

REVISED

ACTION FOR INTEGRITY

STRATEGIC PLAN 2022-2028



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KENYA



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Transparency International Kenya (TI-Kenya) is a not-for-profit organisation that exists to contribute to a transparent and corruption free-society. TI-Kenya is one of the autonomous chapters of the global Transparency International movement that is bound by a common vision of a corruption-free world. TI-Kenya employs advocacy, research, citizen engagement, capacity strengthening, and partnerships development as the core strategies for the fight against corruption.

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TABLE OF CONTENTS

TABLE OF CONTENTS.....	iii
LIST OF ACRONYMS AND ABBREVIATIONS.....	iv
FOREWORD.....	v
1.0 BACKGROUND AND INTRODUCTION.....	1
1.1 Organisational Background.....	1
1.2 Organisational Identity.....	1
1.3 Value Propositions.....	3
1.4 Track record.....	4
2.0 CONTEXTANALYSIS.....	7
2.1 Analysis of the Operating Context.....	7
2.2 Stakeholders Analysis.....	10
2.3 Summary of SWOT Analysis.....	11
3.0 STRATEGIC CHOICES.....	12
3.1 Philosophical Grounding.....	12
3.2 Theory of Change.....	12
4.0 OBJECTIVES, INTERVENTIONS AND STRATEGIES.....	14
4.1 Overview.....	14
4.2 Citizen Demand and Oversight.....	14
4.3 Natural Resources and Climate Governance.....	17
4.4 Public Finance Management.....	20
4.5 Institutional Development.....	21
5.0 IMPLEMENTATIONAL MODALITIES.....	24
5.1 Monitoring, Evaluation, Research, and Learning.....	24
5.2 Organisation Structure.....	24

LIST OF ACRONYMS AND ABBREVIATIONS

AG	Attorney-General
AI	Artificial Intelligence
ALAC	Advocacy and Legal Advice Centre
APNAC	African Parliamentary Network Against Corruption
BO	Beneficial Ownership
CIDP	County Integrated Development Plan
CoK 2010	Constitution of Kenya 2010
COVID 19	Coronavirus Disease 2019
CSO	Civil Society Organisation
CSPEN	Civil Society Parliamentary Engagement Network
DCI	Directorate of Criminal Investigations
DNA	Designated National Authority
EACC	Ethics and Anti-Corruption Commission
ECOSOC	Economic, Social and Cultural Rights
e.g.	For example
EGP	Electronic Government Procurement
GA	General Assembly
GDP	Gross Domestic Product
Gen Z	Generation Z
GoK	Government of Kenya
ICPAK	Institute of Certified Public Accountants of Kenya
ICT	Information and Communication Technology
IEA	Environmental Impact Assessment
IFFs	Illicit Financial Flows

IFMIS	Integrated Financial Management System
IPOA	Independent Policing Oversight Authority
KAM	Kenya Association of Manufacturers
KEPSA	Kenya Private Sector Alliance
KNCHR	Kenya National Commission on Human Rights
LSK	Law Society of Kenya
MCA	Member of County Assembly
MEL	Monitoring, Evaluation, and Learning
MERL	Monitoring, Evaluation, Research, and Learning
MIS	Management Information System
NCCAP	National Climate Change Action Plan
NECS	National Ethics and Corruption Survey
NEMIS	National Education Management Information System
NGO	Non-governmental organisation
NIA	National Integrity Alliance
NRM	Natural Resources Management
OECD	Organisation for Economic Co-operation and Development
OECD DAC	OECD Development Assistance Committee
ODPP	Office of the Director of Public Prosecutions
PFM	Public Finance Management
PIL	Public Interest Litigation
PRWG	Police Reforms Working Group
REDD+	Reducing Emissions from Deforestation and Forest Degradation
SEA	Strategic Environmental Assessment
SMS	Short message service

SOP	Standard Operating Procedure
SWOT	Strengths, Weaknesses, Opportunities, and Threats
TI-Kenya	Transparency International-Kenya
U.S.	United States
WASH	Water, Sanitation, and Hygiene

CHANGING TACK TO TACKLE THE NEW FACE OF CORRUPTION IN KENYA



This Strategic Plan outlines TI-Kenya's strategic direction for the period 2022–2028. The plan is motivated by the need for regular strategic re-positioning and realignment with shifting operational contexts. The strategy is the outcome of a co-creation process by the TI-Kenya fraternity and its key stakeholders. TI-Kenya reflected and reviewed its organizational identity, strategic result areas, interventions, objectives, and strategies as part of the strategic plan development process.

Tapping on lessons learnt from our past practice, and building on our track record, this strategic plan seeks to effectively position TI-Kenya in the rapidly evolving operational context. The plan is seen as a broad framework document that defines our strategic direction and sets out broad parameters for our programmes and operations. Deliberate efforts have been made to ensure that the plans align with and contribute to various global commitments, as contained in documents such as the Sustainable Development Goals. The plan will be operationalized through detailed annual work plans and individual programme or project plans.

The strategic plan is anchored on three programme-focused strategic result areas upon which our work will be concentrated during the period. These are, Citizen Demand and Oversight; Natural Resources and Climate Governance; and Public Finance Management. Institutional Development is a fourth strategic result area that seeks to transit TI-Kenya into a sustainable and effective entity. Overall, the strategic plan will pay special attention towards full implementation of chapter six of the Constitution of Kenya 2010, on leadership and integrity. To effectively deliver the strategy, TI-Kenya will explore various overarching intervention strategies, being citizens' conscientization and behavior change promotion; capacity development of relevant institutions; advocacy towards reform and implementation of applicable regulatory frameworks; and promoting complementary strategic partnerships to scale reach and impact. These will be in addition to the generation and sharing of knowledge, evidence, and solutions towards the fight against corruption.

TI-Kenya recognizes the need to work closely with various complementary actors as part of a system approach to effectively and sustainably deliver on the ambitions set out in the strategic plan document. We wish, therefore, to thank our partners and peers who have and continue to subscribe to our mission by collaborating with us towards its actualization. We especially extend a warm welcome to all our partners and peers to join hands with us as we venture into the exciting, ambitious, and equally challenging task of implementing this strategic plan.

Bernadette W. Musundi (Mrs)

Chair, Board of Directors
Transparency International Kenya



Photo File- TI Kenya

ACKNOWLEDGEMENTS

This strategic plan was initially developed through a consultative process with the Transparency International Kenya membership, Board of Directors, staff and various external stakeholders from the government agencies, civil society, private sector and development partners. The consultative process included critical reflections of TI-Kenya's achievements in the preceding five years, prevailing challenges and lessons learnt, and exploring the context of our anti-corruption work in the ensuing future. The final draft was adopted by the Board of Directors in October 2022 and approved to guide the operations of TI-Kenya for the next 6 years, until the year 2028.

In June 2025, TI-Kenya commissioned a mid-term review of the strategic plan. The review, based on the OECD-DAC guidelines, involved consultations with TI-Kenya staff, management, and the Board, as well as key external partners. It made several findings regarding the design of the strategic plan and its implementation up to the point of review. Following the review, the strategic plan was updated to incorporate the findings of the review.

We are therefore indebted to the Board of Directors led by Mrs. Bernadette W. Musundi (Chairperson), Ms. Eva Wangui, Dr. Bedan Lyanda Musima, Mr. James Muthui, and Ms. Samira Mary Leakey for their contribution and strategic leadership in the strategic planning and review process.

Appreciations to TI-Kenya staff for their dedication to the entire process. We are also grateful to members of TI-Kenya, representatives of civil society organisations, various government agencies, the private sector and various development partners for their contribution towards the strategic planning process. We extend our gratitude to the consulting firm - Strategic Connections through the leadership of Mr. Tom Olila - for providing technical guidance during the entire strategic planning exercise. Similar gratitude is owed to Hisani Ideas Limited, led by Mr. Francis Aywa, for the Mid-Term Review and the revised strategic plan.

Sheila Masinde

Executive Director
Transparency International Kenya

1.0 IDENTITY AND ASPIRATIONS

1.1 Organizational Background

TI-Kenya is a national civil society organisation that works towards a transparent and corruption-free society. Registered in Kenya in 1999 with a mission to combat corruption, we are dedicated to promoting integrity, transparency and accountability in the public and private spheres through good governance and social justice initiatives.

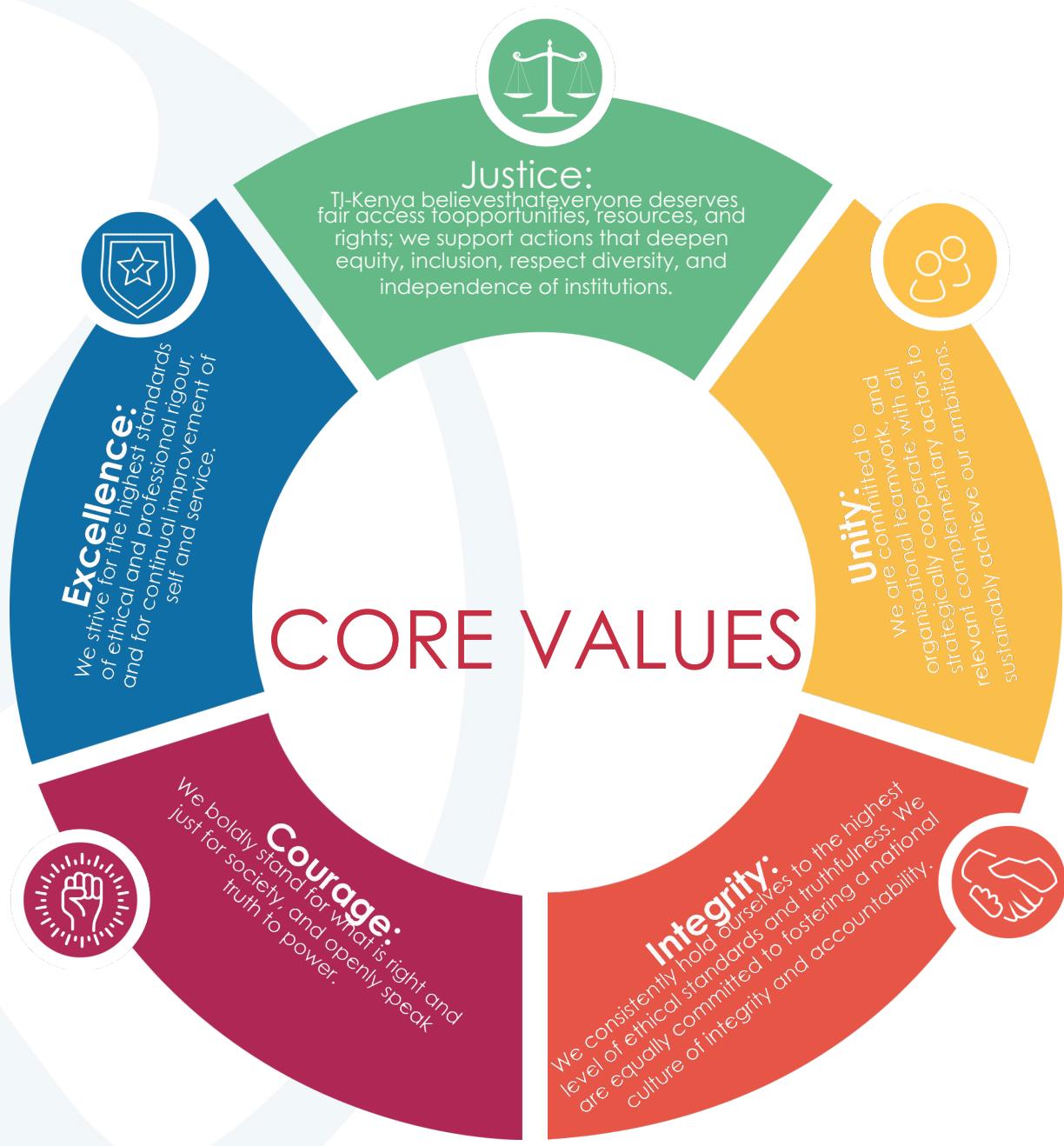
With over 25 years' experience in governance interventions at the national and county levels, we work collaboratively with partners, institutions and citizens to prevent, expose and challenge corruption, and to strengthen systems that uphold good governance and public integrity. We pursue advocacy, partnerships development, strategic litigation, research, capacity building, and civic engagement as our core approaches.

As an independent chapter within the global Transparency International movement, we operate within our own governance structures and resources, strategies, and programmes tailored to Kenya's unique governance landscape. Aligned with the shared vision of a corruption-free world, the global movement serves as a collaborative platform for exchanging knowledge and experiences, and for jointly developing strategies that address the diverse and region-specific forms of corruption worldwide.

We have our main office in Nairobi and regional presence in the Coast, Rift Valley, the larger Western Kenya and Eastern Kenya through four Advocacy and Legal Advice Centres (ALACs) in Mombasa, Eldoret, Kisumu and Nairobi.

1.2 Organisational Identity





Philosophy

TI-Kenya understands corruption to mean ‘participation in abuse of trust and or power’ – including fraudulent or dishonest conduct, bribery, or theft/misuse of public resources - for private benefit. We acknowledge that corruption weakens institutions and undermines sustainable socio-economic development. We thus deliberately promote a culture of ethics and integrity at individual, societal, and government levels. These values are necessary to ensure a more accountable conduct of private and public affairs, administration of public resources, and greater attainment of economic, social, cultural, civic, and political rights as enshrined in our Constitution.

1.3 Value propositions

1. Provision of evidence-informed, innovative, and responsive interventions and services towards cultural and behavior change, and adoption of national values and reduction of theft or misuse of public resources.
2. Sharing of new knowledge, evidence, best practices, and innovative good governance solutions to promote good governance and inculcate national values.
3. Provision of credible platforms – tools, forums, instruments, platforms for people to speak about, share information on, and address corruption concerns.
4. Opportunities to leverage our institutional capabilities, relationships, resources, and structures to scale the fight against corruption and instil values of integrity and transparency.
5. Offer capacity development support, including training, technical backstopping, and sharing of tools on good governance and the fight against corruption.
6. Contributions towards policy, legal and institutional reformulation and implementation processes.
7. Greater visibility and profiling associated with our trusted and reputable brand and goodwill.
8. A track record of integrity, professionalism, accountability, reliability, and quality delivery.



1.4 Our track record

26

Years of experience in governance work at the national and county levels.

18 MILLION

Citizens reached through outreach, public forums on anti-corruption and good governance messages

29

Model County government bills influenced in the past 8 years

49

Quality knowledge products produced in the past 8 years

5481

Persons supported through our Advocacy Legal & Advice Centers (ALACs) in the past 8 years

36

Social audit assessments facilitated in the past 8 years

174

Institutions/ Networks that have received capacity development support from TI-Kenya over the past 8 years

18

Public Interest Litigation cases initiated/ supported over the past 8 years

31

Administrative petitions developed together with other stakeholders, and submitted to county governments in the past 8 years

54

Accountability/anti-corruption focused laws or policies influenced in the past 8 years

1. **Regulatory Reforms:** TI-Kenya has made significant contributions towards ensuring various quality policies and laws, and the operationalisation of the same. This includes crafting advocacy and or technical support towards reformulation of over 35 accountability/ anti-corruption focused laws or policies at national and county levels over the past 5 years, and promotion of the adoption of 14 model county government bills for use by various counties.
2. **Strengthening Institutions:** TI-Kenya has been at the forefront in offering technical support on good governance to various public, private, and civil society institutions. This includes strengthening national and county governments' policymaking and implementation capacities as well as sharing systems, tools, and strategies for increased integrity, transparency, and accountability. A total of 109 actors received capacity development support by TI-Kenya over the last strategic plan period.
3. **Research and Innovation:** TI-Kenya has, in the last 20 years, produced at least 34 high-quality knowledge products that have contributed to shaping policy, practice, and national dialogues on corruption. These include the East African Bribery Index, national opinion polls and surveys. Further, TIKenya has developed various innovative technology-aided tools, platforms, and forums to aid the fight against corruption. These include the 'Uwajibikaji Pamoja' platform¹ and the Action for Transparency mobile application²
4. **Promoting Accountability and Oversight:** The organisation has facilitated over 26 social audit assessments in target counties in the last five years. These are in addition to strengthening communities' claim-making capacities through public conscientisation initiatives and the setting up of various civilian oversight committees. Furthermore, through the ALACs, TI-Kenya continues to offer quality, professional, free legal advice by providing a vehicle through which citizens can report and pursue corruption-related complaints. A total of 3,852 people have been supported through the ALACs in the last five years.
5. **Collaborative Leadership:** Over the years, TI-Kenya has continued to work with and through strategic partnerships and networks within its thematic areas of interest. The collaborations are instrumental in building a critical mass for policy influencing, shared learning, and integrated programming. Such networks include the African Parliamentarians' Network Against Corruption, County Assembly Representatives Network Against Corruption, Court Users Committees, Legal Advisory Committees, the National Integrity Alliance and other accountability and good governance coalitions, and the Reducing Emissions from Deforestation and Forest Degradation (REDD+) Taskforce.
6. **Influencing Practice:** TI-Kenya has been working to revive Integrity Clubs to engage students in ethical and integrity learning; facilitated annual moot court competitions; and supported procurement students' conferences to instil positive values among young people. **Institutional**
7. **Administration:** TI-Kenya is a frugal organisation, in which resources, including finances, equipment, and facilities, are managed responsibly and efficiently. We have a record of timely, quality, and open accountability for all resources entrusted to us by different benefactors. We have robust management systems, structures and a rigorous set of policies and procedures. No compliance issues have been raised by our auditors over the years.

¹ <https://haipcrm.com/>

² <https://actionfortransparency.org/>



Photo File- TI Kenya

2.0 THE COUNTRY WE FACE

“Kenya obtained a score of 32 out of 100, from a score of 31 points in 2023, and is ranked position 121 out of the 180 countries and territories assessed. Kenya’s score (32 points) fell below the Sub-Saharan average score of 33 and the global average score of 43 (a score below 50 indicates serious levels of public sector corruption). Kenya’s score in the Corruption Perception Index remains largely stagnant, reflecting the persistent challenge of corruption in the country. While Kenya scored 32 points in CPI 2024, this represents no significant shift from previous years—only a marginal change from 31 points in 2023. The 5-year trend analysis shows that Kenya had a change of only one score between 2020 (31 points) and 2024 (32 points).”

2.1 Analysis of the Operating Context

General Context of Corruption in Kenya: Corruption remains deeply entrenched in Kenya and continues to be a major impediment to socio-economic development. According to the 2024 Corruption Perceptions Index released in February 2025, Kenya scored 32 points out of 100, ranking 121st out of 180 countries³. This modest improvement from 31 points in 2023 still places Kenya below both the sub-Saharan Africa average of 33 and the global average of 43. This one-point increase is not enough, since the country continues to struggle with deep-rooted corruption. East African peers vary widely: Rwanda scored 57, Tanzania 41, Uganda 26 and Burundi 17, while the best performers in sub-Saharan Africa include Seychelles (72), Cape Verde (62), Botswana (57), and Mauritius (51).

The 2024 National Ethics and Corruption Survey (NECS) by the Ethics and Anti-Corruption Commission reinforces these concerns. It identifies bribery as the most common form of corruption: 52.1 % of respondents admitted to giving bribes, followed by receiving bribes (41.9 %), favouritism (22.5 %), abuse of office (14.6 %), tribalism and nepotism (11.8 %) and embezzlement of public funds (11.7 %)⁴. The survey reports that the national average bribe dropped sharply to KSh 4,878 in 2024 from KSh 11,625 in 2023, yet 30.5 % of respondents still encountered bribery, and the vast majority did not report the incidents. Unemployment (49.1 %) and corruption (44.6 %), on the other hand, emerged as the two most critical problems facing Kenyans. These findings underscore that corruption in Kenya continues to manifest through bribery, nepotism, procurement corruption, theft and mismanagement of public resources, and remains one of the primary challenges hindering development in Kenya.

The 2025 Kenya Bribery Index paints a sobering picture of the persistence and pervasiveness of bribery in public service delivery across the country. Based on interactions reported by over a thousand respondents from 15 counties, one in four Kenyans encountered bribery when seeking services from public institutions. Of these, 23% had bribes demanded or expected, while 2% offered bribes voluntarily. Men were significantly more likely to pay bribes than women, accounting for 64% of reported cases, a disparity likely influenced by gendered patterns of economic activity and institutional engagement.

The police emerged as the most corruption-prone institution, with 72% of respondents who interacted with them reporting a bribery experience. They also accounted for the highest prevalence of actual bribe payments, with 51% of those interactions resulting in a bribe being paid. Nearly 40% of all bribes reported in the survey were paid to police officers. Land services and civil registration followed closely, each with a bribery likelihood exceeding 60%. In contrast, Huduma Centres were the least associated with bribery, registering a mere 9% likelihood.

The judiciary ranked highest in terms of the average bribe size, with Kenyans paying an estimated Ksh 18,800 per incident—an increase of 33% since 2017. Land services also recorded high average bribe amounts, at Ksh 12,610, likely due to the complexity and frequency of interactions required. Despite the government's rollout of the Ardhi Sasa digital platform to curb corruption in land transactions, its limited geographic coverage at the time of the survey

³ <https://www.transparency.org/en/cpi/2024>.

⁴ EACC (2025) *National Ethics and Corruption Survey (NECS)*, 2024. Nairobi: EACC Research Report No. 17.

meant many citizens still relied on manual processes vulnerable to bribery. Health services showed a particularly troubling trend, with bribery prevalence rising by 27% since 2017 and worsening by nearly 20 percentage points since the last survey in 2019. This suggests a growing normalization of bribery even in essential service sectors.

While reporting of bribery incidents has improved over time (from 6% in 2017 to 17% in 2025) the majority of affected individuals still refrain from reporting. Nearly half cited a lack of faith in enforcement agencies, believing no action would be taken even if they did report. Public confidence in anti-corruption efforts remains low, with 47% of respondents expecting the situation to worsen and only 25% believing it will improve in the coming year.

The 2025 County Governance Status Report offers a comprehensive snapshot of how devolved governance is perceived and experienced across Kenya's counties. Drawing from a diverse sample of citizens, county executive officers, and Members of County Assembly (MCAs), the report evaluates performance across four pillars: accountability, transparency, service delivery, and integrity.

Citizens showed strong awareness of the roles of Members of Parliament and Governors, but significantly less understanding of the functions of Senators and Woman Representatives. This gap in civic knowledge translated into lower engagement with these offices — only 4% of respondents had interacted with the Woman Representative's office, compared to nearly 25% who had engaged with their MCA.

While 94% of respondents were aware of the Constitution, only about half had read it. Awareness of the County Integrated Development Plan (CIDP) remained low, with just 30% knowing of its existence and only 20% having read their county's plan. This limited familiarity with key governance documents suggests weak public participation in county planning and budgeting processes.

Citizens also reported minimal transparency in project implementation. Although many were aware of county projects in their areas, over 93% did not know the associated costs, contractors, or timelines. Health services emerged as the top priority for county investment, followed by road infrastructure — reflecting public concern over rising living costs and access to essential services.

On the positive side, 32% of respondents cited improved service delivery as a major achievement of devolution, while 28% appreciated the closer proximity of services. However, challenges persist: nearly 30% pointed to stalled or incomplete projects, 22% flagged bloated staffing, and 21% cited corruption and mismanagement as key failures.

Perceptions of corruption have fluctuated over time. While 47% of respondents in 2025 believed corruption would worsen (down from 55% in 2019) the proportion expecting improvement remained stagnant at 25%. To address these issues, citizens recommended stronger anti-corruption measures, increased health funding, and more inclusive public participation.

Regulatory Frameworks Governing Corruption: Kenya has put in place an extensive legal and policy framework to address corruption, anchored in the Constitution of Kenya (2010) under Chapter Six on Leadership and Integrity. Supporting statutes include the Anti-Corruption and Economic Crimes Act (2003), Public Officer Ethics Act (2003)⁵, Leadership and Integrity Act (2012), Public Procurement and Asset Disposal Act (2015), Public Finance Management Act (2012), Bribery Act (2016), and the Witness Protection Act (2006). The country has also ratified the United Nations Convention against Corruption and the African Union Convention on Preventing and Combating Corruption, reinforcing its global commitments. The enforcement ecosystem is led by the Ethics and Anti-Corruption Commission (EACC), the Directorate of Criminal Investigations (DCI), the Office of the Director of Public Prosecutions (ODPP), and the Judiciary's Anti-Corruption Division, with oversight by the Parliament of Kenya, county assemblies, and the Office of the Auditor-General. Recent government data shows that in the financial year 2023/24, the EACC received 5,171 corruption-related complaints, with 534 cases under active investigation and 221 cases in court (EACC, 2024).

Despite this elaborate framework, the fight against corruption faces persistent challenges. Weak inter-agency coordination, political interference, and selective application of the law undermine enforcement, while judicial delays and corruption within the courts further weaken deterrence. Oversight bodies, though constitutionally

⁵ This has since been repealed by the Conflict of Interest Act, 2025.



TRANSPARENCY
INTERNATIONAL
KENYA

VISION

A corruption-free society

MISSION

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

OUR VALUES:

Integrity

Transparency

Accountability

Participation

Respect

Justice

Equality

Empathy

Humility

Resilience

Curiosity

Optimism

Gratitude

Curiosity

mandated, often suffer from partisanship, conflicts of interest, or inadequate resourcing, which hampers their effectiveness. Additionally, more than 1,200 police misconduct cases have been referred by the Independent Policing Oversight Authority (IPOA) to the ODPP by 2024, yet conviction rates remain low (IPOA, 2024). These challenges — combined with entrenched ethnic and political patronage — have eroded public trust in institutions, highlighting the gap between Kenya's strong anti-corruption laws on paper and their limited impact in practice.

Economic Context: Kenya's economy is substantially market-driven and remains one of the most diversified in East Africa. It benefits from a vibrant private sector, a relatively youthful and skilled workforce, a strategic geographic location, and ongoing infrastructure improvements. However, its economic growth trajectory continues to be constrained by persistent structural challenges, including poverty, unemployment, inequality, and external shocks such as global commodity fluctuations and climate-induced risks. According to the World Bank (2024), Kenya's Global Domestic Product (GDP) growth is projected to decelerate to 4.5% in 2025, primarily due to high borrowing costs, reduced private sector credit, and rising fiscal pressures. Furthermore, the country remains exposed to the impact of corruption and Illicit Financial Flows (IFFs), which undermine domestic revenue mobilization, transparency, and macroeconomic stability. IFFs in Kenya are driven by activities such as public resource theft, trade mis invoicing, narcotics trafficking, and smuggling of natural resources. These flows not only drain critical foreign exchange reserves but also erode trust in public institutions. Institutional weaknesses — including poor enforcement technology, weak cross-border data-sharing, and complicity among officials — continue to impede effective detection and deterrence of IFFs.

Another major constraint on Kenya's economic stability is the rising public debt. As of June 2025, Kenya's public and publicly guaranteed debt stood at KSh 11.81 trillion, equivalent to 67.4% of GDP, surpassing the statutory threshold of 55%, and the IMF's recommended ceiling of 50% for developing economies, approaching debt distress levels. This is attributed to the country's legacy of infrastructure spending, post-COVID recovery borrowing, sluggish revenue growth, rising debt servicing costs, a shift towards domestic debt, global economic shocks, weak fiscal discipline, as well as transparency and governance gaps. Notably, nearly two-thirds of government revenue is allocated to debt repayment rather than to critical public services. This has significantly eroded fiscal space, limiting the government's ability to invest in healthcare, education, and county development priorities. Additionally, concerns over the transparency and accountability of how borrowed funds are utilized remain a recurring issue in public finance governance/management. These economic vulnerabilities underscore the urgency for fiscal consolidation, debt transparency, and stronger anti-corruption safeguards to ensure equitable and sustainable development.

Socio-Cultural Context: Corruption in Kenya has become increasingly normalized, especially among younger populations, fostering widespread apathy toward anti-corruption efforts and hostility toward change-makers. The 2017 NECS revealed that nearly 46% of young Kenyans reported paying bribes for essential services—such as identity documents, healthcare, and tertiary education—illustrating how deeply corruption has become embedded in everyday life for youth. Despite increased access to information and digital connectivity, citizen demand for accountability remains weak—particularly among youth who face economic pressures, systemic unemployment, and shifting value systems.

Recent youth movements show a complex shift: Gen Z is not passive, as had been said before. The #RejectFinanceBill2024 protests, and widespread anti-tax rallies demonstrated mass frustration with corruption, economic hardship, and governance failures⁶. Still, these mobilizations coexist with political fatigue, weak legislative oversight, and persistent patronage networks that weaken institutional responsiveness. A study on citizen quiescence in Nairobi found that weak social contracts explain 58% of citizen inaction in demanding accountability, underscoring the deep disconnect between public expectations and institutional performance⁷. Together, these dynamics highlight an environment where corruption is both culturally normalized and deeply contested, creating a paradox of indifference and resistance.

Climate and Extractives Governance: Kenya faces significant climate-related challenges that threaten its biodiversity, ecosystems, food security, and vulnerable livelihoods. To address these, the Government has enacted

⁶ Ochieng (2024) Mass protests against Kenyan President Ruto's IMF-dictated Finance Bill

<https://www.wsws.org/en/articles/2024/06/20/mjqq-j20.html>

⁷ Mutuku, Richard & Jonyo, Fred. (2023). *The Nexus Between Weak Social Contracts and Citizen Quiescence in Kenya*. East African Journal of Arts and Social Sciences. 6. 414-430. 10.37284/eajass.6.1.1298.



progressive frameworks such as the Climate Change Act (2016), the National Climate Change Action Plan (NCCAP), and the Climate Change (Carbon Markets) Regulations, 2024. These initiatives are supported by large-scale environmental campaigns, including the ambitious 15 Billion Tree Planting Programme, launched in 2022, and the declaration of a National Tree Growing Day as a public holiday to promote citizen participation in environmental action. The government aims to increase tree cover from 8.8% to over 30% by 2032. Despite these efforts, Kenya continues to experience worsening deforestation, land degradation, pollution, and loss of ecological diversity-driven by population pressure, unsustainable resource use, and weak enforcement of environmental laws. These challenges pose direct threats to long-term food security and the resilience of rural communities.

Kenya is also rich in natural resources such as oil, gas, and minerals, presenting both opportunities and governance risks. While various regulatory frameworks are in place, implementation is hindered by state capture, limited capacity, corruption, and the commodification of resources that reinforce social inequalities. The extractives sector continues to suffer from opaque licensing, poor benefit-sharing, and environmental mismanagement. Meanwhile, Kenya is emerging as a leader in carbon finance, with over 11 million voluntary carbon credits issued in 2022, the second highest in Africa. The country operationalized a National Carbon Registry and established a Designated National Authority (DNA) to oversee validation and trading. However, controversies such as the suspension of the Northern Kenya Rangelands Carbon Project have raised concerns about community consent, benefit distribution, and regulatory oversight. Women and Indigenous communities remain disproportionately affected by poor governance in both extractives and environmental initiatives, underlining the urgent need for inclusive, transparent, and accountable natural resource management.

Changing development and funding architecture: In recent years, Kenya's development and funding landscape has undergone a significant transformation. Traditional donor support for governance and accountability initiatives has diminished, with many funders shifting toward market-based, impact-driven, and private sector-aligned models. Donald Trump's Executive Order 14169, titled "Reevaluating and Realigning United States Foreign Aid", of January 2025, disrupted billions of dollars in aid across more than 200 countries. In Kenya, non-governmental organisations (NGOs) reliant on U.S. funding faced layoffs, program closures, and stalled advocacy efforts. There is also a growing push for consortium-based funding models, enhanced impact measurement, and value-for-money approaches. However, these changes have taken place amidst declining international solidarity around anti-corruption programming and a global rise in authoritarian tendencies. In Kenya, civic space continues to shrink-evident through increased regulation of NGOs, surveillance, media repression, and intimidation of dissenting voices. Public accountability actors face operational threats, while freedom of expression and media are frequently undermined through digital and legal instruments. These trends have compounded the operational constraints on independent anti-corruption actors, weakening grassroots mobilization and public engagement.

Kenya's digital transformation has accelerated significantly, marked by widespread mobile and internet penetration, and government adoption of ICT platforms like *Huduma*, *NEMIS*, *eCitizen*, *EGP*, and *IFMIS*. These platforms aim to streamline service delivery, improve efficiency, and reduce in-person corruption. However, digital infrastructure remains unevenly distributed, leaving many rural and marginalized populations with limited access to e-services. At the same time, increased digitization has introduced new vulnerabilities, including data breaches, digital exclusion, and cyber-enabled corruption. With the rise of emerging technologies-such as Artificial Intelligence (AI), blockchain, and automation - Kenya is exploring their potential in governance, especially in data analytics, financial auditing, and identity verification. However, there are growing concerns around algorithmic bias, job losses through automation, and weak regulatory oversight. AI-driven systems, if poorly governed, may further entrench discrimination or be manipulated to serve corrupt agendas. While digitization presents opportunities for enhancing transparency and accountability, it must be matched with investments in data protection, digital literacy, ethical governance frameworks, and equitable access to ensure no one is left behind.

Actor Category	Key Actors	Interests & Influence	Reform Leverage
General Public	Urban and rural citizens, youth, women, persons with disabilities, victims and witnesses of corruption	Service delivery, rights protection, empowerment, and social justice	Civic oversight, grassroots mobilisation, rights-based advocacy
Civil Society Networks & Working Groups	PIL Caucus, Climate Change Working Group, Coast CSO Reference Group, PRWG, NIA, CSPEN, Shule Yangu, Uwajibikaji Pamoja, Okoa Uchumi, Global Compact Network Kenya.	Governance reform, litigation, tax justice, human rights, extractives, PFM accountability	Multi-sectoral advocacy, legal action, coalition building, public interest litigation
Government Institutions	Executive, Judiciary, Legislature, APNAC, EACC, ODPP, KNCHR, Office of Auditor General, Ministries (Finance, AG), County Governments	Policy, regulation, legislation, enforcement, oversight, service delivery	Policy reform, transparency, institutional accountability, and capacity development Budget advocacy,
Oversight Bodies	Parliament Committees, County Assemblies, Senate, Independent Commissions	Legal mandate enforcement, audit, and state accountability	oversight enforcement, integrity promotion Accountability
Private Sector	KEPSA, KAM, Global Compact Kenya, ICPAK, LSK, Editors Guild, corporate foundations, individual companies	Regulatory stability, reputation management, CSR, enabling business environment Research, policy innovation, training,	models, policy dialogue, resource leveraging, private-public partnerships Policy analysis,
Academic & Research Institutions	Universities, colleges, research centres, consulting firms	knowledge dissemination	documentation, best practices exchange, innovation support
Development Partners & Donors	Individual donors, foundations, local funding agencies, embassies, multilaterals	Governance strengthening, democracy promotion, evidence-based programming	Funding support, technical assistance, knowledge generation, strategic influencing

TI-Kenya works with a diverse range of stakeholders, some of whom are outlined below.

TI-Kenya will engage a broad spectrum of partners. This includes working with national government and oversight agencies to co-design open data portals, strengthen e-procurement and embed citizen feedback loops and partnering with county governments to boost functional PFM units, publish NRM/climate budgets online and host stakeholder consultations. It will collaborate with other civil society networks and Integrity Clubs on social audits, scorecards and grassroots monitoring. With the private sector and professional bodies, it will team up to pilot digital

grievance platforms, blockchain contract registries and integrity pacts. It will join forces with media outlets for data-driven investigative journalism, public forums and unified advocacy toolkits and leverage academia for joint research, MERL fellowships and policy roundtables. There is also a possibility of co-funding PFM reform and civic- tech pilots with development partners alongside regional learning exchanges, co-innovating with tech hubs on mobile reporting apps, AI-powered anomaly detection and secure registries. Finally, it will empower communities and citizens through petition-writing training, innovation labs and storytelling campaigns that amplify lived experiences of corruption and accountability.

2.3 Summary of SWOT Analysis

The following is a summary of the major Strengths, Weaknesses, Opportunities and Threats (SWOT) that emerged from the foregoing analysis of TI-Kenya's internal and external environment.

Strengths	Weaknesses
<ol style="list-style-type: none"> 1. Strong reputation, respect, and credibility. 2. Strong mobilisation and convening power 3. Proven track record in good governance and anti-corruption 4. Diverse complementary partnerships at national and international level 5. Robust internal systems, structures and 6. Highly skilled staff team 7. Good levels of investment in ICT/ digital tools 8. Growing county presence and engagements 9. Growing levels of thought leadership (research, agenda setting, media engagement) 10. Suitable levels of attention to staff wellbeing 	<ol style="list-style-type: none"> 1. Low inter-project/ program synergies (coordination, sharing plans, information sharing) 2. Inadequate financial health and resilience 3. Insufficient documentation and sharing of results 4. Insufficient balance between depth vs. breadth (facilitation vs implementation) 5. Unstreamlined internal processes in some areas 6. Limited staffing for certain projects
Opportunities	Threats
<ol style="list-style-type: none"> 1. Advancements in ICT, media and technology 2. Possibility of deepening engagement via regional offices (deepen reach, offer other services) 3. Potential to grow work within the East African region 4. Existence of suitable laws, policies and institutions on anti-corruption 5. Existence of strong complementary actors (for collaborative programming and resource mobilization) 6. Increasing attention to leadership integrity 7. Possibility for role expansion – sub-granting, capacity development support 8. Growing grassroots formations on good governance (e.g., social justice centres, CBOs). 	<ol style="list-style-type: none"> 1. Uncertainties around elections and political transitions 2. Changing funder policies and priorities; reducing funding 3. Increasing competition for funding 4. Shrinking civic space in Kenya and the region 5. Politicization and weaponization of the war on corruption 6. Citizen apathy and socialization of corruption 7. Increasing frequency and severity of shocks 8. Sophistication of corruption (use of technology, budgeted corruption, etc.) 9. Challenges with the justice system (limited convictions, slow processes, implementation of court decisions).

“

TI-Kenya believes that by championing ethical values and behaviours, and shining a spotlight on the corrupt, we promote a culture of transparency and accountability, which leads to greater equity and quality of public service delivery, hence improving the quality of life for Kenyans. We understand that effectively addressing corruption in Kenya requires that we tackle the underlying structures and systems that contribute to, or sustain corruption. Such underlying factors commonly pertain to cultures and norms; laws and policies; as well as the capacities of citizens and relevant institutions.

”

By systematically mapping these factors, TI-Kenya has grounded its strategic objectives and interventions in the current realities, prioritized initiatives that leverage strengths and opportunities, and proactively designed safeguards against risks. This diagnostic also aligns stakeholders around a common understanding of where TI-Kenya excels, where it needs to improve, and what contextual shifts it must navigate — ensuring this strategic plan is both ambitious and achievable.



3.0 OBJECTIVES AND STRATEGIC INTERVENTIONS

3.1 Philosophical Grounding

Effective public governance forms the bedrock of inclusive prosperity, sociopolitical participation, the full realization of human rights, ecological stewardship, and sustainable development. Our strategic focus grounds itself in three interdependent commitments: high-quality, pro-people regulatory instruments; capable and accountable public institutions; and a responsible, engaged citizenry. We treat ethics and integrity, and transparency and accountability, as the organizing tenets that steer choices and allocate effort. We champion open management of public affairs and resources, deter corruption through sunlight and due process, and uphold the dignity and agency of every person. This philosophical stance guides us how we design rules, strengthen institutions, convene civic actors, and safeguard the commons — affirming that public authority remains a trust exercised in the public interest.

NATIONAL INTEGRITY ACTIONS AWARDS 2025



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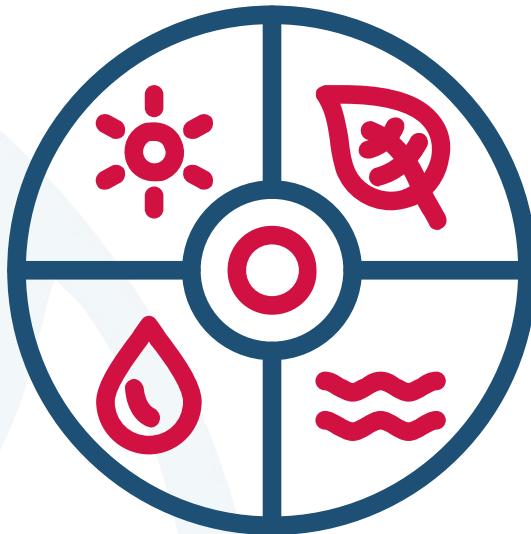
We commit to invest in people's power by promoting behaviour change, influencing policy, practice and social norms, brokering strategic partnerships, and generating and sharing actionable knowledge. We leverage resources and platforms to confront corruption at every level. In parallel, we strengthen our own institutional capability, governance and systems, and we plan for financial and operational sustainability to honour our mandate and maintain independence.

This section sets out the strategic objectives and interventions for Transparency International Kenya's Key Results Areas: Citizen Demand and Oversight, Natural Resources and Climate Governance, Public Finance Management, and Institutional Development.



3.2 Citizen Demand and Oversight

Under Citizen Demand and Oversight, TI-Kenya confronts impunity, weak enforcement, and opaque services by committing to amplify citizen demands for integrity and accountability and to expand access to effective redress for people harmed by corruption. We invest in civic education and organising; practical oversight tools such as budget tracking, scorecards, and public hearings; safe, user-centred reporting channels and helpdesks with clear legal, administrative, and psychosocial referral pathways; strengthened community oversight structures in priority sectors (court user committees, health facility boards, school boards, and water user committees); guidance, accompaniment, and secure documentation for whistleblowers and witnesses; and actionable evidence on service failures and redress gaps to inform advocacy and enforcement. We convene reform coalitions across media, youth, and civic networks to sustain scrutiny and public pressure, with focused work in Security and Justice, Health, Education, and Water, Sanitation and Hygiene (WASH).



3.3 Natural Resources and Climate Governance

Under Natural Resources and Climate Governance, TI-Kenya confronts capture, opacity, and weak compliance across Land, Extractives, Environment, Energy, and the Blue Economy, with a sharp focus on emerging dynamics shaping integrity risks and standards. We address carbon markets and benefit-sharing, tracking of climate finance (adaptation, resilience, and loss-and-damage), ESG and supply-chain due diligence for critical minerals, marine spatial planning and coastal stewardship, nature-based solutions and restoration finance, and devolved resource management through county climate funds. We commit to contract and concession transparency, open environmental and licensing data, robust EIA/SEA practice, community consent and benefit frameworks, and credible grievance and whistleblowing channels. We convene regulators, counties, communities, the private sector, media, and research partners to strengthen rules, enforce probity, and safeguard ecosystems and livelihoods across this fast-moving governance landscape.

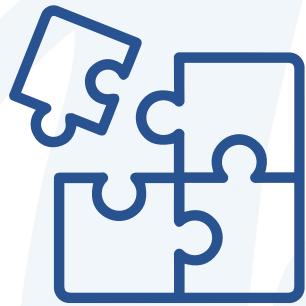
3.4 Public Finance Management

Under Public Finance Management, TI-Kenya confronts opacity in procurement, illicit financial flows, inefficient spending, and weak oversight by advancing open contracting and end-to-end e-procurement, beneficial ownership disclosure, programme-based budgeting transparency, and rigorous audit follow-through. We focus on Health, WASH, Education, and core Public Finance while integrating natural resources and climate-related spending through climate budget tagging, county climate funds, green procurement, and transparent PPP pipelines. We invest in citizen budget literacy, procurement monitoring, expenditure tracking, and grievance and debarment mechanisms; we strengthen whistleblower protections and integrity pacts; and we promote publication of contracts and data to open standards. We convene National and County Treasuries, oversight institutions, county assemblies and parliamentary committees, auditors, private sector, civic-tech actors, media, and communities to tighten controls against trade misinvoicing and other IFF vectors, enhance BO registry use in due diligence, and anchor timely disclosure from planning to payment.

3.5 Institutional Development

Under Institutional Development, TI-Kenya strengthens its core to operate with independence and integrity. We commit to attract, grow, and retain capable, value-aligned staff; embed ethical leadership and effective Board oversight; and standardise robust policies on safeguarding, anti-corruption, duty of care, equality, and risk management. We invest in fit-for-purpose systems - finance, grants, procurement, HR, and compliance - with clear controls and audit readiness; modern digital infrastructure for data protection, cybersecurity, and knowledge management; and agile planning, monitoring, evaluation, research, and learning that informs programme design and decision-making. We professionalise strategic communications across media channels, strengthen brand stewardship, and elevate civic-tech and ICT capacity to support transparency tools.

To secure sustainability, we diversify funding, pursue full cost recovery, cultivate strategic partnerships, build operating reserves, and steward assets responsibly - aligning resources, capabilities, and governance to the Action for Integrity agenda.



Strategic Themes

The objectives, key performance indicators, targets, and strategic interventions have been mapped onto a balanced scorecard.

Stakeholder Perspective

1. Enhance demands for integrity and accountability.
2. Promote efficient, effective and accountable PFM
3. Improve accountability and transparency of natural resources and climate governance.
4. Increase access to effective redress mechanisms for victims of corruption-related injustices.

These objectives will be achieved through the implementation of the following strategic interventions:

Enhance demands for integrity and accountability.

- Build and sustain citizen movements to demand for integrity and accountability
- Support targeted multi-stakeholder engagements at Regional, National and County level.
- Commemorate key national and international anti-corruption and integrity related activities.
- Conduct targeted activism awareness engagements

Promote efficient, effective and accountable PFM

- Participate in international and regional PFM advocacy engagements.
- Engage in structured collaborations with PFM Oversight Institutions.
- Support multi-stakeholder and multi-sectoral engagements on PFM accountability.
- Support commitments on Beneficial Ownership Transparency and Open Contracting.
- Build and sustain citizen movements to demand transparency and accountability on PFM.

Improve accountability and transparency of natural resources and climate governance.

- Build and sustain citizen movements to demand for accountability and transparency in NRCG.
- Promote transparency and accountability in natural resources and climate governance.
- Support climate finance tracking and monitoring activities for transparency and accountability.

Increase access to effective redress mechanisms for victims of corruption-related injustices.

- Conduct public interest litigation on emerging corruption issues
- Support strategic engagements on protection of whistleblowers
- Support advocacy engagements on targeted policy reforms.

Provide continuous legal aid and advice.

Financial Perspective



5. Strengthen financial resilience and sustainability.

This objective will be achieved through the implementation of the following strategic interventions:

- Strengthen financial management and procurement systems and procedures.
- Develop and sustain strategic partnerships with professional and like-minded associations.
- Build organizational financial resources.
- Develop and run profitable business ventures.



Internal Processes Perspective

6. Enhance evidence-based advocacy and strategic communications.

7. Improve planning, monitoring, evaluation, research, and learning systems

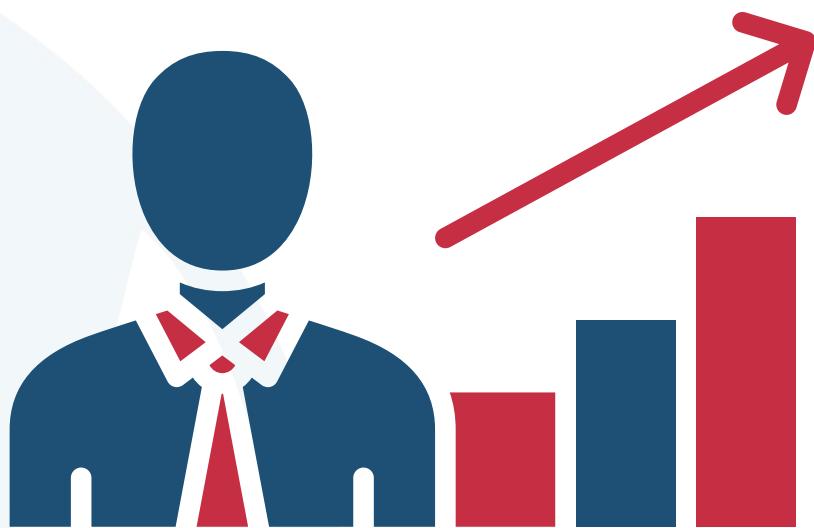
These objectives will be achieved through the implementation of the following strategic interventions:

Enhance evidence-based advocacy and strategic communications.

- Conduct targeted assessments, studies, and case studies on the organisation's mandate.
- Engage in structured collaborations with research and knowledge institutions.
- Review, update and operationalize TI-Kenya communications strategy to reflect updated SP.
- Conduct targeted multi-media engagements on TI-Kenya's mandate.
- Build online platform-based communities for a unified voice against corruption.

Improve planning, monitoring, evaluation, research, and learning systems

- Develop and institutionalize a PMERL plan.
- Revamp TI-Kenya PMERL tools and systems.
- Update PMERL and Research SOPs.



Learning and Growth Perspective

8. Build staff capacity for strategy delivery. 9. Foster a culture of innovation, learning, and adaptive programming These objectives will be achieved through the implementation of the following strategic interventions:

Build staff capacity for strategy delivery.

- Revamp performance management systems
- Acquire and retain talent
- Develop and implement a formal succession plan for the organization.
- Conduct targeted cross-functional learning sessions
- Acquire and retain talent
- Develop and implement a formal succession plan for the organization.
- Conduct targeted cross-functional learning sessions

Foster a culture of innovation, learning, and adaptive programming

- Develop and utilize digital tools.
- Integrate AI into the organization systems.
- Fulfil organization statutory compliance
- Conduct targeted legal compliance and institutional governance interventions.
- Conduct institutional development and review meetings



4.0 IMPLEMENTATIONAL MODALITIES

4.1 Monitoring, Evaluation, Research, and Learning

A key imperative of the Action for Integrity Strategic Plan through 2028 will be the institutionalization of a robust MERL architecture (where measurement, data systems, learning, and governance converge). This way, TI-Kenya will ensure that the Strategic Plan remains a living roadmap. MERL will be the performance-management engine that continuously tracks progress, surfaces insights, and fuels adaptive decision-making. This disciplined approach to performance management is tailored to transform insights into action, accelerate impact, and sustain momentum toward a corruption-free Kenya.

Performance-Management Framework: As a critical first step, TI-Kenya will translate each strategic objective in the Plan into specific, time-bound KPIs with baselines and targets. A live, online dashboard will update key metrics (e.g., petitions logged, policy reforms adopted, budget disclosures) on a monthly cadence. Standardized data-collection protocols, quarterly data-audits, and training for field teams on validation and verification techniques will ensure disciplined use of the framework.

Data Systems and Analytics: TI-Kenya will explore the use of a cloud-based MIS that integrates programme, finance, and advocacy data — enabling cross-pillar analytics and geospatial mapping of performance. It will have configurable triggers to flag risks (e.g., lagging targets, budget variances) and push summary briefs to programme leads and the Management Team. Periodic deep dives using GIS, thematic dashboards, and statistical trend analysis will help to unpack drivers of success or underperformance.

Learning and Adaptation: The Management team will convene strategic result area leads to review dashboard signals, identify emerging bottlenecks, and agree on immediate course corrections. Cross-functional roundtables will surface lessons, disseminate best practices, and recalibrate activity plans based on MERL evidence. A consolidated reflection (bringing together county partners, CSOs, government champions, and Board members) will be used to validate outcomes, update the theory of change, and set SMART targets for the coming year.

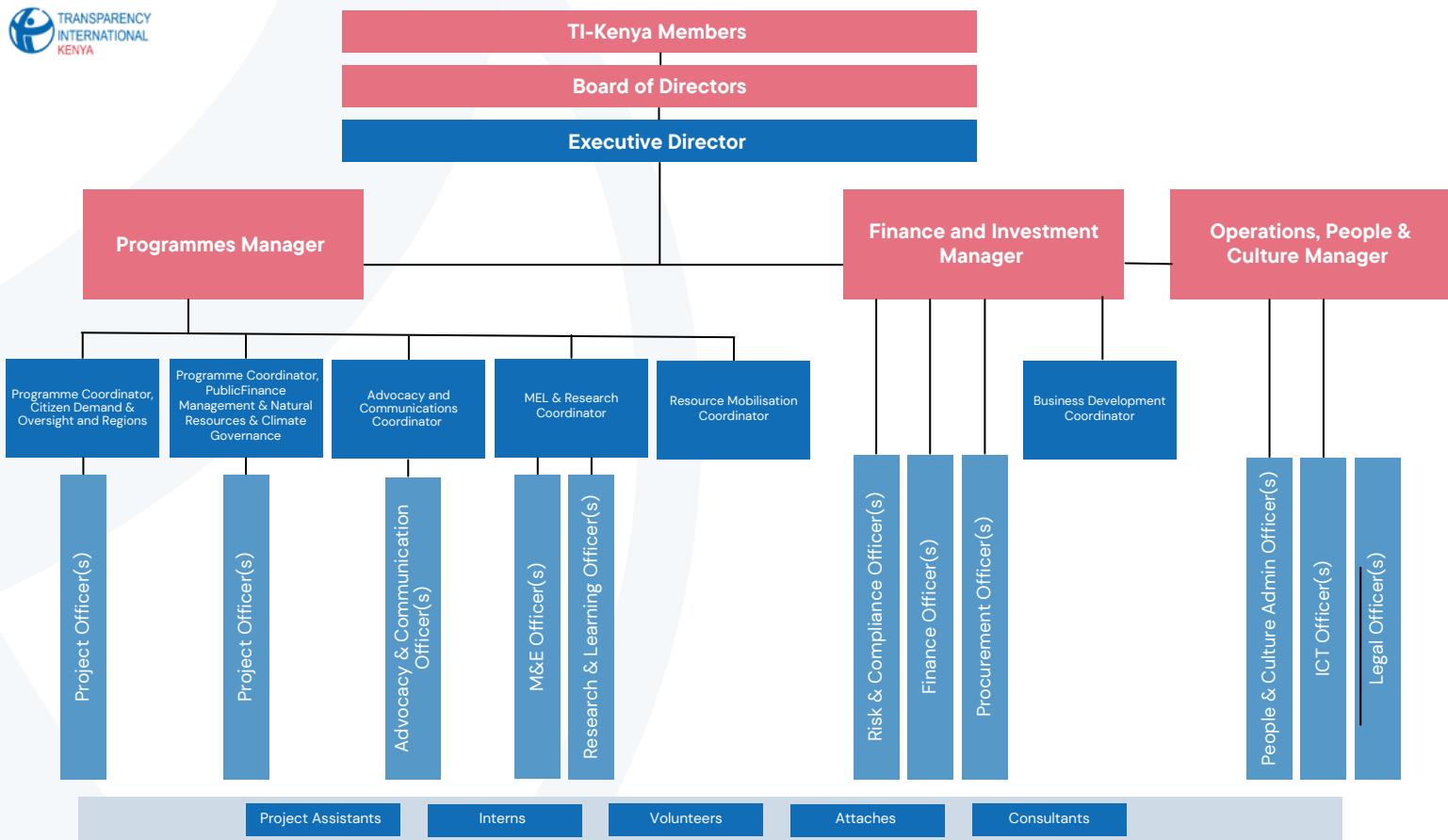
Roles, Responsibilities, and Governance: The MERL Unit will be responsible for overall leadership and coordination in a new formation in which every member of staff has MEL responsibilities. The MERL Unit will lead the development of a MERL Plan for the Strategic Plan, design M&E tools, manage the MIS, coach teams on data use, and lead learning events. Programme leads will own day-to-day data collection, ensure data integrity, and integrate MERL insights into quarterly workplans. The Management Team and Board will receive consolidated MERL reports every quarter, endorse major strategy pivots, and confirm resource re-allocation to high-impact areas. County and Civil Society Partners will feed local data into the MERL platform, co-facilitate learning sessions, and co-author case studies that enrich TI-Kenya's evidence base.

Reporting and Accountability: Every year, TI-Kenya will compile an Annual Report, which will be a publicly available summary of performance against strategic targets, key research findings, and learning-influenced adaptations. TI-Kenya will also disseminate Biannual Stakeholder Briefs (tailored updates for government agencies, donors, and coalitions), highlighting progress, challenges, and emerging opportunities. TI-Kenya's reporting will integrate crisis and risk reporting into a live risk register, based on which the MERL Unit will flag any critical programme or context shifts requiring immediate escalation to the Board and risk-management teams.

4.2 Governance and Management

Governance: TI-Kenya has a well-structured governance structure. At the apex of the organization is the General Assembly (GA), bringing together all the members of TI-Kenya. The members elect the Board of Directors, who meet at least once every quarter. The Board of Directors provides leadership and governance (policy, oversight, and strategic guidance). The Directors are drawn from different professional fields and disciplines that are relevant to TI-Kenya's work. The board is supported by various board committees, including the programmes, finance and investments, human resource and integrity awards sub-committees. The Board will oversee the execution of the strategic plan through quarterly updates to the Programmes and Strategy Committee. Where necessary and appropriate, the Board will validate major shifts in strategy and leverage its diverse expertise to steer TI-Kenya toward its strategic objectives.

Figure 2: Corporate Organogram for TI-Kenya



Management: The Secretariat is headed by the Executive Director, who provides the overall oversight for the institution, assisted by the Management Team, which comprises the Executive Director, Programmes Manager, Finance and Investments Manager, and Operations, People and Culture Manager. The management team also comprises persons with diverse professional backgrounds and expertise. The management is responsible for implementing the TI-Kenya strategy and board directives; ensuring financial sustainability; overseeing programme delivery and reporting; talent acquisition and management; as well as building and managing partner relations. In the remainder of the plan period, TI-Kenya will explore the possibility of progressing towards a flatter organisational structure and aligning it with some of its strategic choices made mid-stream, such as re-organising the county level work to deliver more through partners.

4.3 Advocacy and Strategic Communications



TI-Kenya requires robust advocacy and strategic communications to amplify evidence, elevate citizen voices, shape public discourse on integrity, and drive policy and behavioural change across all four strategic results areas. Consequently, TI-Kenya will strengthen its advocacy and strategic communications in several aspects: advocacy approach and key strategies; channels and tools; partnerships and stakeholder engagement; management and governance; and monitoring, evaluation, and learning.

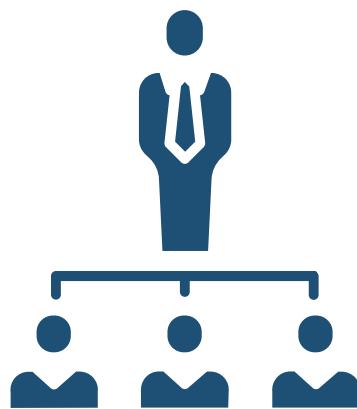
Advocacy Approach and Key Strategies: TI-Kenya will embed advocacy at every stage of programme delivery by co-developing communications strategies, plans and campaign toolkits (messaging frameworks, media packs,) aligned to pillar-specific goals. It will Leverage timely release of research findings, case stories, and policy briefs to secure high-impact engagements with Parliament, county assemblies, and oversight bodies. To reach both mass and hard-to-access audiences, TI-Kenya will deploy multi-channel “push-pull” tactics — press briefings, opinion-editorials, radio debates, social-media webinars, and online and sms polls. It will train and equip Integrity Clubs, CSO coalitions, youth networks, and faith leaders as community advocates and “first responders” on integrity messaging.

Subsequently, it will train journalists, journalism students and content creators and equip them with skills and best practices in reporting on governance, Public Finance Management as well as other niche topics that touch on TI-Kenya's programs. Lastly, it will coordinate joint actions with media partners through investigative fellowships, data-journalism hackathons, and recurring public-forum series (e.g., town halls, webinars).

Channels and Tools: TI-Kenya will leverage its website, social-media channels (Twitter, Facebook, LinkedIn and Tiktok), podcast, blogs, e-newsletters for message amplification. It will combine this digital approach with national and community radio, television features, and print op-eds. For mobile outreach, it will deploy SMS blasts, USSD feedback lines, and interactive voice-response surveys. For greater traction at the community level, TI-Kenya will use Integrity Clinics, social-audit reviews, innovation labs, and citizen scorecards. It will also use visual assets, such as infographics, doodles, explainer videos, interactive dashboards, illustrations, comics and policy-animation reels to curate complex report findings and insights into content that is simple to understand and reshare on social media, improve reach and understanding to drive behavior change.

Partnerships and Stakeholder Engagement: With the national and county governments, TI-Kenya will co-host press conferences and policy dialogues; and integrate citizen feedback into budget and regulatory reform processes. With civil society networks, TI-Kenya will pool resources for cross-CSO campaigns; share communication collateral through coalition platforms. It will also pilot and integrate chatbots into its websites for grievance redress and co-brand digital advocacy tools with private sector & tech hubs. With academia and research institutes, TI-Kenya will publish joint op-eds, present findings at policy roundtables and academic symposiums. Finally, with development partners, TI-Kenya will position itself as an independent national chapter in the global movement on anti-corruption; align on joint-funded advocacy campaigns; and exchange learning at regional forums.

Management and Governance: TI-Kenya will embed communications planning in annual workplans with clear deliverables, timelines, and budget lines. It will operate a central Advocacy and Communications Unit responsible for content creation, media relations, and brand stewardship; maintain a content-approval protocol and crisis-communications SOP to manage reputational risks and misinformation; and ensure strong oversight by the Board's Programme and Strategy, with quarterly review of advocacy impact and brand metrics.



Management and Governance: TI-Kenya will embed communications planning in annual workplans with clear deliverables, timelines, and budget lines. It will operate a central Advocacy and Communications Unit responsible for content creation, media relations, and brand stewardship; maintain a content-approval protocol and crisis-communications SOP to manage reputational risks and misinformation; and ensure strong oversight by the Board's Programme and Strategy, with quarterly review of advocacy impact and brand metrics.



Monitoring, Evaluation, and Learning: MEL is critical to advocacy success. Accordingly, TI-Kenya will track the key performance indicators aligned to the specific objectives highlighted under the four perspectives. This includes outreach metrics: media mentions, social-media reach and engagement, website analytics, SMS-poll response rates. It will also monitor influence indicators: citations of TI-Kenya research in policy debates, uptake of recommendations, shifts in public-opinion survey scores; operate a live Communications Dashboard feeding into the MEL system, with traffic-light indicators for campaign performance and course-correction; and conduct annual post-campaign reviews (incorporating focus-group feedback and stakeholder interviews) to refine messaging, tools, and channel mix.

4.4 Risk Management



TI-Kenya's overall posture through 2028 is going to reflect increased vibrancy and investment in more politically savvy tools for combating corruption, in addition to technocratic investments. This calls for a proactive, organisation-wide discipline that continuously identifies, assesses, mitigates and monitors risks across TI-Kenya's Action for Integrity Strategic Plan, safeguarding our people, assets, reputation and mission delivery. As a necessity, the organisation will require a risk management approach and systems that reflect proactivity (anticipate and address threats before they materialize); inclusivity (draw on insights from field teams, county partners and Integrity Clubs in risk identification); transparency (maintain and regularly update a shared, easily accessible risk register); accountability (assign clear ownership for each risk and mitigation measure); and adaptability (recalibrate responses as the political, security and operational environment evolves).

Risk Management Framework: The current risk management framework will be revisited to ensure it has robust mechanism for risk identification, risk assessment, mitigation planning, as well as monitoring and review. TI-Kenya will conduct quarterly context scans covering political, legal, security, financial, data protection and safeguarding domains and solicit periodic input from programme managers, ALAC desks and community monitors. TI-Kenya management will apply a standardized likelihood-and-impact scoring matrix to prioritize risks and map high-priority risks on a heat map for focused attention. Mitigation plans will be based on scenario-based protocols with contingency budgets and resource allocations and will include the enforcement of duty-of-care measures (security briefings, insurance, incident response teams) as well as internal controls across finance, procurement, HR and IT security. For monitoring and review, management will update a live risk dashboard monthly, highlighting emerging

hotspots and mitigation status and conduct quarterly deep dives to review and approve corrective actions. It should also trigger real-time incident reporting for any threshold breach, with immediate escalation.

Roles and Responsibilities: The Board Audit, Compliance and Risk Management Committee will review the risk policy, high-risk register, and major mitigation plans for the consideration and approval of the Board of Directors. The Management Team will have operational oversight of risk methodology, scenario planning and escalation protocols, while the MERL Unit will integrate risk indicators into performance dashboards, flag trends, and support data-driven adjustments. Programme leads will implement local risk controls, conduct field risk briefings and report incidents per SOPs while Operations & IT Teams will maintain compliance with security, procurement, financial and data-protection standards.

Reporting and Escalation: Reporting and escalation will be improved by maintaining a Live Risk Register (a cloud-based repository accessible to management, programme leads and the Board Secretary). Escalation protocols will entail predefined notification pathways and decision thresholds for low, medium and high-severity events. Quarterly Board Reporting will consist of a concise risk heat map accompanied by management's mitigation progress and upcoming action plan. It will also ensure business continuity tests



4.5 Sustainability and Resilience

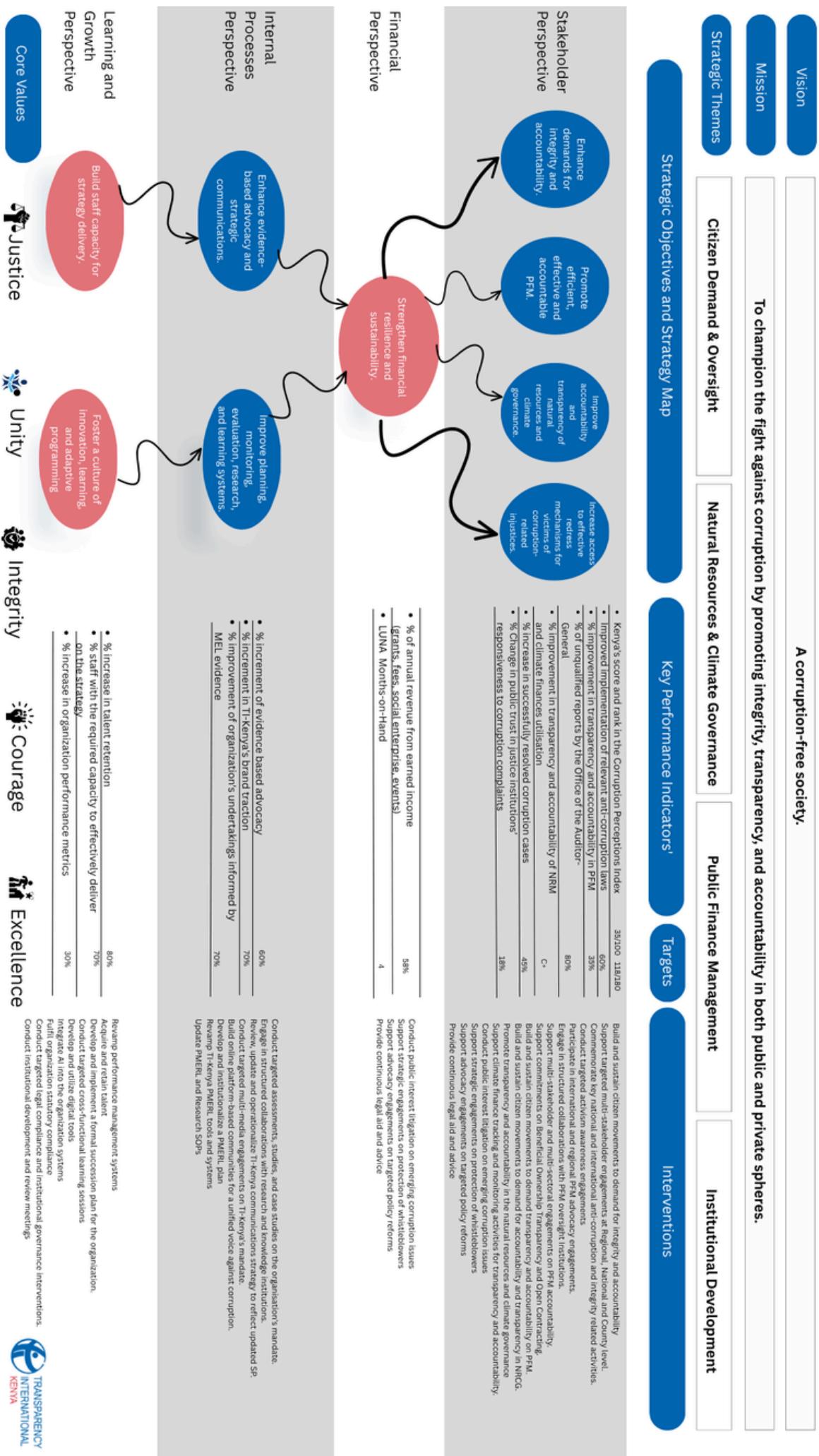
Ending corruption is a complex and ambitious undertaking. TI-Kenya needs to ensure that it remains financially viable, operationally robust, and strategically adaptable to sustain anti-corruption impact through changing political, economic, and environmental conditions through 2028 and beyond. Key strategies in this regard include financial resilience (the ability to withstand financial shocks, such as delayed or reduced funding); operational resilience (business continuity); partnership and network resilience (maintaining the stakeholder relationships necessary for long-term success); and contextual resilience (ability to withstand shocks from its external context). By institutionalizing these financial, operational, partnership, and contextual resilience measures, TI-Kenya will safeguard its independence and amplify its ability to deliver on the Action for Integrity Strategic Plan—no matter how the external environment evolves.

Financial Health and Resilience: TI-Kenya will safeguard its financial health and resilience by diversifying revenue streams (combining unrestricted grants, fee-for-service contracts, social-enterprise pilots and individual giving) while institutionalizing full-cost recovery to ensure every programme budget covers overhead, risk buffers and reinvestment. We will build and maintain operating reserves equivalent to at least three months of core costs, underpinned by a rolling five-year funding pipeline with quarterly updates. Rigorous cost-aware budgeting, robust financial risk policies and regular reserve reviews will shield us from shocks. At the same time, strategic partnerships and consortium models will broaden resource channels, and contingency planning (including business-continuity tests and digital-security investments) will reinforce our operational backbone. Once reserves are at the right level, TI-Kenya should expeditiously follow through on its long-standing aim to acquire office space. Together, these measures will enable TI-Kenya to absorb disruptions, adapt swiftly to evolving contexts and sustain high-impact anti-corruption programmes.

Programme Sustainability: TI-Kenya will secure programme sustainability by embedding ownership and capacity at every level (from county partners and Integrity Clubs to community champions) so that anti-corruption tools, processes and mindsets become self-reinforcing long after direct support ends. We will co-design interventions with government agencies and civil-society networks, transfer core competencies through targeted mentorship and peer-learning cohorts and institutionalize maintenance of social-audit and feedback mechanisms within partner systems. By codifying lessons in accessible toolkits, integrating adaptive funding allocations into annual plans, and nurturing multi-stakeholder coalitions committed to integrity, we ensure that each programme or project evolves into a resilient, locally owned and managed model capable of sustaining impact, scaling innovation and driving continuous accountability across Kenya's diverse contexts.

Roles and Governance: The Board has ultimate responsibility for the survival of the organization and its programmes. It will approve multi-year financial policies, reserve targets, and resilience investments and review quarterly fiscal health reports and contingency-plan activations. The Management Team will oversee fundraising strategy, social-enterprise pilots, and fundraising pipeline management. It will also ensure business continuity tests and digital-security exercises are conducted on schedule. The Operations and Finance Teams will manage reserve accounts, monitor unrestricted revenue ratios, and execute procurement in line with green-procurement guidelines. They will maintain and update the Business Continuity Plan, cybersecurity posture, and knowledge-management systems. Programme leads will integrate flexible-fund allocations and risk-scanning updates into annual work plans and coordinate with county partners and consortium members to share infrastructure and backstop delivery under challenging conditions.

STRATEGY MAP



THE PAST FIVE YEARS IN PICTURES





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