

ANNUAL INSTITUTIONAL REPORT 2023-2024

25 YEARS TRIUMPHS, TRIALS AND TRANSFORMATIONS IN THE ANTI CORRUPTION JOURNEY





Every effort has been made to verify the accuracy of the information contained in this report.

All information was believed to be correct as of September 2024. Nevertheless, Transparency International Kenya cannot accept responsibility for the consequences of its use for other purposes or in other contexts. For further information, comments or suggestions on the TI-Kenya Annual Institutional Report 2023 -2024, please contact: transparency@tikenya.org

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Acronyms

ACECA	Anti-Corruption and Economic Crimes Act
ALAC	Advocacy and Legal Advice Center
A4T	Action for Transparency
APNAC	African Parliamentarians Network Against Corruption
BO	Beneficial Ownership
BRS	Business Registration Service
CAJ	Commission on Administrative Justice
CBEF	County Budget and Economic Forum
CIDP	County Integrated Development Plan
CSPEN	Civil Society Parliamentary Engagement Network
DCI	Directorate of Criminal Investigations
CAA	Citizen Accountability Audit
CBO	Community Based Organization
CGSR	County Governance Status Report
CSO	Civil Society Organization
IDUAI	International Day for Universal Access to Information
IEBC	Independent Electoral and Boundaries Commission
IFF	Illicit Financial Flows
IMF	International Monetary Fund
KNEC	Kenya National Examination Council
KNHRC	Kenya National Human Rights Commission
KRA	Kenya Revenue Authority
LSK	Law Society of Kenya
MOU	Memorandum of Understanding
MP	Member of Parliament
NAP	National Action Plan
NCIC	National Cohesion and Integration Commission
NEMA	National Environmental Management Authority
NIA	National Integrity Alliance
NTSA	National Transport and Safety Authority
OAG	Office of Auditor General
ODPP	Office of the Director of Public Prosecutions
OGP	Open Government Partnership
PIL	Public Interest Litigation
UNESCO	United Nations Educational, Scientific and Cultural Organization

Background Information

Transparency International Kenya (TI-Kenya) was founded in 1999 in Kenya as a not-for-profit organization to develop a transparent and corruption-free society through good governance and social justice initiatives.

TI-Kenya is one of the autonomous chapters of the global Transparency International (TI) movement that is bound by a common vision of a corruption-free world. The global movement provides a platform for sharing knowledge and experience, as well as developing strategies to respond to regionally distinct patterns of corruption. The organization has extensive experience in governance work at the National and County levels. These include direct engagement with the government, the private sector, individuals, and groups. TI-Kenya uses advocacy as its signature approach, complemented by other approaches such as partnerships' development, research, capacity building, and civic engagement.

TI-Kenya has its main office in Nairobi and regional presence in the Coast, Rift Valley, the larger Western Kenya, and Eastern Kenya through its four Advocacy and Legal Advice Centres (ALACs) in Nairobi, Mombasa, Eldoret and Kisumu. TI-Kenya also runs programmes in other countries within the East African region in collaboration with other TI chapters and national Civil Society Organizations.

1.0

Vision, Mission, and Strategic Focus Areas

Vision

A corruption-free Society

Mission

To champion the fight against corruption by promoting integrity, transparency, and accountability in both public and private spheres.

Strategic Areas of Focus:

TI-Kenya's work over the reporting period was anchored on the following strategic focus areas:



Citizen Demand and Oversight (CDO)

This strategic area focusses on concerns around inadequate enforcement of constitutional and legal provisions on leadership, integrity, and anticorruption; normalisation of corruption at individual and societal levels; corrupt, unethical, and unaccountable leadership; and inefficient, ineffective, and non-responsive public service delivery and humanitarian aid systems.



Natural Resources and Climate Governance

This strategic pillar deals with mis-governance of natural resources and environment; corruption; inadequate knowledge/ information; as well as non-transparent natural resources and climate governance processes. The priority sectors that this pillar focusses on include Land, Extractives, Environment, Energy, and Blue Economy.



Public Finance Management

This focus area pays attention to transparency of public procurement processes; illicit financial flows; efficiency of public spending; and quality of financial oversight systems.

The key sectors are Health, WASH, Education, and Public Finance, while the natural resources sector is integrated.



Institutional Development

This strategic focus area builds upon TI-Kenya's track record while further developing its internal capacities and sustainability. It strengthens the quality of human resources and governance/ oversight; internal organisational systems and structures; PMERL; ICT, media, and strategic communications; as well as institutional and financial resilience

2.0

Board of directors

Mrs. Bernadette W. Musundi, Chair, Board of Directors

Mrs. Bernadette W. Musundi is the Chair of the Board of Directors at TI-Kenya, a position she was elected to in 2017. She is a former Permanent Secretary in the Office of the Vice President and Ministry of Home Affairs, Heritage, and Sports. During her service in the Government of Kenya, she played a key role in spearheading reforms in the Prisons Department and policies that concern gender development and children's welfare. She was instrumental in the coordination of administrative steps which led to the establishment of the Children's Act and initiated the development of the national sports policy framework. She also served as the Vice President of the International Co-operative Alliance's (ICA) Global Women Committee which developed the policy framework for women in the cooperative movement. She sits on several boards of directors, among them as Trustee of the Kianda Foundation; and is the current Chair of the Strathmore University Council.

She was also the founding Chairperson of Regina Pacis College Board - a constituent College of Catholic University of Eastern Africa (CUEA). Mrs. Musundi also served as the National Chair of the Trefoil Women's Guild, Girl Guides Association and as Chair of the Board of Governors for Highridge Teachers College. Mrs. Musundi twice served as the Executive Director of the Maendeleo Ya Wanawake Organization (MYWO), among the largest women's NGOs in Eastern Africa. In October 2016, Mrs. Musundi was appointed and subsequently elected Chair of the Recruitment Panel for the Chairman and Commissioners of the Independent Electoral and Boundaries Commission (IEBC). She is a holder of a Bachelor of Arts and Master of Arts in Co-operative Management. She has also undertaken many professional courses in policy development, management, and adult education both locally and internationally.

Ms. Eva Wangui

Ms. Eva Wangui is a business leader with over 20 years' experience in telecommunications, mobile financial Services, manufacturing industries and consultancy. She has previously worked with Diageo for over 15 years rising to the level of Head of Finance, Bharti Airtel Ltd as the Finance Director and served as Cluster Finance Head - Kenya and Tanzania in Safal Group. She is well versed in Financial Reporting & Analytics, Commercial Finance, Project Management, Board Representations, Business Re-engineering, Controls and Governance,

Working Capital Optimization, External Stakeholder Engagements and Talent Leadership. Ms. Wangui holds a master's degree in Business Administration from East and Southern Africa Management Institute (ESAMI), Bachelor of Commerce - First Class Honors (Marketing Option), from KCA University, Advanced Management Programme (AMP) from IESE Business School (Spain) and Strathmore Business School (Kenya), Certified Public Accountant of Kenya (CPA-K). She joined the TI-Kenya Board of Directors in January 2020.

Dr. Bedan Lyanda Musima

Dr. Bedan Lyanda Musima is the founder and managing director of The Dental & Maxillofacial Imaging Centre Ltd (DAMIC). He is also the founder and chief clinical lead of a multidisciplinary dental centre, Dr Musima and Associates Ltd. He has a wealth of experience in the medical industry having previously worked at Dental Place Ltd, Upper Hill Medical Centre as an associated dentist and at the University of Pretoria, Department of Orthodontics as a Postgraduate registrar. He holds a Master of Clinical Dentistry (MClindent), Orthodontics and Dentofacial Orthopedics from the BPP University,

United Kingdom, Bachelor of Dental Surgery (BDS) from the University of Nairobi, Kenya, Diploma in Orthodontics (DOrth) from the University of Pretoria, South Africa, and a Postgraduate Diploma in Dentistry (PDD) Implantology from The University of Western Cape, South Africa. Dr. Musima is a member of the British Orthodontic Society, International Association of Dental Research (IADR), American Dental Association (ADA), Kenya Dental Association (KDA) and the Kenya Hospital Association (KHA). He joined the TI-Kenya Board of Directors in January 2020.

Mr. James Muthui

Mr. James Muthui is an Advocate of the High Court of Kenya having been admitted in 2003. He has a vast legal experience in commercial and civil litigation in land disputes, intellectual property, banking law, environmental conservation law, judicial review, employment disputes, debt collection, arbitration, and meditation. He is currently a partner at Kaplan and

Stratton Advocates. He holds a Bachelor of Law degree from The University of Nairobi. He is a member of the Law Society of Kenya, Chartered Institute of Arbitrators, and International Bar Association. Mr. Muthui is a Commissioner of Oaths (2007) and a Patent Agent, Kenya Industrial Property Institute (2012). He joined the TI-Kenya Board of Directors in February 2020.

Ms. Samira Mary Leakey

Ms. Samira Mary Leakey is a Writer, Editor, Communications and Public Affairs specialist. She has conducted independent consultancies in communications and project management fields with the Turkana Basin Institute, the African Conservation Fund, World Bank, Institute of Economic Affairs, African Medical and Research Foundation and the UNDP Global Environment Facility, Africa Bureau. She co-authored

the autobiographical book of Meave Leakey's life in search of human origins. Ms. Samira holds a master's degree in public Affairs – International Development Policy Focus from Princeton University, and a Bachelor of Arts in Politics from The University of London, School of Oriental and African Studies. She joined the TI-Kenya Board of Directors in February 2020.

Sheila Masinde

Sheila Masinde has over 10 years' work experience in media, outreach, governance, and programme management. She joined TI-Kenya in 2014 from BBC Media Action (British Broadcasting Corporation's international development charity) where she was the Communications and Training Manager. She first worked for Transparency International Kenya from 2009 to 2012 as the Advocacy and Communications Programme Officer. She has also worked at the Nation Media Group as a radio news

presenter for Easy FM and online sub-editor, and I Choose Life as a Programme Trainer and Assistant Programme Manager. She also sits on the board of I Choose Life and serves in the resource mobilization and communications board committee. She holds a Master of Arts in Communication studies from the School of Journalism, University of Nairobi, and Bachelor of Arts degree from Kenyatta University. She serves as the secretary to the Board of Directors since January 2020.

Message from the Chair, Board of Directors

Mrs. Bernadette W. Musundi



This reporting period marked the second year of our Action for Integrity Strategic Plan implementation. Tackling corruption in Kenya requires a multifaceted approach encompassing legal reforms, institutional strengthening, and promoting a culture of ethics and integrity. Additionally, it demands collaboration between state and non-state actors, increased citizen engagement, and a commitment to ethical leadership to achieve meaningful progress in the fight against corruption. To this end, TI-Kenya continued to promote

integrity, transparency and accountability in both public and private spheres.

On 14th February 2024, TI-Kenya marked 25 years of unwavering commitment towards building a corruption-free society and reflected on our impactful journey since 1999 in promoting integrity, transparency, and accountability across Kenya's public and private sectors. This milestone was commemorated at a dinner in May 2024, graced by Dr. François Valérien, Chair of the Transparency International Board of Directors, and attended by leaders from civil society, government, private sector, academia, and development partners among other stakeholders. The event celebrated [TI-Kenya's achievements](#), reflected on its challenges and renewed its dedication to the fight against corruption. To crown TI-Kenya's 25th Anniversary, we held the Integrity Walk themed 'Standing Up for Integrity' bringing together several Kenyans in a powerful show of unity against corruption sparking bold conversations on accountability and transparency.

"Under the Citizen Demand and Oversight Programme, we championed for ethical values and positive behavior change, reaching to over

3 million

Kenyans with anti-corruption advocacy messaging."

Under the Citizen Demand and Oversight Programme, we championed for ethical values and positive behavior change, reaching over 3 million Kenyans with anti-corruption advocacy messaging. To advance the anti-corruption efforts, we collaborated with like-minded stakeholders including state and non-state actors



across the Country. Targeted engagements and advocacy activities were implemented to promote greater equity and quality of public service delivery. Through our Public Interest Litigation interventions, we have continued to push for improved enforcement of anti-corruption laws, policies, and institutional frameworks. TI-Kenya continued to fiercely defend anti-corruption laws, opposing attempts to weaken safeguards in governance and championing reforms to fix the prosecution of corruption cases. We embraced social media to further our efforts in media awareness, in turn reaching over 30 million citizens with critical messages on governance issues such as leadership and integrity, illicit financial flows, ethical business practices, and social accountability.

In the Natural Resources and Climate Governance (NRCG) pillar, TI-Kenya supported targeted advocacy engagements. This included high-level round table meetings with relevant duty bearers, awareness creation forums, public participation engagements, and participation in national, regional and international anti-corruption policy and legislative reforms discussions. Additionally, TI-Kenya ramped up the efforts in the utilisation of anti-corruption tools and technology in advancing its core mandate of pursuing a corruption-free society. This includes incorporating [ICT](#) in our work of championing the fight against corruption by promoting integrity, transparency and accountability at all levels. These engagements played a crucial role in contributing to greater accountability and transparency of natural resources and climate governance as well as enhancing sustainable use and equitable sharing of natural resources.

In the Public Finance Management (PFM) pillar, TI-Kenya, built the capacity of citizens including CSOs, women, youth and PWDs on budget tracking, meaningful public participation, public procurement processes, monitoring

of public service delivery and quality of financial oversight systems. The empowered citizens supported the influencing of six policies and bills including the Finance Bills. This was key in promoting a culture and practice of ethics, integrity, and accountability in public finance administration. Following Kenya's placement on the grey list by the Financial Action Task Force, TI-Kenya, in collaboration with its partners, released a media brief providing an in-depth analysis of the grey listing context, its implications, and key recommendations for Kenya to prioritise ahead of the next evaluation. These efforts contributed to fostering a culture of ethics, integrity, and accountability in public finance management.

Internally, the organisation continues to be responsive to the ever-changing world dynamics and operating context. We have strengthened our people, culture and governance mechanisms; systems, policies and procedures, financial management and administration, and planning monitoring, evaluation, research and learning capacity, and targeted advocacy efforts. The implementation of appropriate ICT infrastructure, media, and communication tools has progressively enhanced visibility and increased media engagement. To further strengthen Institutional Development, we have diversified our resource mobilisation strategies to ensure efficient support in the actualisation of the current Strategic Plan.

We remain grateful to the TI-Kenya Members, Board of Directors, staff, citizens of Kenya, the global Transparency International (TI) movement, development partners, civil society, faith-based organisations, academia, private sector, government institutions and other stakeholders for the unwavering continued support and partnership. We look forward to sustaining and fostering more dynamic collaborations to strengthen anti-corruption efforts.



3.0

Message from the Executive Director *Sheila Masinde*



During this period, as we approach the mid-term point on the implementation of the Action for integrity Strategic Plan (2022-2028); we employed a range of strategies in the fight against corruption, implementing strategic interventions across key result areas, including Citizen Demand and Oversight, Natural Resources and Climate Governance, and Public Finance Management. The key strategic interventions and results documented are as follows: -

Citizen Demand and Oversight (CDO)

To advance efforts on citizen demand and oversight during the period, we reached about 3 million people with advocacy messages igniting awareness and inspiring citizen-led actions. TI-Kenya's [Advocacy and Legal Advice Centers](#) (ALACs) directly reached 1,154 Kenyans with free, confidential legal advice. From Nairobi to Kisumu, Mombasa to Eldoret, we have been helping citizens take action, report corruption, and claim their rights—whether in person, by phone via a toll-free line, or email. With every consultation, we are enhancing access to justice, one legal step at a time.

In an effort to promote ethical values, norms, and behavior among citizens while empowering them to demand integrity and hold leaders' accountable, TI-Kenya conducted the 2024 National Integrity Actions Awards recognising individual acts of integrity by people who have made significant contributions towards promoting integrity, transparency, and accountability. Additionally, TI-Kenya held the people's anti-corruption summit convened under the theme "Effective Whistleblower Protection Mechanism: A Critical Tool in the Fight Against Corruption", bringing together over 300 participants drawn from the civil society, government, private sector, religious sector, political class, development partners, civic action groups, and citizens including men, women, youth, and persons with disability.

As a complementary advocacy mechanism, TI-Kenya uses public interest litigation (PIL) and administrative petitions to safeguard Chapter Six of the Constitution on leadership and integrity and to push for policy and legislative changes at national and county level. During the year, we intensified the fight for integrity in the

courtroom with five public interest litigations and tens of memorandums were submitted for action having most of our recommendations considered. We continue to increase advocacy for the enforcement of anti-corruption laws, policies, and institutional frameworks through targeted advocacy efforts.

Natural Resource and Climate Governance (NRCG)

In 2024, TI-Kenya advocated for transparency and inclusivity in Kenya's mining sector, ensuring that communities in resource-rich regions benefit equitably. Through community dialogue forums, capacity-building workshops, and advocacy initiatives, we empowered local stakeholders to engage in decision-making processes, demand accountability, and monitor mining activities. By addressing human rights concerns, promoting adherence to environmental standards, and advocating for gender-responsive policies, we fostered a more transparent, inclusive, and sustainable mining industry that prioritises the welfare of affected communities.

The Turkana Artisanal and Small-scale Miners (ASM) were trained in the utilisation of the Uwajibikaji Pamoja and Action for Transparency (A4T) digital platforms to promote effective advocacy and resource monitoring. Additionally, in collaboration with Homa Bay County partners, we supported the community of Homa Bay to take part in public participation across the eight sub counties with the communities submitting their petitions on targeted climate change actions to the County Government for consideration. During the year, we hosted the Climate Governance Convening with the Parliamentary Caucus on Climate Change which

*“To tame corruption in Kenya, measures must be taken to enhance **transparency, strengthen oversight, and foster a culture of integrity** within the criminal justice system.”*

Sheila Masinde

focused on enhancing the understanding of lawmakers regarding transparency and accountability in climate finance, a critical component in addressing climate change. The engagement provided an opportunity for parliamentarians to advance discussions on climate-related policies and illicit financial flows.

Public Finance Management (PFM)

During the year, in Public Finance and Management (PFM), TI-Kenya sought to promote a culture and practice of ethics, integrity, and accountability in public finance administration and contribute to efficient, effective, and accountable public revenue generation and expenditure. To this end, TI-Kenya, continued to drum for transparency in corporate governance to combat corruption and illicit financial flows, advocating for compliance with international standards.

To this end, TI-Kenya conducted targeted capacity strengthening with state and non-state actors in the regional blocs, multi-stakeholder advocacy engagements, strategic partnerships and targeted dissemination of knowledge products. Strategic efforts on advancing beneficial ownership included promoting the implementation of beneficial ownership legislation, emphasizing the need for companies and Limited Liability Partnerships (LLPs) to disclose their beneficial owners as required by the Companies Act and the Limited Liability Partnerships Act.

Additionally, to enhance public knowledge and to raise salience on tax incentives among policy members,

“ To this end, TI-Kenya, continued to drum for transparency in corporate governance to combat corruption and illicit financial flows, advocating for compliance with international standards”

TI-Kenya has been conducting sensitization forums across the six regional economic blocs with key PFM knowledge products disseminated including the [The Unequal Harvest – Tax Incentives & The Fragmentation of Kenya’s Economy; Bridging the Divide- Can Kenyan policies tackle income inequalities;](#) and [The Disparity Equation – A Comparative study on tax incentives and economic inequality in Kenya’s Regional Blocs.](#)

Institutional Development

Institutional Development, being the cross-cutting strategic pillar, continued to strategically support TI-Kenya to efficiently, effectively, and sustainably discharge its mandate. Through Institutional Development, we have promoted sustainable approaches in Planning, Monitoring, Evaluation, Research, and Learning (MERL); strategic communications and advocacy. TI-Kenya continues to thrive in the generation and dissemination of quality knowledge products for evidence-based decision making while championing the fight against corruption.

We extend our gratitude to all our development partners who significantly supported our interventions and stakeholders in the public and private sectors, CSOs, faith-based institutions, academia and the public that supported TI-Kenya’s initiatives

4.0

Analysis of operating environment

In 2024, Kenya experienced multiple issues ranging from significant alignments in the political and legislative frameworks, high cost of living, high profile corruption cases, drought and famine, floods and health service provision challenges. Informed by these events, TI-Kenya aligned most of its interventions ensuring targeted response to the operating context.

The period experienced nationwide protests sparked by the passing of the Finance Bill 2024 by Parliament. The Act's provisions, including increased taxation measures, provoked nationwide outrage as citizens demanded greater transparency in public debt management and effective solutions to the surging cost of living. The protests were characterized by mass demonstrations and marked a turning point in Kenya's political climate. In response to public discontent, Kenya's President William Ruto announced the withdrawal of the Finance Bill and dissolved his cabinet, later naming a new Cabinet that included some of the Cabinet Secretaries that had been dismissed.

Another significant development in 2024 was the impeachment of Deputy President Rigathi Gachagua. The impeachment process, initiated by Parliament, was driven by allegations of abuse of office, corruption, and failure to align with the administration's broader governance agenda. The impeachment proceedings were highly contentious and drew widespread public and political attention. Ultimately, the Deputy President was removed from office, marking a pivotal moment in Kenya's political landscape.

On the 12th of September 2024, the president launched the Open Government Partnership (OGP) National Action Plan five (NAP V) 2023 – 2027. During the launch, the president reiterated his support for the OGP reforms, and committed to continue engaging the multistakeholder forum members in working towards the reforms. The NAP V, through the Beneficial Ownership (BO) cluster that is co-convened by TI-Kenya and the Business Registration Service, seeks to enhance transparency

in ownership of legal persons and arrangements with a view to improving public procurement processes, strengthening the public finance architecture and enhancing public accountability processes.

Key areas of focus for this phase include ensuring that the BO register is interoperable with other government registries and databases to enhance interagency cooperation. This will also leverage existing data in the said databases to verify BO information. Additionally, it is expected that sustained awareness creation campaigns amongst individuals and business community players will enhance compliance to the laws. Ultimately, advocating for an open register that will work towards enhancing citizen oversight on public finance management processes.

In 2023, TI-Kenya, and other Petitioners, filed a petition challenging the constitutionality and the legislative process of the Finance Act 2023 at the High Court, which initially declared it unconstitutional. This petition proceeded until the Supreme Court, alongside other 11 consolidated petitions as SC Petition Nos. E031, E032 &

“Another significant development in 2024 was the impeachment of Deputy President Rigathi Gachagua.”

E033 of 2024. In 2024, the Supreme Court, in favor of TI-Kenya and the other petitioners, declared the Finance Act 2023 as unconstitutional in its entirety, posing a big win for TI-Kenya. On the other hand, the Supreme Court, in its judgment, emphasized the necessity for Parliament to establish a legislative framework to operationalize the constitutional requirement of public participation. In line with this directive, Parliament initiated the drafting of the Public Participation Bill, 2024, to which TI-Kenya contributed by submitting a

¹https://www.opengovpartnership.org/wp-content/uploads/2024/01/Kenya_Action-Plan_2023-2027_December.pdf



comprehensive memorandum with recommendations aimed at strengthening the Bill.

Additionally, the withdrawal of the high-profile corruption cases by the ODPP during this period, diluted the efforts in the fight against corruption. In response, TI-Kenya, alongside other petitioners, has taken a proactive stance by filing a petition (E538 of 2023) aimed at setting a precedent for holding individual prosecution counsels personally accountable in instances where accused persons may seek compensation for malicious prosecution.

The Petition mentioned herein seeks accountability for alleged prosecutorial misconduct in the Kshs 63 billion Aror and Kimwarer dams' case (R v Henry Rotich & Others, Milimani CMC Anticorruption Case No 20 of 2019), where the prosecution failed to call witnesses, resulting in the acquittal of the accused persons. Through this petition, TI-Kenya and the other CSOs aim to hold the prosecution counsel personally liable for potential damages due to malicious prosecution, which could further burden the public finances. The matter is still ongoing in court.

“Additionally, withdrawal of the high-profile corruption cases by the ODPP during this period, diluted the efforts in the fight against corruption”

In line with the operating environment, through our Action for Integrity strategic plan, TI-Kenya continues to advance strategic interventions on advancing positive social behavior change, public interest litigation, joint multi-stakeholder advocacy engagements in turn promoting access to justice, citizen and leadership integrity, access to justice, public services and aid resources. Through this targeted engagements, TI-Kenya has remained progressive in championing for integrity, accountability and transparency in both public and private spheres.

5.0

Detailed achievements under strategic focus areas

1. Citizen Demand and Oversight

This strategic area focusses on concerns around inadequate enforcement of constitutional and legal provisions on leadership, integrity, and anticorruption, normalization of corruption at individual and societal levels.

Below is a highlight of the strategic intervention under the Citizen Demand and Oversight(CDO) aligned to the Action for Integrity Strategic Plan: -

CITIZEN (INDIVIDUAL) AND LEADERSHIP INTEGRITY

The citizen (individual) and leadership integrity strategy seeks to promote ethical values, norms, and behavior among citizens and support citizens to demand for integrity and hold leaders accountable.

To this end during this period, TI-Kenya held the following key engagements: -

i) 2024 National Integrity Actions Awards

TI-Kenya through the implementation of its 6-year strategic plan (2022-2028) dubbed “Action for Integrity” seeks to promote ethical values, norms, and behavior among citizens and support citizens to demand integrity and hold leaders accountable. TI-Kenya’s Action for Integrity plan draws inspiration from the Constitution on National Values and Principles of Governance (Article 10) and Chapter 6 on Leadership and Integrity. To promote the continued application

and implementation of integrity as envisaged under the strategy and the Constitution of Kenya 2010, TI-Kenya recognized individual acts of integrity by people who have made significant contributions towards promoting integrity, transparency, and accountability through the 2024 National Integrity Actions Awards.

The National Integrity Actions was held on 9th December 2024 in Nairobi. The five award categories included the Uzalendo Integrity Award; The Whistle-blower Integrity Award; The Leadership Integrity Award; the Transparency Integrity Award and the Judiciary Integrity Award.



ii. Peoples Anti-Corruption Summit

On 8th July 2024, TI-Kenya organized the 2024 People's Anti-Corruption Summit in partnership with Kenya Christian Professional Forum (KCPF) and anti-corruption actors under the National Integrity Alliance (Inuka Kenya Ni Sisi, Mzalendo Trust, TISA, and KNHRC) to commemorate the Africa Anti-corruption Day Marked on 11th July every year. This significant event in TI-Kenya's calendar was held at the Ufungamano House, Nairobi County. The summit brought together over 300 participants drawn from the civil society, government, private sector, religious sector, political class, development partners, civic action groups, and citizens including men, women, youth, and persons with disability. Convened under the theme "Effective

Whistleblower Protection Mechanism: A Critical Tool in the Fight Against Corruption" the event commemorated and celebrated corruption whistle-blowers and had forward-looking discussions that proposed the next legal steps that could be institutionalized to protect whistle-blowers in Kenya.

The event was graced by Mr. Joseph Kimani from the Royal Danish Embassy to Kenya, Ms. Sheila Roquette, USAID Deputy Mission Director, Busia Senator Okiya Omtatah, and Ms. Faith Odhiambo, the Law Society of Kenya President, who all underscored the importance of whistleblowers in ensuring a corrupt-free society. The summit rallied citizens and Kenyan leadership to support efforts to strengthen public accountability.

iii. #StandingUpForIntegrity

This year's Integrity Walk was nothing short of iconic! Celebrating TI-Kenya's 25th Anniversary, the walkathon brought together thousands of Kenyans in a powerful show of unity against corruption. With the theme "Standing Up for Integrity" it was more than just a walk—it was a movement, sparking bold conversations on accountability and transparency. From the energetic crowds to the inspiring messages, 2024's walk set a new benchmark for grassroots advocacy.²



iv. Co-creation of anti-corruption messaging and content

The integration of activism and the co-creation of content by creators is emerging as a powerful strategy to combat corruption in Kenya. This approach leverages the creativity of artists and content creators to engage the public, raise awareness, and foster dialogue around corruption issues. Activism combines art and activism, using various artistic expressions to challenge social injustices, including corruption. To this end, TI-Kenya engaged 3 groups of creative youths and activists from Nairobi, and Mombasa on leadership and integrity issues to employ mediums such as music, visual arts, and performance to critique corrupt practices and advocate for accountability to bring about "UTU" within the public spaces. A total of 45 creatives were engaged across the 2 counties. Through the engagement, the creatives who include graphic designers, animators, cartoonists, musicians, poets, satirists, and spoken word artist were empowered on contemporary leadership and integrity issues in Kenya. As a result, the creatives have integrated anti-corruption work in their artistic work, to spur behavior change hence drawing the attention of citizens and duty-bearers



²Watch highlights of the Integrity Walk on our YouTube Channel

To further support creative youths, TI-Kenya held a Creatives for Integrity Competition in September 2024 which attracted a total of 43 creative youths from Mombasa, Uasin Gishu, and Nairobi. The competition sought to encourage youthful creatives to develop and submit artistic content on leadership and integrity issues using various art forms including cartoons, visual art, music, and poetry among others.

The top three teams were selected for awarding and public recognition during the award ceremony held on 9th December 2024 during the commemoration of the International Anti-corruption Day held at Sarova Panafric in Nairobi where various speakers observed that effective anti-corruption messaging must be relatable and engaging. By using humor, satire, and



storytelling, activists can communicate complex issues in an accessible manner. The combination of activism and co-created content fosters a broader movement against corruption.

ACCESS TO PUBLIC SERVICES AND AID RESOURCES

In line with the Action for Integrity Strategic Plan, the objective of this strategy pillar is to contribute to enhanced access to responsive high quality public services and aid resources with the expected outcomes being: -

- » Citizens demand their rights and hold duty bearers accountable for the delivery of quality services.
- » Increased resource allocation to services prioritized by citizens.
- » Increased access to responsive, timely, and high-quality health, education, WASH, and humanitarian aid services.

In effort to advance above, TI Kenya contributed to the following:

i. Reduced Corruption in the health sector

In 2024, through the [USAID-funded USAWA Program](#), TI-Kenya intensified efforts to combat fraud, waste, and abuse in Kenya's healthcare sector. By enhancing transparency, promoting accountability, and advocating for stricter enforcement of healthcare regulations. We empowered citizens to demand better healthcare services and safeguarded public resources in the healthcare sector. Our work focused on strengthening healthcare leadership, governance, financing and commodity systems in the health sector at the county level to increase transparency, accountability and participation; and improve enforcement of relevant laws, policies and procedures, thereby ensuring equitable and efficient delivery of services to all Kenyans.



Photo/TI-Kenya: Engaging stakeholders in Kakamega County to monitor the use of healthcare resources

ii. Increased civilian oversight in county and national budget making processes

The citizens issuing statements/holding press briefs on the gaps in the 2024/2025 county budget in Kakamega [skewed allocations, stalled projects [see video below on concerns raised by citizens⁴ . The

was because of enhanced citizen engagement in the budget making processes through demanding for access to information and better public participation. Additionally, the Kakamega citizen through the social accountability champions on 15th February during a public participation forum in Lurambi on the 2024/2025 CFSP, called out on the County Government on access to information.⁵

⁴https://www.youtube.com/watch?v=dtcqS5VtJi4&ab_channel=PalmaWaVasho

⁵<https://youtu.be/KFQStyh9Ys8?si=nwc9lhJGIX7awoD8>

⁶https://x.com/griffin_murumba/status/1758237450281836653?t=crJJFH4AWesif0flgXb0A&s=08



Memorandums submitted to Counties

Some of the memorandums submitted during the period include:

- » A memorandum on the draft 2024 budget policy statement for the medium-term expenditure framework FY 2024/25-2026/27 Budget. Thirteen of these comments were successfully incorporated into the final documents. One of the comments which was considered was the construction of the road from Mamboleo Junction to Miwani that has stalled for over 7 years.
- » Submitted memoranda on the priority issues affecting TVETs at the county level during the development of the County Fiscal Strategy Paper (s) stage that occurs annually in the month of February as follows; Kisumu County – 9th February 2024; Siaya County – 9th February 2024 and Kakamega County – 15th February 2024.
- » Supported the drafting of the memorandum by the Kakamega County Disability Caucus on the priority areas of concern affecting Persons with Disabilities which was submitted to the County Government of Kakamega on the 15th of February 2024.
- » In collaboration with the Bungoma Disability Empowerment Network, TI-Kenya drafted and submitted a memorandum on the priority issues affecting persons with disability in Bungoma County alongside recommendations to the issues to the County Government of Bungoma on the 14th of April 2024. Through this, The County Assembly passed the Bungoma County Disability Mainstreaming Policy that seeks to address some of the issues raised in the memorandum. [the passing came after the commitment by county executive and the deputy governor to lobby for the passing of the Policy during the roundtable stakeholder meeting held on 13th and 14th May 2024.
- » Enhanced awareness of citizens (marginalized groups) on their land rights through awareness creation and capacity strengthening.

ACCESS TO JUSTICE

The objective of this strategic pillar is to increase access to appropriate/effective redress mechanisms for victims of corruption-related injustices through:

- » Increased reporting of corruption cases.
- » Expeditious and suitable resolution of corruption-related cases/ injustices
- » Increased enforcement of anti-corruption laws, policies, and institutional frameworks

Increased reporting of corruption cases

» Provision of corruption reporting tools

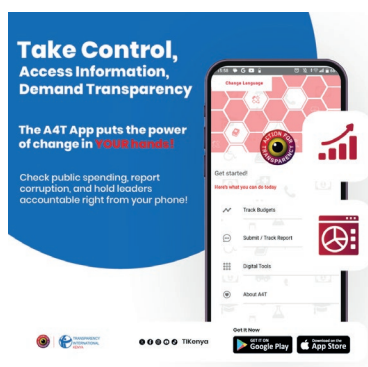
To enhance access to justice; and promote citizen efforts in reporting on corruption cases while progressively harvesting citizen actions on anti-corruption efforts. To this end, TI-Kenya provides corruption reporting

tools for citizens to report incidents of corruption, raise complaints on service delivery as well as digital platforms where citizens can access public information regarding public resources accountability.

These tools include: -



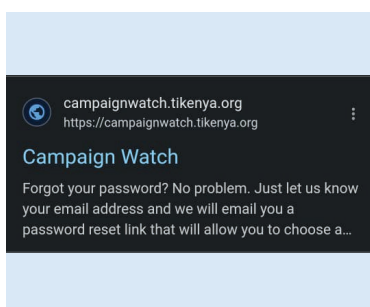
Uwajibikaji Pamoja:
<https://haipcrm.com/>



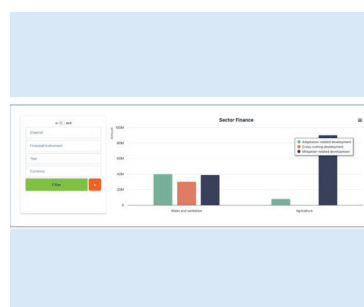
Actionfor Transparency (A4T)
<https://actionfortransparency.org>
(app available on play store and app store)



Public Audit:
<http://publicaudit.tkenya.org/>



Campaign Watch:
<https://campaignwatch.tkenya.org/>



Climate Finance Watch
<https://climatefinancewatch.tkenya.org/>

During the period, the anti-corruption digital tools were expanded and updated including system enhancements to Uwajibikaji Pamoja platform and A4T app. Training user manuals developed in both English and Kiswahili languages with 620 user manuals and 1240 brochures produced and disseminated. The capacity of 369 citizens including CSOs, Journalists, women, youth, PWDs, Health Accountability Champions and climate change champions in 11 Counties on utilization of the

corruption reporting tools was strengthened. There was a total of 245 downloads of the tools with a total of 149 reports being received during the period. At least 20 cases have been scaled up for action with 7 being referred to the relevant oversight bodies and/or resolved during the period. Efforts to ensure progressive deployment and utilization of the digital tools have been put in place through integration of activation forums and engagements with other organizational undertakings

» Provision of free legal aid and assistance to citizens.

TI-Kenya has established regional offices in four cities in Kenya (Nairobi, Kisumu, Eldoret and Mombasa) to extend the reach of the programmatic activities of the organization to 22 counties across the coastal, western and north rift region of Kenya. These offices, called Advocacy and Legal advice Centers (ALACs), also offer legal advice services to clients in need of pro bono legal aid services.

During the reporting period, a total of 822 cases were reported as compared to 399 last year. The breakdown of the cases are as follows; The number of women who reported cases [433] is higher as compared to 389 men) with most of the cases reported pertaining to land disputes (495). At least 545 of the reported cases have been successfully dealt with and 149 cases referred to our referral network partners for further action. Additionally, the ALACs supported in the collection of 46 high level adjudicated corruption cases in the country, extraction of case data for trend analysis, and upload on the African Anti-Corruption Database (TRACE database).



“During the reporting period, a total of

822
cases

were reported”

Expeditious and suitable resolution of corruption-related cases/ injustices.

» Strategic Public Interest Litigation

Public Interest Litigation (PIL cases) are legal cases that address issues of significant public importance, particularly those affecting disadvantaged groups. The primary aim of PIL is to bring about social change through legal action, often by challenging existing laws or practices. The PIL seeks to reform legal rules, enforce existing laws, or clarify public norms, with the goal of improving social conditions or advancing justice. As a

complementary advocacy mechanism, TI-Kenya uses PIL and administrative petitions to safeguard Chapter 6 of the Constitution and to push for policy and legislative changes at national as well as county levels.

In this respect, the organization was involved in the following PIL cases.





Spencer Sankale Ololchike Vs Maasai Mara University and TI-Kenya & 2 Others (ELRCPET/E097/2021),

To strengthen accountability through whistleblowing, TI-Kenya was enjoined in a case filed by a whistleblower in the Court of Appeal, after he was dismissed from his position at Maasai Mara University after whistleblowing on abuse of office and financial misappropriation by the university leadership. In the case, TI-Kenya raised public interest issues on the victimization of whistleblowing and anticipates that the court's decision will be instrumental in providing jurisprudence to enhance the protection of whistleblowers in Kenya. **The Judgement was delivered on 11th July in favor of the petitioner⁶**



E022 of 2023 - Ferdinand Waititu case:

TI -Kenya in partnership with Law Society of Kenya (LSK) and Katiba Institute approached the High Court of Kenya to challenge the appointment of Ferdinand Waititu (Baba Yao) as chair of the newly created Nairobi Rivers Commission. The court, however, gave temporary orders barring Waititu from occupying public office. Because of this case, Waititu is out of office. Consequently, the file was closed and the matter dismissed by court in May 2024.



E004 of 2024 - Fredrick Mulaa vs ODPP, AG and Others (TI-Kenya enjoined as an Interested Party)

This petition challenges the withdrawal of corruption charges against a former Governor by the DPP following his nomination and subsequent appointment as Cabinet Secretary for the Ministry of Cooperatives. His nomination and subsequent appointment did not consider the fact that he had unresolved integrity issues, including the corruption charges that were unprocedural withdrawn by the DPP. The case, which was filed in August 2024, is still ongoing in court.



HCCHRPET/E397/2024 - Wanjiru Gikonyo & KHRC v AG & National Assembly (TI-Kenya is enjoined as an Interested Party)

This petition, which was filed in August 2024, challenges the process of Cabinet Secretary nominations and appointments, arguing that the principle of public participation was not observed by Parliament. Due to the nature of the petition and the heavy constitutional issues raised, a three-judge bench has been constituted to proceed over the matter. The case is still ongoing in court



Transparency International Kenya & Others versus ODPP & Others. HCCHRPET E538 of 2023

This petition, in which TI-Kenya is one of the Petitioners, seeks accountability for alleged prosecutorial misconduct in the Kshs 63 billion Arror and Kimwarer dams case (R v Henry Rotich & Others, Milimani CMC Anticorruption Case No 20 of 2019), where the prosecution failed to call witnesses, resulting in the acquittal of the accused. The petitioners aim to hold the prosecution counsel personally liable for potential damages due to malicious prosecution, which could further burden the public finances. The matter is still proceeding in court⁷.



HCPET E426 of 2024 - Wanjeri Nderu & 2 Others v Gabriel Gathuka Kagombe & Others; and 5 Interested Parties (TI-Kenya enjoined as an Interested Party)

The Petitioners challenged the 1st Respondent, Gabriel Gathuka Kagombe's, eligibility for his candidature, election, and tenure as a director of Theta and Ndarugu Tea Factory Company Ltd, a Zone 1 board member of the KTDA, and as Chairperson of KTDA Holdings, citing a conflict of interest as both a serving Member of Parliament and a state officer. Additionally, the 1st Respondent fails to meet the integrity standards required under Chapter Six of the Constitution, particularly violating Articles 10 and 73 due to this dual position. Additionally, the 1st Respondent still has pending integrity issues, including a murder charge related to the death of a boda boda rider, further questioning his suitability for his candidature. The petition seeks to bar the 1st Respondent's candidature based on the grounds above. This matter is still proceeding in court.

⁶Judgment Spencer Sankale.pdf

⁷TI & Others v DPP & Others - Petition.pdf



Increased enforcement of anti-corruption laws, policies, and institutional frameworks

During the period under review; TI-Kenya participated and contributed towards review/development of various anti-corruption laws/policies including:

Conflict of Interest Bill (National Assembly Bill No 12 of 2023)

TI-Kenya [actively opposed the amendments made to the Conflict of Interest Bill](#), 2023. When the Senate introduced amendments that gutted key provisions, including sanctions for conflicts of interest and EACC's authority to enforce them, we voiced strong opposition, because the proposals were a dangerous step back for anti-corruption efforts. Through persistent advocacy, we successfully influenced the National Assembly to reject these detrimental amendments, ensuring the bill retained its strength as a tool for accountability and good governance. TI-Kenya made submissions on the Conflict-of-Interest Bill (National Assembly Bill No 12 of 2023)⁸. Most of our proposals to enrich the Bill were taken up / agreed upon by the AG. This was however marred with challenges since the Senate decided to mutilate and water down the Bill when it was taken to the senate for consideration. Follow ups are ongoing with calls to National Assembly /President to reject the Bill as proposed by the senate.

<https://tikenya.org/2024/06/25/senate-conflicted-in-mutilating-conflict-of-interest-bill/>

National Access to information policy

TI-Kenya, submitted memorandum on TI-Kenya Memo⁹ on the draft National Access to Information Policy to the Ministry of Information, Communication and Digital Economy. **3 of our proposals were adopted and incorporated into the policy**¹⁰ thus contributing to policy change and influencing. The draft policy provides broad policy directions, priorities and tangible strategies in relation to access to information held by both public and private entities

Memo to the National Assembly on the Public Audit Amendment Bill 2024.

The Public Audit Amendment Bill sought to give effect to the Judgment in Constitutional Petition No 388 of 2016. To this end, TI-Kenya participated in the call for public participation for comments of the Bill and submitted a memo on 21st March 2024.

[memo. Public Audit Amendment Bill.pdf](#)

Memorandum on Anti-Corruption and Economic Crimes Act (Amendments) Bill 2023 to the National Assembly

The Anti-Corruption and Economic Crimes (Amendment) Bill, 2023 sought to amend the Anti-Corruption and Economic Crimes Act, and specifically, section 45 subsections 2(b) and 2 (c). TI-Kenya submitted a memo¹¹ done jointly with CSPEN on 14th March 2024, before the National Assembly's Justice and Legal Affairs Committee.

Memorandum to the State Department for Lands and Physical Planning on the Affordable Housing regulations 2024.

Parliament passed the Affordable Housing Act to provide a framework of the access to affordable housing and connected purposes. It led to the creation of the Affordable Housing Regulations Draft of 2024 in accordance with Sec 59(1) of the Act. As such TI-Kenya under the banner of the Coastal Land Non-State Actors Network submitted a joint memorandum to the Ministry of Lands, on 29th April 2024

⁸Report of the Consideration of the Conflict of Interest 2023(National Assembly Bill No.12 of 2023-1.pdf :

TI-Kenya Memo on the Conflict of Interest Bill 29.06.2023-1.pdf; AG Response to Stakeholder Comments conflict of interest Bill.pdf

⁹Submission Matrix - Transparency International Kenya on Access to information Policy.pdf

¹⁰Submission Matrix - Transparency International Kenya on Access to information Policy.pdf

¹¹TI-Kenya Memo on the Anti-Corruption and Economic Crimes Amendment Bill 2023.docx

Greater enforcement and adherence to Chapter 6 of the Constitution of Kenya 2010 and laws on leadership and Integrity

» Legislative Impact Assessment and Institutional Capacity on Anti-Corruption Report

TI-Kenya developed a report examining the effectiveness of Kenya's anti-corruption framework, focusing on the impact of key laws— such as the Ethics and Anti-Corruption Act, Anti-corruption and Economic Crimes Act, Anti-bribery Act, and the Leadership and Integrity Act— and the capacity of institutions tasked with implementing these laws. The research also examined the role of ethics and values in combatting corruption.

The report highlighted that while Kenya has good anti-corruption laws, weak enforcement due to loopholes and implementation delays hinder their effectiveness.

Challenges affecting institutions include resource mobilization, inter-agency cooperation, and overlapping mandates. Public confidence in the government remains low, but civil society and faith-based organizations play a significant role in promoting ethical leadership.

Key recommendations include legislative amendments to address legal deficiencies and align with international best practices, increased funding and cooperation for critical organizations, integrating ethics education into training curricula, and collaborating with non-state actors to raise ethical awareness. The report also emphasized the importance of citizen engagement and government transparency to enhance accountability and eradicate corruption.



The future of anti-corruption is digital, and the Youth are leading the charge

2. Natural Resources and Climate Governance (NRCG)

This strategic pillar deals with mis-governance of natural resources and environment; corruption; inadequate knowledge/ information; as well as non-transparent natural resources and climate governance processes.

The key objectives of the strategic result area include:

- » To contribute to greater accountability and transparency of natural resource and climate governance.
- » To enhance sustainable use and equitable sharing of natural resources.

Below is a highlight of the strategic intervention under the natural resource and climate governance (NRCG) aligned to the Action for Integrity Strategic Plan:

A. Responsible and sustainable governance of natural resources and climate finance

i. Advocacy on implementation of Mining (Amendment) Bill, 2023

TI Kenya and partners, in collaboration with the LNSA - National Land Non-State Actors Network, proposed key governance reforms in the mining and land sectors to enhance transparency and accountability. Through the Mining (Amendment) Bill, 2023, the multi-stakeholder forum advocated for redefining artisanal mining, strengthening compensation frameworks, shifting regulatory powers to the Mining Regulatory Authority (MRA), and integrating county governments into mining oversight. Follow-up actions are underway on the consideration of the submitted recommendations.

ii. Advocacy on review of the National Land Policy

TI-Kenya, in collaboration with other like-minded state and non-state actors, supported a review of the National Land Policy, leading to the submission of a memorandum with key recommendations to the Ministry of Lands and the National Lands Technical Working Group for consideration in the review of National Land Policy Sessional Paper 3 of 2009. These progressive targeted efforts aimed at improving governance structures, protecting community rights, and ensuring responsible resource management.

iii. Pre-COP 29

Transparency International in collaboration with the ForumCiv, African Women's Development & Communications Network (FEMNET), Christian Aid, AFRODAD, AMWA, and other civil society organizations (CSOs) convened a two-day pre-COP 29 hybrid event in Nairobi. This gathering brought together grassroots communities and leading voices from CSOs across Africa to build the capacities of CSOs on climate change and the processes of the Conference of the Parties (COP), with a focus on the discussions scheduled for

COP 29 in Baku, Azerbaijan. The event took place at a pivotal time, as countries and parties had established a New Collective Quantified Goal on Climate Finance (NCQG) in 2024, intended to replace the previous \$100 billion annual target. This new goal aimed at addressing the climate finance needs of developing countries, and COP29 was expected to solidify this commitment with clear timelines for action.

During this period, TI-Kenya in collaboration with Pan African Climate Justice Alliance (PACJA), Forum CIV, Christian Aid, FEMNET and AfrdoDAD hosted a hybrid pre-CoP 29 conference, in Nairobi, Kenya in October 2024 through which a communique on the African position on Climate Change developed and presented during the CoP held in November 2024, in Baku, Azerbaijan. The pre-CoP meeting agenda highlighted the need for responsive transparency frameworks to address the issues of transparency and accountability in climate finance reporting and Management. TI-Kenya had an opportunity to showcase CFWT as a digital innovation in improving transparency and accountability in climate finance reporting with regional stakeholders from Ghana and South Africa expressing interest in scaling CFWT beyond Kenya, which could inform future expansion efforts.

iv. Climate Governance Convening with Parliamentary Caucus

The Parliamentary Climate Change and Conservation Caucus (PCCCC-K), consisting of Members of Parliament, Senators, and representatives from the East African Legislative Assembly, participated in a climate governance capacity-building workshop in August 2024. This session, hosted in Naivasha, focused on enhancing the understanding of lawmakers regarding transparency and accountability in climate finance, a critical component in addressing climate change.



Climate Governance Convening with Parliamentary Caucus held in August 2024 in Naivasha.

The training emphasized key areas of climate governance, especially in relation to the Climate Finance Watch Tool, and provided an opportunity for parliamentarians from various political parties to engage in advancing climate-related policies. The discussions also centered on their role in mitigating climate risks and ensuring resource allocation for climate adaptation and mitigation is transparent and accountable. It resulted in drafting of the carbon market regulations and non-market approaches regulations. This is key as it aims at promoting community involvement and protection of community rights in carbon markets benefit sharing.

v. FLLoCCA Convention

As part of the WSF stakeholder engagement, TI Kenya took part in the FLLoCCA Convention was held at Maanzoni from December 16th to December 19th, 2024. The event brought together key stakeholders, including representatives from the National Treasury, the Ministry of Environment and Climate Change, and various county governments, to discuss critical aspects of climate action. Sessions focused on social accountability, environmental safeguards, grievance

redress mechanisms, and the FLLoCCA-CSO engagement framework. The meeting provided an opportunity for the stakeholders to explore mechanisms of promoting sustainable FLLoCCA CSOs oversight committees. The convention facilitated networking and dialogue to enhance transparency and accountability in the implementation of the FLLoCCA program

B. Greater transparency and equity in natural resources' benefit-sharing.

i. Environment and Land Court Conference

The Environment and Land Court (ELC), which bore the constitutional mandate to resolve disputes relating to the environment and land, held a Conference from 25th to 29th November 2024 in Uasin Gishu County, Eldoret, the venue of the conference, which was Moi University Annex School of Law. The theme of the Conference was 'The Role of the Courts in Remediating Climate Change Chaos: A Call for Distributive and Procedural Justice.' The ELC Climate Change Conference brought together various stakeholders and duty bearers to consider and deliberate on the impacts of climate change in Kenya, the efficacy of the adaptation and mitigation measures implemented by the Kenyan government, and the incorporation of a human rights perspective in Kenya's climate change discourse. These discussions aimed at collaboratively crafting comprehensive solutions, policies, and strategies on climate change, taking into account a diversity of voices and ensuring justice for all.

Participants discussed and advanced the work of all those concerned with issues of climate and environmental justice to promote distributive and procedural justice in Kenya and across Africa. The conference agenda entailed: Human Rights-Based Approach to Climate Change and Climate Justice; Interlinkages between Gender and Climate Justice; Climate Justice and Marginalized Communities; Climate Financing; Climate Adaptation and Resilience Building and Climate Change and Natural Resource Management. The Environment and Land Court (ELC) and stakeholders committed to ensuring equitable access to technology in procedural and distributive processes in order to facilitate a just transition through access to technology.



Environment and Land Court Conference in Eldoret, Uasin Gishu in November 2024

ii. NapSteering Committee Engagement

On September 24, 2024, the TI-Kenya convened a session with the National Steering Committee for the Implementation of the United Nations Guiding Principles (UNGPs) in Kenya. The specific objectives of the session were: To present the Human Rights Due Diligence Framework Initiative, to strengthen the stakeholders dialogue between the HRDD Champions and National steering committee on Business and Human Rights, and advocate for new commitments on HRDD that have the potential to deliver a wide range of Implementation of the National Action Plan on Business and Human Rights.

There was a buy in on the uptake of the HRDD toolbox with the stakeholders highlighting that the tool provides a prevention and mitigation of negative human rights consequences linked with a company's activities, goods, or services.



NAP steering meeting at Golden Tulip, Nairobi on September 2024

iii. Jukwaa la Uzidujaji 2024

TI-Kenya participated in the the Jukwaa la Uzidujaji 2024 conference which was a two-day engagement. The two days marked a defining moment in the ongoing conversation about the future of extractive sector in Tanzania as well as the East Africa Region. This gathering brought together a diverse group of stakeholders, including small-scale miners, civil society organizations, government officials, the private sector, and Members of Parliament, all united with a focus on transparency, governance, and accountability, the conference served as a critical platform for discussing solutions to the challenges facing the sector. At its core, the conference aimed to advance the mining sector through thoughtful dialogue on how to align resource extraction with social, environmental, and economic sustainability. The discussions centered on the need for effective regulation, increased transparency, and a commitment to long-term sustainability.



During the conference, the participating governments committed to following up with their respective agencies on concerted advocacy efforts aimed towards phasing out mercury in mining

iv. Incorporation of The Submitted Reviews on The Mining Act 2016 (Regulations and Amendments)

TI-Kenya and partners proposed amendments to the Mining Act, 2016, through the Mining (Amendment) Bill, 2023, to enhance transparency, accountability, and governance in Kenya's mining sector. The changes redefined artisanal mining to accommodate semi-automated operations, strengthened compensation frameworks for land use and damages, and shifted regulatory and licensing powers from the Cabinet Secretary to the Mining Regulatory Authority (MRA). The amendments also advocated for better representation of artisanal and small-scale miners in governance bodies, aligned mineral rights with community land laws, and integrated county governments into mining oversight, including monitoring compliance and managing aggregate minerals. These reforms aimed to balance national and county roles while ensuring responsible and inclusive mining governance.

v. Kenya Mining Investment Conference and Expo 2024

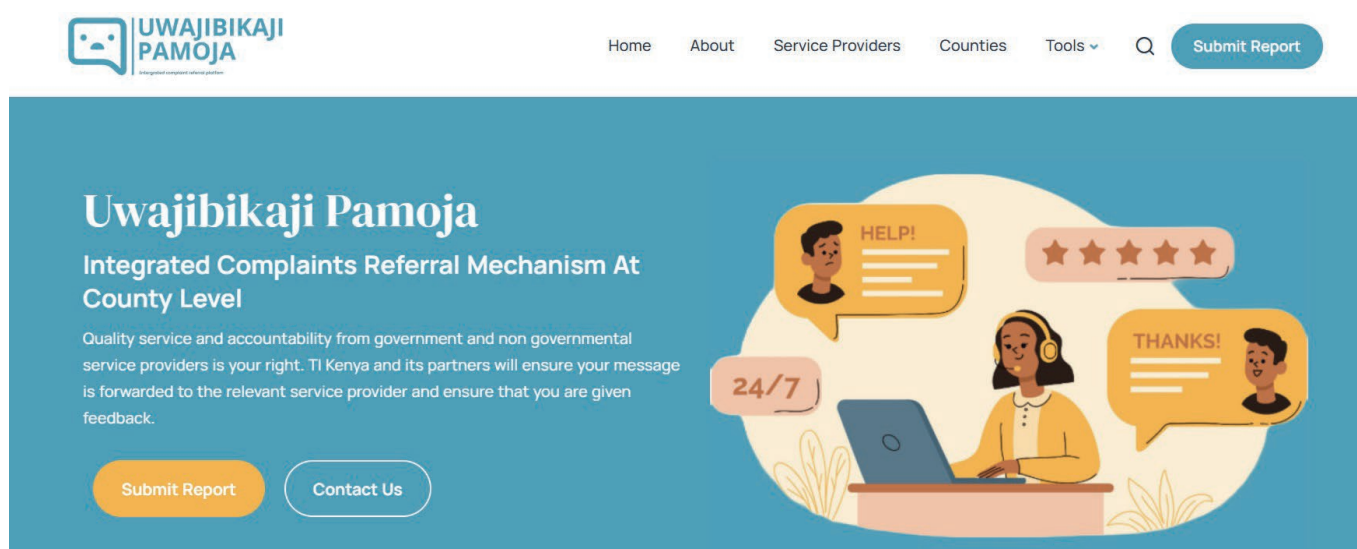
TI-Kenya participated in the Kenya Mining Investment Conference and Expo 2024 which was held between 26th-27th November 2024 under the theme "Exploring the role of critical minerals in strengthening foundations and unlocking business opportunities for a sustainable future. The conference brought together over 300 delegates, representing 10 countries across Africa, Europe, and Asia. The diverse attendees included policymakers, mining practitioners, academic researchers, community leaders, and private sector players. The event sought to position Kenya as a strategic mining investment & capital raising conference and exhibition that encapsulates the breadth of opportunities for Critical and Green Minerals. The Kenya Mining Conference and Expo also incorporated the latest technological and social innovations that can transform the industry & how critical minerals can play a crucial role in the countries and continents energy transition imperatives.

C. More citizens demand rights and hold duty bearers accountable to effective natural resource and climate governance.

i. Turkana ASM Uwajibikaji Pamoja Training

In 2024, the Turkana ASM were trained on how to use the Uwajibikaji Pamoja and Action for Transparency (A4T) platforms to promote effective advocacy and resource monitoring. On the first day, participants were introduced to the features of the Uwajibikaji Pamoja platform, starting with an overview of its role in fostering transparency. The participants were taken through the Information Center and showed how to

submit and track reports via both the web and SMS. Hands-on practice was provided to ensure they felt confident navigating the platform. The Q&A session helped address any questions, allowing participants to gain a clear understanding of how to make a report and feedback processing. As a follow-up to the training, a total of 26 cases were submitted by the stakeholders, illustrating positive reception of the digital tools by the stakeholders.



ii. Public Participation in Homabay County on Climate Change

TI-Kenya in collaboration with Homabay County partners supported the community of Homabay to take part in public participation forums across the 8 sub-counties from 1st October – 4th October. These included;

- » Alaw Rachuonyo Hall in Kendu Bay Town Rachuonyo South Sub-County;
- » The County Hall in Oyugis Town Rachuonyo East Sub-County;
- » The County Hall in Ramula Town Homa Bay Town Sub-County;
- » The CDF Hall in Kabunde Rangwe Sub-County; The County Hall in Rangwe Town Ndhiwa Sub-County; The CDF Hall in Ndhiwa Town Suba South Sub-County;
- » The DCC's Hall in Magunga Town Suba North Sub-County and the DCC's Hall in Mbita Town.

This presented the communities with an opportunity to submit their petitions to the County Government for consideration into the act.



3. Public Financial Management (PFM)

This strategic result area pays attention to transparency of public procurement processes; illicit financial flows; efficiency of public spending; and quality of financial oversight systems.

The key objectives of the strategic result area include:

- » To promote a culture and practice of ethics, integrity, and accountability in public finance administration.
- » To contribute to efficient, effective, and accountable public revenue generation and expenditure.

Below is a highlight of the strategic intervention under the public finance management (PFM) aligned to the Action for Integrity Strategic Plan:

D. Increased transparency and accountability in management and oversight of public resources.

During the period, the strategic result area (PFM), to enhance transparency and accountability in management and oversight of public resources; influenced the implementation of six policies and bills namely:

i. Enacting of the Siaya County PWDs Bill 2023

Through the regional Multi stakeholder engagements, TI-Kenya held a series of engagements in Siaya County in an effort to support actualization of the projects goal. One such activity was supporting the development of the Siaya County Disability Bill 2023 with Members of County Assembly of Siaya (Committee of Gender, Education, Youth Affairs and Social Services) in Siaya County. TI-Kenya, through the ALAC Western project team organized for a two-day engagement with members of the Siaya County Assembly on 13th & 14th November 2023 at Ciala Resort to review and finalize the Siaya County Persons with Disability Bill 2023.

The committee members sought to incorporate input gathered during public participation fora that had been held earlier across Siaya County and further contributions by stakeholders during the meeting from the meeting.

"TI Kenya also submitted a memorandum highlighting 5 key issues for amendment to the draft bill"

As a follow-up to the targeted engagements, the Committee members deliberated on the draft bill and suggested amendments to the draft bill during the two-day engagement. Thereafter, the Committee members proceeded to develop a committee report on the draft bill and thereby proposed the bill for approval to the

County Assembly. The County Assembly thereafter proceeded to approve the Siaya County PWD Act 2023 in December after which the Act was assented to by the Governor, HE James Orengo. The change was recorded in the official records of the Siaya County Assembly. The County Government of Siaya, through the Department of Education, Youth, Gender and Social Services are rolling out the implementation of the Siaya County PWD Act which is currently in force. This will ensure the realization of rights of persons with disabilities across Siaya County.

ii. Enacting of the Bungoma County PWDs mainstreaming policy

TI-Kenya, through the ALAC western office in collaboration with the Disability Empowerment Network, held a multi-stakeholder engagement in Bungoma County and developed a memorandum to the county executive of Bungoma requesting the fast-tracking of the Disability Mainstreaming Policy in Bungoma County. The memorandum was presented to the deputy governor who represented the governor at the meeting. In response to the memorandum, the Department of Gender, Youth, Culture and Sports picked up on the issue and submitted the draft policy to the County Assembly of Bungoma, which then proceeded to approve the Disability Mainstreaming Policy 2023. The Disability Mainstreaming Policy addresses most of the inequalities caused by PWDs in Bungoma County ranging from employment opportunities to funding opportunities for PWD groups. Bungoma Disability Empowerment Network was engaged in coming up with a memorandum aligns with the project's objective of fostering the contributions of marginalized individuals to public policy formulation and reducing income and wealth inequalities for PWDs through employment. The Disability Empowerment Network in Bungoma County continues to engage the Bungoma County government executive, through the Department of Gender, Youth, Culture and Sports. On the implementation and enforcement of the Disability Mainstreaming Policy 2023 in Bungoma County.

iii. Trans-Nzoia county Disability Mainstreaming policy 2024

TI-Kenya, through the ALAC regional office in the Rift Valley, held an engagement forum with relevant state and non-state actors to kick-start the establishment process of the Trans-Nzoia County Persons with Disability policy 2024. The multi-stakeholder engagement participants included civil society actors, women groups, county assembly committee and county government department of gender. The Trans-Nzoia county PWD policy is poised to address the rights and privileges of persons with disabilities (PWDs) in Trans-Nzoia County regarding employment aimed at enhancing their employment opportunities. The technical committee is still in the process of engaging stakeholders on fast-tracking the collation of inputs and validation of the Trans-Nzoia county PWD policy anticipated to be complete by Quarter two of 2025.

iv. Mombasa County enhanced PWDs access to public resources

Transparency International-Kenya engaged in targeted capacity strengthening, awareness creation and consultative meetings with the PWDs thematic CSOs in Mombasa County. The engagements focused on enhancing equitable access to public resources for PWDs, especially on the access to public buildings. The meeting aimed to follow up on a memorandum regarding public building accessibility that was initially submitted to the National Assembly in 2023 after a series of engagements with the Coast Civil Society PWD thematic CSOs. A further aim of the meeting was to build capacity for PWDs on policy matters. As a follow up to this activity, the coast region team and the PWDs thematic CSOs held discussions with the National Gender and Equality Commission (NGEC) regarding accessibility complaints to local public buildings leading to a commitment for advocating policy improvements. Additionally, our advocacy efforts related to Petition were highlighted in the senate and National Assembly. This is documented in the assembly Hansard, where the CS for Labour and Social Protection was put on the spot regarding grievances framed in the PWD thematic area. In addition, the aftermath of the NGEC meeting resulted

in a rapid assessment regarding access to buildings in Mombasa County. This allowed for the key assessment of the state of public buildings in Mombasa County on matters of access for PWDs, an activity that had not been taken into consideration before. Additionally, NGEC held a national X-Space conversation to advance discussions in response to a petition by PWDs in Mombasa on the state of accessibility in Kenya's built environment for persons with disabilities.

The PWDs CSOs thematic group in Mombasa County was further able to share 18 proposed recommendations aimed at amending the draft PWDs National Policy 2024. These recommendations largely focused on inclusivity, removal of discriminatory language, advocacy for better resources for PWDs, enhancement of habilitation and rehabilitation services, and ensuring public resources/Materials are PWD-friendly. This finalized memorandum of recommendations was submitted to the Ministry of Labor and Social Protection on May 22, 2024.

Subsequent targeted follow-up engagements with the NGEC, Senate, and National Assembly representatives are integral in ensuring that the impact of empowered communities in championing their rights, particularly in the context of resource allocation is sustained. This will play a key role in combating inequalities, amplifying PWDs/marginalized voices in the fight against inequalities and access to public resources through policy making and advocacy

v. Kiambu PWDs Bill Enactment

TI-Kenya engaged Kiambu county special interest groups on income and wealth inequalities. The interventions majorly focused to enhance the mainstreaming of the persons with disability within the Kiambu county governance planning, to improve their access to public services, improve public finance policy systems to promote their economic participation and empowerment of the Kiambu county disability people. As a follow-up to the engagements, the MCAs initiated a legislative process that sought to revive the PWDs bill which had stalled from the last assembly, and have it passed by the new assembly.

This was further followed with a courtesy call at the County assembly of Kiambu, where the team met with the Speaker of County Assembly, in company of the nominated member for the marginalized groups in Kiambu county assembly and the clerk for the assembly. The discussions centered on the role of County Assembly in conducting oversight role over fiscal practices especially in overseeing the award of tax waivers, fostering own source revenue by updating valuation roll to current market rate to reduce income and wealth inequalities, as well as on fast tracking Kiambu PWD bill legislation process. Consequently, the Kiambu County Assembly passed the PWD bill. The bill lays a framework for creation of a PWD board which will provide an oversight through which to channel PWD matters to the county government.

"The PWDs CSOs thematic group in Mombasa County was further able to share **18** proposed recommendations..."

vi. Operationalization of Machakos PWDs Act 2024

TI-Kenya engaged Machakos county special interest groups on income and wealth inequalities. The interventions majorly focused on enhancing the mainstreaming of the persons with disability within the Machakos county governance planning, to improve their access to public services, improve public finance policy systems to promote their economic participation and empowerment of the Machakos county disability people. The key agenda of the meeting entailed discussions on drumming for the operationalization of the Machakos county PWDs act 2016 that was passed but has not been implemented ever since.

As a follow-up to this, there was a consensus that the stakeholders, being led by the county executive

committee member for social and gender mainstreaming department, to initiate the process of operationalizing the act. This further was followed by a commitment from the Executive committee member, Mr John Kilonzo, that there will be financial allocation of about 6 million KES that will be allocated and ringfenced specifically to cater for the needs of PWDs. Following a short period after TI-Kenya engagements, there was a gazette notice operationalizing the PWDs board for the county and further indicating their role in enhancing the PWDs mainstreaming in the county. This has now provided for an avenue where the county leadership can be held accountable in implementation of PWDs reforms through the act, and through the board, who now directly oversee the implementation of programmes that support economic empowerment of the PWDs.

E. Improved accountability over public resources management

To contribute to this outcome area, during the reporting period, PFM enhanced citizen participation in the public finance management process through the following:

i. Okoa Uchumi Engagements

» Governance diagnostics report enhanced International Monetary Fund (IMF) engagement

Through the okoa Uchumi coalition, TI-Kenya engaged government on IMF policy agreements, especially on public debt and anti-corruption. Initially, IMF and government showed reluctance in acknowledging citizens and civil society concerns on public debt management, and anti-corruption commitments. Further, despite the fact that TI-Kenya and Okoa Uchumi CSOs made submissions for consideration during the agreement talks, IMF and government barely responded to the concerns raised. This caused TI-Kenya and Okoa Uchumi CSOs to issue a protest letter demanding the governance issues to be addressed and further to substantively incorporate CSOs in the agreement conversations. Key outcome from this is that Kenya has now made a request to IMF for a governance diagnostics assessment. The report will be a comprehensive assessment of governance issues that impact economic growth, stability, and public trust.

» Strengthened Public debt management oversight

TI-Kenya, through Okoa Uchumi coalition, Civil society parliamentary engagement Network (CSPEN), and the African Parliamentarian Network against Corruption engaged the government on public debt accountability. Through consistent efforts, the government has made a commitment to cut down on borrowings, implement fiscal consolidation and further, for the first time, the government produced an annual public debt management report.



“Through the Okoa Uchumi coalition, TI-Kenya engaged government on IMF policy agreements, especially on public debt and anti-corruption.”

» Finance Bill 2023:

Through REAP project engagements, TI-Kenya facilitated okoa Uchumi engagements and CSPEN on budget making process and the finance bills. TI-Kenya made finance bill recommendations to the amendments, budget proposals, and further capacity built the citizens to meaningfully engage the duty bearers on finance bill and budget making process. Through these efforts, Kenya has experienced a shift in citizen engagement with government during the last two years of public debt management cycle. Finance Bill 2023: In this year, TI-Kenya joined the petition to challenge the provisions of the finance bill 2023. The finance bill proposed the introduction of clauses which generally increased the cost of living, including the housing levy, increase of withholding tax. Copy of the petition: KHRC v NA - (Finance Act) Pet E228 of

2023. Some of the hashtags during the period included: **#GENZ #Rejectfinancebill2024** protests, that saw the president withdraw the finance bill 2024, as well as sack all the cabinet ministers. Under the Okoa Uchumi, TI-Kenya facilitated the review and development of a [MEMO](#) for submission to the Finance and planning committee during the public hearings. Alongside, TI-Kenya through the Okoa Uchumi submitted a protest Letter that enumerated the issues of increased taxation without accountability and the need for the government and parliament to reconsider the finance bill to be more citizen responsive. The continued public sensitization and engagements on the finance bill issues led to the reject finance bill protests, which finally forced the president to reject the finance bill, and further to fire the entire cabinet following the public pressure. The bill proposed taxation of women sanitary towels, introduction of taxation on motor vehicles at 2.5% on insured value, among other clauses that were punitive.

ii. Enhanced citizen engagement in the PFM processes, in the 6 regional blocks

TI -Kenya through the REAP project has been conducting sensitization forums across the 6 regional economic blocs to enhance public knowledge and to raise salience on tax incentives among policy members. The inception meetings conducted at the beginning of project implementations revealed that the public and grassroots CSOs had scanty or no information on which to engage the duty bearers and demand accountability on tax incentives. Even for national CSOs and both for national and county parliamentarians, there is still an acknowledge gap. The National Treasury, which is mandated by law to release tax expenditure reports annually, only released its first expenditure report in 2021 and a subsequent one in 2022, the report for 2023 is yet to be released.

iii. Enhanced evidence-based advocacy in Kenya:

Through the project interventions, TI-Kenya launched 2 reports which have been disseminated (Comparative study on tax incentives and Tax incentives as drivers of income inequalities) whose recommendations are being used to inform TI-Kenya 's advocacy efforts. During a parliamentary engagement TI-Kenya shared the report findings with African Parliamentary Network Against Corruption (APNAC) members who committed to pursue the matter with the relevant parliamentary committee. Similarly, the report findings and recommendation on the need to update outdated land valuation rolls in Kiambu County which favours the rich property owner's majority of which are men exacerbating income and gender inequality as it denies the county land rates at current market rate formed part of the discussion during a courtesy call the team did to the Speaker of Kiambu County Assembly. On the 5th September 2024, TI-Kenya in collaboration with the Nation Media Group hosted a Town Hall conversation with Live Audience participation, to engage on government accountability and transparency in its operations. The forum brought together international, regional and local decision makers and thought leaders with diverse expertise in industry, government, academia, civil society, youth, students, special interest groups and the diplomatic community. The townhall aimed to holistically have a discourse on economic inequalities in Kenya, and how poor public finance management has led to enhancement of the income and wealth inequality in Kenya. The townhall forum sought to provoke discourse, encourage dialogue, shape opinions and key policy directions, and offer practical solutions on key issues critical to the development and growth of Kenya. The Nation Media Group gave the event 360 degrees publicity across all its platforms – Print, Broadcasting & Digital.



F. Improved private sector (business) integrity and ethics.

In an effort to ensure improved private sector (business) integrity and ethics, TI-Kenya:

i. Held a Beneficial Ownership Cluster Meeting, 14th March 2024

As part of the efforts towards finalization of the OGP NAP V work plan, TI-Kenya in collaboration with the Business registration services convened the cluster members from civil society organizations, government agencies, and other relevant actors, in a meeting that aimed to construct a comprehensive work plan that aligns with the SMART criteria, ensuring effectiveness and efficiency in achieving the desired outcomes. Through collaborative efforts and strategic planning, TI-Kenya aims to leverage the OGP platform to drive meaningful reforms, enhance citizen engagement, and foster a culture of openness and accountability in corporate governance. During the meeting a key outcome from the meeting was the development of a clear implementation plan for the BO cluster. 1st BOT Cluster meeting 2024

ii. Finalized and published the [Beneficial Ownership law fact sheet](#)

TI-Kenya, with support of GFI, finalized and published the BO fact sheet. The fact sheet summarizes the Kenya BO law and provides an overview of the criteria used to identify a Beneficial Owner in Kenya, and further a summary on emerging and conflicting concepts within BOT. [BoT in Kenya Factsheet](#). This factsheet has been useful tool in the stakeholder capacity building engagements, and further a guide to the users of the BO regulations in the private sector, where they build their understanding on compliance requirements, and for the law enforcement officers.

iii. Conducted a media briefing on Kenya Grey listing.

On Friday 23rd February 2024, the Finance Action Task Force (FATF), the global anti-money laundering watchdog, decided to put Kenya on the grey list. The grey list refers to countries that have deficiencies in dealing with money laundering and terrorist financing. With Uganda removed from the list following recommendations of FATF's fifth plenary meeting, Kenya now joins Tanzania and South Sudan in the grey list. Kenya has again been put under high watch for not having strong safeguards against the flow of dirty cash, joining 23 other countries in a list of shame known as the 'grey list.' With support of the stakeholders in GFI, Cifar, TI-Kenya released a media brief that expounded more on the context for grey listing, as well as give an overview of the major implications that this brings to the country, and further on the key steps that the country should prioritized before the next evaluation process in order to be removed from the grey list.

[Media Brief 1](#) [Media Brief 2](#)

iv. Held capacity building workshop on Beneficial Ownership to the law enforcement officers' 30th May 2024 - (FRC, KRA, ARA, NGO Coordination board, EACC, Betting control and licensing board, CBK, DCI, ODPP).

The capacity building of law enforcement and government agencies regarding the significance of risk assessments and the utilization of beneficial ownership information in financial crime investigations. Highlighting the increasing complexity of money laundering and terrorism financing, it underscores the need for ongoing education, robust regulatory measures, and enhanced international cooperation. The initiatives discussed aim to improve the detection and prevention of illicit financial activities by leveraging beneficial ownership data and implementing comprehensive national action plans.

[Law enforcement officers engagement](#)

v. Held private sector capacity building on Beneficial Ownership Transparency 4th June 2024

Transparency International Kenya in collaboration with the Business Registration Service (BRS), focusing on sensitizing the private sector regarding Beneficial Ownership Law compliance and addressing Kenya's grey listing status. Held under the umbrella of the Open Government Partnership (OGP), the workshop underscored Kenya's commitment to transparency, accountability, and governance reforms. The event aimed to bolster private sector understanding beneficial ownership regulations, anti-money laundering, and anti-terrorism financing laws. The workshop also highlighted strategies to elevate Kenya back to whitelist status, reinforcing the collective effort towards a more transparent and accountable financial ecosystem. Private Sector Engagement Report



vi. OGP Week 2024: 27th May 2024 - 31st May 2024:

As the BO Cluster Leads in Kenya, TI-Kenya in collaboration with the GFI, and the BRS hosted a webinar on Beneficial Ownership (BO) Transparency. The webinar focussed to delve on the Hits and Misses in the Implementation in the implementation of the Beneficial Ownership Law in Kenya. This also was in efforts to mark the OGP week 2024 under the theme "Meet the moment. Raise ambition. Rise to the challenge". The panel discussion brought reflections from the Private sector (CIPE), the Law enforcement agencies (EACC), the Civil Society (NDI & GFI). The Webinar focussed to identify the successes Kenya has had in the implementation of the Beneficial Ownership law and the major gaps. This also provided for an opportunity of looking forward, in identifying the major focus areas for enhancing beneficial ownership law.

"...The panel discussion brought reflections from the Private sector (CIPE), the Law enforcement agencies (EACC), the Civil Society (NDI & GFI)"

vii. Kenya Judicial Academy training – Judges and Magistrates capacity building on usefulness of Beneficial Ownership information in adjudication of AML and corruption cases. 12 to 14th June 2024

The overall objective of the training was to enhance the capacity of the judicial officers, as identified that despite the pivotal role played by the Anti-Corruption Court in combating financial crimes, there has been a notable gap in training initiatives over the past year. This deficiency may hinder the court's full potential to navigate complex legal landscapes, interpret new legislation, and apply best practices in prosecuting cases related to money laundering, corruption, and economic offenses. Key outcomes from this activity included: commitment by the Judges to prioritize the AML/TF cases, and continued capacity building engagements, The commitment by the ODPP to review the current corruption charge sheets to add money laundering as a predicate offence.

viii. Africa Beneficial Ownership Standards advocacy 4th to 6th July 2024

TI-Kenya has been participating the transparency international advocacy engagements in pushing for establishment of Africa Beneficial Ownership standards. The multi-stakeholder forum brought together participants from 10 countries to discuss beneficial ownership transparency at national and regional levels. The key objectives of the meeting was to discuss how regional commitments on BO transparency could strengthen country efforts, as well as identify key strategies to support a regional BO standard at the African Union. The following key steps from this meeting included: a situational analysis on BO transparency in Africa as to be undertaken and recommendations developed for consideration by participants. Participants will also share available resources with the analysis team to support the development of a final report. Also, BO transparency champions will be identified and agreed upon to support the AU agenda item goal. Suggested champions at this stage are Ghana, Nigeria and Senegal.

"...The multi-stakeholder forum brought together participants from

10

countries to discuss beneficial ownership transparency at national and regional levels."

G. Research and analysis to promote ethical business practices.

One of the key strategic interventions of the PFM is to undertake research, analysis, investigation, and documentation on topical issues. During the period, the PFM strategic result areas scaled up the dissemination of the knowledge products below: -

- » Research into tax incentives driving economic inequality across six economic blocks in Kenya.
- » Fiscal analysis of government allocations and Illicit Financial Flows in the mining sector.
- » Comparative analysis of existing tax incentives and decision-making processes in Kenya across the six Economic Blocs in Kenya and where relevant, EAC region, to transpose learnings from neighboring countries.
- » Sector-specific assessment of how tax incentives benefit mining companies in Kenya to facilitate evidence-based advocacy around the award of tax incentives and formulation of policies that promote transparency and accountability in the mining sector.
- » Review of poverty eradication measures/ policies put in place by the various countries and how effective these have been in eradicating / reducing income inequalities.

The targeted recommendations from the knowledge products continue to be utilized in informing evidence-based decision making and responsive advocacy approaches. Additionally, the findings and recommendations of the research were utilized to promote adaptive programming practices.



4. Institutional Development

This strategic focus area seeks to build upon TI-Kenya's track record while further developing its internal capacities and sustainability.

The strategic objective aims at enabling TI-Kenya to discharge its mandate efficiently, effectively, and sustainably.

a. People, Culture and Governance

The People, Culture and Governance component is anchored on ensuring that; TI-Kenya attracts, motivates and retains optimal number of high-quality staff; the staff are highly productive (meets all set performance targets); TI-Kenya board is effective, diversified and strengthens its capacity; and TI-Kenya membership is vibrant and more engaged.

During the period under review, TI-Kenya: -

- I. Conducted targeted capacity building through the scheduled learning sessions, mentorship, peer to peer learning and dissemination of research findings in turn strengthening the areas of improvement.
- II. Enhanced the organization's people's engagement approaches including productive work environment, staff welfare, performance management and staff relations in an endeavor to attract, motivate and retain high quality staff.
- III. Held the scheduled quarterly board meetings to review and strengthen institutional governance processes.
- IV. Updated the TI-Kenya HR policy and manual to align with the current operating context and standard HR practices and procedures.
- V. Scaled up the implementation of Job evaluation and workload analysis undertaken in 2021 resulting to performance improvement to in turn contributing to strengthened institutional culture and identity.
- VI. Supported joint engagements in turn deepening the relations between board, staff, and other key stakeholders i.e. the 2024 integrity walkathon and TI@25 event.

b. Systems, policies and structures

During this period, TI-Kenya strived to ensure that the internal systems, policies, procedures and structures are geared towards promoting sustainable practices in the organization. In line with this, all the key policies and procedures were reviewed ensuring alignment to the operating context and adherence to all applicable statutory requirements. Appropriate measures were put in place to ensure progressive enhancement of

planning, monitoring, evaluation and learning, finance, procurement, human resources as well as enhanced ICT operations

c. Planning, Monitoring, Evaluation, Research and learning (MERL)

The Planning, Monitoring, Evaluation, Research, and learning (MERL) is a critical function in TI-Kenya that aims at improving the overall organizational performance by promoting greater transparency and accountability, effective resource allocation, and encouraging learning and data-driven decision-making. To promote this, TI-Kenya employs effective data management practices ensuring quality assurance and utilization of quality and credible data for evidence-based decision making.

During the period under review, TI-Kenya: -

- » Conducted targeted implementation of the detailed implementation plans anchored in the approved annual workplans in line with the Action for Integrity strategic plan.
- » Conducted the annual Review and Work Planning workshop to take stock of the implementation progress, challenges encountered, and lessons learned while planning for 2025 undertakings
- » Advanced organizational, planning, M&E and learning practices through organized institutional learning forums including learning sessions, programmes and staff meetings. The meetings were held on ad hoc, monthly, quarterly, biannual and annual basis.
- » Conducted progressive monitoring and periodic assessments of the programmatic and institutional undertakings ensuring alignment to the Action for Integrity strategic plan.
- » Disseminated results of the 2023 Corruption Perception Index (CPI) while advocating for responsive approaches in addressing corruption in Kenya.
- » Commenced production of 13 knowledge products anchored in the Citizen Demand and Oversight, Public Finance Management and Natural Resources and Climate Governance strategic areas. These knowledge products will be utilized for evidence-based decision making, citizen awareness, movement building and advocacy reforms.

d. Strategic Communications and partnerships

To enhance media engagement, boost visibility, and solidify TI-Kenya's presence in key spaces, the organization actively promoted its brand to align stakeholders with our vision of a corruption-free society. TI-Kenya amplified the anti-corruption agenda through **14 radio talk shows, 5 live TV interviews, and 9 press conferences** and media briefings, effectively reaching over 30 million citizens with critical messages on governance issues such as leadership and integrity, illicit financial flows, ethical business practices, and social accountability. Additionally, our monthly e-newsletters kept audiences informed and engaged in our ongoing anti-corruption initiatives.

We championed transparency and accountability by publishing 9 opinion pieces in leading local dailies, influencing public discourse on corruption-related matters.

Our digital advocacy efforts remained strong, with sustained anti-corruption campaigns across social media. During this period, our X account (formerly Twitter) saw 6 million engagements, with our following growing to 19.7K. Meanwhile, engagement on Facebook reached 13.4K, LinkedIn recorded 4.2K interactions, and our YouTube channel continued to expand its reach.

TI-Kenya also took part in key public outreach and awareness activities, including the 2024 Integrity Walk, which attracted approximately 2,000 participants, as well as significant observances such as the International Day for Universal Access to Information, Africa Anti-Corruption Day, International Anti-Corruption Day, and the People's Dialogue Festival. These platforms provided opportunities to educate the public on corruption and their role in combating it.

This comprehensive approach to strategic communications continues to strengthen our advocacy, ensuring that the fight against corruption remains a national priority.



"We championed transparency and accountability by publishing

9
opinion pieces
in leading local dailies"

6.0

Financial Management and Administration

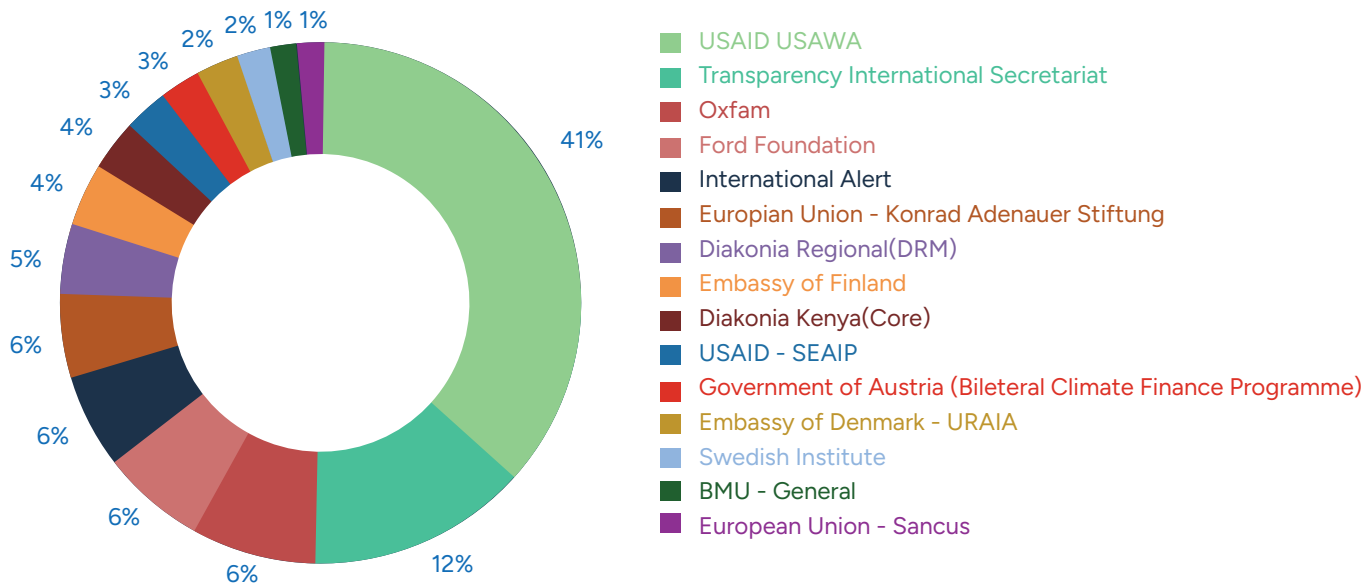


FINANCIAL PERFORMANCE ANALYSIS FOR THE FINANCIAL YEAR THAT ENDED ON 30TH SEPTEMBER 2024

1 RESTRICTED INCOME

Restricted grants	2024	2023
BMU - General	2,551,220.00	0.00
Embassy of Sweden - Diakonia Regional (DRM)	15,855,005.00	0.00
Embassy of Sweden - Diakonia Kenya (Core)	13,346,156.00	26,070,790.00
Embassy of Denmark - URAIA	6,999,975.00	8,916,364.00
Embassy of Finland	14,179,611.00	8,565,094.00
European Union - Konrad Adenauer Stiftung	18,612,204.00	0.00
European Union - Sancus	2,537,331.00	0.00
Embassy of Finland - International Alert	19,151,302.00	11,756,161.00
Ford Foundation	20,493,134.00	16,980,586.00
NORAD - Global Financial Integrity	0.00	6,998,976.00
Government of Austria (Bilateral Climate Finance Programme)	8,471,420.00	0.00
Oxfam	20,747,652.00	18,571,582.00
Others	0.00	7,098,154.00
Swedish Institute	6,208,688.00	0.00
Transparency International Secretariat	39,089,244.00	50,592,038.00
USAID – USAWA	136,191,111.00	0.00
USAID – SEAIP	10,570,635.00	0.00
	335,004,688.00	155,549,745.00

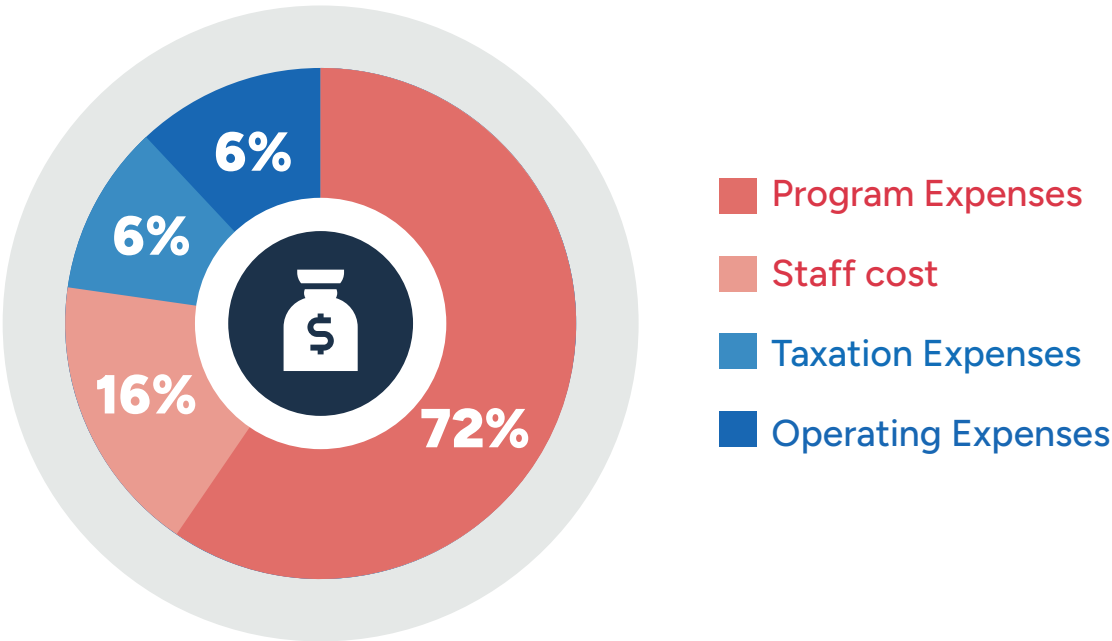
2 WHO SUPPORTED US



3 HOW THE FUNDS WERE APPLIED (KSH)

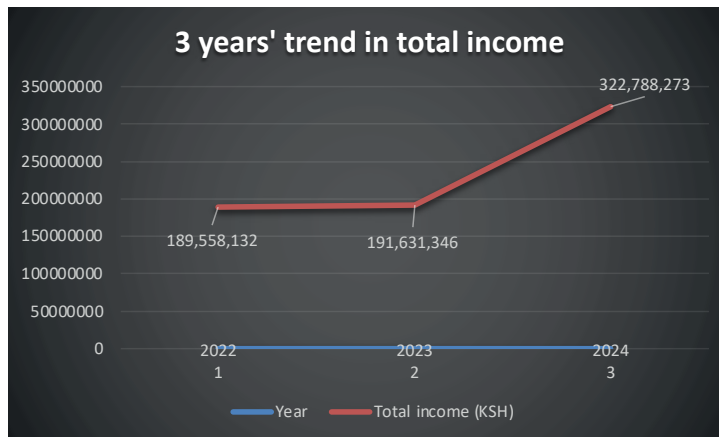
EXPENSES	Amount (Ksh)/ Percentage
Program Expenses	272,687.391.00
Staff Cost	58,402,940.00
Taxation Expenses	1,440,346.00
Operating Expenses	22,410,000.00
Total	353,500,332.00

HOW WE USED OUR FUNDS



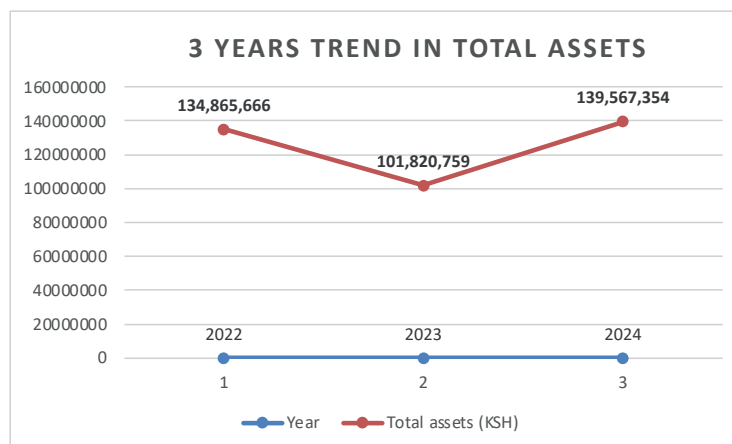
4 3 YEARS' TREND ON TOTAL INCOME AND EXPENSES

Year	Total income (KSH)
2022	189,558,132
2023	191,631,346
2024	322,788,273



5 3-YEAR TREND IN OUR TOTAL ASSETS

Year	Total assets (KSH)
2022	134,865,666
2023	101,820,759
2024	139,567,354





7.0

Success Stories

A WIN FOR CHAPTER 6 OF THE CONSTITUTION ON LEADERSHIP AND INTEGRITY

On 23rd January 2023 TI -Kenya in partnership with LSK and Katiba Institute filed a Notice of Motion under a certificate of urgency together with a main petition challenging appointment as Chair of Nairobi Rivers Commission of the former Kiambu County governor Ferdinand Waititu who was impeached by Kiambu County Assembly on corruption charges. This impeachment was upheld by the Senate on January 29, 2020. The same was further upheld by a three (3) Judge bench of the High Court on February 24, 2022, vide Petition No 29 of 2020 consolidated with Petition No 87 of 2020; Hon Ferdinand Waititu Babayao & another v the County Assembly of Kiambu & 4 others; Kiambu County Executive Committee (Interested Party).

"This case demonstrates TI-Kenya's efforts of advocating for accountable and transparent leadership in Kenya that is based on national values and principles of governance..."

The basis of the Petition was that Waititu's appointment was an affront to Chapter Six on Leadership and Integrity specifically article 75 (3) which prohibits persons dismissed or otherwise removed from public office from holding any other public office.

On 10th February 2023, High court issued conservatory orders barring Waititu from occupying the position as Chair or the Commission or any other state or public seat pending the hearing and determination of the substantive petition. Further, in 2024, after a yearlong without Waititu making appearance in the case every time it was mentioned. The case was considered withdrawn, and the court closed the file forever locking Mr. Waititu from ever occupying any state or public office.

This case demonstrates TI-Kenya's efforts of advocating for accountable and transparent leadership in Kenya that is based on national values and principles of governance enshrined under article 10 of the Constitution of Kenya which aligns with TI-Kenya's strategic plan dubbed "Action for Integrity" whose vision is a corruption free world through championing the fight against corruption by promoting integrity, transparency, and accountability in both public and private spheres.

JUSTICE AT LAST! A MIGORI WIDOW GETS JUSTICE THROUGH THE ALAC

TI-Kenya continues to champion the fight against corruption by promoting integrity, transparency, and accountability in both public and private spheres. TI-Kenya has established regional offices in four cities in Kenya (Nairobi, Kisumu, Eldoret and Mombasa) to extend the reach of the programmatic activities of the organization to 22 counties across the coastal, western and north rift region of Kenya. These offices, called Advocacy and Legal advice Centers (ALACs), also offer legal advice services to clients in need of pro bono legal aid services. In 2024, the ALACs, a total of 822 cases have been reported with most of the cases pertaining

"At least
545
of the reported cases
have been successfully
dealt with and
149
cases referred to
our referral network
partners for further
action"

to land disputes (495). At least 545 of the reported cases have been successfully dealt with and 149 cases referred to our referral network partners for further action.

One of such cases was a complaint received by the ALAC Western office from a widow residing in Migori County concerning ongoing threats from her in-laws aimed at disinherit her from her deceased husband's parcel of land. The client has endured multiple attacks resulting in damage to her property, as well as rape and sexual assault. Despite her repeated attempts to report these incidents to the police, no action was taken. The lack of response from law enforcement prompted her to seek legal advice from our office on how to address the situation and secure peaceful occupation of her parcel of land.

In an effort to promote access to justice, the ALAC office promptly responded by advising the client on the obligation of the state and all its organs to uphold, respect, protect, promote, and fulfill the rights and fundamental freedoms enshrined in the Bill of Rights. Furthermore, the officer emphasized the duty of police officers to aid the public in times of need, conduct thorough investigations of crimes, and apprehend offenders. Subsequently, the office took proactive steps by writing to the Officer Commanding Police Division (OCPD) to initiate action. The OCPD ordered the area chief to reprimand the culprit who destroyed the property, but the culprit managed to escape.

Following several weeks without progress in apprehending the perpetrator, the client revisited the Western ALAC office seeking further assistance. In response, the office escalated the matter to the Office of the Director of Public Prosecutions in the Nyanza region. A formal request was made for their assistance in advancing our client's pursuit of justice, specifically by obtaining our client's case file for prosecution.

Following the letter written by the ALAC office, the Office of the Director of Public Prosecutions in the Nyanza region proceeded to request our client's file, thoroughly investigated the matter, and subsequently prosecuted the culprit for malicious damage of property. The matter is currently in court.

EMPOWERING PERSONS WITH DISABILITY -ENACTMENT OF THE SIAYA COUNTY PERSONS WITH DISABILITY ACT 2024

The Transparency International Kenya in collaboration with the European Commission, is implementing a project dubbed Rallying Efforts to Accelerate Progress (REAP) – Africa Inequalities Initiative. This project aims to reduce income and wealth inequalities in Africa, particularly benefiting those who are most marginalized. To achieve this, the initiative will focus on the following interventions: generation of evidence; capacity building, awareness creation and targeted advocacy engagements.

In line with this, TI- Kenya in collaboration with relevant stakeholders advocated for the approval and enactment of the Siaya County Persons with Disability Act 2024. The process commenced with targeted support on the development of the Siaya County Persons with Disability Bill 2023 with Members of County Assembly of Siaya (Committee of Gender, Education, Youth Affairs and Social Services) in Siaya County. The committee members sought to incorporate input gathered during public participation fora that had been held earlier across Siaya County and further contributions by stakeholders during the meeting from the meeting. TI Kenya also submitted a memorandum highlighting 5 key issues for amendment to the draft bill.

“In line with this, TI-Kenya in collaboration with relevant stakeholders advocated for the approval and enactment of the Siaya County Persons with Disability Act 2024 ”

As a follow-up to the targeted engagements, the Committee members deliberated on the draft bill and suggested amendments to the draft bill during the two-day engagement. Thereafter, the Committee members proceeded to develop a committee report on the draft bill and thereby proposed the bill for approval to the County Assembly. The County Assembly thereafter proceeded to approve the Siaya County Persons with Disability Act 2024 in December after which the Act was assented to by the Governor, H.E. James Orengo. The change was recorded in the official records of the Siaya County Assembly. Attached find the link to the following documents; County Assembly Committee Report on the Act. The Siaya County Disability Act; Stakeholders

meeting held comprising the county executive, county assembly and stakeholders; Memorandum to Siaya County Assembly by Transparency International Kenya. Notably, all the suggestions floated by TI Kenya were adopted into the Siaya County Persons with Disability Act, 2024. The Act addresses the rights and privileges of persons with disabilities (PWDs) in Siaya County regarding employment aimed at enhancing their employment opportunities. This is key as it fosters meaningful engagements of marginalized individuals to public policy formulation and reducing income and wealth inequalities for PWDs through employment.

The County Government of Siaya, through the Department of Education, Youth, Gender and Social Services is rolling out the implementation of the Siaya County Persons with Disability Act 2024. This will ensure the realization of rights of persons with disabilities across Siaya County.

BUILDING A MULTI-STAKEHOLDER MOVEMENT FOR ACCOUNTABILITY IN THE HEALTH SECTOR

TI-Kenya with support from USAID under the United Society Against Fraud, Waste and Abuse (USAWA) Programme, brought together civil society, citizen networks, private sector, media and religious sector actors who were equipped to own, lead, and catalyze advocacy on reforms and addressing corruption in the Health Sector.

This was achieved through a consortium of organisation led by TI-Kenya convening CSOs, Inter-religious Council of Kenya (IRCK) convening the religious sector, Global Compact Network Kenya (GCNK) convening the private sector and Association of Media Women in Kenya (AMWIK) convening the media sector to jointly advocate for the curbing of fraud, waste and abuse of public resources in the Health Sector at national and county levels focusing on five counties, i.e. Kakamega, Nakuru, Isiolo, Mombasa and Kilifi.

This collaboration resulted in heightened engagements by the different stakeholders demanding accountability in the Health sector including within the Health Sector reforms that the Government had initiated with introduction of new legislations on primary health care, digital health, facility improvement financing and social health insurance.

IRCK activated existing County Social Budgeting Observatories (CSBOs) in Kilifi, Isiolo and Kakamega counties and established new ones in Mombasa and Nakuru in preparation for Electronic Social Intelligence Reporting (e-SIR) activities in the five counties. The reports from this exercise indicated inadequate health information systems that lack efficient feedback, and complaint reporting mechanisms to address procurement irregularities in the supply of drugs and medicines. The report also highlighted lack of correlation

on planned interventions to address insufficiency in infrastructure, diagnostic, equipment, drugs and other medical supplies as highlighted in the annual development plans against the community needs. Based on these reports, the health departments in the five counties are expected to develop an action plan to address issues arising from the exercise, which will be closely monitored by the community.

Private Sector engagements through GCNK convening of Health Sector Anti-Corruption Conventions in five counties resulted in increased awareness among the private sector stakeholders on the Kenya Code of Ethics for Business and encouraged collective action against corruption in the health sector. The local chapters of the Kenya National Chamber of Commerce and Industry (KNCCI) within the 5 counties agreed to integrate implementation of anti-corruption policies with the highest executive during their annual general meeting. Isiolo County participants committed to register a formal association for the private health sector facilities and pharmaceuticals in six months to advocate for compliance to business ethics within private health sector.

AMWIK, made significant strides in building the capacity of journalists to report on corruption, particularly within the health sector. By conducting targeted training sessions and fostering partnerships between media and county governments, AMWIK empowered reporters to uncover and spotlight systemic inefficiencies, fraud, and mismanagement in public health services. Notable outcomes include investigative stories such as “Ufisadi kwenye sekta ya afya” aired by TV Magharibi (YouTube link), and reports by The Coast Media on the deteriorating sanitation conditions in Kilifi and their direct link to morbidity and mortality (Story 1; Story 2). In Isiolo, AMWIK-supported journalists exposed critical issues such as the suspension of admissions at Isiolo Referral Hospital due to a nurses’ strike (Eastleigh Voice) and maternal care challenges (The Press Point). In Nakuru, coverage like the exposé by The Standard on financial irregularities in county spending (link) and AMWIK’s official launch of the USAWA program (Nax Today) highlighted the deepening collaboration between media and civil society in governance oversight.

“This collaboration resulted in heightened engagements by the different stakeholders demanding accountability in the Health sector ”

RESTORING ACCOUNTABILITY IN MOMBASA’S LARGEST REFERRAL HOSPITAL AND LEVEL IV HOSPITALS

Through advocacy efforts by Health Accountability Champions supported by TI-Kenya, the County Government of Mombasa appointed the long-awaited Coast General Teaching and Referral Hospital (CGTRH) board and Health Facility Management Committees for Level IV hospitals. This action contributes to TI-Kenya’s Citizen Demand Programme to advocate for enhanced access to responsive high quality public services in the Health Sector. Similarly, the action described also ensured Mombasa County adheres to legal requirements on putting up governance structures to oversee service delivery thereby safeguarding against maladministration of health facilities and ensuring continued and accountable service delivery to the residents of the County.

The background to this achievement is that, in August 2022, CGTRH and Level IV Hospitals in Mombasa County did not have a Board and management committees in place, thereby creating a governance vacuum. TI-Kenya recognized this gap and initiated efforts to advocate for the establishment of a health board for CGTRH, and all level 4 hospitals in Mombasa County. Furthermore, on the 7th – 9th August 2024, TI-Kenya participated in a technical strategic planning meeting for CGTRH, where we advocated, for the importance of the board in the running of the hospital. Additionally, we argued that the lack of a board was a violation of the Constitutional principles and legal requirements on transparency, accountability and good governance.

Building on this momentum, TI-Kenya’s health accountability champions in Mombasa prepared and submitted a petition to the Governor, H.E Abdullswamad Nassir, urging him to appoint all missing health boards in the county. The petition was delivered on September 13, 2024. On the same day, the County released a notice of appointment for several boards, including CGTRH and subsequently appointments to Level IV hospitals was done following advocacy engagements including a meeting with the County Executive Committee Member for Health, Dr Swabah Ahmed on 25th October 2024.

This success story underscores the transformative impact of the USAID USAWA Program in strengthening citizen engagement, creating platforms for advocacy, and driving systemic change. By empowering communities to raise their voices and follow through with strategic actions, the program not only helped restore governance at a critical health facility but also reaffirmed the power of participatory democracy in public health accountability.

THE PRICE OF TRUTH: HOW TI-KENYA FOUGHT FOR WHISTLE BLOWER SPENCER SANKALE

Spencer Sankale Olochike, a dedicated accountant at Maasai Mara University, never anticipated becoming a national figure. His commitment to integrity led him to uncover a massive embezzlement scheme within the university, where over KSh 177 million was allegedly misappropriated by top officials, including Vice-Chancellor Prof. Mary Walingo. This courageous act, which became known as the “Mara Heist,” set off a series of events that would profoundly impact his life. Following his whistleblowing, instead of being lauded for his bravery, Sankale faced severe retaliation. On June 17, 2021, the university council summarily dismissed him, accusing him of gross misconduct, including allegations of insolence and defamation. This action was widely perceived as a punitive response to his exposure of corruption, highlighting the precarious position of whistleblowers in Kenya.

In response to this injustice, a coalition of organizations rallied to Sankale’s defense. Transparency International Kenya (TI-Kenya), Amnesty International Kenya, and the Institute of Certified Public Accountants of Kenya (ICPAK) jointly condemned his dismissal. In a public statement dated June 22, 2021, they demanded his immediate and unconditional reinstatement, emphasizing that his termination appeared to be an attempt to intimidate a key witness in Corruption Case No. E002 of 2020 (Republic - V-s Professor Mary Khakoni Walingo & 4 others). They pledged full support for Sankale, including legal assistance to challenge the university’s decision.

In further response to the university’s decision to dismiss Sankale, the coalition supported him in filing E097 of 2021 Spencer Sankale Olochike v Maasai Mara University; Transparency International Kenya, Institute of Public Accountants of Kenya & Amnesty International Kenya (Interested Parties) [2021], a case on his unfair dismissal from the university seeking among other orders, a declaration that the summary dismissal of the Petitioner by the Respondent in retaliation of his whistleblowing role amounted to a violation of his rights under Article 236 of the Constitution as read with Section 65 of the Anti-Corruption and Economic Crimes Act, 2003. TI-Kenya provided legal expertise and advocacy, ensuring that Sankale’s case remained in the public eye and that pressure was maintained on the university to rectify the situation. This included being enjoined in the case as interested parties to support in following up the matter.

The collective efforts of these organizations culminated in a significant legal victory in July 2024. The Employment and Labor Relations Court in E097 of 2021 ruled in favor of Sankale. The court ordered Maasai Mara University to compensate him for the unfair termination, reinforcing

the principle that whistleblowers should be protected, not persecuted.

Sankale’s ordeal underscores the urgent need for comprehensive whistleblower protection laws in Kenya. While existing legislation offers limited safeguards, this case has intensified calls for robust legal frameworks to shield individuals who courageously expose corruption. The unwavering support from civil society organizations exemplifies the critical role such entities play in defending justice and promoting transparency. Today, Sankale’s story serves as both a cautionary tale and a beacon of hope. It highlights the personal risks faced by whistleblowers and the profound impact of collective advocacy in challenging systemic corruption. As Kenya continues its journey toward greater accountability, the collaboration between individuals of integrity and supportive organizations offers a promising path forward.

“TI-Kenya provided legal expertise and advocacy, ensuring that Sankale’s case remained in the public eye and that pressure was maintained on the university to rectify the situation”



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