for the year 2017: [https://www.transparency.org/news/feature/corruption\\_perceptions\\_index\\_2017](https://www.transparency.org/news/feature/corruption_perceptions_index_2017) (last accessed on 24 December, 2018).

5- International Indicators of Governance Database: <http://info.worldbank.org/governance/wgi/#home> (Last access on 24 December, 2018)

6- The Global Competitiveness Report (2017 - 2018): <https://www.weforum.org/reports/the-global-competitiveness-report-2017-2018> (last access on 24 December 2018)

**4. Experts on the Subject Matter and Stakeholders:** In light of the limited data and information produced nationally and due to the fact that Kuwait's experience in the field of promoting integrity and anti-corruption is new, the input and views of experts and stakeholders which represent their considerable longstanding experiences reflect the current situation, opportunities and challenges in this domain. It also utilised the information received from NAZAHA and the State Audit Bureau, as well as the correspondences, and bilateral and multilateral meetings and consultations with relevant government agencies and representatives of the judiciary as well as experts and activists from the private sector and civil society.

## • Alignment with National Development Priorities

Kuwait's strategy to promote integrity and combat corruption has been carefully developed and designed to align with the New Kuwait Vision 2035, which aims to transform Kuwait into a regional financial, commercial, cultural and institutional centre. It is based on the following five main objectives: (i) citizen participation and respect for the rule of law, (ii) effective government, (iii) a prosperous economy, (iv) cooperative nation, (v) a more influential role for Kuwait globally. It consists of seven pillars of investment and development:

- **Prominent International Standing** (improving the regional and global presence of Kuwait in the diplomatic, commercial, cultural and charitable fields).
- **Advanced Infrastructure** (developing and upgrading the country's infrastructure to im-

prove quality of life for all Kuwaiti citizens).

- **Innovative Human Capital** (reforming the education system to better enable and equip Kuwait's youth and facilitate competitive and productive capacities for the national workforce).
- **Effective Government Administration** (reform of administrative and bureaucratic practices to promote transparency, accountability, and overall public sector effectiveness).
- **High-quality Healthcare** (improving quality of services and national staff-development in a low-cost and effective healthcare system).
- **A diverse and sustainable economy** (developing a thriving and diversified economy to reduce state dependence on oil export revenues).
- **Sustainable living environment** (ensuring the provision of housing through environmentally sound resources and plans).

The **KIACS** has been aligned with the five goals and seven pillars of the New Kuwait Vision 2035 at different levels. The most important of these are focusing on taking concrete and practical steps to enhance efficiency, promote integrity, transparency and accountability in the public sector, reduce of bureaucratic procedures, support effective management procedures, and preserve public funds, while retaining focusing on development of capacities that aim to prevent and detect corruption and ensure respect for the rule of law. The strategy also focuses on taking necessary steps to strengthen the integrity of the private sector and enable it to play a more effective role in reporting corruption. This will allow it to take a leading role in achieving sustainable development, not to mention the pivotal role that this strategy will play in improving the levels of co-operation with cultural and educational institutions, educational institutions, civic institutions and the media.



One of the common grounds of the **KIACS** and the New Kuwait Vision 2035 is the focus on the concept of participation. The KIACS will spread awareness among citizens and residents, reinforce co-operation with civil society and the media, and establish legislative, administrative and practical measures to expand the network of parties involved in promoting integrity and eradicating corruption. This will contribute to the achievement of sustainable development and help consolidate Kuwait's leading position both regionally and globally. Such a leading role will support the stability of the region, strengthen its relations with the rest of the world, and enhance co-operation and investment therein.

## • Aligning with the International Frameworks of Anti-Corruption and Development

**KIACS** is consistent with the country's international commitments, relating to the impact of corruption on development, and it focuses on Sustainable Development Agenda (SDGs) 2030 and The United Nations Convention against Corruption – which are the most significant frameworks in this area.

The Sustainable Development Agenda 2030<sup>7</sup> is comprised of 17 goals and ratified by Kuwait in September 2015. The interlinked and interdependent nature of these goals is of great importance in achieving its objectives. Successful fulfillment of the aspirations of this plan in its entirety will serve to improve the lives of the Kuwaiti population as a whole, of both citizens and residents, resulting in a better society overall domestically, and a better world in a larger context.

7- See SDGs for 2030: <https://www.un.org/sustainabledevelopment/ar/sustainable-development-goals/> (last access on 24 December 2018)

In this regard, **KIACS** has been developed to enable Kuwait to make firm strides towards making a breakthrough with this pioneering and ambitious Agenda, particularly in regards to Goal #16; regarding “peace, justice, and strong institutions” through which states from all over the world will seek to promote inclusive peaceful societies that achieve sustainable development, provide access to justice for everyone, and build effective, accountable, and inclusive institutions on all levels. Accordingly, the national strategy has been aligned with the 16th goal of the Agenda towards achieving its targets relating to promoting integrity and combating corruption, which they are:

**16.3 - Promote the rule of law at the national and international levels and ensure equal access to justice for all.**

**16.4 - By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime.**

**16.5 - Substantially reduce corruption and bribery in all their forms.**

**16.6 - Develop effective, accountable and transparent institutions at all levels.**

**16.7 - Ensure responsive, inclusive, participatory and representative decision-making at all levels.**

**16.10 - Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements.**

The **KIACS** plays a critical role in achieving these targets through its efforts to build a more integrated, transparent, and accountable public sector that ensures effective and efficient delivery of public services and embraces integrity in education, the private sector, and various components of society, including civic organisations and the media.

Despite the sustainable-development goals, including the targets and indicators, not being legally binding, governments are expected to take charge and develop national frameworks to achieve them. It is incumbent upon governments to monitor, oversee, and follow up on the progress in achieving these goals. To this effect, extensive efforts and the availability of current data collection mechanisms - which are both effective and periodic - are required. The regional and international follow-up and review studies to be carried out in this area will be based on national analyses derived from related national plans and programmes, such as this strategy

The second international framework that should be taken into consideration when addressing the relationship between corruption and development, with which this national strategy has been aligned, is **The United Nations Convention against Corruption (UNCAC)**<sup>8</sup> and relevant international documents, such as the Bangalore Principles of Judicial Conduct<sup>9</sup>. Kuwait signed the convention on 9th December 2003 and ratified it by issuing Law No. 47 for the year 2006, which was issued according to article 70 of the Kuwaiti Constitution that states that ratified conventions “have the force of law” as of the date of ratification and issue, thus officially making Kuwait a party to the convention on 16th February 2007.

The **KIACS** will enable Kuwait to reinforce its commitment to the provisions of the convention, particularly Article 5, which declares that States parties shall develop and implement effective and co-ordinated policies to combat corruption by promoting transparency of public procedures, and building integrity in both public and private sectors. The national strategy also provides a clear roadmap to fulfil the remaining articles, including those related to preventive measures (Chapter 2), criminalization and law enforcement (Chap-

8- See the text of UNCAC: [https://www.unodc.org/res/ji/import/international\\_standards/united\\_nations\\_convention\\_against\\_corruption/unca\\_arabic.pdf](https://www.unodc.org/res/ji/import/international_standards/united_nations_convention_against_corruption/unca_arabic.pdf) (last access on 24 December 2018)

9- See the book that comments on Bangalore Principles of Judicial Conduct: [https://www.unodc.org/documents/corruption/Publications/Bangalore\\_principles\\_AR\\_eBook.pdf](https://www.unodc.org/documents/corruption/Publications/Bangalore_principles_AR_eBook.pdf) (last access on 24 December 2018)

ter 3), international co-operation (Chapter 4), and asset recovery (Chapter 5). This will allow the strategy to ensure that Kuwait’s legislation, regulations, policies, procedures, and practices conform to the best applicable international standards, so that it can serve as a leading example for countries in and outside of the region.

## The General Framework

Kuwait’s Strategy for Promoting Integrity and Anti-Corruption spans a period of five years from 2019 to 2024. It endeavours to play a vital role in achieving the desired and necessary transformation of Kuwait, beginning by ensuring the implementation of the United Nations Convention against Corruption, and ending with having achieved improved rates on the sustainable development indicators according to the New Kuwait Vision 2035, and improving the country’s position in terms of integrity and combating corruption on the international indicators.

To proceed in the right direction, the KIACS requires the guidance of an ambitious vision, a specific, feasible mission, and clear principles reflecting the essence of what it aims to achieve. All three components must reflect Kuwait’s aspirations and translate the conviction and commitment of those responsible for the development and implementation of this strategy, which has been drafted using clear language based on proven scientific methodology, on the outcomes of the national consultations that took place throughout the preparation of the strategy, and by drawing on comparative experiences from around the world.

**Vision: To build a New Kuwait, on a foundation of trust that would embody the principles of transparency, accountability and the rule of law, with all parties striving in unison to eliminate corruption.**

The developers of the **KIACS** have been keen to adopt a vision representing a high-level purpose that aligns with and serves the New Kuwait Vision 2035 of building upon the deep-rooted history and rich heritage of the country to establish a New Kuwait based on firm trust among its diverse components, particularly the trust of its citizens, residents, and investors in government apparatus, and the ability of public and private institutions to combat corruption. In the absence of trust, it is difficult to ensure the co-operation that is needed to overcome the diverse developmental challenges and build a better future. In order to cultivate trust, it is essential to ensure full respect for the principles of transparency, accountability, the rule of law, and societal engagement, which are the same principles advocated by the United Nations Convention against Corruption. As per article 5 of the convention, each State Party, including Kuwait, is obliged to develop effective, co-ordinated anti-corruption policies.

**Mission: To promote values of integrity and anti-corruption in the public and private sectors and in the society at large, thereby contributing to sustainable development.**

Based on this ambitious vision, the mission of the national strategy highlights the specific contribution it will offer, focusing on presenting the diametrical relationship between the concepts of integrity and corruption, due to the fact that they are viewed as counterparts which cover the majority of concepts presented within the strategy. Due to this, the strategy omitted very broad concepts such as governance and other terms that act as supportive principles such as transparency, accountability, etc. This is in line with the regionally and internationally adopted approach in this field, such as the use of the United Nations use of the term “Against-Corruption” as the title of its 2003 convention. This convention is considered the most comprehensive convention in the world in its field. This is even more corroborated by the choice made by “Internation-

al Transparency” to use the term “integrity” in the title of its “National Integrity System”.

The mission emphasises that its approach is broad in scope by adopting the value-based and rule-based approach relating to integrity and anti-corruption. Furthermore, the ‘mission’ explicitly states that the strategy is targeting both public and private sectors, as well as the society, and that the ultimate objective is to contribute to achieving sustainable development, which reconnects to the inclusive vision New Kuwait Vision 2035.

## Principles

Kuwait Integrity and Anti-Corruption Strategy is based on 5 principles that govern its work; National Sovereignty, Engagement, Broadness in Scope, Practicality, and Responsibility.

### 1. NATIONAL SOVEREIGNTY

National sovereignty is a core principle in international law and an integral part of The United Nations Convention against Corruption. It is the foundation for any national strategy that wishes to succeed on the ground, which therefore it must align with the country’s needs and priorities, as well as its political, economic, social, and cultural environments, and with its constitution and legal and institutional systems. This should occur without hindering the country’s development and advancement, so as to reflect the national will and conform to international standards.

### 2. ENGAGEMENT

The strategy should, on all levels and at its various stages, consider, embody and take advantage of the contributions of as many stakeholders as possible, thus taking into account the elements of inconclusiveness and ownership. This is achieved through engaging representatives of official and non-official ac-

tors in assessing the situation, defining priorities, executing interventions, monitoring initiatives, and evaluating successes and failures. This allows KIACS to embody the principles and practices of democracy and explicitly commits to the provisions of the United Nations Convention against Corruption and the message of the New Kuwait Vision 2035.

### 3. BROADNESS IN SCOPE

Promoting integrity and eradicating corruption is an integrated process requiring preventive, punitive, and awareness-raising efforts, in both the public and private sectors, and at the sociality and state levels. It is primarily based on a set of principles and practices, including transparency, accountability, the rule of law, and societal engagement, thus requiring that any strategy focusing on such themes encapsulate these dimensions and embraces them in both text and practical application.

### 4. PRACTICALITY

It is not possible to combat all existent forms of corruption in one fell swoop simultaneously. Such endeavours and lofty aims require insightful updating of the laws and procedures viewed through the lens of wisdom and foresight, deep shift in the cultures of all institutions and individuals involved, and long-term confrontation with the existent work-patterns and well-established networks within the country. All of this necessitates continuous political, institutional, and public support, in addition to sufficient financial and human resources. Therefore, it is of the utmost importance to not to scatter the efforts everywhere without processes in place, but rather dedicate efforts to address specific priorities - albeit at the expense of other lesser priorities - and this is particularly important during the development and implementation of the initial strategy.

### 5. RESPONSIBILITY

Everyone is responsible for promoting integrity and eradicating corruption, though the levels of responsibility vary according to each participant's specific role and duties. Hence, it is necessary to clarify and attribute the individual responsibilities within the framework

of the strategy, and to link responsibility to accountability via a scientific framework to monitor and assess performance and outcomes. Then build on it to follow up on the work done and corrected, if necessary.

## Themes and Objectives

The KIACS is built on four main themes (public sector, private sector, society, and competent bodies) for its work during its five-year term from 2019 – 2024, in accordance with the “vision”, “mission”, and “principles” defined in its general framework. Each of these four themes has an overall strategic goal that is subject to monitoring and evaluation.



### The First Pillar: Public Sector

**The First Strategic Goal:** Protecting the Integrity of the Public Sector and Developing the Efficiency and Effectiveness of the Public Services so that They are Delivered in a Transparent and Accountable Manner.

The first theme focuses on the public sector in its broader sense, which includes the executive, legislative, and judiciary authorities and their institutions and personnel. It was selected due to its fundamental contribution to the national economy and the rule of law, as it adopts the approach of subsidies in all of the aspects of economic and social life. Furthermore, it is deemed the major buyer in market, and the largest recruitment body in the country, in addition to its broad and complex role in delivering services to citizens, residents, and the private sector.

In most countries, as it is within Kuwait, this sector is a fertile environment for corruption, primarily due to the administrative work and the scope of such transactions and deals be-



ing high in both value and volume, and the overlapping laws and regulations governing these dealings. Additionally, the public sector is known to be monopolistic in various areas, such as legislation, public policy-making, state procurement, border management, issuing licenses and permits, and law enforcement, to name just a few. The mere existence of this monopoly of power does not necessarily result in corruption, but it certainly significantly increases the possibility thereof when it is connected to broad discretion on the one hand, and inadequate control and lack of respect for the rule of law on the other. The probability increases in contexts where kinship and tribal ties, or any other form of factional relationships, shape the relationships of people with one another and with the state.

Accordingly, the overall strategic goal of this theme is “protecting the integrity of the public sector and developing the efficiency and effectiveness of its public services in a transparent and accountable manner”. To this effect, there are five priorities, under which there are twenty-two initiatives along with their indicators and implementation requirements, that have been developed, according to what is shown in the next part of this strategy.



### The Second Pillar: Private Sector

#### The Second Strategic Goal: Encouraging the Private Sector to Promote Integrity and Fight Corruption

The second theme is focused on the private sector, including all national and foreign for-profit-entities based and operating in Kuwait. This is due to the fact that this sector is often involved in corrupt practices, particularly bribery, either as an initiator or as a victim, thus requiring special attention within the framework of any strategy to promote integrity and combat corruption, in accordance with the United Nations Convention against

Corruption. The private sector is of even greater importance in countries that desire to morph into commercial and financial centres, achieve economic diversification, attract investments, and develop the private sector so as to contribute to entrepreneurship, innovation, employment creation, and sustainable development.

Accordingly, the overall strategic goal for this theme is “encouraging the private sector to promote integrity and combat corruption”. To facilitate this, there are two priorities under which there are six initiatives, along with their indicators and implementation requirements, that have been developed, according to what is shown in the next part of this strategy.



### The Third Pillar: Society

#### The Third Strategic Goal: Enabling the Society to Contribute to Building a Culture that Promotes Integrity and Anti-Corruption.

The third theme is focused on society as whole, which is comprised of citizens, residents, and private, legal not-for-profit entities, as well as the media. Media is considered a part of this theme due to its close association with the components of the theme, be it public or private media. The society is the first and foremost victim of corruption, as confirmed by the SDGs, yet it is also a partner in dealing with it, as confirmed by the provision of United Nations Convention against Corruption, particularly articles 10 and 13 thereof.

Accordingly, the overall strategic goal for this theme is “enabling the society to contribute to building a culture that promotes integrity and anti-corruption”. To this effect, three priorities under which there are eleven initiatives along with their indicators and implementation requirements that have been developed, according to what is shown in the next part of this strategy.



## The Fourth Pillar: Specialized Bodies

**The Fourth Strategic Goal:** Enhancing the Efficiency and Effectiveness of Specialized Bodies that Focus on Promoting Integrity and Combating Corruption

The fourth and final theme is focused on the specialized bodies that focus on promoting integrity and combating corruption, including the judicial and control agencies as well as the Kuwait's anti-corruption authority NAZAH, due to their significance in the success of any national strategy targeting such issues. This is because corrupt practices are of difficult to prevent, detect, prosecute, in light of the rapid technological advancement, the swift ability of individuals and capital to move across borders, and the ability of corrupt people to conceal information and protect themselves from the due repercussions of their crimes. This has been confirmed by the United Nations Convention against Corruption, particularly articles 6 and 36 thereof, which call for finding specialised, independent entities to combat corruption and equipping them with adequate human and financial resources to carry out their missions without any undue influence.

Accordingly, the overall strategic goal for this theme is “promoting the efficiency and effectiveness of the specialised bodies that focus on promoting integrity and combating corruption”, including, most importantly NAZAH, The State Audit Bureau of Kuwait, and all relevant judicial bodies, without prejudice to their independence. To this effect, there are three priorities, under which there are eight specific initiatives along with their indicators and implementation requirements have been developed, according to what is stated in the next part of this strategy.

## Priorities and Initiatives

The KIACS and its four themes consists of thirteen priorities, under which there are 47 specific initiatives to be implemented between 2019 and 2024. The Strategy adopts five priorities and twenty-two initiatives in the first theme which focuses on the public sector, two priorities and six initiatives in the second theme which focuses on the private sector, and three priorities and eleven initiatives in the third theme which targets the society, and three priorities and eight initiatives in the fourth theme which focuses on specialized bodies.

### • Priorities and Initiatives of the First Pillar, the Public Sector

Underpinning the public sector these -under KIACS- are five priorities, namely transparency in the management of public finance and public affairs, recruitment and promotion in the public sector, supporting integrity among public servants and accountability in the public sector at large, and increasing the effectiveness and efficiency of delivering public services (see Figure 3).

#### Priority 1: Transparency in the Management of Public Finance and Public Affairs

By virtue of this strategy, Kuwait is taking appropriate measures to promote transparency in the management of public finance and public affairs through a number of initiatives that focus on the right to access information, monitoring election campaign finance, enforcing financial disclosures and developing related laws, preventing corruption in public tenders, and supporting public agencies to periodically disseminate information about their work, including their efforts to implement the strategy. Together, these initiatives will build stronger trust in state institutions, contribute to reducing the risks of corruption

and establishing the rule of law by improving the laws and regulations pertaining to the right to access information and public performance reports, and contribute to achieving a more efficient governmental performance.

### **Priority 2: Recruitment and Promotion in the Public Sector**

By virtue of this strategy, Kuwait will adopt new measures concerning the issue of recruitment and promotion in the public sector. A number of initiatives are planned to establish objective standards to enforce merit-based recruitment and promotion in the public sector and put in place a transparent selection mechanism for high level and senior positions according to objective standards. These initiatives will also focus on supporting the civil service system, and considering establishing a specialized institute for training all public-sector officials. Not only will the implementation of such policies and procedures improve the performance of the public service, but also ensure a professional and accountable public performance, which will subsequently help in building trust between citizens and the government and enhancing the efficiency and effectiveness of the public sector to operate on the basis of transparency and the rule of law.

Despite the appreciation that the central recruitment system in Kuwait, including recruitment procedures run by Civil Service Commission, has received while undergoing the UNCAC Implementation Review, and being taken as a role model for best practices, it is evident that there is a room for improvement in some public service systems. Therefore, Kuwait will undertake a comprehensive review of all the procedures and processes of the central recruitment system to ensure objectivity and transparency in recruitment, hiring, and promotion procedures based on merit and performance. This includes clarifying job titles and job descriptions, and adopting competency tests and assessments as part of the recruitment procedures, to ensure only qualified candidates are being hired. However, re-

viewing the current performance assessment systems should continue, in cooperation with the Civil Service Commission and with feedback from public servants and managers.

### **Priority 3: Integrity in Public Service Performance**

By virtue of this strategy, Kuwait is taking appropriate measures to promote integrity in the public service. A number of interrelated initiatives are planned to review and revise the Code of Conduct for public servants, develop and implement training programs on this Code of Conduct, and develop a Code of Conduct for the members of the National Assembly and its personnel. They also aim to support the Superior Council of the Judiciary in developing and disseminating Codes of Conduct for the judges, prosecutors, and the other public servants under their supervision, and the Ministry of Internal Affairs in developing and disseminating Codes of Conduct for its personnel including police officers, in correspondence to the nature of their works.

### **Priority 4: Accountability in The Public Sector**

By virtue of this strategy, Kuwait dedicates a special attention to promoting accountability in the public sector, through implementing a number of initiatives. The purpose of these initiatives is to improve the management of public servants and perform periodic appraisals and review and enhance the standards and mechanisms of accountability in the public sector including accounting, auditing, and monitoring. Other purposes include enhancing accountability measures in the state-owned enterprises, establishing and enforcing a system for managing conflict of interests, and amending the necessary legislations to effectively criminalise illicit enrichment. All this will address any legislative gaps and make any necessary modifications to ensure Kuwait's full compliance with the United Nations Convention against Corruption and to achieve accountability in the public sector.

## **Priority 5: Effectiveness and Efficiency in Delivering Public Services**

In its efforts to improve the prevention of corruption in the public sector, the strategy attaches particular importance to addressing the effectiveness and efficiency of public services delivery. It calls for making gradual progress to eventually include all public services. To this effect, it proposes carrying out initiatives that aim to revise and simplify bureaucratic procedures, continuing the work on developing e-government platforms for automating the process for having access to public services, and developing simplified handbooks for the public on how to access public service and making them available in both hard and soft copies. Lastly, the initiatives should also introduce corruption risk management systems to the sectors that pro-

vide public services to identify and address flaws and gaps periodically and sustainably.

These initiatives can reduce bureaucracy, enhance the effectiveness and efficiency of the government's performance, and reduce the risks of corruption and waste of state resources. Currently, training programs for relevant managers and employees are being developed to simplify the routine and bureaucratic procedures and improve the delivery of public services. This will enable Kuwait, through adopting appropriate measures such as e-government systems, to increase transparency and public access to public services, build the citizens' trust in government, reduce the risk of corruption, and increase the effectiveness of public service delivery systems, through an efficient approach that focuses on servicing citizens.

Figure 3



## First Pillar Public Sector



### 1. Transparency in the Management of Public Finance and Public Affairs

- 1.1 Ensure the right to access to information
- 1.2 Review and amend legal texts regulating the financing of electoral campaigns
- 1.3 Enhance the compliance with the asset declaration system
- 1.4 Preventing Corruption in Public Tenders
- 1.5 Support ministries and public bodies to disseminate information on their work



### 2. Recruitment and Promotion in the Public Sector

- 2.1 Establish objective criteria to ensure merit-based recruitment and promotion procedures for civil service
- 2.2 Adopt a special mechanism for the recruitment of senior public officials in a transparent manner according to objective criteria
- 2.3 Strengthening the civil service system and consider the establishment of a specialized institute to train civil servants of all grades



### 3. Integrity in Public Service Performance

- 3.1 Review and revise the code of conduct for civil servants of the executive branch
- 3.2 Develop and deliver training programmes on the code of conducts for civil servants
- 3.3 Develop a code of conduct for members of the parliament and its staff
- 3.4 Support the Supreme Judicial Council to prepare and disseminate codes of conduct for judges, prosecutors and other public service employees working under their supervision
- 3.5 Support the Ministry of Interior to develop and disseminate codes of conduct for its staff, including police officers



### 4. Accountability in the Public Sector

- 4.1 Review and strengthen performance management systems of public service employees and conduct regular performance evaluations
- 4.2 Review and strengthen the standards and mechanisms of accountability in the public sector, including accounting, auditing and oversight mechanisms
- 4.3 Review and strengthen measures to ensure integrity and accountability in state-owned enterprises
- 4.4 Establishing and enforce a conflict of interest management system
- 4.5 Amend legislation to effectively criminalize illicit enrichment



### 5. Effectiveness and Efficiency in Delivering Public Services

- 5.1 Review and streamline bureaucratic procedures of public service delivery
- 5.2 Develop and implement e-government internet-based platforms to further automate processes for the delivery of public services
- 5.3 Develop and publish user-friendly guides for the public regarding how to access and apply for public services both in paper and electronically
- 5.4 Integrate corruption risk management into sectors that provide public services to identify and address weaknesses periodically and sustainably

## • Priorities and Initiatives of the Second Pillar, the Private Sector

Underpinning the private sector - under the National Strategy - are two priorities, namely integrity and accountability, and the role of this sector in exposing corruption.

### Priority 6: Integrity and Accountability in the Private Sector

The private sector is viewed as a key partner in combating corruption and in the efforts of Kuwait to cohere the different groups in society in order to achieve a thriving economy and prosperity. In the pursuit of this ultimate goal, Kuwait is taking important measures to promote integrity and transparency in the private sector, thereby ensuring a business environment adopting equal opportunity practices, and promoting the sustainable development for the society at large.

The participation of the private sector in the development of the national strategy to promote integrity and combating corruption reflects how corruption is a serious issue that hinders the development of the private sector and economic growth. This is because it imposes restrictions on attracting effective investment in the human capital and drives companies to compete by working on building differential relations with high level public servants to receive special and differential treatment and private gains. This will ultimately result in channelling public funding towards projects that may drain the public budget only to secure private gains at the expense of the public interest.

This priority focuses on specific initiatives that will lead to the revision and strengthening of auditing systems and procedures in the private sector at large, the development of awareness-raising and training programs, the promotion of ethical practices in business, the pursuit of establishing the princi-

ples and practices of corporate governance, and the development of legislations to criminalise corruption in the private sector. By this, it will establish the values of integrity in the private sector through which it will support the existence of an active and business environment that is attractive for foreign investment, strengthen Kuwait's position in the global business and financial markets. Other measures should be considered to promote good corporate governance whereby the confidence of the private sector in the market that guarantees equal opportunities is increased. Further measures are needed to encourage and strengthen public-private partnerships.

### Priority 7: Role of the Private Sector in Reporting Corruption

Given the significant role of the private sector in fighting against corruption. Not only can it throttle corruption and prevent the channelling of illicit funds and assets acquired through corrupt practices, but also can apply strict and rigorous mechanisms to facilitate reporting, investigating and prosecuting corruption. Often, public-private cooperation leads to enforcing laws that criminalise corruption and enables the government to adopt effective measures to protect whistle-blowers. Initiatives under this priority are centred on the development and application of effective mechanisms and legislations which can enhance the level of cooperation and partnerships between the public and private sectors with respect to preventing and reporting corruption through protecting whistle-blowers, and reviewing and fortifying public-private cooperation mechanisms in relevant areas.

Figure 4



## Second Pillar Private Sector

### 6. Integrity and Accountability in the Private Sector



- 6.1 Review and strengthen effective auditing standards in the private sector
- 6.2 Develop awareness and training programmes and encourage ethical business practices in the private sector
- 6.3 Follow-up work on establishing corporate governance principles and practices
- 6.4 Develop legislation on the criminalization of corruption in the private sector

### 7. Role of the Private Sector in Reporting Corruption



- 7.1 Encourage and protect whistleblowers on corruption within private sector entities
- 7.2 Review and strengthen mechanisms for cooperation between the public sector and the private sector in fighting corruption

## • Priorities and Initiatives of the Third Pillar, the Society

Underpinning the private sector - under the National Strategy - are three priorities, namely public awareness for citizens and residents, the role of education, and establishing deep-rooted a joint-responsibility-collaboration with the civil society and media. (See Figure 5)

### Priority 8: Public Awareness

By virtue of this strategy, Kuwait will take appropriate measures to disseminate awareness about the concept of corruption and how to combat it and the actions taken by the government. This will take place by utilising the different media and communication platforms, including television, radio and social media. The purpose of such campaigns is to engage the public in the process since it is an important partner who can help in establishing the values of transparency and integrity to ensure the rule of law to let citizens feel actively involved in fighting against corruption. By working with all of the segments in society, Kuwait will be able to effectively combat corruption through creating an informed culture that can consolidate the values and principles of integrity and ethics.

Initiatives under this priority include the development and implementation of national programs to educate citizens and residents about the national strategy to promote integrity and anti-corruption, and explain its relevance to the "New Kuwait Vision 2035". Many activities will be conducted to infuse specific values that disdain corruption into the different segments of society, through the family, the media and community institutions. Preparation and implementation of community outreach programs are to be carried out as part of these initiatives. This will include awareness-raising campaigns, to educate the society on the role, scope of work and activities of "NAZAHA" and the role of citizens in combating corruption.

### Priority 9: The Role of Education

Kuwait takes the appropriate measures to establish culture of integrity among future gen-

erations who are considered fundamental to the success of "New Kuwait Vision 2035". For this purpose, there will be initiatives to advocate the concepts of integrity and informed citizenship in all educational and curriculums at the school and university levels, according to the nature of each level.

Initiatives under this priority include the incorporation of anti-corruption values, transparency, accountability, the rule of law, and community participation into school curricula, and training educators and teachers to learn how to build a culture of integrity and combat corruption. Other initiatives focus on reviewing and updating curriculums used in universities and colleges to teach professional business ethics, and continuing the development and implementation of mechanisms to combat degree fraud and prevent fraudulent credentials at all levels and develop objective criteria for degree equivalence and recognition.

### Priority 10: Cooperation with the Civil Society and the Media

One of the key objectives of anti-corruption is to establish cooperation and coordination with civic organisations and the media. This is because it is a leverage to enhance the process of monitoring and detecting corruption by the means of raising awareness to build a strong society, enhancing transparency and trust in public institutions, and ensuring the effective participation of public institutions and ministries with the public and the media in publishing and spreading the news about activities, challenges and achievements in this field.

To this effect, a number of initiatives should be in place, therefore, the national strategy adopts a number of initiatives that will ensure the collaboration of the public sector and civil society to raise public awareness on corruption, and extending such efforts to reach out to all segments. Other initiatives will focus on supporting civil society initiatives that are related to public scrutiny, supporting public agencies in performing their monitoring roles, developing and implementing a strategy to communicate effectively with the media on issues of integrity and corruption. Moreover, developing programs to promote integrity within the domain of media and journalism.

Figure 5



## Second Pillar Society

### 8. Public Awareness



- 8.1 Preparation and implementation of national programmes to raise awareness of citizens and residents on the Anti-Corruption and Integrity Strategy and its relationship to the “New Kuwait Vision 2035”
- 8.2 To inculcate anti-corruption values in society, including through family, media and community institutions of all kinds
- 8.3 Develop and implement outreach program to raise awareness about the mandate and activities of Nazaha and the role of citizens

### 9. The Role of Education



- 9.1 Integrate anti-corruption values and knowledge on the principles of transparency, accountability, the rule of law and community participation in school curricula
- 9.2 Train the educators to build a culture of integrity and fighting corruption
- 9.3 Revise ethics and integrity curricula and standards in universities and professional schools
- 9.4 Follow up on mechanisms to counter fraud in university and professional diplomas and to develop standards for equivalency of university and professional certification

### 10. Cooperation with the Civil Society and the Media



- 10.1 Promote complementarity between the efforts of the public sector and civil society in promoting integrity and fighting corruption
- 10.2 Support civil society initiatives in the field of social oversight and support government agencies in their oversight role
- 10.3 Develop and implement a strategy for public institutions to communicate effectively with the media
- 10.4 Develop and implement programs to strengthen the integrity of the media, including professional journalism

## • Priorities and Initiatives of the Fourth Pillar, Specialised Bodies

Underpinning the specialised bodies - under the National Strategy - are three priorities, namely capacity development of bodies specialised in promoting integrity and combating corruption, the role of such specialised bodies in protecting whistle-blowers, and enhancing the level of their cooperation and coordination.

### Priority 11: Capacity Building

Kuwait adopts all needed measures to strengthen the capacity of public regulatory and auditing institutions whose mandate is to audit public accounts and coordinate with the public prosecution to investigate and prosecute suspected cases with a view to hold them accountable. Furthermore, appropriate measures have been taken to successfully enforce anti-corruption laws, which includes providing training and capacity-building programs to develop the basic expertise of competent public servants to manage the procedures and complexities of such investigations. They also focus on ensuring effective legal prosecution, seizure and confiscation of funds and properties associated with corruption cases, while developing their capacity of to reduce corruption on the basic principles of transparency and accountability.

### Priority 12: Whistle-blowers protection

Kuwait takes appropriate measures to protect whistle-blowers and verify and report the cases of corruption. For the purpose of encouraging others to report and provide information about suspected cases of corruption, so as Kuwait can identify, investigate and hold accountable suspects, it is launching a secure national online platform to report cases of corruption. This will certainly enhance cooperation between the government and other relevant regulatory institutions for law enforcement.

### Priority 13: Coordination and Cooperation

Kuwait takes appropriate measures to enhance coordination and cooperation between the specialized bodies in Kuwait in order to implement the National Strategy and relevant laws and regulations, as well as memorandums of understanding, joint cooperation programs. One of the important measures taken in this regard is the establishment of a joint mechanism to investigate major corruption cases. It consists of NAZAHA, different regulatory and supervisory bodies, the Public Prosecutor's Office, and other concerned agencies. All the teams merging from this joint mechanism will receive training and have access to the most updated tools and databases. Further to the point, the specialized bodies keep working on forging cooperative relations, sign off bilateral and multilateral agreements with counterparts from around the world, and strengthen their involvement and contribution in relevant regional and international networks.

Figure 6



## Fourth Pillar Specialized Bodies



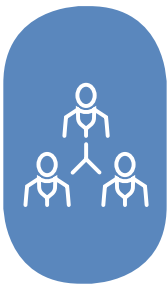
### 11. Capacity Building

- 11.1 Develop and implement an internal strategy to enhance the structure and technical capabilities of Nazaha
- 11.2 Enhance training programs for oversight agencies on their role in promoting integrity and fighting corruption
- 11.3 Strengthen training programs for investigators, prosecutors and law enforcement judges on the criminalization of corruption, disclosure, reporting, investigation and prosecution of such offenses



### 12. Whistleblowers protection

- 12.1 Take measures to expand and strengthen protections for whistleblowers in the public sector
- 12.2 Create a secure national online platform for the reporting of corruption
- 12.3 Implement incentive programs that include rewards and honoring for whistleblowers



### 13. Coordination and Cooperation

- 13.1 Strengthen cooperation and coordination among law enforcement bodies in the investigation and prosecution of corruption cases
- 13.2 Fulfill the obligations of the State of Kuwait within the framework of the UNCAC Implementation Review Mechanism in a participatory and effective manner

# Monitoring and Evaluation

Monitoring and evaluation are based on a set of core principles set out below, which will be adopted to ensure the implementation of Kuwait Integrity and Anti-Corruption Strategy:

- Assessing the effectiveness of the national strategy depends on the extent to which the targeted initiatives are implemented at a practical level and have achieved the desired impact.
- Take into consideration that the implementation process needs regular and periodic follow-up, including monitoring, evaluation and issue related reports on the progress made and challenges faced in an effective manner.
- Strengthening coordination during the implementation phase of the national strategy among all stakeholders to ensure flexibility, thus contributing to the necessary adjustments to the implementation of the strategy.
- Ensuring effectiveness of the mechanisms used to monitor, evaluate and report on progress in the implementation of the national strategy will ensure that the coordination between the parties concerned is correct and well-coordinated, that implementation methods are consistent, and that the preparation of progress reports on assessing concrete impact, lessons learned, and challenges is done transparently through appropriate channels.
- Mechanisms for the effective implementation of such a strategy include gathering and analysing information and reports from concerned parties and implementing bodies and discussing recommendations for enhancing the efficiency and effectiveness of the implementation of the strategy.

The national strategy includes indicators to measure the impact of the strategy in general

and of each pillar in particular, in line with relevant international indicators, as well as indicators to measure progress in implementing each of the targeted outcomes, to help in monitoring, evaluating and annually measuring progress in implementation and impact of the Strategy, in accordance with pre-defined targets, starting with the establishment of baselines for the transition period before the effective implementation of the strategy

The Kuwait Anti-Corruption Authority (NAZA-HA), as the main body responsible for monitoring and evaluating the implementation of the national strategy and producing national reports in accordance with Article (9) of the Regulations for establishing the anti-corruption authority will undertake the following tasks:

- Periodic meetings with implementing bodies and other concerned parties to review progress in implementing the national strategy. Periodic dates for these meetings are scheduled in consultation with implementing partners, through bilateral meetings and consultations with stakeholders.
- Follow-up on collecting and receiving information, data and reports from implementing bodies on the progress made in the implementation of the national strategy.
- Analysis of data, information, reports and other information received from the implementing bodies and preparation of periodic reports for dissemination including reports produced by the Authority.
- Leading on the launch of the national strategy, including the organization of a public event to promote it as well as organizing meetings with high ranking officials in implementing bodies and holding workshops to build the technical capacities of these parties.

# Implementation

The mechanism adopted to manage the implementation of any national strategy is essential, but it is often not given the necessary attention, as demonstrated by the comparative experience but avoided by “Kuwait Integrity and Anti-Corruption Strategy”, which established a clear, coordinated and effective mechanism drawing on best practices globally and compatible with Kuwait’s legal and institutional systems. Accordingly, the strategy’s implementation mechanism is based on five (5) key components (see Figure 7) as follows:

- **High Committee for the Leadership and Coordination of National Strategy:** The High Committee is established by a decision of the Council of Ministers, headed by the Anti-Corruption Authority (Nazaha), and includes in its membership a leading official from each of the implementing bodies mentioned in the strategy document. The Committee shall meet regularly every three (3) months and whenever necessary, and shall be responsible for the overall supervision of the proper implementation of the strategy and provision of necessary guidance for it, in addition to working to secure required human and financial resources. The High Committee also reviews, approves and publishes implementation, monitoring and evaluation reports, approves annual workplans, and makes substantive adjustments to the strategy and implementation plans, as appropriate, based on the proposal of the relevant technical committees. The Committee may draw upon the technical expertise necessary to carry out its work and shall establish such committees and teams as it may deem appropriate.
- **Technical committees working on the implementation of the national strategy:** A technical committee shall be established by a decision of the high committee for each of the four pillars mentioned in the

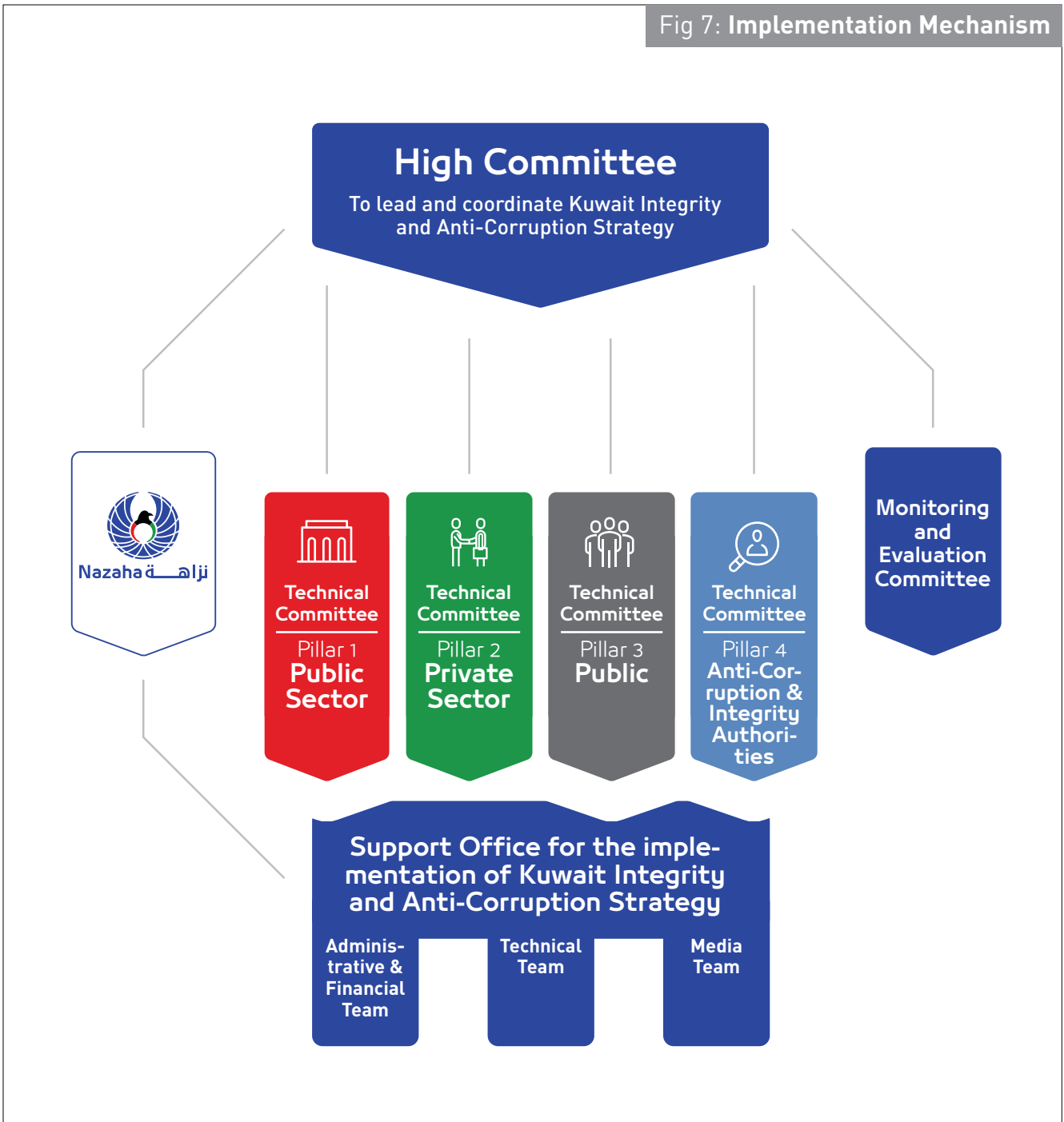
strategy. It shall consist of experts representing the concerned stakeholders. The high Committee shall elect a rotating presidency for each of them at the beginning of each year. These committees meet once a month according to a schedule to be set at the beginning and middle of the year and will be responsible for the technical supervision of the proper implementation of the pillar related to it and preparing the necessary recommendations for it, in addition to gathering information required to ensure a good implementation. The technical committee prepares the annual work plans and drafts the monthly reports on the implementation of the pillar to be submitted to the High Committee, in addition to proposing any substantive amendments to the pillar, where appropriate. The committees can draw on the technical expertise to complete its work.

- **Monitoring and Evaluation Committee:** A specialized committee is established under the chairmanship of a representative of the Anti-Corruption Authority (Nazaha) and membership of experts from among its employees and independent experts. The committee meets once a month according to a schedule to be set up at the beginning and middle of the year. It shall be responsible for collecting the necessary information for monitoring and evaluating the implementation of the strategy and preparing the related reports. It shall also prepare draft reports and recommendations to enhance the implementation efforts of the strategy and submit them to the High Committee.
- **Support Office for the implementation of Kuwait Integrity and Anti-Corruption Strategy :** An office to support the implementation of the strategy projects is established under the supervision of the Anti-Corruption Authority (Nazaha), which includes specialized teams of experts and may draw upon the necessary expertise to carry out its work. This includes:

A team working in cooperation with the technical committees and the monitoring and evaluation committee to carry out the administrative and financial work necessary to support the implementation of the strategy according to annual work plans prepared by the technical committees and approved by the High Committee.

A technical team working in cooperation with the administrative and financial team and providing the necessary advice and training to the technical committees and the monitoring and evaluation committee and the implementing agencies at the request of the parties or as directed by the Higher Committee.

Fig 7: Implementation Mechanism



A media team working in cooperation with the administrative and financial team as well as the technical team to develop and implement the necessary media and communication plans and activities to support the implementation of the strategy and to report on its work to the technical committees, the monitoring and evaluation committee, the administrative and financial team and the technical team on a monthly basis.

These committees, with the support of the above mentioned teams, will be working in accordance with the “vision”, the “message” and the “principles” of this strategy, and based on the contents of this document, including the Implementation Matrix (Annex 3), the proposed timetable (Annex 4), and “Monitoring and Evaluation Matrix” (Annex 5) so that the first six months of 2019 will be allocated for the completion of a founding phase aimed at forming the committees and teams mentioned and preparing them in the necessary manner to implement the strategy (2019-2024), and to adopt the first annual work plan in accordance with the approved mechanisms.

## Conclusion

The Kuwait Integrity and Anti-Corruption Strategy is the first of its kind in the history of the country and is unique in the process of its preparation in terms of its wide inclusivity in participation, which is considered rare in the Arab region and the world, placing it in the ranks of strategies closest to the best international standards in this particular field. The strategy has also made sure that it is comprehensive without falling prey to dispersion or copying from the experience of others without adapting to the Kuwaiti context. Its main focus was to ensure the highest possible adherence to the provisions of the United Nations Convention against Corruption, and to have and to encourage sustainable development in terms of its potential positive impact on the achievement of the goals of Sustain-

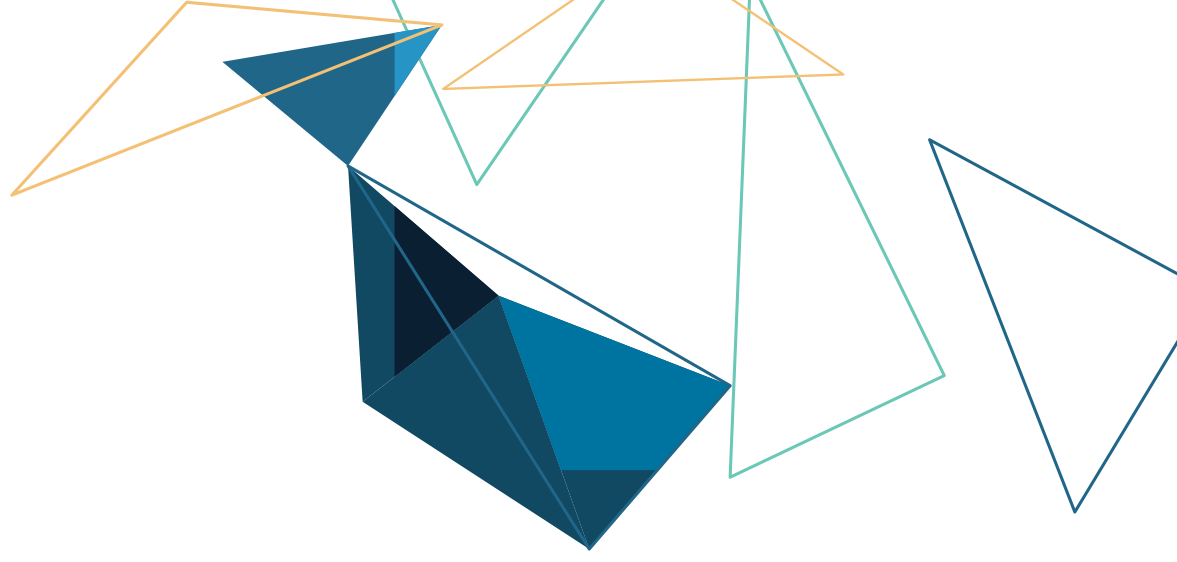
able Development Goals (SDGs) for the year 2030 in general, and “Vision of New Kuwait 2035” in particular.

But the lesson is always in good implementation, so the strategy was keen to include the elements that will ensure success in this area, including an integrated proposal for the proposed mechanism for implementation and a coherent and realistic series of priorities and initiatives detailed in the “Implementation Matrix” and its proposed “Timetable”, in accordance with the “Monitoring and Evaluation Matrix”. This is all within a framework of a broad “vision”, a clear “message” and “principles” that guide implementation at ground level.

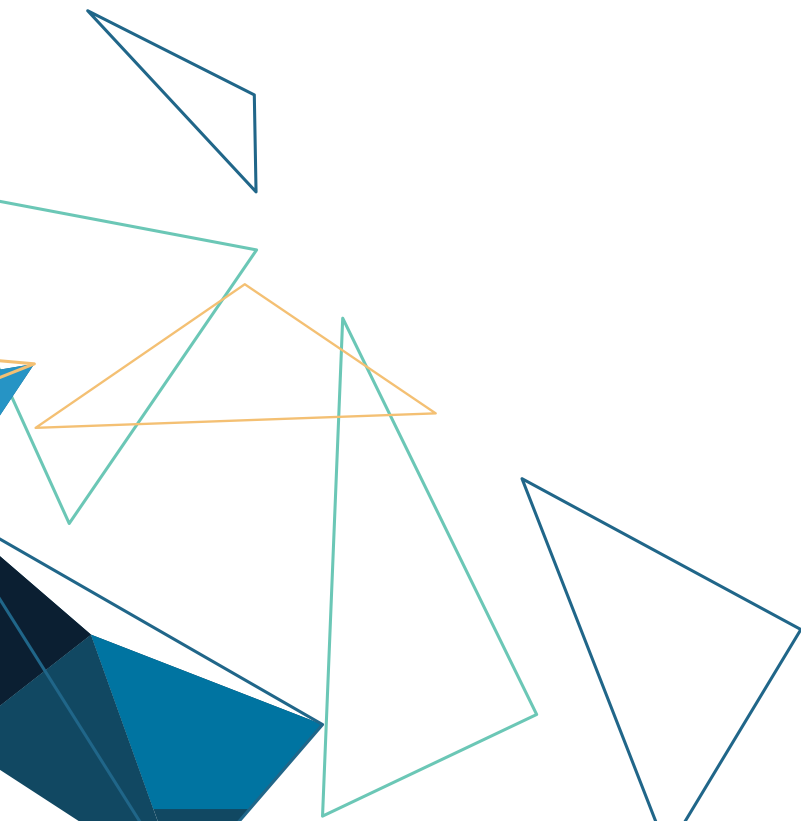
The success of the strategy depends on several factors, most importantly the cooperation of the various concerned parties, based on shared responsibility and unity to promote integrity and fight corruption, which together constitute a pillar of the future of the State of Kuwait.

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# Annex (1)



## Annex 1 - The law of Kuwait Anti-Corruption Authority (NAZAHA)

- Having perused the Constitution; and;
- Decree-Law No. (3) of 1955 Concerning Kuwait Income Tax as amended;
- Law of Kuwait Chamber of Commerce and Industry of 1959;
- The Amiri Decree No. (10) of 1960 on the Law of the Civil Service Commission as amended;
- The Amiri Decree No. (12) of 1960 on the Law regulating the Fatwa and Legislation Department of the Government of Kuwait;
- Law No. (16) of 1960 Promulgating the Penal Code as amended;
- Law No. (17) of 1960 Promulgating the Code of Procedures and Criminal Prosecution as amended;
- Law No. (21) of 1962 on the Diplomatic and Consular Corps as amended;
- Law No. (35) of 1962 Concerning Elections of the National Assembly as amended;
- Law No. (12) of 1963 Concerning the Rules of the National Assembly as amended;
- Law No. (30) of 1964 on the Establishment of the State Audit Bureau as amended;
- Law No. (37) of 1964 on Public Tenders as amended;
- Decree-Law No. (2) of 1967 on Establishment of the National Guard; Law No. (32) of 1967 Concerning the Army as amended;
- Law No. (23) of 1968 Concerning the System of the Police Force as amended;
- Law No. (32) of 1968 Concerning Currency, the Central Bank of Kuwait and Organization of Banking Business as amended;
- Decree-Law No. (15) of 1979 regarding the Civil Service as amended;
- Decree-Law No. (24) of 1979 on the Cooperative Societies as amended;
- Law No. (38) of 1980 Promulgating the Civil and Commercial Procedures Law as amended;
- Law No. (40) of 1980 Promulgating Law of Regulating Experts as amended;
- Law No. (36) of 1982 Concerning the Firefighters as amended;
- Decree-Law No. (23) of 1990 on Regulation of the Judiciary Law as amended;
- Law No. (1) of 1993 On the Protection of Public Funds as amended;
- Law No. (11) of 1995 Concerning Judicial Arbitration with respect to Civil and Commercial Matters as amended;



- Law No. (88) of 1995 Concerning the Trial of Ministers as amended;
- Law No. (25) of 1996 regarding the Disclosure of Commissions in connection with Government Contracts as amended;
- Law No. (53) of 2001 on the General Directorate of Investigations of the Ministry of Interior;
- Law No. (10) of 2003 on the promulgation of the Unified Customs Law for the States of Gulf Cooperation Council;
- Law No. (5) of 2005 Concerning Kuwait Municipality as amended;
- Law No. (47) of 2006 on the Approval on the United Nations Convention against Corruption;
- Law No. (10) of 2007 on the Protection of Competition as amended;
- Law No. (7) of 2010 regarding the Establishment of the Capital Markets Authority and Regulating Securities Activities as amended;
- Law No. (25) of 2012 on the promulgation of the Companies Law;
- Law No. (106) of 2013 Concerning Anti-Money Laundering and Combating the Financing of Terrorism;
- Law No. (20) of 2014 Concerning Electronic Transactions;
- Law No. (37) of 2014 Concerning the Establishment of the Communications and Information Technology Regulatory Authority as amended;
- Law No. (23) of 2015 Concerning the Establishment of Finance Controllers Body;
- Law No. (63) of 2015 Concerning Combating Cybercrimes; and
- Law No. (97) of 2015 Concerning the Public Authority for Sport.

The National Assembly has approved the following law, which we have ratified and promulgated:

# Part 1

## • General Provisions

### • Article (1)

For the purposes of applying the provisions of this law, the following words and phrases shall have the meanings assigned to them, unless the context otherwise requires:

- **Authority:** Kuwait Anti-Corruption Authority.
- **Competent Minister:** The Minister of Justice.
- **Chairman:** The Chairman of the Authority.
- **Board:** The Board of Trustees.
- **Convention:** The United Nations Convention Against Corruption.
- **Illicit Gain:** Any increase in the wealth or diminution of liabilities occurs - because of assuming an office or a capacity - to the official subject to this law, his minor children or those under his guardianship, custodianship or curatorship whenever it is disproportionate to their resources and it is unjustified.
- **Public Official:** In applying the provisions of this law, the term of public official shall include the persons set forth in Article (43) of the Law No. (31) of 1970 amending some provisions of the Penal Code No. (16) of 1960.
- **Assets and Liabilities:** They are the cash money, real estate or movables owned by the person subject to the provisions of this law and his minor children and those under his guardianship, custodianship or curatorship inside and outside Kuwait, including their rights and their indebtedness to third party, as well as the agencies or authorizations, which have financial effect, issued by him to third party or issued to him by third party, in addition to the usufruct.
- **Reporting:** It is the act of informing or reporting by a natural or a legal person of

information in his possession on a crime or an attempted crime, connivance or disposal of an evidence of a crime or a serious financial violation to the Authority or any competent body designated to receive such reports.

- **Whistleblower:** he / she is the person who reports any corruption offence. That also applies to the witnesses, victims of crimes and the experts who give testimony concerning criminalized acts.

### • Article (2)

The Provisions of this Law shall apply to:

1. The Prime Minister, deputies of the Prime Minister, the Ministers and whoever holds an executive office at the ministerial rank.
2. The speaker, deputy-speaker and members of the National Assembly.
3. The president and members of the Supreme Judicial Council, president and justices of the Constitutional Court and the Technical Department of the Court, judges, members of the Public Prosecution, the president and members of the Fatwa and Legislation Department, the Director General and members of the General Administration of Investigations at the Ministry of Interior, the Legal Department of Kuwait Municipality, arbitrators, experts at the Ministry of Justice, liquidators, receivers, agents of creditors, notaries and the registrar at the Departments of Real Estate Registration & Authentication at the Ministry of Justice .
4. The Chairman and vice-chairman and members of the Municipal Council.
5. The chairman and members of boards, authorities and committees which undertake executive functions, which a law, decree or resolution is issued by the Council of Ministers on the formation thereof or appointment of their members.
6. The Chief of the Finance Controllers Body, his deputy and heads of sectors and finance controllers.
7. The Leaders are as follows:

- Holders of the group of leading positions in the general schedule pay scale (Senior ranked positions / Undersecretary / Assistant Undersecretary).
  - Members of Boards of Directors and general managers and their deputies or assistants and secretaries-general and their deputies or assistants in the public bodies or institutions or any government agency.
  - The equivalent of a leader, such as heads of departments or administrative units and their deputies or members entrusted to the public bodies and institutions.
  - Directors of the departments and the equivalents, such as heads of the organizational units, which depend in the structures thereof on a level of management or higher.
  - The provision of the above two paragraphs apply to the military personnel, diplomats and civilians in the ministries, governmental departments, public bodies and institutions and the agencies with independent or supplementary budget whenever they undertake the responsibilities or enjoy the privileges prescribed for the office, whether they hold the office regularly or temporarily. The Authority shall, in coordination with the concerned agencies on a regular basis, define and update the holders of these offices under the provisions of this law.
8. The chairman, vice-chairman, members of the Board of Trustees, the Secretary-General, Assistant Secretaries-General, directors and the technical staff of the Kuwait Anti-Corruption Authority.
  9. The chairman, vice-chairman, deputies, directors and the technical staff of the State Audit Bureau of Kuwait.
  10. Representatives of the State in the membership of the Boards of Directors of the companies in which the State or one of the governmental agencies, public bodies or institutions or other public legal entities directly contribute in a proportion not less than %25 of the capital.

11. The members of the boards of directors of the cooperative societies and sports authorities.

## Part 2

# • Kuwait Anti-Corruption Authority

## Chapter 1: Objectives and Competences of the Authority

### • Article (3)

A public authority named (Kuwait Anti-Corruption Authority) shall be established and supervised by the Minister of Justice and performs its functions and competences in full independence and impartiality in accordance with the provisions of this Law.

### • Article (4)

#### The Authority aims at achieving the following:

1. Establishing the principle of transparency and integrity in the economic and administrative transactions to ensure the achievement of the rational management and optimal utilization of the State's funds, resources and properties.
2. Implementing the United Nations Convention against Corruption approved by the Law No. (47) of 2006 and any anti-corruption international conventions and treaties to be approved.
3. Seeking to combat corruption, prevent its dangers and impacts, prosecute its perpetrators, confiscate and recover funds and proceeds resulted from the practice thereof, in accordance with the law.
4. Protecting the State's agencies from bribery, exploitation and abuse of power in order to achieve personal benefits and prevention of mediation and nepotism.

5. Protecting the whistleblowers of corruption.
6. Promoting the principle of cooperation and participation with the States and the regional and international organizations in the fields of anti-corruption.
7. Promoting and activating the role of the civil society institutions and organizations in combating corruption, educating members of the society of its dangers and raising awareness of means and methods of corruption prevention.

#### • Article (4)

The Authority shall undertake the following functions and competences:

1. Developing a comprehensive national strategy for integrity, transparency and anticorruption, drawing up mechanisms, plans and programs for its implementation, and following up its implementation with the concerned authorities.
2. Receiving and studying the reports, complaints and information submitted to it concerning the corruption offences, and when ascertained that they constitute a suspicion of a crime, such reports shall be referred to the competent investigative body.
3. Receiving the statements of Assets & Liabilities and forming committees to examine such statements.
4. Protecting the whistleblowers in coordination with the competent bodies.
5. Informing the competent bodies in order to take the necessary legal actions to terminate any contract, to which the State is a party, or withdraw a concession or other engagements, if it is found out that such contracts are concluded in violation of the provisions of the laws or implemented in violation of the concluded contract, in coordination with the competent bodies.
6. Following up actions and measures taken by the competent bodies to recover funds and proceeds resulting from the corruption offences.
7. Studying the legislations and legal instruments related to anti-corruption periodically and proposing the necessary amendments thereto in order to keep pace with the international conventions and treaties ratified or acceded to by Kuwait, in addition to developing the necessary measures for the prevention of corruption and updating the mechanisms and methods of combating corruption in coordination with all State's authorities.
8. Coordinating with the Ministry of Foreign Affairs with regard to cooperation with the Gulf, Arab and international states and organizations related to anti-corruption and participating in the programs, which aim at preventing corruption and represent Kuwait in the regional, Arab and international conferences and forums related to anti-corruption.
9. Studying and assessing the reports issued by local, regional and international organizations related to anti-corruption, reviewing Kuwait's status therein and taking the appropriate action towards them.
10. Coordinating with the media in order to raise the society's awareness of the dangers of corruption, corrupt practices and their impacts and how to prevent and combat them such practices.
11. Taking the necessary measures to ensure the participation of the civil society organizations in raising awareness about the dangers of corruption and the impacts thereof on the society and expand the role of society in anti-corruption activities and prevention of corruption.
12. Requesting the competent bodies to investigate incidents of financial and administrative corruption, detecting the violations and irregularities and collecting evidence related thereto.
13. Developing databases and information systems and exchange of information with other agencies and organizations concerned with corruption issues inside and abroad, in accordance with the legislation in force.
14. Requesting the competent bodies to bring the necessary administrative and civil actions.
15. Referring the incidents involving a suspicion of a criminal offense to the competent investigative body accompanied by all doc-

uments.

16. Any other functions or competences that are consistent with the purpose of the establishment of the Authority and may be assigned thereto.

## Chapter 2: Board of Trustees

### • Article (6)

The authority shall be managed by a board named the (Board of Trustees) which is composed of seven persons who have experience, integrity and efficiency, including a chairman and a vice-chairman who are appointed by a decree based on the nomination by the competent minister.

### • Article (7)

The Member of Board of Trustees shall be:

11. A Kuwaiti national,
22. Not less than 40 years,
33. Holder of at least a university degree,
44. Known of good reputation and has never been sentenced in one of the corruption cases or in a crime involving a breach of honor or honesty, He shall be a full-time member of the Board of Trustees. The member loses his capacity, in accordance with the law, and his office would become vacant if he violated that, and he may not be re-nominated again for the membership of the Board of Trustees. Therefore, the competent minister shall take actions to appoint a replacement member in accordance with the provisions of this Law.

### • Article (8)

Salaries, remunerations, allowances and benefits of the Chairman of the Authority and the members of the Board of Trustees shall be determined by a decree based on the proposal of the competent minister and the approval of the Council of Ministers.

### • Article (9)

The term of office of the Board of Trustees is four years, which shall be renewable for one time. The competent minister may, based on the proposal of the majority members of the

Board of Trustees, revoke the membership of the Chairman or the vice-chairman, or any other member; if it is proven that he has seriously breached his duties after the conduction of an investigation.

If the office of the chairman or the vice-chairman or any member of the Board of Trustees becomes vacant for any reason, a replacement shall be appointed and the new member shall complete the term of the preceding member only.

### • Article (10)

The Board of Trustees shall:

1. Develop the anti-corruption general policy in cooperation with the relevant authorities and draw up the necessary plans and programs for the implementation thereof.
2. Adopt the organizational structure of the offices, the internal regulation of the financial and administrative affairs and the resolutions regulating work at the Authority, without prejudice to the provisions of Articles (5 and 38) of the Decree-Law No. (15) of 1979 concerning the Civil Service.
3. Approve the agreements and contracts entered into by the Authority, which are relevant to its competences.
4. Form a committee or more that it believes to be necessary for its work.
5. Approve the Authority's draft budget and its final statement prior to submission to the competent bodies.
6. Adopt and publish the annual general report of the Authority.
7. Submit a biannual report to the National Assembly and the Council of Ministers on the activities related to the prevention of corruption and anti-corruption, obstacles, negatives and the proposed recommendations.
8. Publish all information and data on the corruption offences after having been proven by a conclusive judicial decision.
9. Any matter under the competence of the Authority and its objectives shall be presented by the chairman or two board members.

### • Article (11)

The chairman, vice-chairman and members of the Board of Trustees shall, prior to assuming their duties, take the following oath before His Highness the Amir:

**(I hereby, swear by Almighty God to be loyal to the homeland and the Amir, to respect the Constitution and the laws of the State and shall perform my duties honestly and truthfully).**

## Chapter Three: The Executive Body

### • Article (12)

The Authority shall have an Executive Body to undertake the technical, administrative and financial matters as follows:

1. The Chairman shall supervise the executive body and represent the authority before the judiciary and others, without prejudice to the provisions of the Amiri Decree No. (12) of 1960 on the Law regulating the Fatwa and Legislation Department of the Government of Kuwait.
2. The Authority shall have a Secretary-General and Assistant Secretaries to be appointed by a decision of the Chairman, and they shall be responsible before him for the management and administration of the daily activity of the Executive body. The internal regulations shall determine their functions and competences.
3. The Authority shall transparently select its personnel who have the experience, competence, integrity and scientific disciplines, in accordance with the standards prescribed by the internal regulations, and they shall not have any consanguinity until the second degree to the Chairman, Vice-Chairman or the members of the Board of Trustees.
4. The Authority may, in accomplishing its functions, ask for the assistance of judges, prosecutors, employees of the governmental agencies and others, who will be entrusted to work for the Authority, in accordance with the applicable laws and regulations in this regard.

### • Article (13)

The Authority shall undertake the qualification and training of its employees to enable them to perform their duties and competences with respect to combating anticorruption.

### • Article (14)

The Chairman shall issue a decision concerning the determination of the officials of the Authority who will undertake the detection of the violations and drafting of minutes in preparation for referral to the competent body.

### • Article (15)

The Chairman, members of the Board of Trustees and the employees of the Authority shall not disclose any secret, information or data, which has reached to their knowledge, due to the performance of their duties in cases other than the cases herein set forth.

### • Article (16)

Within their term of office, the Chairman, members of the Board of Trustees and any employee of the Authority shall not:

1. Do any business by himself or in his capacity as an agent, guardian, custodian or a curator, nor authorize third party to do so.
2. Practice any office, profession or other paid or unpaid work, including holding an office or occupying a post in the government, public agency and institutions or a company, or a private business.
3. Participate in the membership of the Board of Directors or provide any direct or indirect service or consultancy to any agency.
4. Receive monetary compensation, directly or indirectly, from any agency.

### • Article (17)

A regulation organizing the activities of the members of the Board of Trustees of the Authority and its current and former employees shall be issued by a decision of the Council of Ministers based on the proposal of the Board of Trustees.

## Chapter Four: Financial Affairs

### • Article (18)

The Authority shall have a budget appended to the general budget of the State, and such budget shall be prepared according to the rules and procedures governing the State's General Budget.

The fiscal year of the Authority shall start from 1st of April of each year and ends on 31st of March of the following year.

The Authority shall draft its budget and send it on the due date to the Ministry of Finance. In case of disagreement, or if the Ministry of Finance objected to the Authority's estimations and the Authority did not agree to such objections, the Minister of Finance shall present such objections to the Council of Ministers for its action.

### • Article (19)

The Chairman of the Authority shall have the same competences conferred on the Minister of Finance concerning the use of the financial appropriations made in the Authority's budget, and the Board of Trustees may practice the same competences conferred on the Civil Service Commission with regard to regulating its work and personnel affairs.

## Chapter Five: Community Participation

### • Article (20)

Subject to the inviolability of the privacy, honor and dignity of individuals, whoever becomes aware of the occurrence of any corruption offences shall report them to the Authority or the competent body and present the information, which he possesses, thereon in order be studied by the authority to ascertain the seriousness thereof and take the legal actions in this respect.

In coordination with the competent bodies, the Authority shall ascertain the corruption offences herein set forth, whenever such of-

fences are brought to the knowledge of the Authority by any means.

### • Article (21)

The Authority shall cooperate with the various entities in combating corruption, and in particular the following:

1. Cooperation with the educational institutions and places of worship to spread the values of transparency, integrity and good citizenship.
2. Cooperation with the governmental and private institutions to develop public outreach programs related to the activity of the Authority.

## Part 3

# • Corruption Offences and Procedures of Seizure and Investigation

## Chapter 1: Corruption Offences

### • Article (22)

In applying this Law, Corruption Offences shall include the following:

1. The offences against the public funds set forth in Law No. (1) of 1993 On the Protection of Public Funds.
2. The offences of bribery and abuse of power set forth in Law No. (31) of 1970 amending some provisions of the Penal Code No. (16) of 1960.
3. The offences set forth in Law No. (106) of 2013 Concerning Anti-Money Laundering and Combating the Financing of Terrorism.
4. Counterfeiting and forgery offences set forth in Law No. (16) of 1960 Promulgating the Penal Code.

5. The offences relating to the administration of justice set forth in Law No. (16) of 1960 Promulgating the Penal Code.
6. The offences of Illicit Gain as set forth herein.
7. The offences of evasion of customs duties set forth in Law No. (10) of 2003 on the promulgation of the Unified Customs Law for the Arab States of Gulf Cooperation Council.
8. The offences of tax evasion set forth in Decree No. (3) of 1955 concerning Kuwait Income Tax.
9. The offences of impeding the work of the Authority, putting pressure upon it to hinder the performance of its duties, interfering in its competences, or refraining from providing it with the required information set forth herein.
10. The offences set forth in Law No. (10) of 2007 on Protection of Competition.
11. The offences set forth in Law No. (25) of 1996 on the Disclosure of Commissions in connection with Government Contracts.
12. Any other offences set forth in other laws, which are considered corruption offences.

## Chapter 2: Corruption Offences

### • Article (23)

The Authority shall follow up the procedures of seizure, confiscation and recovery of funds and proceeds of corruption offences in accordance with the provisions, rules and procedures stipulated in the applicable laws.

### • Article (24)

Without prejudice to the provisions of Law No. (32) of 1968 concerning Currency, the Central Bank of Kuwait and the Organization of Banking Business, the Authority shall, upon becoming aware of the existence of a suspicion of a corruption offence, collect information thereon, and may have, for that purpose, access to the records, papers and documents related to such offence. In addition, it may re-

quest to be provided with any relevant data, information or documents, and may decide to refer them to the competent judicial bodies.

### • Article (25)

Subject to the provisions of Article (28) hereof, the Authority may address and summon any person who has a relationship to a corruption offence in order to hear his testimony thereon.

### • Article (26)

The agencies affiliated to the public or private sectors or any natural or legal person may not do any of the following acts:

1. Refuse, without legal justification, to provide the Authority with any records, documents, papers or information that may be useful for the whistleblowing of acts of corruption.
2. Impede the work of the Authority or put pressure on it to obstruct the performance of its duties or interfere in its competences with the intention of affecting thereon.

### • Article (27)

Subject to the provisions of law No. (88) of 1995 Concerning the Trial of Ministers, the public prosecution shall have exclusive competence on the investigation, disposition and prosecution of all offences set forth herein and any other offences related thereto.

### • Article (28)

The rules stipulated in the applicable laws shall apply to the procedures of seizure, investigation and prosecution in the corruption offences.

If the person charged with a corruption offence was one of the persons for whom the Constitution or the Law stipulates a special legal procedure for investigation or prosecution, such procedure shall be followed in this respect.

### • Article (29)

The correspondence, information, documents



and reports related to the corruption offences and the inspection or investigation thereof as well as the statements of Assets and Liabilities are considered secrets that shall be maintained. All those who are required to enforce this Law shall not disclose such statements, except in accordance with the law, and such prohibition shall remain in effect following the termination of their employment relationships.

## Part 4

# • Disclosure of Assets and Liabilities

## Chapter 1: Officials Subject to the Statements of Assets & Liabilities

### • Article (30)

The categories set forth in Article (2) hereof shall file their Statements of Assets & Liabilities in accordance with the provisions of this Part.

### • Article (31)

The executive regulations shall organize the form and data of the statement of Assets and Liabilities, in addition to the method of inspecting its elements. The executive regulations shall determine the method of formation of the committees in order to inspect the Assets & Liabilities Statements according to the offices and office levels of officials subject to the law. The Authority may ask for the help of the members of the judiciary and public prosecution for the presidency and membership of the Inspection Committees, subject to the approval of the Supreme Judicial Council.

In addition, the executive regulations govern the provision of the appropriate service to the official to assist him in filing the statement.

## Chapter 2: Filling the Statement, its Inspection and Confidentiality

### • Article (32)

All officials subject to the provisions of this Part shall file their statement following the issuance of the executive regulations, according to the following dates:

#### 1. The First Statement

- Within six months after the date of publishing the executive regulations, if he still holds his office.
- Within sixty days after assuming his office.

2. **Statement Update:** Within 60 days after the end of every 3 years, as long as the official subject to the law remains in his office.

3. **The Final Statement:** Within ninety days after leaving his office.

### • Article (33)

The Authority shall receive the Statements in accordance with the procedures prescribed by the executive regulations.

The executive regulations shall determine the rules and procedures for the receipt of the Statements filed by the employees of the authority and the method of inspection thereof, provided that the Chairman and members of the Board of Trustees shall file their Statements to the president of the Supreme Judiciary Council who will present them to an inspection committee composed of three judges commissioned for this regard. If a suspicion of Illicit Gain is found, the committee shall refer it to the competent public prosecution for its actions.

### • Article (34)

In case of suspicion of an offence of Illicit Gain, the Authority may secretly request data, explanation and papers that it deems to be necessary from individuals, governmental, or private entities inside and outside Kuwait.

The public prosecutor or his representative may, upon the request of the Authority, directly issue an order for the access and obtainment of any data or information related to accounts, deposits, safes at banks and the financial institutions, if revealing the truth is required in one of the offences set forth herein.

#### • Article (35)

The inspection committees shall prepare a report on each official subject to the provisions of this part, who is likely having an increase in his Assets & Liabilities resulted from an Illicit Gain after hearing his Statements.

Such report shall be referred to the Authority in order to be sent to the public prosecution for its action.

The executive regulations shall specify the time limits for the preparation and transmittal of the reports.

#### • Article (36)

Without prejudice to the provisions of Law No. (1) of 1993 on the Protection of Public Funds, the public prosecution may, upon initiating the investigation, take the appropriate precautionary procedures, if it has sufficient evidence on the Illicit Gain.

Anyone, against whom the procedure was taken, may file an appeal before the Criminal Court at the Court of First Instance within two months from the date of the issuance thereof, in order to promptly decide on the appeal, whether by dismissal, revocation or modification of the procedure and determine the necessary guarantees if required.

The appeal may be refiled only after six months from the date of the decision on the appeal. The public prosecutor may revoke or modify the procedure according to the requirements of investigation.

The investigative committee of the ministers may take the precautionary procedures in accordance with the provisions of Law No. (88) of 1995 concerning the Trial of Ministers.

## Part 5

# • Protection of the Whistleblower

### Chapter 1: Procedures of Reporting

#### • Article (37)

It is the duty of every person to report corruption offences, and the freedom, security and tranquility of the whistleblower is guaranteed in accordance with the provisions hereof or any other law establishing other guarantees in this regard. The whistleblower shall not be offended in any way whatsoever for reporting such offences.

#### • Article (38)

Reporting under the provisions of this law, requires that the whistleblower shall have serious indications to justify his belief in the veracity of the reported incident.

#### • Article (39)

The executive regulations shall set out the procedures for the submission of the report, taking into account the ease of submission and maintaining the full confidentiality of the whistleblower's identity.

### Chapter 2: Protection Program

#### • Article (40)

The whistleblower shall be afforded protection from the time he or she submits the report, and the protection shall extend to include his or her spouse, relatives and all other persons closely connected to him, when necessary.

#### • Article (38)

Protection of the whistleblower shall include the following:

1. Providing the whistleblower with personal protection: by not revealing his identity or whereabouts, and providing him with per-



sonal guards or a new place of residence, if circumstances so require.

2. Providing the whistleblower with the administrative and occupational protection: by preventing any administrative action against him and guaranteeing the continuity of his employment salary, rights and benefits during the period decided by the Authority.
3. Providing the whistleblower with the legal protection: by not bringing a criminal, civil, disciplinary case against him, when the report fulfils the conditions contained in Article (38) hereof.

The executive regulations shall determine other methods and procedures of protection and the forms thereof.

#### • Article (42)

The executive regulations shall determine the means that the Authority may provide for the whistleblower, through which he can give his Statements in a manner that ensures all his material, moral and administrative guarantees to ensure his safety.

#### • Article (43)

The State shall compensate the whistleblower or his heirs for any material or moral damages he may suffer from, as a result of the submission of the report, meeting the conditions contained in Article (38) hereof. The executive regulations shall set out the material and moral incentives that may be granted to the whistleblower and the conditions for granting them.

## Part 6

### • Penalties

#### • Article (44)

Any perpetrator initiating to report the existence of a conspiracy to commit one of the crimes set forth in Article (22) hereof to the authority, the public prosecution, or the compe-

tent authorities, and whoever involved therein prior to its commission, shall be pardoned from the punishment. The court may pardon the perpetrator from penalty, if the reporting takes place following the occurrence of the crime and prior to commencing the investigation, provided that the perpetrator – during the course of the investigation – enabled the authorities to arrest the other perpetrators of the offence, seize the funds related to the crime or arrest perpetrators of another crime of similar type and severity.

#### • Article (45)

Whoever breaches the provisions of Articles (26 ,16 ,15 and 29) hereof shall be punished by imprisonment for a period not more than three years and a fine of not less than two thousand and not exceeding ten thousand Dinars or by one of these penalties.

Whoever breaches the provisions of Article (20) hereof shall be punished by a fine of not less than five hundred and not more than three thousand Dinars. The provisions of this paragraph shall not apply to the spouse, ascendants or descendants.

#### • Article (46)

If one of those who are mentioned in Article (30) hereof fails to file his Assets & Liabilities statement within the time limit set forth in Article (32), he shall be punished by the following penalties:

1. **The First Statement:** a fine of not less than five hundred and not more than three thousand Dinars, and if the delay exceeds ninety days, after being warned to file the statement, he may be dismissed.
2. **Statement Update:** a fine of not more than three thousand Dinars, and if the delay exceeds ninety days, after being warned to update the statement, he shall be punished by imprisonment for a term not exceeding one year and a fine of not less than three thousand and not more than ten thousand Dinars, or by one of these penalties and may be dismissed.
3. **The Final Statement:** a fine of not more

than five thousand Dinars, and if the delay exceeds ninety days, he shall be punished by imprisonment for a term not exceeding three years and a fine of not less than three thousand nor more than thirty thousand Dinars or by one of these penalties.

In all cases, the violation's file shall be referred to the competent inspection committee to verify the elements of his Assets and Liabilities.

#### • Article (47)

If the official subject to the law files an incomplete or false statement of Assets & Liabilities with his knowledge thereof, or if he did not file a statement for one of the persons under his guardianship, custodianship or curatorship, despite of being warned to file it, he shall be punished by imprisonment for a term not exceeding three years and a fine of not less than three thousand and not more than thirty thousand Dinars, or by one of these penalties, and he may be dismissed.

#### • Article (48)

Whoever commits the offence of Illicit Gain shall be punished by imprisonment for a term not exceeding five years and fine equals to the value of the Illicit Gain, which he obtained, in addition to ruling with the confiscation of the Illicit Gain, whether it was in his own account or in the account of his spouse or minor children or those under his guardianship or curatorship.

The lapse of the criminal action due to death shall not preclude the confiscation ruling of the Illicit Gain.

#### • Article (49)

Any conviction in the crime set forth in Article (48) hereof shall require the dismissal of the convict from his office or revocation of his membership, together with depriving him from holding a public office and the appointment or nomination for membership in any representative body unless he has been rehabilitated.

#### • Article (50)

Any person other than those mentioned in Articles (47 and 48) who earnestly benefited from the Illicit Gain with his knowledge thereof, shall be punished by half of the penalty stipulated in Article (48) hereof.

#### • Article (51)

Whoever discloses the identity of the whistleblower or his domicile shall be punished by imprisonment for a term not exceeding three years and a fine of not less than one thousand nor more than five thousand Dinars, or by one of these two penalties.

#### • Article (52)

Any official proven to have taken an administrative action against the whistleblower for reporting one of the offences set forth herein shall be punished by a disciplinary penalty, and the administrative action taken against the whistleblower shall be null and void.

#### • Article (53)

Without prejudice to any severe penalty, a person who reported corruption offences mandatorily provided false data or information, concealed information or data, committed fraud or deception, concealed the truth or was misleading the justice, shall be punished by imprisonment for a term not exceeding three years, and the court may rule with dismissing him from his office.

## Part 7

### • Final Provisions

#### Article (54)

The criminal case, in the corruption offences set forth in Article (22) hereof, shall not be abated and the adjudged penalty for such offences shall not be barred by prescription.



## **Article (55)**

The court may bring any natural or legal person, whom it believes to have earnestly benefited from the Illicit Gain, into the case. Further, the dismissal or confiscation ruling shall be enforceable to his wealth in proportion to the extent of benefits he gained.

### **• Article (56)**

The penalties stipulated herein shall not preclude the imposition of any severe penalty prescribed by another law for the committed act.

### **• Article (57)**

The executive regulations of this law shall be issued pursuant to a decree, on the proposal of the Board of Trustees, within two months from the date of issuing this Law, and it shall be published in the Official Gazette.

### **• Article (58)**

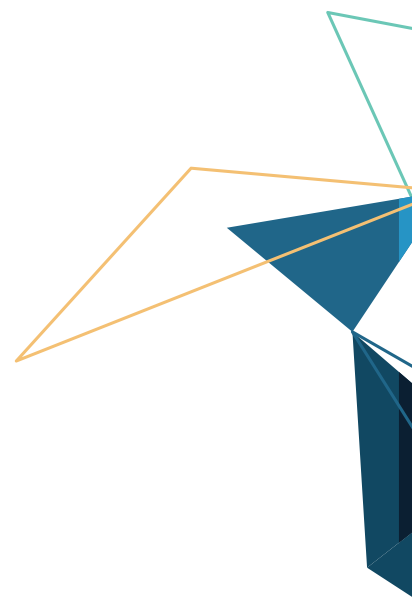
Any provision that contradicts the provisions of this law shall be superseded.

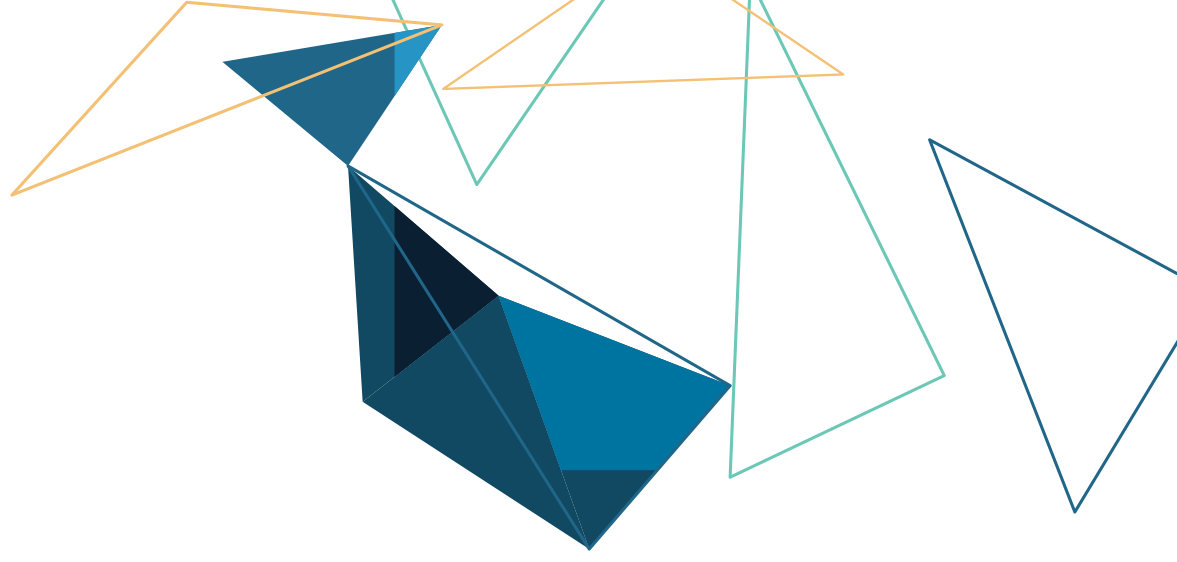
### **• Article (59)**

The Prime Minister and the ministers – each within his jurisdiction – shall implement this Law and it shall be published in the Official Gazette.

THE AMIR OF KUWAIT  
**SABAH AL-AHMAD AL-JABER AL-SABAH**

Issued at Al-Seif Palace on: 14th Rabi' Al-Akhir 1437 A.H - Corresponding to: 24th January 2016 A.D



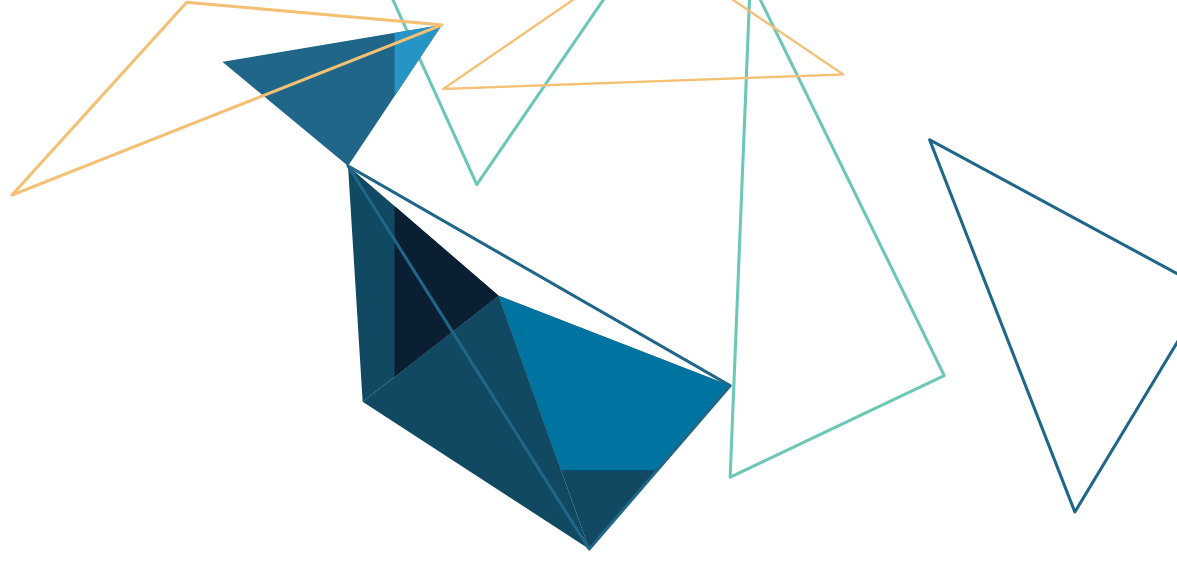


# Annex (2)

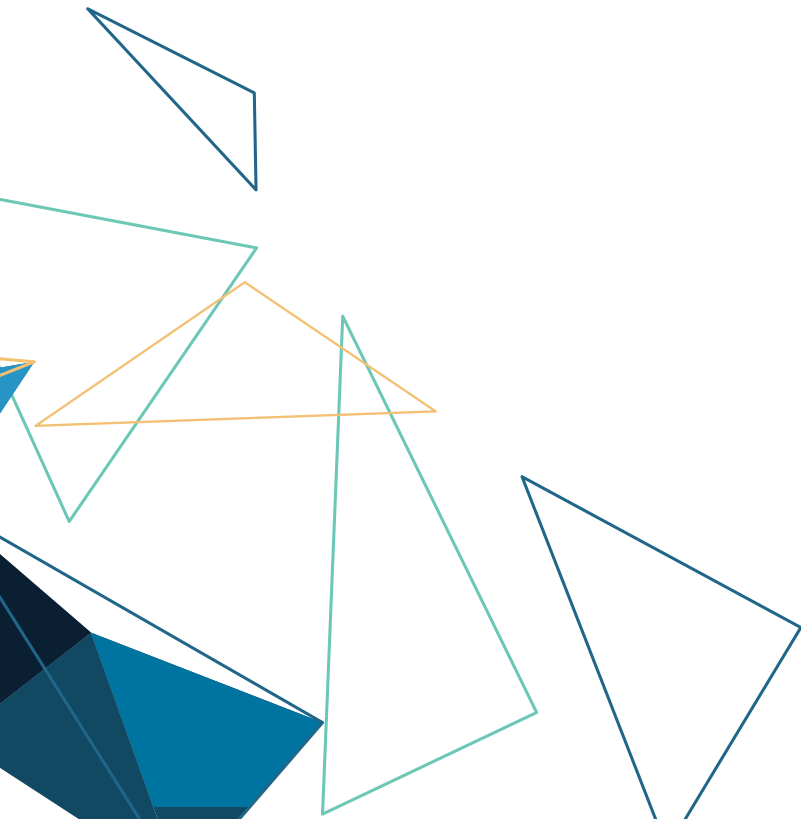


## Annex 2 - List of bodies taking part in the preparation of the national Strategy

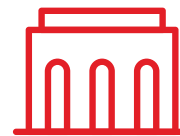
1	Kuwait Banking Association
2	Kuwait Industries Union
3	Union of Investment Companies
4	Federation of Kuwaiti Engineering Offices and Consulting Houses
5	Kuwait University
6	Kuwait Investment Authority
7	Capital Markets Authority
8	The National Fund for Small and Medium Enterprise Development
9	Central Bank of Kuwait
10	Zain Telecommunications
11	Kuwait Financial Centre
12	Ministry of Justice
13	Civil Service Commission
14	Financial Controllers Bureau
15	Ministry of Foreign Affairs
16	Public Prosecution
17	Government Performance Follow-Up Agency
18	Kuwait Financial Intelligence Unit
19	General Secretariat of the Supreme Council for Planning and Development
20	Central Agency for Public Tenders
21	Ministry of Commerce and Industry
22	Ministry of Interior
23	Ministry of Finance
24	Ministry of Higher Education
25	State Audit Bureau
26	Ministry of State for Youth Affairs
27	Competition Protection Authority
28	Kuwait Association for Protecting Public Funds
29	Kuwait Society of Lawyers
30	Kuwait Accountants and Auditors Associations
31	Kuwait Economic Society
32	Kuwait transparency Society
33	Kuwait Society for Education Quality
34	Kuwait Society for Strategic Planning



# Annex (3)



## Annex 3 - List of implementing



### • 1<sup>st</sup> Pillar: Public Sector

Short Term: Before June 2020

Medium Term: Before June 2022

Long Term: Before June 2024

#### PRIORITY 1

#### Transparency in the Management of Public Finance and Public Affairs

#### Initiative 1.1

#### Ensure the right to access to information

#### Initiative Indicators

- Access to information law passed
- Percentage of citizens and residents reporting satisfaction on easier access to information

#### Benchmark

#### Benchmark Completion

#### Completion Date

#### Implementation Bodies

1. Discuss the draft law on the right of access to information for conformity with international standards	Law drafted	Short Term	Nazaha, National Assembly
2. Pass the right to access to information law	Law drafted	Short Term	National Assembly
3. Establish committee to strengthen the implementation of law	Committee established	Short Term	Nazaha
4. The committee holds consultation meetings on effective methods of implementing law with key stakeholders, including civil society	Consultations held	Short Term	Nazaha
5. Draft and implement policies and procedures for implementing law	Policies and procedures drafted	Short Term	Nazaha, Ministry of Justice



6. Hold consultation meetings on draft procedures with key stakeholders, including civil society	Consultations held	Medium Term	Nazaha
7. Revised draft policies and procedures as necessary in accordance with consultations	Drafts revised and finalized	Medium Term	Nazaha, Ministry of Justice
8. Submit policies and procedures for approval in by appropriate official channels in each relevant public body	Policies and procedures approved and implemented.	Short Term	Nazaha
9. Train representatives of the concerned government bodies on the proper implementation of the law	Training program developed and implemented	Medium Term	Nazaha
10. Monitor and evaluate the extent of compliance with the law, with the participation of civil society where appropriate, and make recommendations to improve the implementation	Annual report prepared and published	Long Term	Nazaha

<b>Initiative 1.2</b>		<b>Review and amend legal texts regulating the financing of electoral campaigns</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of legal texts on regulating the financing of electoral campaigns</li> <li>• Percentage of candidates for election compliant with new legal texts</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Create a committee to draft the financing electoral campaigns law	Committee created	Medium Term	Ministry of Interior, National Assembly
2. Hold consultations with relevant public bodies and other stakeholders	Criteria developed	Medium Term	Ministry of Interior, National Assembly
3. Based on consultations, draft law on financing National Assembly elections	Law drafted	Medium Term	Ministry of Interior, National Assembly
4. Hold consultations on draft legislation with relevant stakeholders including civil society, where appropriate	Consultations held	Medium Term	Ministry of Interior, National Assembly
5. Refine and finalize draft of proposed legislation based on the consultations	Draft law revised and finalized	Long Term	Ministry of Interior, National Assembly
6. Adopt the draft law by appropriate official channels	Law passed	Long Term	National Assembly



<b>Initiative 1.3</b>		<b>Enhance the compliance with the asset declaration system</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of submitted asset declarations</li> <li>• Percentage of asset declarations reviewed on a timely and continuing basis</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Organizing awareness and capacity building activities to support law enforcement	Periodic awareness and training program developed and implemented	Short Term	Nazaha
2. Create committee to develop or revise procedures for asset declarations	Committee created	Short Term	Nazaha
3. Hold consultation meetings with key stakeholders, including civil society	Consultations held	Short Term	Nazaha
4. Draft procedures or revisions to procedures for asset declarations	Procedures drafted	Short Term	Nazaha
5. Hold consultation meetings on draft procedures or revisions with key stakeholders, including civil society	Consultations held	Short Term	Nazaha
6. Revise draft of or revisions to procedures as necessary in accordance with consultations	Procedures revised and finalized	Medium Term	Nazaha
7. Submit procedures for approval in by appropriate official channels	Procedures approved and implemented	Medium Term	Nazaha

<b>Initiative 1.4</b>		<b>Preventing corruption in public tenders</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of public tenders published at their various stages</li> <li>• Percentage of satisfaction of applicants to public tenders for the transparency and objectivity of the relevant operations in which they participated</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Assess the risks of corruption in public tenders and identify ways to reduce them	Report completed	Short Term	Central Agency for Public Tenders (CAPT), Nazaha
2. Establish committee to develop and/or revise public procurement and public tender procedures	Committee established	Short Term	Central Agency for Public Tenders (CAPT)
3. Hold consultations with relevant stakeholders regarding current procedures on public tenders' decisions and appeals processes	Consultations held	Short Term	Central Agency for Public Tenders (CAPT), Nazaha
4. Draft proposed policies and procedures for preventing corruption in public tenders as required in accordance with the consultations	Draft prepared	Medium Term	Central Agency for Public Tenders (CAPT)
5. Hold consultations with relevant stakeholders, including civil society and private sector where on draft procedures	Consultations held	Medium Term	Central Agency for Public Tenders (CAPT), Nazaha
6. Revised and finalize draft procedures based on feedback from consultations	Draft procedures revised and finalized	Medium Term	Central Agency for Public Tenders (CAPT)
7. Submit draft procedures for approval by appropriate official channels	Draft procedures approved and adopted in relevant public bodies	Medium Term	Central Agency for Public Tenders (CAPT)
8. Follow up to ensure effective implementation, review, and appeals procedures	New procedures are implemented and reviews and appeals of decisions are conducted	Medium Term	Central Agency for Public Tenders (CAPT)



<b>Initiative 1.5</b>		<b>Support ministries and public bodies to disseminate information on their work</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of ministries and public bodies that publish regular reports regarding their operations and/or budgets, where appropriate</li> <li>• Percentage of ministries and public bodies that publish regular reports regarding efforts taken to promote integrity and counter corruption</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Create committee to develop guidelines for reporting by public bodies	Committee created	Short Term	Nazaha
2. Hold consultation meetings with key stakeholders, including civil society	Consultations held	Short Term	Nazaha
3. Draft guidelines for public bodies on reporting	Guidelines drafted	Short Term	Nazaha
4. Hold consultation meetings on draft guidelines with key stakeholders, including civil society	Consultations held	Short Term	Nazaha
5. Revise draft guidelines as necessary in accordance with consultations	Guidelines revised and finalized	Short Term	Nazaha
6. Submit guidelines for approval in by appropriate official channels in each relevant public body	Training program developed and implemented	Short Term	Nazaha
7. Train representatives of concerned government agencies to appropriately implement the guidelines	Guidelines approved in each public body	Short Term	Nazaha
8. Monitor and evaluate the extent to which the guidelines are applied, with the participation of civil society where appropriate, and make recommendations to improve the implementation	Annual report prepared and published	Long Term	Nazaha

## PRIORITY 2

## Recruitment and Promotion in the Public Sector

<b>Initiative 2.1</b>			
<b>Establish objective criteria to ensure merit-based recruitment and promotion procedures for civil service</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of civil servants who are transparently recruited on the basis of objective merit-based criteria</li> <li>• Percentage of civil servants who are transparently promoted on the basis of objective merit-based criteria</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Assess the risks of corruption in recruitment and promotion in the public sector and identify ways to reduce them	Report completed	Short Term	Civil Service Commission, Nazaha
2. Establish committee to review and revise hiring and promotion procedures	Committee established	Short Term	Civil Service Commission
3. Hold consultation meetings with relevant stakeholders regarding recruitment and promotion procedures in the public sector and appeals processes	Consultations held	Short Term	Civil Service Commission, Nazaha
4. Draft proposed recruitment and promotion policies and procedures in the public sector to prevent corruption as required in accordance with the consultations	Draft prepared	Medium Term	Civil Service Commission
5. Conduct series of consultative meetings with relevant stakeholders including civil society and the private sector	Meetings held	Medium Term	Civil Service Commission, Nazaha

6. Review and finalize the draft of proposed recruitment and promotion policies and procedures as required in accordance with the consultations	Draft revised and finalized	Medium Term	Civil Service Commission
7. Submit the draft of proposed recruitment and promotion policies and procedures for approval through appropriate channels	Policies and procedures proposed approved	Medium Term	Civil Service Commission
8. Follow-up to ensure effective implementation of approved policies and procedures	Policies and procedures are implemented	Medium Term	Civil Service Commission

<b>Initiative 2.2</b>			
<b>Adopt a special mechanism for the recruitment of senior public officials in a transparent manner according to objective criteria</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of a special mechanism for the recruitment of senior public officials in a transparent manner according to objective criteria</li> <li>• Percentage of recruitment procedures carried out in accordance with the mechanism</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish committee to review and revise related policies and processes	Committee established	Short Term	Civil Service Commission, Nazaha
2. Hold consultation meetings with relevant stakeholders including civil society	Consultations held	Short Term	Civil Service Commission, Nazaha
3. Propose the mechanism and the necessary legal amendments based on the consultations	Draft mechanism completed with the proposed legal amendments	Short Term	Civil Service Commission, Nazaha
4. Conduct series of consultative meetings to review the draft mechanism, and finalized as appropriate	Meetings held, and draft finalized	Medium Term	Civil Service Commission, Nazaha
5. Submit the draft mechanism and legal amendments for approval through appropriate channels	Mechanism and legal amendments approved	Medium Term	Civil Service Commission, Nazaha

6. Follow-up to ensure the effective implementation of the approved mechanism	Mechanism is implemented	Medium Term	Civil Service Commission, Nazaha
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**Initiative 2.3** **Strengthening the civil service system and consider the establishment of a specialized institute to train civil servants of all grades**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of a civil service system in accordance with international standards</li> <li>• Existence of a complete proposal for establishing a specialized training institute for civil servants</li> </ul>
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**Benchmark** **Benchmark Completion** **Completion Date** **Implementation Bodies**

1. Create a committee to review and revise the civil service system and to draft a proposal for the establishment of a training institute for training civil servants	Committee created	Medium Term	Civil Service Commission
2. Hold experts' meetings to review the latest international standards and comparative experiences	Experts meetings held	Medium Term	Civil Service Commission
3. Review and revise the articles of the law of the Civil Service Commission	Amendments prepared	Medium Term	Civil Service Commission
4. Hold consultations with relevant stakeholders including civil society	Consultations held	Medium Term	Civil Service Commission, Nazaha
5. Draft and finalize revisions to Civil Service Commission Law	Revisions drafted and finalized	Long Term	Civil Service Commission
6. Revise and finalize draft proposal to establish a training institute to train civil servants of all grades	Proposal completed	Long Term	Civil Service Commission
7. Submit amendments for approval through appropriate official channels	Proposed amendments adopted	Long Term	Civil Service Commission
8. Submit the proposal to establish the Institute to consider establishing it through appropriate official channels	Proposal submitted	Long Term	Civil Service Commission

**PRIORITY 3**

**Integrity in Public Service Performance**

**Initiative 3.1**

**Review and revise the code of conduct for civil servants of the executive branch**

**Initiative Indicators**

- Existence of a modern code of conduct for civil servants of the executive branch
- Existence of a binding mechanism to enforce the code of conduct in government agencies of the executive branch

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Establish a Committee to update the Code of Conduct of civil servants	Committee created	Short term	Civil Service Commission, NAZAHA
2. Hold experts' meetings to review the latest international standards and comparative experiences	Experts meetings held	Short term	Civil Service Commission, NAZAHA
3. Hold consultations between the Committee and relevant ministries or administrative bodies	Consultations held	Short term	Civil Service Commission, NAZAHA
4. Amend the code of conduct or develop a new code based on the consultations and develop a binding mechanism to enforce it	Draft completed	Short term	Civil Service Commission, NAZAHA
5. Conduct consultative meetings with relevant stakeholders to review the revised or new code of conduct and its enforcement mechanism	Consultations held	Short term	Civil Service Commission, NAZAHA
6. Review the revised or new Code and the mechanism for its enforcement based on the consultations	Revision completed	Short term	Civil Service Commission, NAZAHA
7. Submitting the revised or new Code and its enforcement mechanism for approval through appropriate official channels	Code adopted	Short term	Civil Service Commission, NAZAHA

Initiative 3.2	Develop and deliver training programmes on the code of conducts for civil servants		
Initiative Indicators	<ul style="list-style-type: none"> <li>• Percentage of public bodies that evaluate adherence with the Code of Conduct in their annual evaluations for all employees</li> <li>• Number of disciplinary actions based on lack of adherence to Code of Conduct and/or number of employees rewarded for exemplary behavior under the Code of Conduct</li> </ul>		
Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Ensure incorporation of Code of Conduct into job requirements for each public body	Code of Conduct enforced in all public bodies	Medium Term	Civil Service Commission, NAZAHA
2. Conduct trainings for each body on using Code of Conduct as a benchmark during performance evaluations	Training programmes prepared and training conducted	Medium Term	Civil Service Commission, NAZAHA
3. Revise performance evaluation mechanisms to incorporate Code of Conduct	Code of Conduct incorporated into performance evaluation systems	Medium Term	Civil Service Commission, NAZAHA
4. Follow up to ensure evaluations are effective and results have real impact on employees	Performance evaluations effectively implemented	Medium Term	Civil Service Commission, NAZAHA



**Initiative 3.3** **Develop and deliver training programmes on the code of conducts for civil servants**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of a code of conduct for civil servants</li> <li>• Percentage of parliamentarians and staff members trained in compliance with the code of conduct</li> </ul>
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**Benchmark** **Benchmark Completion** **Completion Date** **Implementation Bodies**

1. Establish a Committee to work on development of Code of Conduct	Committee formed	Medium Term	National Assembly, NAZAHA
2. Hold experts' meetings to review the latest international standards and comparative experiences	Experts meetings held	Medium Term	National Assembly, NAZAHA
3. Hold consultations between Drafting Committee and relevant stakeholders	Consultations completed	Medium Term	National Assembly, NAZAHA
4. Based on consultations and review of international good practices, draft Code of Conduct and process to enforce it	First draft completed	Medium Term	National Assembly, NAZAHA
5. Conduct series of consultative meetings to review draft Code of Conduct and revise, as appropriate	Consultations completed	Medium Term	National Assembly, NAZAHA
6. Review the draft code of conduct based on the consultations	Revision completed	Medium Term	National Assembly, NAZAHA
7. Finalize draft code and submit for approval through appropriate official channels	Code of Conduct adopted	Medium Term	National Assembly, NAZAHA
8. Hold training programmes on the code of conduct	Training programmes completed and trainings conducted	Medium Term	National Assembly, NAZAHA

<b>Support the Supreme Judicial Council to prepare and disseminate codes of conduct for judges, prosecutors and other public service employees working under their supervision</b>			
<b>Initiative 3.4</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of a code of conduct for judges, prosecutors and other public service employees working under their supervision</li> <li>• Percentage of judges, prosecutors and other public service employees working under their supervision trained in compliance with the code of conduct</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish a Committee to work on development of Code of Conduct	Committee formed	Short term	Supreme Council for the Judiciary
2. Hold experts' meetings to review the latest international standards and comparative experiences	Experts meetings held	Short term	Supreme Council for the Judiciary
3. Hold consultations between Drafting Committee and relevant stakeholders	Consultations completed	Short term	Supreme Council for the Judiciary
4. Based on consultations and review of international good practices, draft Code of Conduct and process to enforce it	First draft completed	Short term	Supreme Council for the Judiciary
5. Conduct series of consultative meetings to review draft Code of Conduct and revise, as appropriate	Consultations completed	Short term	Supreme Council for the Judiciary
6. Review the draft code of conduct based on the consultations	Revision completed	Short term	Supreme Council for the Judiciary
7. Finalize draft code and submit for approval through appropriate official channels	Code of Conduct adopted	Short term	Supreme Council for the Judiciary
8. Hold training programmes on the code of conduct	Training programmes completed and trainings conducted	Short term	Supreme Council for the Judiciary
9. Disseminate the content of the Code and its enforcement mechanism with the users of the judiciary and public prosecution services		Short term	Supreme Council for the Judiciary



**Initiative 3.5** **Support the Ministry of Interior to develop and disseminate codes of conduct for its staff, including police officers**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of a code of conduct for civil servants</li> <li>• Percentage of parliamentarians and staff members trained in compliance with the code of conduct</li> </ul>
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**Benchmark** **Benchmark Completion** **Completion Date** **Implementation Bodies**

1. Establish a Committee to work on development of Code of Conduct	Committee formed	Short Term	Ministry of Interior
2. Hold experts' meetings to review the latest international standards and comparative experiences	Experts meetings held	Short Term	Ministry of Interior
3. Hold consultations between Drafting Committee and relevant stakeholders	Consultations completed	Short Term	Ministry of Interior
4. Based on consultations and review of international good practices, draft Code of Conduct and process to enforce it	First draft completed	Short Term	Ministry of Interior
5. Conduct series of consultative meetings to review draft Code of Conduct and revise, as appropriate	Consultations completed	Short Term	Ministry of Interior
6. Review the draft code of conduct based on the consultations	Revision completed	Short Term	Ministry of Interior
7. Finalize draft code and submit for approval through appropriate official channels	Code of Conduct adopted	Short Term	Ministry of Interior
8. Hold training programmes on the code of conduct	Training programmes completed and trainings conducted	Medium Term	Ministry of Interior
9. Follow up to ensure evaluations are effective and results have real impact on employees	Performance evaluations effectively implemented	Medium Term	Ministry of Interior

## PRIORITY 4

## Accountability in the public sector

<b>Initiative 4.1</b>		<b>Review and strengthen performance management systems of public service employees and conduct regular performance evaluations</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of public bodies that conduct regular, at least annual, performance reviews and the implementation of performance contracts</li> <li>• Percentage of public bodies that have adopted 360-degree performance evaluations, including upward reviews of managers</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Review performance evaluation systems in each public body	Report completed	Short Term	Civil Service Commission
2. Prepare a model of a performance evaluation system for government agencies based on the report	Model system prepared	Short Term	Civil Service Commission
3. Hold consultations with relevant public bodies and other stakeholders, where appropriate	Consultations held	Medium Term	Civil Service Commission, Nazaha
4. Review the model performance evaluation system for public bodies and prepare a specific form for each government body accordingly	Model system reviewed and specific form for each body developed	Medium Term	Civil Service Commission, Nazaha
5. Distribute and implement model system in each public body	Each public body adopts its own performance evaluation system	Medium Term	Civil Service Commission, Nazaha
6. Follow up to ensure performance evaluation systems are effectively implemented	Each public body consistently and effectively use new system	Long Term	Civil Service Commission



**Initiative 4.2** **Review and strengthen the standards and mechanisms of accountability in the public sector, including accounting, auditing and oversight mechanisms**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Number of accounting and auditing standards and oversight mechanisms in line with international best practices adopted</li> <li>• Percentage of improvement in the level of actual compliance with the approved standards according to the reports of oversight agencies</li> </ul>
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Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Review accounting and auditing standards and oversight mechanisms	Report completed	Medium Term	Nazaha, State Audit Bureau, Ministry of Finance
2. Develop criteria for review of auditing and accounting standards and oversight mechanisms	Criteria developed	Medium Term	Nazaha, State Audit Bureau, Ministry of Finance
3. Conduct review based on established criteria	Review conducted	Medium Term	Nazaha, State Audit Bureau, Ministry of Finance
4. Propose draft revisions to accounting and auditing standards and oversight mechanisms as necessary	Draft completed	Medium Term	Nazaha, State Audit Bureau, Ministry of Finance
5. Hold consultations with relevant stakeholders regarding draft revisions.	Consultations held.	Medium Term	Nazaha, State Audit Bureau, Ministry of Finance
6. Revise and finalize draft revisions to accounting and auditing standards and oversight mechanisms according to consultations.	Revisions finalized.	Long Term	Nazaha, State Audit Bureau, Ministry of Finance
7. Revised approved through appropriate channels and implemented.	Revised standards and oversight mechanisms implemented by relevant ministries and administrative bodies.	Long Term	Nazaha, State Audit Bureau, Ministry of Finance

<b>Initiative 4.3</b>		<b>Review and strengthen measures to ensure integrity and accountability in state-owned enterprises</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of guidelines for strengthening accountability in state-owned enterprises</li> <li>• Percentage of state owned enterprises that report substantial compliance with new policies and measures</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Create committee to review integrity and accountability measures in state owned enterprises and propose new policies and measures as appropriate.	committee created	Short Term	Nazaha
2. Hold experts' meetings to review the latest international standards and comparative experiences	Meetings held	Short Term	Nazaha
3. Hold consultations with state owned enterprises and other stakeholders	Consultations held	Short Term	Nazaha
4. Based on consultations, draft or revise policies and measures for integrity in state owned enterprises.	Drafts of policies and measures completed.	Short Term	Nazaha
5. Hold consultations on draft policies and measures with relevant stakeholders including private sector, where appropriate	Consultations held	Short Term	Nazaha
6. Based on consultation, refine and finalize draft of proposed policies and measures	Draft refined and finalized	Short Term	Nazaha
7. Submit proposed guidelines for approval through appropriate official channels	New or revised policies and measures adopted and implemented in state owned enterprises.	Medium Term	Nazaha
8. Provide advice and training to state-owned companies	Advice provided, and training conducted	Medium Term	Nazaha
9. Monitor compliance with guidelines and award best practices	Reports completed, and awards given	Long Term	Nazaha



**Initiative 4.4** **Establishing and enforce a conflict of interest management system**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of ministries that have adopted bylaws specific to their organization on conflicts of interest</li> <li>• Number of cases where conflicts have arisen that have been successfully managed</li> </ul>
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**Benchmark** **Benchmark Completion** **Completion Date** **Implementation Bodies**

1. Designate a committee or point person in each public body or ministry to develop its conflict of interest policies and procedures	Committee or point person designated	Short Term	Nazaha
2. Hold workshops with each designated committee or point person to develop conflict of interest policies and procedures	Workshops held	Short Term	Nazaha
3. Draft of conflict of interest policies and procedures by committee or point person	First drafts completed	Medium Term	Nazaha
4. Hold consultations within each public body or ministries, and with civil society and other stakeholders where appropriate, regarding the first drafts	Consultations held in each public body or ministry	Medium Term	Nazaha
5. Revised and finalize draft bylaws in each ministry or public body	Each set of draft bylaws is revised and finalized	Medium Term	Nazaha
6. Submit bylaws for approval through appropriate channels in each ministry or public body	Bylaws approved by each ministry and public body	Medium Term	Nazaha
7. Follow-up to ensure the effective implementation of approved policies and procedures	Policies and procedures implemented	Long Term	Nazaha

<b>Initiative 4.5</b>		<b>Amend legislation to effectively criminalize illicit enrichment</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Legislation adopted in accordance with UNCAC</li> <li>• Percentage of illicit enrichment cases successfully prosecuted under new law</li> </ul>			
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>	
1. Create committee to review and revise illicit enrichment law	Committee created	Short Term	Ministry of Justice, Public Prosecution	
2. Hold consultations with relevant public bodies	Consultations held	Short Term	Ministry of Justice, Public Prosecution	
3. Based on consultations and review, draft revisions to illicit enrichment law	Revisions drafted	Short Term	Ministry of Justice, Public Prosecution	
4. Hold consultations on draft revisions with relevant public bodies and other stakeholders, where appropriate, including civil society.	Consultations held	Short Term	Ministry of Justice, Public Prosecution	
5. Based on consultation, refine and finalize initial set of revisions	Revisions refined and finalized	Medium Term	Ministry of Justice, Public Prosecution	
6. Submit revisions for approval through appropriate official channels	Revisions adopted into illicit enrichment law and implemented	Medium Term	Ministry of Justice, Public Prosecution	

## PRIORITY 5

## Effectiveness and Efficiency in Public Services Delivery

Initiative 5.1		Review and streamline bureaucratic procedures of public service delivery		
Initiative Indicators	<ul style="list-style-type: none"> <li>• Number of administrative procedures shortened or simplified</li> <li>• Percentage decrease in time necessary to receive public services</li> </ul>			
Benchmark	Benchmark Completion	Completion Date	Implementation Bodies	
1. Establish committee to review current administrative procedures	Committee established	Short Term	General Secretariat of the Supreme Council for Planning and Development, Government Performance Follow-up Agency, Nazaha	
2. Review existing procedures and make recommendations for simplification as appropriate	Review completed, and recommendations made	Short Term		
3. Hold consultations with relevant public bodies regarding proposed recommendations	Consultations held	Medium Term		
4. Based on consultations, revise and finalize recommendations as necessary	Recommendations revised and finalized	Medium Term		
5. Procedures revised according to recommendations and approved	New procedures revised and approved	Medium Term		

Initiative 5.2	Develop and implement e-government internet-based platforms to further automate processes for the delivery of public services		
Initiative Indicators	<ul style="list-style-type: none"> <li>• Percentage of relevant government institutions that have e-governance platforms</li> <li>• Percentage decrease in documentation and document cycle</li> </ul>		
Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Identify public bodies providing services to the public that do not have appropriate e-government systems	Public bodies identified	Short Term	Central IT Agency
2. Work with identified public bodies to design e-governance platforms, either with consultants or in house technical experts	E-government platforms designed	Medium Term	Central IT Agency
3. Submit new e-government platforms for approval by appropriate official channels	New platforms approved and implemented	Medium Term	Central IT Agency
4. Review client satisfaction and document cycle data from new platforms to ensure effectiveness	Client satisfaction and document cycle data collected and reviewed	Medium Term	Central IT Agency
5. Revise e-government platforms according to reviewed data, if necessary	E-government platforms revised and improved	Long Term	Central IT Agency



**Initiative 5.3** **Develop and publish user-friendly guides for the public regarding how to access and apply for public services both in paper and electronically**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Number of relevant online guides developed and published</li> <li>• Percentage of citizens reporting better understanding of how to access government services</li> </ul>
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<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish committee with members from relevant public bodies and drafters to develop online guides.	committee established	Short Term	General Secretariat of the Supreme Council for Planning and Development, Government Performance Follow-up Agency, Nazaha
2. Hold consultations with relevant stakeholders regarding which guides need to be developed	Consultations held	Short Term	
3. Based on consultations, draft online guides for access to government services, information, or assistance	First draft of guides completed	Short Term	
4. Hold consultations with relevant stakeholders, including civil society where appropriate, on draft guides	Consultations held	Short Term	
5. Revised and finalize draft guides based on feedback from consultations	Draft guides revised and finalized	Medium term	
6. Submit draft guides for approval by appropriate official channels	Draft guides approved and published online.	Medium term	
7. Monitor and evaluate the impact on public service applicants	Annual report prepared and published	Medium term	

<b>Initiative 5.4</b>		<b>Integrate corruption risk management into sectors that provide public services to identify and address weaknesses periodically and sustainably</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Number of sectors that have successfully completed a corruption risk assessment and adopted plan to reduce them</li> <li>• Number of sectors that have institutionalized and sustainably integrated corruption risk management</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish central task force to lead the integration of risk management into sectors	Central task force established	Short Term	Nazaha
2. Establish Committee of experts to assess corruption risks in each sector	Committee established	Medium Term	Nazaha, Relevant Government Agency
3. Conduct corruption risk assessment of for each sector using approved methodology and intentional criteria	Corruption risk assessment developed	Medium Term	Nazaha, Relevant Government Agency
4. Propose recommendations to reduce the risk of corruption in each sector	Recommendations proposed	Medium Term	Nazaha, Relevant Government Agency
5. Implement selected recommendations to reduce the risk of corruption in each sector	Progress report completed	Medium Term	Nazaha, Relevant Government Agency
6. Institutionalize corruption risk management in all sectors and establish a central mechanism at NAZAHA to support them	Institutionalization done	Long Term	Nazaha, Relevant Government Agency

## • 2<sup>nd</sup> Pillar: Private Sector



Short Term: Before June 2020

Medium Term: Before June 2022

Long Term: Before June 2024

### PRIORITY 6

### Integrity and Accountability in the Private Sector

Initiative 6.1		Review and strengthen effective auditing standards in the private sector		
Initiative Indicators	<ul style="list-style-type: none"> <li>Percentage of development of auditing standards in Kuwait</li> <li>Percentage of Kuwaiti businesses that have successfully passed audits under new standards</li> </ul>			
Benchmark	Benchmark Completion	Completion Date	Implementation Bodies	
1. Establish committee to review and strengthen effective auditing standards in the private sector	Committee established	Short Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha	
2. Hold workshops with key stakeholders, including private sector	Workshops held	Short Term		
3. Draft auditing standards for the private sector	Draft completed	Medium Term		
4. Hold consultation meetings on draft guidelines with key stakeholders, including private sector	Consultations held	Medium Term		
5. Revise draft auditing standards as necessary in accordance with consultations	Standards revised and finalized	Medium Term		
6. Submit standards for approval in by appropriate official channels	Standards approved	Medium Term		
7. Monitor and evaluate compliance in the private sector with approved standards	New auditing standards adopted by private sector	Long Term		

<b>Initiative 6.2</b> <b>Develop awareness and training programmes and encourage ethical business practices in the private sector</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Number of private sector entities reached through awareness and training programmes</li> <li>• Extent to which private entities have effectively adhered to the principle of fighting corruption under the “United Nations Global Compact”</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Develop an integral programme to educate and train the private sector	Programme developed	Short Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha
2. Train the trainers to implement the awareness and training programme	Training of trainers conducted	Short Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha
3. Prepare and implement a media campaign to raise awareness on the main components of the programme	Campaign organized	Medium Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha
4. Hold awareness and training sessions to implement the programme	Training sessions conducted	Medium Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha
5. Monitor and evaluate change in policies and procedures adopted in the private sector to promote ethical practices	Report completed	Long Term	Ministry of Commerce (non-listed), CMA (listed) Nazaha



**Initiative 6.3** **Follow-up work on establishing corporate governance principles and practices**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Extent to which auditors are independent of management in companies</li> <li>• Level of guarantees and protections available to minority shareholders”</li> </ul>
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**Benchmark** **Benchmark Completion** **Completion Date** **Implementation Bodies**

1. Create committee to propose ways to support corporate governance efforts	Committee created	Short Term	Ministry of Commerce (non-listed), CMA (listed)
2. Evaluating the progress achieved at the level of corporate governance in the State of Kuwait	Report completed	Short Term	Ministry of Commerce (non-listed), CMA (listed)
3. Hold workshops with key stakeholders, including private sector	Workshop held	Short Term	Ministry of Commerce (non-listed), CMA (listed)
4. Draft proposals to support corporate governance	Draft completed	Medium Term	Ministry of Commerce (non-listed), CMA (listed)
5. Hold consultation meetings on draft guidelines with key stakeholders, including private sector	Consultations held	Medium Term	Ministry of Commerce (non-listed), CMA (listed)
6. Revise draft auditing standards as necessary in accordance with consultations	Standards revised and finalized	Medium Term	Ministry of Commerce (non-listed), CMA (listed)
7. Submit standards for approval in by appropriate official channels	Standards approved	Medium Term	Ministry of Commerce (non-listed), CMA (listed)
8. Promulgate new audit standards among private sector	New auditing standards adopted by private sector		

**Initiative 6.4****Develop legislation on the criminalization of corruption in the private sector****Initiative Indicators**

- Existence of law on liabilities of legal persons
- Level of compliance with the provisions of the United Nations Convention against Corruption, which criminalizes bribery and embezzlement in the private sector

**Benchmark****Benchmark Completion****Completion Date****Implementation Bodies**

1. Create Working Group to review and revise liability of legal persons law	Working Group created	Short Term	Nazaha, Ministry of Commerce, Ministry of Justice
2. Hold consultations with relevant public bodies and other stakeholders, where appropriate, including the private sector	Consultations held	Short Term	Nazaha, Ministry of Commerce, Ministry of Justice
3. Based on consultations and review, draft liability of legal persons law	Draft legislation completed	Short Term	Nazaha, Ministry of Commerce, Ministry of Justice
4. Hold consultations on draft with relevant public bodies and other stakeholders, where appropriate, including private sector	Consultations held	Short Term	Nazaha, Ministry of Commerce, Ministry of Justice
5. Based on consultation, refine and finalize draft law	Draft refined and finalized	Medium Term	Nazaha, Ministry of Commerce, Ministry of Justice
6. Submit final draft for approval through appropriate official channels	Liability of legal persons law adopted and implemented	Medium Term	Nazaha, Ministry of Commerce, Ministry of Justice

## PRIORITY 7

## Role of the Private Sector in Reporting Corruption

### Initiative 7.1

### Encourage and protect whistleblowers on corruption within private sector entities

#### Initiative Indicators

- Percentage of businesses with internal whistleblower protection policies
- Percentage of reported cases of employment retaliation by whistleblowers successfully investigated and addressed

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Create Committee to draft revisions to Nazaha's mandate to strengthen its role in whistleblower reports and protections	Committee formed	Short term	Nazaha
2. Draft proposed revisions to Nazaha's mandate	Draft completed	Short term	Nazaha
3. Hold consultations with relevant stakeholders, including private sector where appropriate, on draft revisions.	Consultations held	Short term	Nazaha
4. Based on consultations, revise and finalize proposed revisions to Nazaha's mandate	Revisions finalized	Short term	Nazaha
5. Finalized revisions to Nazaha's mandate approved by appropriate official channels	Revisions to mandate approved and adopted	Short term	Nazaha
6. Create Working Group to develop model whistleblower protection policies and procedures, including representatives of private sector	Working Group created	Short Term	Nazaha

7. Hold consultation meetings with key stakeholders, including private sector, and review international good practices	Consultations held and review completed	Short Term	Nazaha
8. Draft model whistleblower protection policies and procedures	Draft completed	Short Term	Nazaha
9. Hold consultation meetings on draft with key stakeholders, including private sector	Consultations held	Medium Term	Nazaha
10. Revise draft as necessary in accordance with consultations	Model policies and procedures revised and finalized	Medium Term	Nazaha
11. Spread awareness of and encourage adoption of model whistleblower policies and procedures amongst private sector	Awareness raising campaign conducted	Medium Term	Nazaha



<b>Review and strengthen mechanisms for cooperation between the public sector and the private sector in fighting corruption</b>				
<b>Initiative 7.2</b>				
<b>Initiative Indicators</b>				
<ul style="list-style-type: none"> <li>• Enhanced policies and procedures regarding cooperation between the public and private sector adopted</li> <li>• Number of successful cases of cooperation between the public and private sector in corruption related investigations”</li> </ul>				
<b>Benchmark</b>		<b>Benchmark Completion</b>		
<b>Completion Date</b>		<b>Implementation Bodies</b>		
1. Create Working Group, to develop mechanisms for cooperation between the public and private sector, including private sector representatives		Working Group created	Short Term	Nazaha, Ministry of Justice, Ministry of Interior
2. Hold consultation meetings with key stakeholders, including private sector, and review international good practices		Consultations held and review conducted	Short Term	Nazaha, Ministry of Justice, Ministry of Interior
3. Draft policies, procedures and mechanisms for cooperation between the public and private sector, including private sector representatives		Draft completed	Short Term	Nazaha, Ministry of Justice, Ministry of Interior
4. Hold consultation meetings on draft with key stakeholders, including private sector		Consultations held	Short Term	Nazaha, Ministry of Justice, Ministry of Interior
5. Revise draft policies, procedures, and mechanisms as necessary in accordance with consultations		Draft revised and finalized	Short Term	Nazaha, Ministry of Justice, Ministry of Interior
6. Submit draft policies, procedures and mechanisms for approval in by appropriate official channels if necessary		Policies, procedures and mechanisms approved and implemented	Medium Term	Nazaha, Ministry of Justice, Ministry of Interior
7. Follow up to ensure successful cooperation with the private sector		New mechanisms followed by public and private sectors	Medium Term	Nazaha, Ministry of Justice, Ministry of Interior



## • 3<sup>rd</sup> Pillar: Society

Short Term: Before June 2020

Medium Term: Before June 2022

Long Term: Before June 2024

### **PRIORITY 8** **Public Awareness**

<b>Initiative 8.1</b>	<b>Preparation and implementation of national programmes to raise awareness of citizens and residents on the Anti-Corruption and Integrity Strategy and its relationship to the “New Kuwait Vision 2035”</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• An integral awareness programme on the strategy</li> <li>• Number of citizens and residents reached through awareness programs</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Prepare awareness programmes to include a media campaign and a field campaign	Programmes prepared	Short Term	Nazaha
2. Implement the awareness programmes	Programmes implemented	Short Term	Nazaha
3. Monitor and evaluate the effectiveness of awareness programmess	Report completed	Short Term	Nazaha
4. Repeat the awareness programmes annually after being revised in the light of evaluation	Programmes have been revised and implemented annually	Long Term	Nazaha



<b>Initiative 8.2</b>		<b>To inculcate anti-corruption values in society, including through family, media and community institutions of all kinds</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of public surveyed who report understanding of corruption concepts and measures</li> <li>• Percentage increase of public surveyed who report understanding of corruption concepts and measures</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish a Working Group for the public awareness strategy and campaigns	Working Group established	Short Term	Nazaha
2. Brainstorm ideas for outreach messages and suitable media, including social media, based on international good practices	Report prepared to summarize ideas and options	Short Term	Nazaha
3. Consider retaining public relations firm to design awareness campaigns, logos, materials, etc.	Public Relations firm retained (or decision not to do so)	Short Term	Nazaha
4. Design package for public awareness strategy and campaigns, including media spots, educational materials and implementation plans	Public Awareness campaign package completed and approved	Medium Term	Nazaha
5. Launch and implement public awareness campaigns based on strategy	Public Awareness campaigns launched and completed	Medium Term	Nazaha
6. Monitor and evaluate the effectiveness of the awareness campaign	Report completed	Medium Term	Nazaha
7. Repeat the awareness campaign after being revised in light of the evaluation	Campaign have been revised and implemented annually	Long Term	Nazaha

<b>Initiative 8.3</b>	<b>Develop and implement outreach program to raise awareness about the mandate and activities of Nazaha and the role of citizens</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage increase in members of the public surveyed who report accurate understanding of NAZAHA’s mission and mandates and the role of citizens</li> <li>• Number of citizens and residents reached through the outreach program</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Prepare the outreach program	Program prepared	Short Term	Nazaha
2. Implementation of the outreach program	Program implemented	Short Term	Nazaha
3. Monitor and evaluate the effectiveness of the outreach program	Report completed	Short Term	Nazaha
4. Repeat the outreach program annually after being revised in light of the evaluation	Program have been revised and implemented annually	Long Term	Nazaha

## PRIORITY 9

## The role of education

### Initiative 9.1

### Integrate anti-corruption values and knowledge on the principles of transparency, accountability, the rule of law and community participation in school curricula

#### Initiative Indicators

- Percentage of schools, universities and professional schools that teach the required values and knowledge
- Percentage of students who reach the required level of the course

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Survey conducted of existing integrity teaching in schools, universities and professional schools	Survey completed	Short Term	Ministry of Education, Ministry of Higher Education
2. Workshop held to evaluate present gaps in integrity education	Workshop concluded	Short Term	Ministry of Education, Ministry of Higher Education
3. Draft of revisions necessary to integrity curriculum developed	Draft revisions completed	Medium Term	Ministry of Education, Ministry of Higher Education
4. Revised curriculum piloted in a limited number of schools, universities and professional schools	Curriculum is taught successfully in pilot schools	Medium Term	Ministry of Education, Ministry of Higher Education
5. Curriculum revised in line with feedback from piloting institutions	Updated curriculum completed incorporating comments from all schools participating in pilot programme	Long Term	Ministry of Education, Ministry of Higher Education
6. Updated curricula incorporated into all schools, universities and professional schools	Updated curricula taught in all schools, universities and professional schools	Long Term	Ministry of Education, Ministry of Higher Education

<b>Initiative 9.2</b>		<b>Train the educators to build a culture of integrity and fighting corruption</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of teachers who successfully pass the training programme</li> <li>• Percentage of teachers who then apply the tools and skills from the training programme in their teaching</li> </ul>			
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>	
1. Conduct review of current training programmes for teachers and educators	Review completed, resulting in analytical report, options, and recommendations	Short Term	Ministry of Education	
2. Based on report recommendations, draft relevant anti-corruption training programmes for teachers and educators	Draft training programs completed	Short Term	Ministry of Education	
3. Conduct consultations of with relevant ministries, agencies, and stakeholders, including civil society, on the draft training programmes	Consultations completed and revisions to draft training programmes completed, as appropriate	Short Term	Ministry of Education	
4. Submit final draft training programs for official approval through appropriate channels	Training programs approved	Short Term	Ministry of Education	
5. Integrate approved training programmes into current systems for training teachers and educators	Training programs integrated and conducted	Medium Term	Ministry of Education	
6. Conduct evaluation of quality and impact of anti-corruption training	Evaluation completed and training programs revised, as appropriate	Medium Term	Ministry of Education	



<b>Initiative 9.3</b>		<b>Revise ethics and integrity curricula and standards in universities and professional schools</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of universities and professional schools teaching integrity issues</li> <li>• Percentage of universities and professional school students reaching the required standard as part of the course</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Survey conducted of existing integrity teaching in universities and professional schools	Survey has been completed with the participation of over 40% of universities and professional schools	Short Term	Ministry of Higher Education Council of Private Universities
2. Workshop held to evaluate present gaps in integrity education	Workshop concluded with agreement on key gaps in integrity education and key features of possible curriculum	Short Term	Ministry of Higher Education Council of Private Universities
3. Draft of revisions necessary to integrity curriculum developed for universities and professional school students	Draft revisions completed and amended following consultation with workshop participants	Short Term	Ministry of Higher Education Council of Private Universities
4. Revised curriculum piloted in a limited number of schools	Curriculum is taught successfully in pilot schools	Medium Term	Ministry of Higher Education Council of Private Universities
5. Curriculum revised in line with feedback from piloting institutions	Updated curriculum completed incorporating comments from all schools participating in pilot programme	Medium Term	Ministry of Higher Education Council of Private Universities
6. Updated curricula incorporated into majority of universities and professional schools	The curricula is incorporated in all universities and professional schools	Long Term	Ministry of Higher Education Council of Private Universities

<b>Initiative 9.4</b>			
<b>Follow up on mechanisms to counter fraud in university and professional diplomas and to develop standards for equivalency of university and professional certification</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Mechanisms to counter fraud developed</li> <li>• Standards for equivalency of university and professional certification developed and promulgated</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish Working Group to develop mechanisms to counter fraud in diplomas and develop standards for certification	Working Group established	Short Term	Ministry of Education, Ministry of Higher Education
2. Conduct assessment of fraudulent diploma programs and current standards for certifications	Assessment conducted	Short Term	Ministry of Education, Ministry of Higher Education
3. Based on assessment, draft proposed mechanisms to counter fraud and proposed standards for certification	Draft completed	Short Term	Ministry of Education, Ministry of Higher Education
4. Conduct consultations with relevant stakeholders, including academia and civil society where appropriate, on draft mechanisms and standards.	Consultations conducted	Medium Term	Ministry of Education, Ministry of Higher Education
5. Based on consultations, revise and finalize draft mechanisms and standards	Draft revised and finalized	Medium Term	Ministry of Education, Ministry of Higher Education
6. Mechanism and standards approved by appropriate official channels and promulgated	Mechanisms and standards adopted and implemented	Medium Term	Ministry of Education, Ministry of Higher Education

## PRIORITY 10

## Cooperation with the Civil Society and the Media

### Initiative 10.1

### Promote complementarity between the efforts of the public sector and civil society in promoting integrity and fighting corruption

#### Initiative Indicators

- Existence of an effective and coordinated mechanism to promote complementarity
- Percentage of civil society organizations and government bodies that report smoother interactions between the two sides

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Establish a clear and organized mechanism for coordination and cooperation between NAZAHA and civil society	Mechanism established and enforced	Medium Term	Nazaha
2. Conduct comprehensive review of current measures in place to ensure adequate cooperation between public institutions and civil society, taking into account international good practices	Review report completed	Medium Term	Nazaha
3. Based on report findings and recommendations, draft policies and measures to strengthen cooperation between public institutions and civil society	Draft measures completed	Medium Term	Nazaha
4. Conduct consultations of with relevant public bodies and civil society on the draft measures	Consultations completed, resulting in revisions to draft measures, as appropriate	Medium Term	Nazaha
5. Revise the draft measures based on the consultations	Draft revised	Medium Term	Nazaha
6. Submit final draft measures for official approval through appropriate channels	Draft measures approved	Short Term	Nazaha
7. Implement approved measures	Measures implemented	Long Term	Nazaha
8. Monitor and evaluate efforts to implement recommendations	Report completed	Long Term	Nazaha

<b>Initiative 10.2</b>	<b>Support civil society initiatives in the field of social oversight and support government agencies in their oversight role</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Number of relevant civil society initiatives launched</li> <li>• Percentage of respondents expressing satisfaction with the results of relevant civil society initiatives launched</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Conduct an analytical study on relevant initiatives that have been implemented in the past	Study completed	Short Term	Nazaha
2. Hold consultations on the study's findings and recommendations	Consultations held	Short Term	Nazaha
3. Draft an indicative framework on relevant initiatives that can be supported	Draft completed	Short Term	Nazaha
4. Conduct consultations on the framework	Consultations held	Short Term	Nazaha
5. Revise the draft framework based on the consultations	Draft revised	Short Term	Nazaha
6. Submit final draft for official approval through appropriate channels	Draft submitted and approved	Short Term	Nazaha
7. Launch a mechanism to support initiatives developed in accordance with the indicative framework	Mechanism launched	Medium term	Nazaha
8. Monitor and evaluate supported initiatives	Report completed	Long Term	Nazaha



<b>Initiative 10.3</b> <b>Develop and implement a strategy for public institutions to communicate effectively with the media</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of public institutions and media entities that adopt the measures suggested in the strategy</li> <li>• Percentage of public institutions and media entities that report smoother interactions between the two sides after the adoption of the strategy</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Conduct comprehensive review of current measures in place to ensure adequate cooperation between public institutions and the media, considering international good practices	Review report completed	Short Term	Ministry of Information, Nazaha
2. Based on report findings and recommendations, draft strategy to strengthen cooperation between public institutions and the media, based on international good practices	Draft strategy completed	Short Term	Ministry of Information, Nazaha
3. Conduct consultations of with relevant ministries, media entities, and other stakeholders, including civil society, on the draft strategy	Consultations held	Short Term	Ministry of Information, Nazaha
4. Revised draft based on the consultations	Draft revised	Short Term	Ministry of Information, Nazaha
5. Submit final draft strategy for official approval through appropriate channels	Draft strategy approved	Short Term	Ministry of Information, Nazaha
6. Implement approved strategy	Strategy implemented	Long Term	Ministry of Information, Nazaha
7. Monitor and evaluate the results of the strategy	Report completed	Long Term	Ministry of Information, Nazaha

<b>Initiative 10.4</b>			
<b>Develop and implement programs to strengthen the integrity of the media, including professional journalism</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of journalists and other media employees who participate in the programmes</li> <li>• Percentage of journalists and other media employees who successfully complete the programmes</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Hold workshops on the integrity of the media, including professional journalism	Workshop concluded with agreement on key gaps	Short Term	Ministry of Information, Nazaha
2. Develop training programs for journalists and other media personnel	Training programs developed	Medium Term	Ministry of Information, Nazaha
3. Implement training programs	Training programs implemented	Long Term	Ministry of Information, Nazaha
4. Monitor and evaluate the training programs	Report completed	Long Term	Ministry of Information, Nazaha
5. Draft educational curricula for journalism classes	Draft educational curricula completed	Medium Term	Ministry of Information, Ministry of Higher Education, Nazaha
6. Pilot training programme or curricula in state media training systems or journalism classes at universities	Training programme/curricula successfully taught at pilot organizations	Medium Term	Ministry of Information, Ministry of Higher Education, Nazaha
7. Training programme/ curriculum revised in line with feedback from piloting institutions	Updated training programme/ curriculum completed	Medium Term	Ministry of Information, Ministry of Higher Education, Nazaha
8. Training programme/ curricula widely disseminated among media and universities	Training programme/ curricula taught to majority of journalists and other media employees	Long Term	Ministry of Information, Ministry of Higher Education, Nazaha

## • 4<sup>th</sup> Pillar: Specialized Bodies



Short Term: Before June 2020

Medium Term: Before June 2022

Long Term: Before June 2024

### PRIORITY 11

### Capacity Building

#### Initiative 11.1

#### Develop and implement an internal strategy to enhance the structure and technical capabilities of Nazaha

#### Initiative Indicators

- Progress in implementing the adopted internal strategy
- Level of efficiency and effectiveness of “Nazaha” in performing its functions in accordance with the law

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Prepare and adopt an internal strategy of “Nazaha” by drawing on the opinion of experts and concerned stakeholders, international standards and comparative experiences	Strategy Completed	Short Term	Nazaha
2. Propose a new or modified policies and procedures to support “Nazaha” in implementing its strategy	Draft Proposals completed	Short Term	Nazaha
3. Submission of proposed policies and procedures for adoption through official channels	Draft Proposals adopted	Short Term	Nazaha
4. Implement the first phase of the adopted internal strategy	First Phase implemented	Short Term	Nazaha
5. Implement the second phase of the adopted internal strategy	Second phase implemented	Medium Term	Nazaha
6. Evaluate phases I and II of the implementation of the adopted internal strategy	Report completed	Medium Term	Nazaha, Independent Consultants
7. Implement the third phase of the adopted internal strategy	Third phase implemented	Long Term	Nazaha
8. Evaluate the third phase of the adopted internal strategy	Report completed	Long Term	Nazaha, Independent Consultants

<b>Enhance training programs for oversight agencies on their role in promoting integrity and fighting corruption</b>			
<b>Initiative 11.2</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of training programs for other concerned oversight agencies</li> <li>• Level of progress of knowledge and skills to promote integrity and fight corruption among staff of other concerned oversight agencies</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Conduct a study on training needs in promoting integrity and anti-corruption of other concerned oversight agencies	Study conducted	Short Term	Nazaha, State Audit Bureau, Ministry of Finance, Civil Service Commission, Government Performance Follow-up Agency
2. Holding joint workshops for other concerned oversight agencies with promoting integrity and fighting corruption	Workshops held	Short Term	
3. Prepare and adopt a joint training strategy for other concerned oversight agencies in promoting integrity and fighting corruption based on the study and the workshops	Strategy completed	Short Term	
4. Implement the first phase of the approved joint training strategy	First phase implemented	Medium term	
5. Evaluation of the first phase of implementation of the adopted internal strategy	Report completed	Medium term	
6. Implement the second phase of the adopted internal strategy	Second Phase implemented	Long Term	
7. Evaluation of the second phase of implementation of the adopted internal strategy	Report completed	Long Term	



<b>Initiative 11.3</b>		<b>Strengthen training programs for investigators, prosecutors and law enforcement judges on the criminalization of corruption, disclosure, reporting, investigation and prosecution of such offenses</b>		
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of training programs for investigators, prosecutors and law enforcement judges</li> <li>• Level of progress of knowledge and skills to promote integrity and fight corruption among investigators, prosecutors and law enforcement judges</li> </ul>			
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>	
1. Conduct a study on training needs in promoting integrity and anti-corruption of law enforcement bodies	Review completed, resulting in analytical report, options, and recommendations	Short Term	Nazaha, Ministry of Justice, Supreme Council of the Judiciary, Public Prosecution and the Kuwait Institute for Judicial and Legal Studies	
2. Holding joint workshops for law enforcement bodies	Draft training programmes completed	Short Term		
3. Prepare and adopt a joint training strategy for law enforcement bodies based on the study and the workshops	Consultations completed, resulting in revisions to draft training programmes, as appropriate	Short Term		
4. Implement the first phase of the approved joint training strategy	Training programmes approved	Short Term		
5. Evaluation of the first phase of implementation of the adopted internal strategy	Training programs integrated and conducted	Medium Term		
6. Implement the second phase of the adopted internal strategy	Evaluation completed and training programmes revised, as appropriate	Medium Term		
7. Evaluation of the second phase of implementation of the adopted internal strategy	Report completed	Long Term		

## PRIORITY 12

## Whistle-blowers protection

### Initiative 12.1

### Take measures to expand and strengthen protections for whistle-blowers in the public sector

#### Initiative Indicators

- Percentage of ministries or agencies that have adopted the new protocols and procedures
- Increased level of public trust in the whistle-blower protection system

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Conduct review of existing measures for the protection of whistleblowers and reporting persons, taking into account international good practices	Evaluation completed	Short Term	Nazaha
2. Draft protocols and procedures to provide protection to whistleblowers and reporting persons	Draft completed	Short Term	Nazaha
3. Conduct series of consultative meetings with law enforcement, relevant ministries, and other stakeholders to review draft and revise, as appropriate	Consultation Meetings held	Short Term	Nazaha
4. Revise draft protocols based on the consultations	Draft revised	Short Term	Nazaha
5. Finalize draft protocols and procedures and submit for approval through appropriate official channels	Draft Adopted	Short Term	Nazaha
6. Distribute protocols and procedures to all relevant ministries and agencies, and follow up to ensure implementation	Protocols and procedures distributed	Medium Term	Nazaha
7. Monitor and evaluate the extent to which policies and procedures are adopted and their impact on public trust	Report completed	Long Term	Nazaha



<b>Initiative 12.2</b>		<b>Create a secure national online platform for the reporting of corruption</b>	
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Percentage of reports received on the platform</li> <li>• Quality of the content received by the electronic platform</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Design an online platform to report on corruption	Design completed	Short Term	Nazaha
2. Create an online platform designed to report on corruption and inform the public about it	Online platform designed and introduced	Short Term	Nazaha
3. Conduct training for staff concerned with the online platform to report on corruption	Training courses organized	Short Term	Nazaha
4. Implement pilot online platform to report on corruption	Pilot phase implemented	Short Term	Nazaha
5. Evaluate the pilot online platform to report on corruption	Evaluation completed	Medium Term	Nazaha
6. Update the online platform based on the evaluation	online platform completed	Medium Term	Nazaha
7. Train staff on the updated online platform	Training courses organized	Short Term	Nazaha
8. Launch of the online platform to report corruption	online platform publicly available and in use	Medium Term	Nazaha
9. Develop and adopt a permanent and periodic training program for staff concerned with the online platform	Training courses implemented	Medium Term	Nazaha
10. Evaluate the value added of the online platform to report corruption	Report completed	Long Term	Nazaha

**Initiative 12.3** **Implement incentive programs that include rewards and honoring for whistle-blowers**

<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Existence of an integral program to incentivize whistle blowers among public service employees</li> <li>• Percentage of respondents who reported that the approved program succeeded in motivating them to report corruption in case discovered</li> </ul>
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<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Evaluate existing policies and procedures to incentivize whistleblowers	Evaluation completed	Short Term	Nazaha
2. Prepare draft policies and procedures to incentivize whistleblowers	Draft completed	Short Term	Nazaha
3. Hold consultations with key stakeholders to review and revise the draft	Consultation meetings held	Short Term	Nazaha
4. Revision of draft policies and procedures	Draft adopted	Short Term	Nazaha
5. Submit draft of the revised policies and procedures for adoption through official channels	Draft implemented	Short Term	Nazaha
6. Disseminate policies and procedures among all government agencies	Protocols and procedures distributed	Medium term	Nazaha
7. Monitor and evaluate the extent to which policies and procedures are enforced and their impact	Report completed	Long Term	Nazaha

## PRIORITY 13

## Coordination and Cooperation

### Initiative 13.1

### Strengthen cooperation and coordination among law enforcement bodies in the investigation and prosecution of corruption cases

#### Initiative Indicators

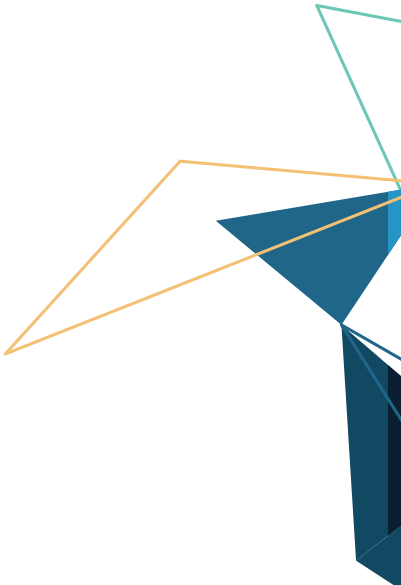
- Percentage of ministries or agencies that have adopted the new protocols and procedures
- Increased level of public trust in the whistle-blower protection system

Benchmark	Benchmark Completion	Completion Date	Implementation Bodies
1. Conduct comprehensive review of current measures in place to ensure adequate cooperation among law enforcement institutions,	Review report completed	Short Term	Nazaha, Public Prosecution
2. Draft relevant measures to strengthen cooperation among law enforcement institutions, including sharing information and criminal intelligence	Draft measures completed	Short Term	Nazaha, Public Prosecution
3. Conduct consultations of with relevant ministries, agencies, law enforcement bodies, and other stakeholders, on the draft measures	Consultations held	Short Term	Nazaha, Public Prosecution
4. Revise draft based on the consultations	Draft measures reviewed	Short Term	Nazaha, Public Prosecution
5. Submit final draft measures for official approval through appropriate channels	Draft measures adopted	Short Term	Nazaha, Public Prosecution
6. Approved measures implemented throughout law enforcement institutions	Measures implemented	Medium Term	Nazaha, Public Prosecution
7. Follow up on the extent to which the measures are relevant and their impact on efficiency and effectiveness in coordination and cooperation	Periodic Report prepared	Long Term	Nazaha, Public Prosecution

<b>Fulfill the obligations of the State of Kuwait within the framework of the UNCAC Implementation Review Mechanism in a participatory and effective manner</b>			
<b>Initiative 13.2</b>			
<b>Initiative Indicators</b>	<ul style="list-style-type: none"> <li>• Second Cycle Review successfully completed and country report issued</li> <li>• Percentage of recommendations from Second Cycle Review that have been followed-up on</li> </ul>		
<b>Benchmark</b>	<b>Benchmark Completion</b>	<b>Completion Date</b>	<b>Implementation Bodies</b>
1. Establish a permanent committee to follow up on Kuwait's obligations within the framework of the UNCAC Implementation Review Mechanism in a participatory and effective manner	Committee established	Short Term	Nazaha
2. Complete Self-Assessment Checklist for Chapter 2 and 5 of the UNCAC	Self-Assessment successfully completed	Short Term	Nazaha
3. Finalize and publish the national report and its executive summary on chapters 2 and 5 of the UNCAC	Executive Summary and Final Report published	Short Term	Nazaha
4. Develop and adopt an action plan to follow up the implementation of the recommendations of the review mechanism of Chapters 2 and 5 of the UNCAC	Action plan completed	Short Term	Nazaha
5. Monitoring and evaluate the compliance with the approved action plan	Report completed	Short Term	Nazaha
6. Complete Self-Assessment Checklist for Chapter 3 and 4 of the UNCAC	Self-Assessment successfully completed	Short Term	Nazaha
7. Finalize and publish the final national report and its executive summary on chapters 3 and 4 of the UNCAC	Executive Summary and Final Report published	Short Term	Nazaha



8. Develop and adopt an action plan to follow up the implementation of the recommendations of the review mechanism of Chapters 3 and 4 of the UNCAC	Action plan adopted	Short Term	Nazaha
9. Monitoring and evaluate the compliance with the approved action plan	Report written	Short Term	Nazaha

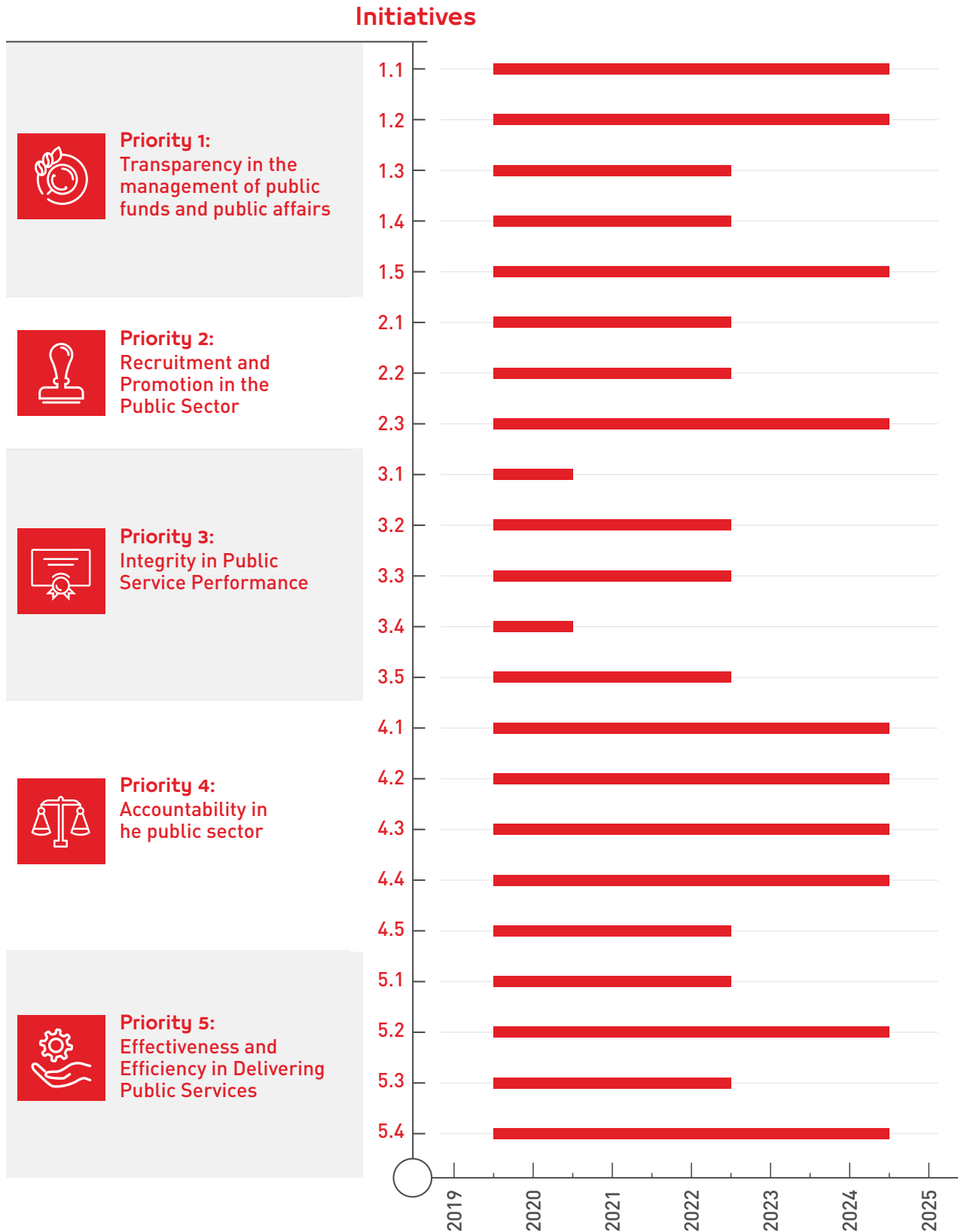




# Annex (4)

# Annex 4 - Proposed Timetable

## • 1<sup>st</sup> Pillar: The Public Sector





- 1.1 Ensure the right to access to information
- 1.2 Review and amend legal texts regulating the financing of electoral campaigns
- 1.3 Enhance the compliance with the asset declaration system
- 1.4 Preventing corruption in public tenders
- 1.5 Support ministries and public bodies to disseminate information on their work

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- 2.1 Establish objective criteria to ensure merit-based recruitment and promotion procedures for civil service
- 2.2 Adopt a special mechanism for the recruitment of senior public officials in a transparent manner according to objective criteria
- 2.3 Strengthening the civil service system and consider the establishment of a specialized institute to train civil servants of all grades

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- 3.1 Review and revise the code of conduct for civil servants of the executive branch
- 3.2 Develop and deliver training programmes on the code of conducts for civil servants
- 3.3 Develop a code of conduct for members of the parliament and its staff
- 3.4 Support the Supreme Judicial Council to prepare and disseminate codes of conduct for judges, prosecutors and other public service employees working under their supervision
- 3.5 Support the Ministry of Interior to develop and disseminate codes of conduct for its staff, including police officers

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- 4.1 Review and strengthen performance management systems of public service employees and conduct regular performance evaluations
- 4.2 Review and strengthen the standards and mechanisms of accountability in the public sector, including accounting, auditing and oversight mechanisms
- 4.3 Review and strengthen measures to ensure integrity and accountability in state-owned enterprises
- 4.4 Establishing and enforce a conflict of interest management system
- 4.5 Amend legislation to effectively criminalize illicit enrichment

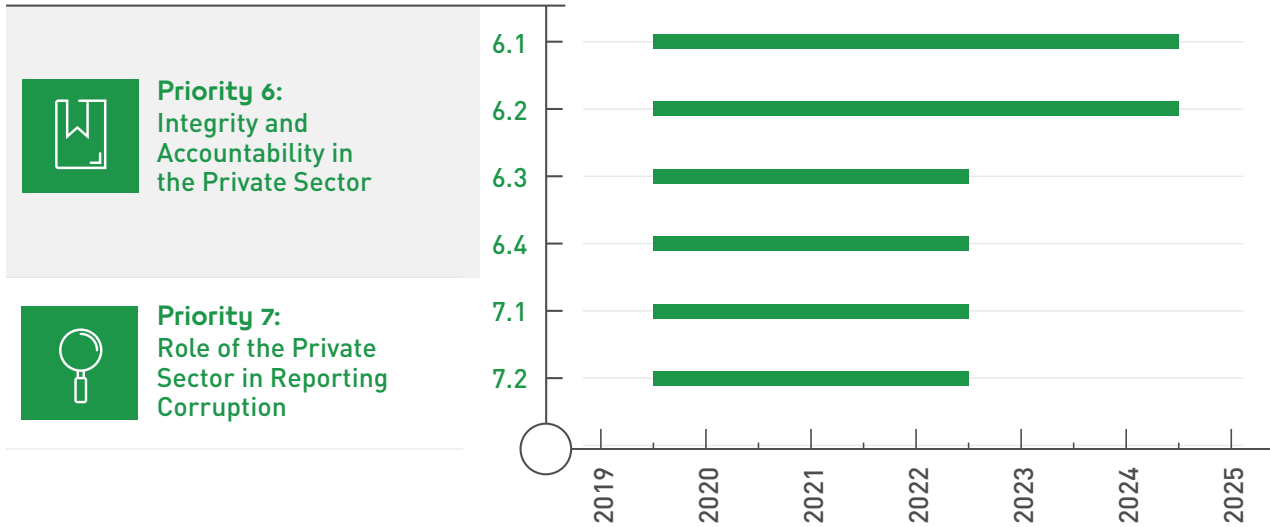
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- 5.1 Review and streamline bureaucratic procedures of public service delivery
- 5.2 Develop and implement e-government internet-based platforms to further automate processes for the delivery of public services
- 5.3 Develop and publish user-friendly guides for the public regarding how to access and apply for public services both in paper and electronically
- 5.4 Integrate corruption risk management into sectors that provide public services to identify and address weaknesses periodically and sustainably



## • 2<sup>nd</sup> Pillar: The Private Sector

### Initiatives



- **6.1** Review and strengthen effective auditing standards in the private sector
- **6.2** Develop awareness and training programmes and encourage ethical business practices in the private sector
- **6.3** Follow-up work on establishing corporate governance principles and practices
- **6.4** Develop legislation on the criminalization of corruption in the private sector

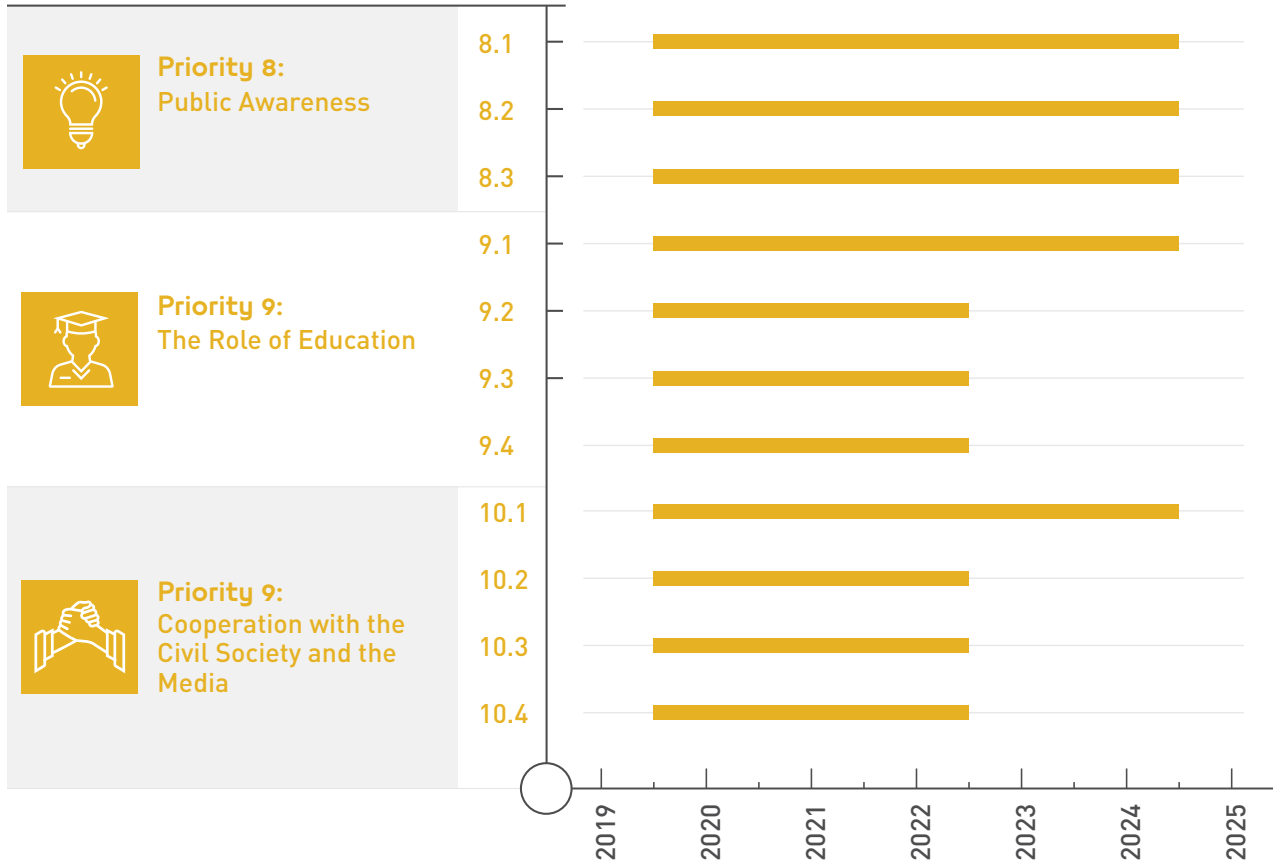
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- **7.1** Encourage and protect whistleblowers on corruption within private sector entities
- **7.2** Review and strengthen mechanisms for cooperation between the public sector and the private sector in fighting corruption



## • 3<sup>rd</sup> Pillar: The Society

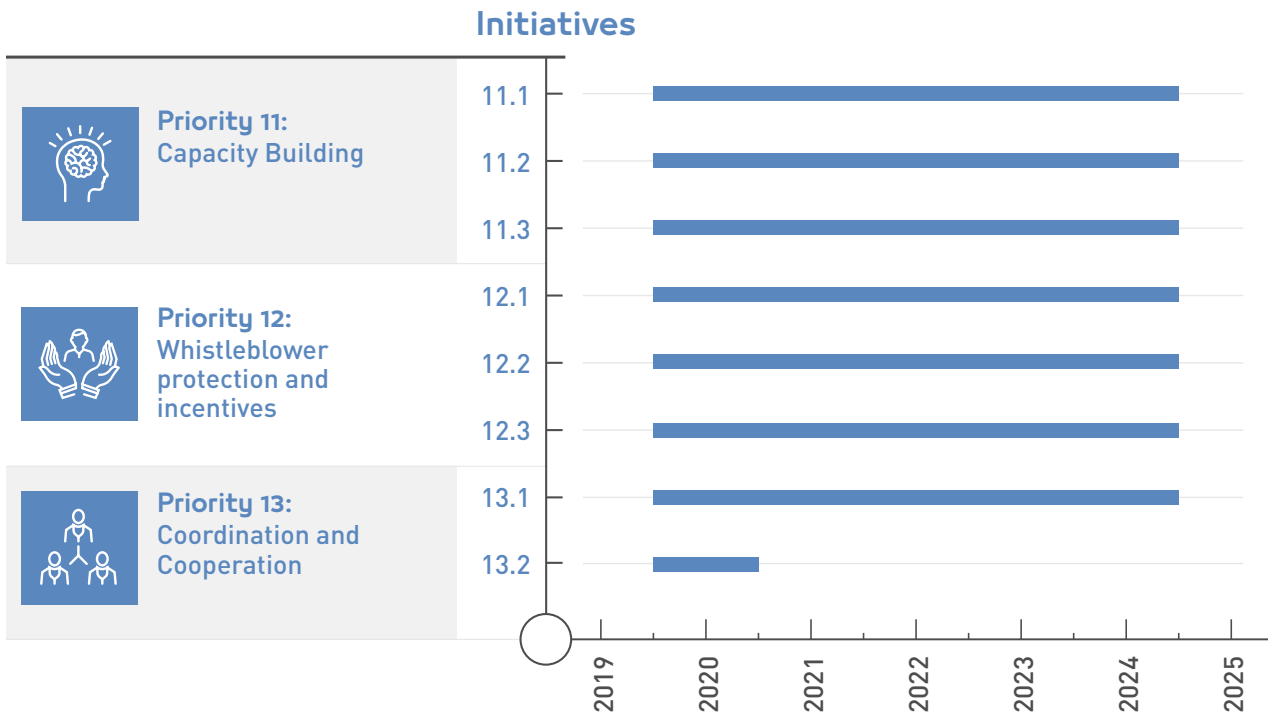
### Initiatives



- **8.1** Preparation and implementation of national programmes to raise awareness of citizens and residents on the Anti-Corruption and Integrity Strategy and its relationship to the “New Kuwait Vision 2035”
  - **8.2** To inculcate anti-corruption values in society, including through family, media and community institutions of all kinds
  - **8.3** Develop and implement outreach program to raise awareness about the mandate and activities of Nazaha and the role of citizens
- 
- **9.1** Integrate anti-corruption values and knowledge on the principles of transparency, accountability, the rule of law and community participation in school curricula
  - **9.2** Train the educators to build a culture of integrity and fighting corruption
  - **9.3** Revise ethics and integrity curricula and standards in universities and professional schools
  - **9.4** Follow up on mechanisms to counter fraud in university and professional diplomas and to develop standards for equivalency of university and professional certification
- 
- **10.1** Promote complementarity between the efforts of the public sector and civil society in promoting integrity and fighting corruption
  - **10.2** Support civil society initiatives in the field of social oversight and support government agencies in their oversight role
  - **10.3** Develop and implement a strategy for public institutions to communicate effectively with the media
  - **10.4** Develop and implement programs to strengthen the integrity of the media, including professional journalism



## • 4<sup>th</sup> Pillar: Specialized Bodies



- 11.1 Develop and implement an internal strategy to enhance the structure and technical capabilities of Nazaha
- 11.2 Enhance training programs for oversight agencies on their role in promoting integrity and fighting corruption
- 11.3 Strengthen training programs for investigators, prosecutors and law enforcement judges on the criminalization of corruption, disclosure, reporting, investigation and prosecution of such offenses

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- 12.1 Take measures to expand and strengthen protections for whistleblowers in the public sector
- 12.2 Create a secure national online platform for the reporting of corruption
- 12.3 Implement incentive programs that include rewards and honoring for whistleblowers

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- 13.1 Strengthen cooperation and coordination among law enforcement bodies in the investigation and prosecution of corruption cases
- 13.2 Fulfill the obligations of the State of Kuwait within the framework of the UNCAC Implementation Review Mechanism in a participatory and effective manner

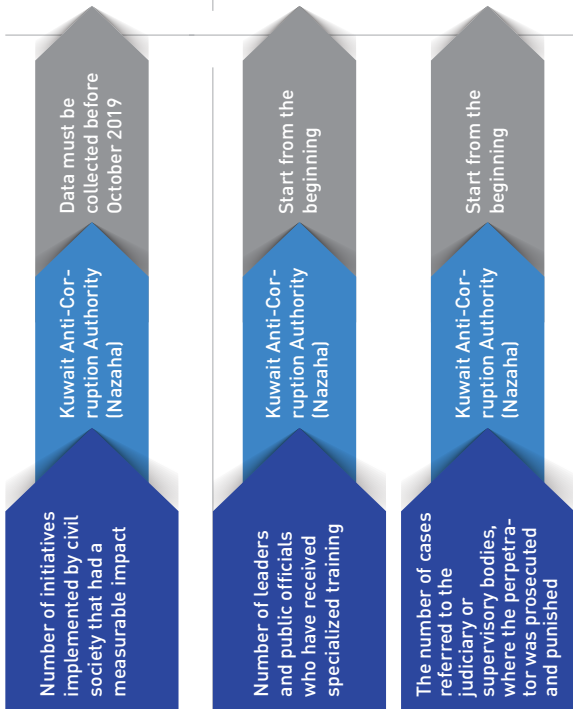


# Annex (5)

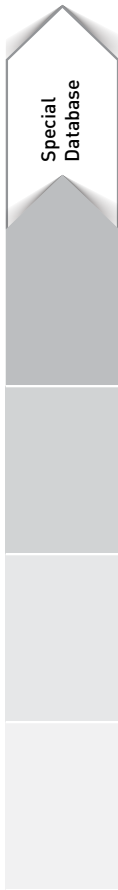
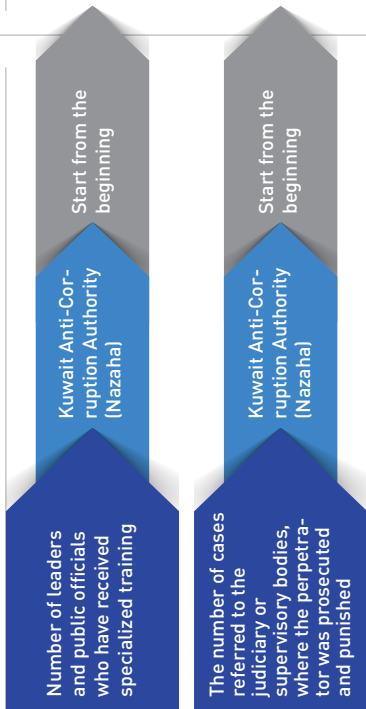
# Annex 5 - Monitoring and Evaluation Matrix

Outcome	Indicator	Data Source	Current Status	Objective				Instrument
				2021	2022	2023	2024	
Increase in the level of integrity and anti-corruption in the state of Kuwait	The level of trust of citizens and residents in the Kuwait Anti-Corruption Authority (Nazaha)	An independent body under contract	Data must be collected before October 2019	20% increase	40% increase	60% increase	80% increase	Public opinion poll
	The level of trust of the private sector in the integrity of the business environment	An independent body under contract	Data must be collected before October 2019	10% increase	10% increase	30% increase	60% increase	Survey on opinion of Executives
	Number of new laws and regulations adopted and put into effect under the United Nations Convention Against Corruption (UNCAC)	Kuwait Anti-Corruption Authority (Nazaha)	Start from the beginning	3	3	3	3	Self-assessment study
An increase in the level of the integrity of the public sector and the development, effectiveness, and efficiency of public services in a transparent and accountable manner	Score of Kuwait on the Corruption Perception Index	Transparency International	Entering the data	---	2 points	5 points	7 points	Corruption Perception Index
	The level of satisfaction of users targeted for easy access, lack of bribery and nepotism	Kuwait Anti-Corruption Authority (Nazaha)	Data must be collected before October 2019	---	---	---	---	Survey on user experience
The private sector is more involved in promoting integrity and fighting corruption	Number of companies adopting new internal measures to promote integrity and report corruption	Kuwait Anti-Corruption Authority (Nazaha)	Data must be collected before October 2019	---	---	---	---	Study

**The society is more involved in building an incubator culture for integrity and anti-corruption**



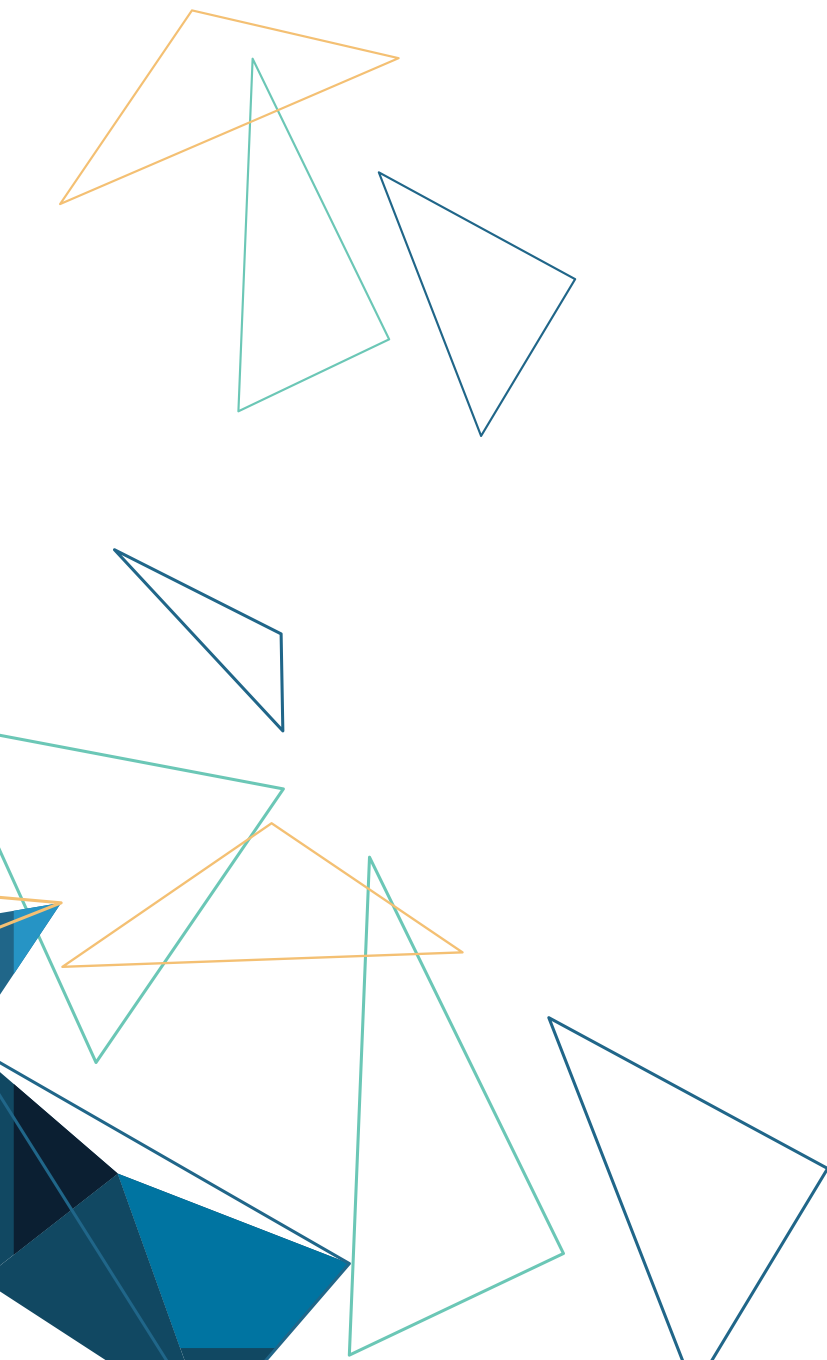
**The specialized capacities of the bodies playing a major role in the implementation of the strategy**



## هيكلة العمل

Activity	Objective	Time	Action	Implementing Body
<b>Monitoring</b>	Analysis of the progress of the strategy according to the implementation matrix	Quarterly	The team monitors progress and reports on it according to the approved model	Kuwait Anti-Corruption Authority (Nazaha)
<b>Risk Management</b>	Reduce the risks that can affect strategy	Quarterly	The risk identification, evaluation, and mitigation team will develop and update a matrix accordingly	Kuwait Anti-Corruption Authority (Nazaha)
<b>Learning</b>	Documentation and utilization of the knowledge emanated from the strategy	Quarterly	The team brings together information on good practices and lessons learned	Kuwait Anti-Corruption Authority (Nazaha)
<b>Periodic Assessment</b>	Performance review in accordance with the Implementation Matrix	Quarterly	The High Committee shall study the reports and information submitted to it and make decisions thereon to ensure proper implementation	Kuwait Anti-Corruption Authority (Nazaha), High Committee
<b>Quality of the Implementation of the Strategy</b>	Evaluation of the Strategy	End of Strategy	The team shall identify strengths and weaknesses in view of the above criteria in order to make decisions	Kuwait Anti-Corruption Authority (Nazaha), Monitoring and Evaluation Committee
<b>Final Report</b>	Documenting the activities and outcomes of the strategy	The last year of implementation of the Strategy	A report summarizing the main activities and progress of work of the Implementation Matrix is prepared with the challenges, risks and recommendations to build the future strategy	Kuwait Anti-Corruption Authority (Nazaha), High Committee









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Kuwait Anti Corruption Authority



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