



TRANSPARENCY
INTERNATIONAL
KENYA



CORRUPTION RISK
ASSESSMENT OF INFRASTRUCTURE
PROJECTS IN KENYA

ABOUT TRANSPARENCY INTERNATIONAL KENYA

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.

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ACRONYMS AND ABBREVIATIONS

- AHB** - Affordable Housing Board
- AHP** - Affordable Housing Programme
- BETA** - Bottom - Up Economic Transformation Agenda
- CRA** - Corruption Risk Assessment
- CRBC** - China Roads and Bridges Corporation
- EA** - Environmental Audit
- EIA** - Environment Impact Assessment
- ESIA** - Environmental and Social Impact Assessment
- ICRAT** - The Infrastructure Corruption Risk Assessment Tool
- MGR** - Meter Gauge Railway
- PIM** - Public Investment Management
- PIIP** - Public Procurement Information Portal
- PPP** - Public Private Partnership
- PPRA** - Public Procurement Regulatory Authority
- SGR** - Standard Gauge Railway

EXECUTIVE SUMMARY

Infrastructure development is a key driver of economic growth in Kenya. Unfortunately the infrastructure sector remains at risk and susceptible to corruption and governance failures. From the recent reports, Kenya is losing over KES 600 billion in stalled and mismanaged public infrastructure projects emanating from mismanagement of funds, stalled funds, corruption and poor implementation of relevant legislative frameworks. Undermining public trust, increasing the debt burdens for the citizens and harbouring the benefits that infrastructure investments are supposed to deliver to the citizens. Against this background and using the Infrastructure Corruption Risk Assessment tool - ICRAT - TI Kenya with support from TI Australia under the Fiscal Transparency and Accountability Initiative which aims at advancing Responsible Infrastructure Investment conducted a corruption risk assessment on the infrastructure sector in Kenya using three case studies - The Standard Gauge Railway, The Kiambu Civil Servants Housing Scheme and The Vihiga Affordable Housing Project. The goal for this assessment was to ensure that Public Investment Management (PIM) processes are comprehensive, transparent and accountable, leading to infrastructure projects benefiting communities. The assessment of these three projects - which was conducted between September 2025 and March 2026 - relied on a combination of - Open-source data search and analysis, access to information requests, fact - finding missions and stakeholder consultations.

Key Findings

The ICRAT tool assessment matrix examined the country context otherwise known as the general context and the agency specific context integrating important political, institutional and operational factors leading to the generation of consolidated findings. Under the country context the average rating score is categorized as high risk to corruption. The key areas of concerns which were identified as contributing factors to the high risk were - limited transparency in public procurements; gaps in the whistleblower protection; persistent perception on corruption; and the cultural hierarchy where elite networks and patronage systems continue to influence public decision-making and resource allocation. Implementation gaps on the Access to Information Act, 2024 and the Public Finance Management Act, 2012 were spotlighted as some of the loops existing that subvert effective oversight on public infrastructure.

The Standard Gauge Railway - SGR

Based on the analysis done using the ICRAT tool the SGR project had the highest corruption risk, with an indicative corruption risk rating of 4.49, which is considered very high - compared to the other two infrastructure projects assessed. Major critical loopholes identified were - weak grievances mechanism; opaqueness of the contracts whereby there was limited public disclosure of full project costs, loan terms, and detailed expenditure reduced transparency and public oversight; opaque procurement processes and non -transparent community engagements. The SGR project was majorly financed through Chinese loans and executed by external contractors voicing concerns on long term debt sustainability and conflict of interests.

Kiambu Civil Servants Housing Scheme

Executed during President Uhuru Kenyatta tenure under the affordable housing pillar of the Big Four Agenda - the project displayed a moderately high corruption risk with a vulnerability score of 3.24. Key corruption risks areas pointed out were - conflict of interest in procurement process; environmental planning concerns and transparency on the budget in terms of the amount of money allocated versus the amount of money spent. Notwithstanding the fact that the project followed a more structured policy framework, bureaucratic and procurement delays as well as limited private investors interest due to regulatory and market risks curtailed its effectiveness in addressing the housing shortage.

Vihiga Affordable Housing Project

Implemented under President William Ruto - Bottom - Up Economic Transformation Agenda on the affordable housing program - Vihiga affordable housing project recorded moderately high corruption risk with a vulnerability score of 3.56. Major corruption risks spotlighted areas included - *absence of critical project documentation which include, Environmental Impact Assessment, feasibility studies, Environmental and Social Impact Assessment, superficial community engagement during the project design and inception phase and probable conflict of interests in the project procurement processes.* These gaps cast doubts on the project's transparency and long-term sustainability frameworks.

Conclusion

The corruption risk assessment in these three projects illustrates varying corruption risks ranging from very high risks in the SGR project to moderately high risks in the two housing projects. Weak and limited public participation, inadequate documentation, opaque procurement processes catalysed by vested interests were some of the red areas spotlight that magnify the risk of corruption in the three assessed infrastructure projects. These findings underscore the pressing needs for institutional accountability and enhanced transparency in the nations investment management processes ensuring that infrastructure projects in the country deliver value for money - serving their intended purposes contributing to sustainable and inclusive development that meets the community needs.

Key Recommendations

The key recommendations include: -

- o The **Kenya Railway Corporation, State Department for Housing and Urban Planning, Boma Yangu** and other government entities implementing infrastructure projects should proactively publish all project selection documents, final contract agreement and progress implementation to ensure Public Investment Management (PIM) processes are comprehensive, transparent and accountable.
- o The **National Assembly** should put in place legislative and oversight measures to promote Responsible Infrastructure Investment in infrastructure projects selection, implementation and evaluation processes.
- o The **National Assembly** should ensure that the investment policies approved under the newly enacted National Infrastructure Fund Act, 2026 align to value for money and return on investment principles.
- o The **National Assembly and Directorate of Public Private Partnerships** should ensure that projects identified for infrastructure development under the PPP framework and the newly enacted National Infrastructure Fund Act, 2026 are aligned to long-term sector policies, multi-year plan or frameworks

- o The **Directorate of Public Private Partnerships** should restrict the abuse of Privately Initiated Proposal (PIP) to circumvent abuse of bidding process and promote competitive bidding for high-cost infrastructure projects.
- o The **National Treasury and Economic Planning** should establish corrective actions to enhance Value for Money on ongoing and planned infrastructure developments in turn ensuring project implementation is aligned approved project budgets.
- o **Public Procurement and Regulatory Authority, Public Private Partnership authority and Procurement entities** should ensure mandatory disclosure of all project selection documents on public procurement information portal and the final contract agreement.
- o The **procuring entities** should ensure compliance to the conflict-of-interest act including making public Beneficial Ownership information of companies involved in the procurement of the infrastructure projects.
- o The **oversight institutions** should collaborate with relevant state and non-state actors to conduct comprehensive infrastructure corruption risk assessments and support in addressing the identified areas of vulnerability.
- o **National Environmental Management Authority** should ensure mandatory disclosure of Environmental and Social impact assessment reports, feasibility studies and relevant public participation documents.
- o **Professional associations** should promote the highest standards of ethics amongst their members and put in place accountability mechanisms including capacity development to address corruption vulnerabilities in infrastructure project implementation process.
- o The **media and civil society actors** should promote transparency and accountability in infrastructure developments in the Country through strategic partnerships and collaboration with accountability partners to advance public awareness and targeted joint advocacy actions.
- o The **Civil Society Organizations (CSOs)** should support citizens with social accountability tools including public expenditure tracking, citizen score cards and social audits as a means of ensuring citizen oversight on infrastructure projects.

1.1 INTRODUCTION

TI-Kenya with support from TI-Australia is implementing a project dubbed “Fiscal Transparency and Accountability Initiative” which aims at advancing Responsible Infrastructure Investment. The project goal is to ensure that Public Investment Management (PIM) processes are comprehensive, transparent and account-able, leading to infrastructure projects benefit-ing communities in developing countries. The project seeks to utilize the Infrastructure Corruption Risk Assessment tool (ICRAT) to evaluate Corruption Risks Assessment in the infrastructure sector of the selected infrastructure projects) in Kenya.

This project aimed to: -

- a)** Generate empirical evidence to deter corruption.
- b)** Provide data for effective advocacy on transparency in the government infrastructural development projects.
- c)** Contribute to improved accountability in the public sector spending.

The Infrastructure Corruption Risk Assessment Tool (ICRAT) helps users identify the loopholes that enable corruption to thrive in the infrastructure sector. The ICRAT tool is designed to assist civil society and other stakeholders to ask the right questions and hold those responsible for commissioning, selecting and financing public infrastructure to account. The tool provides a practical, easily applicable roadmap to identify and mitigate red-flag corruption hotspots during the process of project selection.



WHY DO WE NEED THIS TOOL? The tool identifies the loopholes that enable corruption to take hold early in the project cycle, during the selection of an infrastructure project. Current infrastructure investment is high and needs to increase over the next decade to meet the Sustainable Development Goals, deal with climate change and stimulate the economy following the COVID-19 downturn. The Global Infrastructure Hub estimates there is a \$15 trillion USD investment gap between projected investment and the amount needed to provide adequate global infrastructure by 2040. Reducing the losses associated with poor infrastructure governance could significantly reduce this gap and ensure there is more money to go towards projects the community needs.

If the project selection process is skewed or manipulated and corruption or undue influence is able to gain a foothold at the project selection and design stage, the flow on effects over the life of the project can be huge or even disastrous. It can result in cost blowouts and inefficiencies, poor quality or substandard construction and ‘white elephant’ projects, poorly aligned with the public’s need. Addressing a gap Several tools have been designed to help civil society in the procurement and construction stage of the project cycle. However few, if any, specifically target the project selection stage of an infrastructure project. This tool is designed to assist civil society and other stakeholders to assess the project selection process, ask the right questions and hold those responsible for commissioning and selecting public infrastructure to account



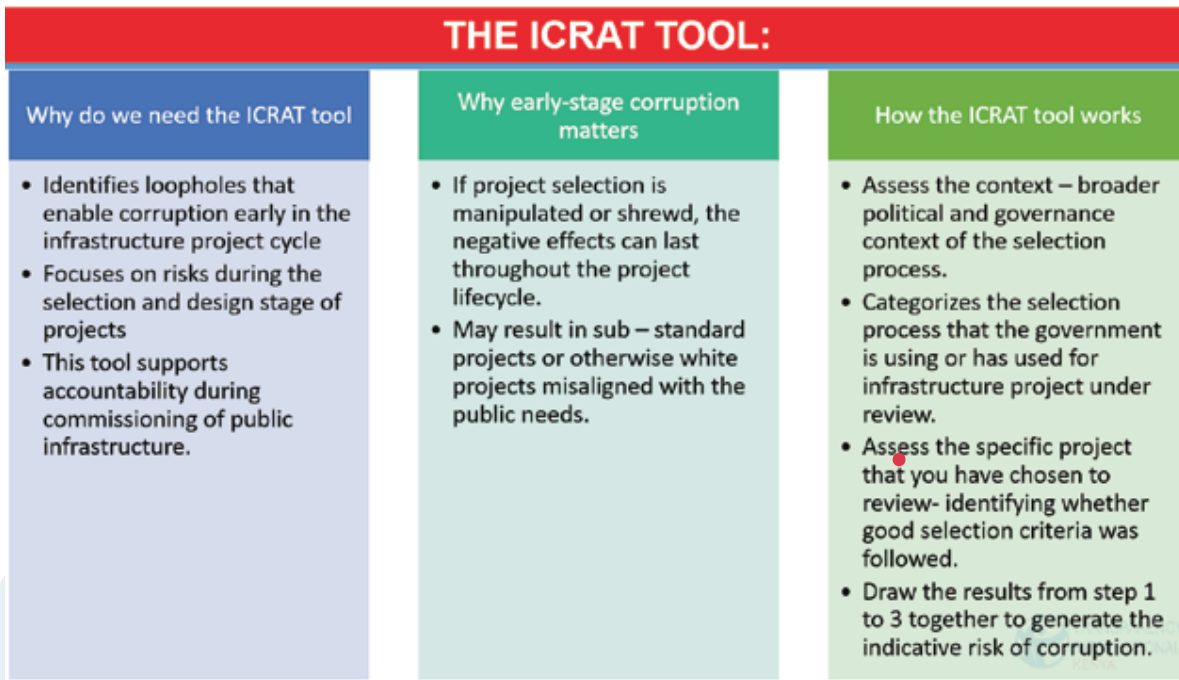


Figure 1: The ICRAT Tool

HOW DOES IT WORK? This tool guides the user through two assessments of the contextual and project- specific corruption vulnerabilities and then guides the user through approaches to communicate the results of these assessments to the authorities.

Level I: Initial Assessment assesses the broad political or governance context of the selection process and the agency context of the project itself.

Level II: Detailed Assessment is an optional, further detailed assessment of aspects in the project selection process that have been highlighted by the initial assessment. The final step ‘Communicating and Addressing’ guides the user to develop mitigating actions and messaging to communicate the results and advocate for improved processes and measures.

The ICRAT has been designed to be a practical and flexible process to identify red-flags and address vulnerabilities to corruption. It principally assesses the ‘grey areas’, such as undue influence and equips users with a process for separating corruption from mismanagement and incompetence. It will also help to identify those areas that are vulnerable to grand corruption, involving high-level officials.

In more detail, the three levels of using the ICRAT instrument can be seen as follows:

Table 1. ICRAT Assessment Steps

Stage 1. Initial Assessment	Stage 2. Advanced Assessment * ¹¹	Stage 3. Communication of Findings and Follow Up
1. Assess context	5. Identify specific corruption risks	6. Respond to risk
2. Grouping the project selection stages		7. Risk mitigation
3. Identify project vulnerabilities		8. Reporting
4. Assess indications of corruption risks		

From the table above, in summary, it can be seen that the ICRAT instrument can be carried out in six steps which include:

1. Steps 1 to 4 are used to conduct a Level I assessment

a. Step 1 assesses the risk of corruption in the General Context where the infrastructure project is being developed.

b. **Step 2** categorizes the project selection process that the government uses or has used for the infrastructure project under review.

c. **Step 3** assesses the specific projects that have been selected for review to identify whether sound selection criteria and appraisal processes were followed.

d. Step 4 draws on the results from Steps 1 to 3 to generate an Indicative Risk of Corruption.

2. Step 5 is optional and can be used for a Level II assessment. This step is carried out to reexamine the selection criteria and the evaluation process assessed in Step 3 in more depth. This process is carried out to understand the vulnerability variables in more detail and whether the vulnerability is more likely due to mismanagement, negligence, or undue influence.

3. Steps 6 to 8 are for Level III used to conclude (i.e., after Level I or Level II has been done) and prepare to communicate results. This step helps draw conclusions, develop material for follow-up reporting, and guide the research team in providing recommendations for mitigation actions. The last part of this step is to produce a summary report to communicate the assessment findings to stakeholders, especially government officials and the media.

WHO CAN USE IT?

Civil society: Civil society organisations benefit with a better understanding of corruption risks, empowering them with better opportunities to participate during the often-opaque process of selecting infrastructure projects.

Government: Government officials benefit with stronger evidence of the institutional weaknesses and gaps that may be contributing to integrity failures and poor outcomes in infrastructure development.

Infrastructure developers and financiers: Infrastructure developers and financiers benefit by being better able to understand, assess and mitigate corruption risks, and provide assurance that project decision-making is fair, transparent, and based on merit and need.



1.2 CONTEXT

Kenya is losing more **Sh600 billion** in stalled and mismanaged public infrastructure projects emanating from mismanagement of funds, stalled funds, corruption and poor implementation of relevant legislative frameworks. Despite the government having the **Bottom-Up Economic Transformation Agenda** for Inclusive Growth, the actualization of the commitments including delivery of infrastructure projects remains unfulfilled despite having billions of KES allocated to public infrastructure projects. Besides having a debt burden, these trends have a direct impact on the Country economy and wellbeing of the citizen.

The **2025 Projects Progress and Status Report** indicated that Kenya had a total of 37 PPP projects. A total of 8 PPP projects are currently in the implementation phase, with the remaining 29 being at various stages. Out of the 37 projects, a total of 16 are PIP projects in transport (3), energy (2), water (5), health (1), Agriculture & Irrigation (3), Environment (1), and Education (1).

Notably, the infrastructure sector in Kenya, continues to face numerous challenges including severe financing constraints and high debts, land acquisition and compensation issues, vandalism, inefficient project management and cost overruns. Recent reports highlight misuse of privately initiated proposals (PIPs) as a procurement method. For instance, the government cancelled a PIP by the **Adani Group** for the JKIA expansion and another **power transmission project** over transparency and value-for-money concerns. The Office of the Auditor General has also repeatedly flagged irregularities in PPP projects. Poor enforcement of relevant legislations that govern PPPs - **Public Private Partnership ACT, 2021** and the **Public Procurement and Asset Disposal Act 2015** - have often been by passed by the government through direct procurements (single sourcing) and privately initiated proposals leading to inflated costs lack of transparency and corruption in the infrastructure sector. Recent accounts particularly point to concerns of abuse of **privately initiated proposals** as a procuring method for PPPs.

1.3 RESEARCH SCOPE

This research is focused on understanding, identifying and assessing systemic vulnerabilities and corruption risks in the project selection stage of the infrastructure project cycle. It is hoped that by using the ICRAT instrument, stakeholders, especially civil society organizations, can promote accountability in a public infrastructure project. The ICRAT trial process in Kenya began with assessing three Government infrastructure projects.

- **The Standard Gauge Railway** - Under Kenya's Vision 2030 - Transport and Infrastructure Development - The purpose of the project - SGR phase 1 and 2 -which is under the Kenya Railway Corporation, was to construct a railway from the Kenyan port of Mombasa to Nairobi (phase 1) to Naivasha (Phase 2A) for transportation of Cargo and passengers. However critics note that due to underlying governance related challenges this purpose might not be fully achieved with scope- Analysts note that freight demand and passenger volumes initially are lower than projected, making the SGR Inadequate in terms of serving the people who needs it the most.

- **The National Affordable Housing Programme (Boma Yangu)** - Kiambu Civil Servants Affordable Housing project and Vihiga County Affordable Housing project - The Big Four Agenda identified Affordable housing as one of the manifestos they were to deliver to the Kenyan citizens. The affordable houses under civil servants housing Kiambu was established to address the issue of housing shortages in Kiambu county and improve the overall quality of life for low and income families. From the assessment using the ICRAT, the project failed to meet the implementation objectives. The project was characterized by cultural hierarchies and conflicts of interests and hence the target group did not benefit from the project.

The BETA manifestos outlined housing and settlement as one of their key assignment particular in improving the rural and urban housing and settlement through growing the number of mortgages to 1,000,000 by enabling low-cost mortgages of less than Ksh.10,000. The Vihiga Affordable Housing Project with 220 housing units was initiated in Milimani estate, Vihiga County. This project has faced a lot of **critics** due to lack of public will as their implementation plan is not publicly available. The funding model for the project has also faced a lot of critics and it's even hard to tell whether the project will benefit the target group.



These projects were chosen because of the availability and access to data, the source of funding, the total investment value is significant, the project status has been completed or will be completed soon, the various procurement schemes, and the high level of public attention, such as the spotlight on audit results or the media regarding non-optimal performance, ethical violations, allegations of maladministration, as well as the negative impact of the development on the environment or local communities, especially for the marginalized populations.

1.4 DATA COLLECTION METHODS

The research team was led directly by Transparency International Kenya, as well as three external investigative journalists. During the research process, the research team invited experts from various fields—including the government, private sector, professionals, and civil society organizations—to share their views, both for the ICRA instrument and during the research process. Ensuring the diversity of views is crucial so that the information obtained is representative and balanced. The TI Kenya research team carried out the data tracking/ collection/ collating and analysing process independently. The research team combined primary and secondary data from key informants' interviews, searching for data from open sources to formal requests for information from several related institutions.

1.4.1 Open-Source Data Search

This activity was carried out to explore publicly available data contained in sources from the official website. This step was carried out to obtain more detailed in-depth data and information regarding key questions, including those related to the project selection process, identification of gaps between official regulations and practice in the field, a list of related policies, and validating of the vulnerabilities and risks of corruption that occur and their impacts. Sources from official websites include official government websites, companies, academic journals, media houses website as well as research reports from various non - state actors. This data tracing process was carried out from October 2025 to March 2026.

1.4.2 Information Requests

Access to information requests in regard to the infrastructure projects that TI - Kenya was accessing was necessitated by the lack of the needed information on the various official websites. Article 35 of the Constitution of Kenya guarantees every citizen the right to access information held by the state or by another person, if required for the exercise or protection of rights. This mandate discharged by the Access to Information Act, 2016 - seeks to promote transparency, democracy and accountability by requiring disclosure of information by public entities. The research team submitted an official letter requesting information to The National Treasury and Economic Planning; The National Environmental Management Authority, The State Department for Environment and Climate Change - Ministry of Environment, Climate Change and Forestry; Controller of Budget of the Republic of Kenya; State Department for Housing and Urban Development - Ministry of Lands, Housing and Urban Development; National Lands Commission - Kenya; State Department for Transport -Ministry of Transport and Infrastructure; The Kenya Railway Corporation; The Office of The Auditor General.



The list of information requested by the research team includes the following:

- a. Project annual report*
- b. Audit reports - project specific budgets*
- c. Contractor beneficial ownerships and conflict of interest's disclosures*
- d. Project Terms of Reference (TOR)*
- e. Project procurement contract documents*
- f. Feasibility study documents and environmental Documents, including Environmental Impact Analysis as well as environmental audit reports.*
- g. Gender - disaggregated beneficial data.*

This access to information request was expected to provide more comprehensive, overarching information on mapped infrastructure projects. However, by the time this report was completed in March 2026, there had been no response that met the needs of the request for information, both technically in terms of time and substance of the answers.

1.4.3 Fact - Finding and Verification Mission

TI - Kenya conducted a fact-finding and verification mission in Murtoto, Suswa - Narok County in January 2026 - to assess implementation outcomes and corruption risk indicators related to the termination point of the Standard Gauge Railway. Providing an opportunity for the team to ascertain and confirm various corruption risks indicators in line with the SGR infrastructure project, suggesting recommendation that will strengthen transparency, integrity and accountability in Kenya's public infrastructure projects. By capturing the site conditions and observed realities, through photography and videography, we were able to generate first hand empirical evidence on the magnitude of corruption in the infrastructure sector and in the SGR sector most specifically.

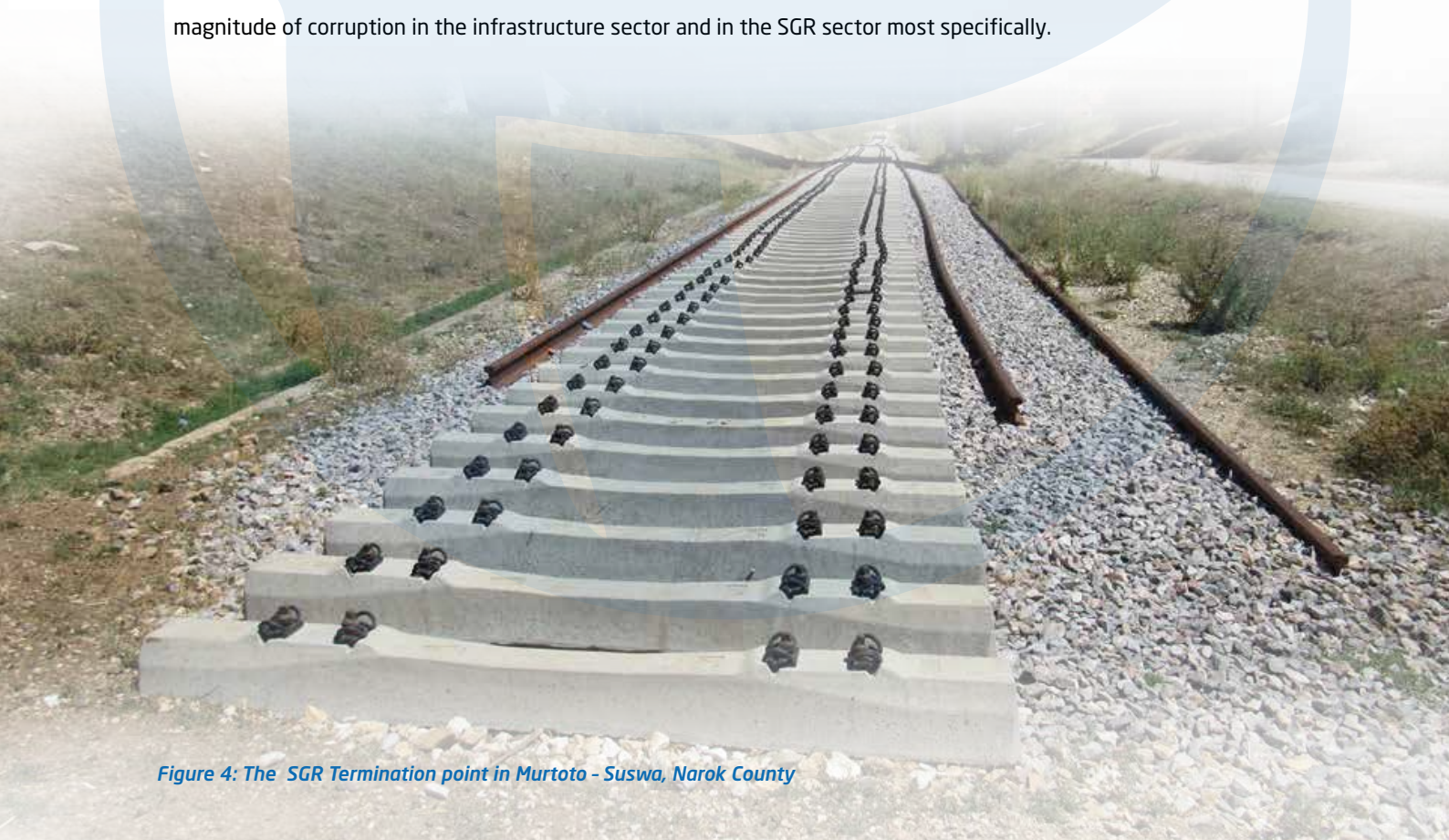


Figure 4: The SGR Termination point in Murtoto - Suswa, Narok County

1.4.4 MULTI - DISCIPLINARY MEETING

A multi-disciplinary meeting was conducted in February 2026 in Nairobi, providing an opportunity for the stakeholders to share insights to the assessment reports on the mapped infrastructure projects - The Standard Gauge Railway and The Boma Yangu - while suggesting recommendation that will strengthen transparency, integrity and accountability in Kenya's public infrastructure projects. The multi - disciplinary meeting invited a number of stakeholders from both state and non-state actors.

Including: The Media Council of Kenya, National Environmental Management Authority, Office of the Auditor General, Media agencies, Architectural Association of Kenya, the private sector and Civil Society Organizations. The multi-disciplinary meeting which involved subject experts was extremely vital as it helped ensure that we achieve a balanced non bios assessment, enriching the reliability and validity of the information



2.0 KEY FINDINGS FROM THE RESEARCH PROCESS

Using the ICRAT Tool to assess the corruption risk in the infrastructure sector with a focus on the Standard Gauge Railway and The Boma Yangu project (Kiambu Civil Servants Affordable Housing project and Vihiga County Affordable Housing project), the assessment provides evidence-based insights, targeted recommendations based on the research findings. The ICRAT tool assessment matrix examined the country context otherwise known as the general context and the agency specific context integrating important political, institutional and operational factors leading to the generation of consolidated findings. The general context is the general political economy of the country and government, in which incentives and expectations are shaped, finances and priorities are managed, fairness and openness are upheld, and public decisions and approvals are made. While the agency context are the decision makers involved in the specific case of the project selection - such as the community engagements, agency head, technical advisers, and any financiers or influencers, the professional competency and capacity for the task, and the mechanisms for consultation and redress.

2.1 COUNTRY CONTEXT

The assessment on the country context involved eight assessment criteria matrixes namely: The election process; Legal, judicial system and whistleblowers; Public finance and procurement; Cultural hierarchy; Access to Information; Openness of media; Civil society activity and The Corruption perceptions. On each of the a forementioned assessment criteria's, scoring was done, on a scale of 1 - 5,

Figure 5: Likert Scale with 1 indicating low risk to corruption vulnerability and 5 indicating very high risk to corruption vulnerability.



with 1 indicating very good performance - low risk and 5 indicating extremely poor performance - very high risk.

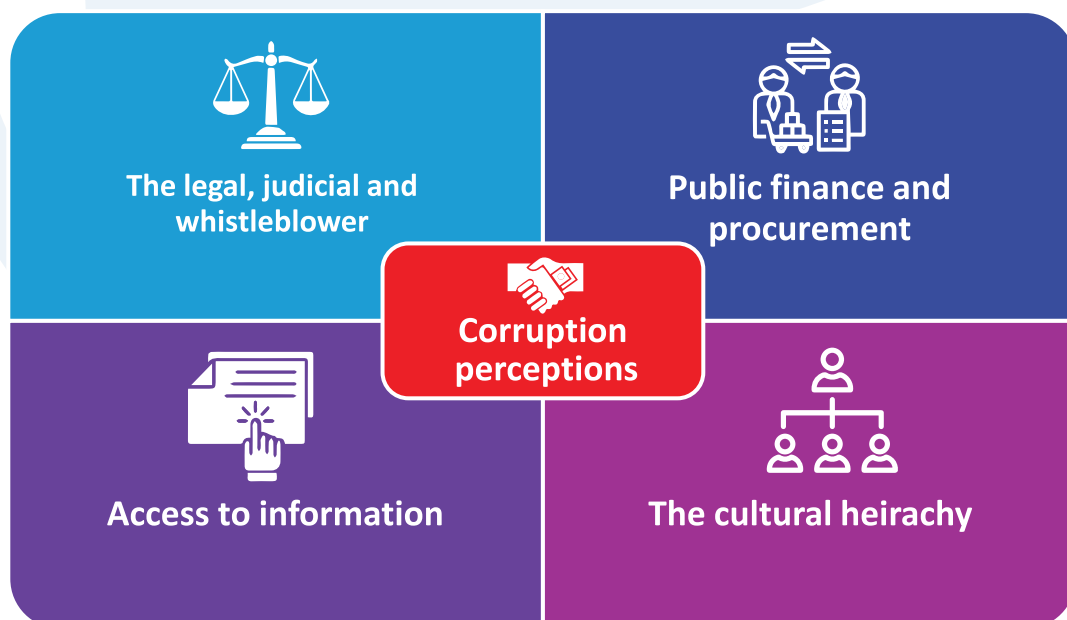
The scoring under each of the eight assessment criteria was systematically evidence based determined after going through an extensive and thorough data collection process that included: open-source data search, information request, fact finding and verification mission, multi - stakeholder engagements and contextual analysis, ultimately collating and synthesizing the findings and arriving at the final score. The governance aspects having very high-risk rating of either between 4 or 5, were identified and listed as key areas of concerns.



Under the country context the average rating score was 4.125 - which is categorized as high risk. The key areas of concerns which were identified as contributing factors to the high risk were:

- 1) The Legal, judicial and whistleblower** - gaps remain in judicial efficiency, perceived independence, and strong whistleblower protection enforcement. With this gap amplified by the lack of a single, comprehensive law explicitly dedicated to the protection of whistleblowers.
- 2) Public Finance and procurement** - strong legal frameworks -Public Finance Management ACT, 2012 exist, but implementation gaps, procurement irregularities, and political influence risks remain.
- 3) Access to information** - legal access exists - Access to information Act, 2016, but delays, limited proactive disclosure, and restricted project-level transparency persist.
- 4) Corruption perceptions** - The corruption perceptions in the country are very high, with the 2025 corruption perception index released by Transparency International showing a decline in Kenya corruption perception. With Kenya scoring 30 out of 100, dropping from 32 in 2024.
- 5) The Cultural hierarchy** - elite networks and patronage systems continue to influence public decision-making and resource allocation

While the Kenyan Constitution and Access to Information Act 2016 provide the right to information, there are inconsistencies due to government obtrusion and a lack of public awareness. Public participation is limited, and government is not accountable to civil society and the public on their input and contribution to decision-making processes. Despite the existence of the laws, compliance is inconsistent both at the county and national level. Effective implementation has been hindered by government interference, and a lack of proper monitoring frameworks, which exacerbates the corruption risks in the country across all sectors.



2.2 THE STANDARD GAUGE RAILWAY

Under Kenya's Vision 2030 - Transport and Infrastructure Development - The purpose of the project - SGR - was to construct a railway from the Kenyan port of Mombasa to Nairobi (phase 1) to Naivasha (Phase 2A) for transportation of Cargo and passengers. However opaque procurement process, cost overruns as well as governance challenge have made the anticipated economic transformation expectations partly a pipe dream. The cost and value of the project was way above - Phase 1 cost Ksh490.92 billion, 90% of which was funded through Chinese loans. Phase 2A, which extended the line to Naivasha, was completed at a cost of Ksh 193.78 billion. As of November 2024, the original Ksh 539 billion loan borrowed for the SGR phase 1 and 2 have ballooned to Ksh 737.5 billion to interest accrued from non-payment - the cost is too much for a struggling country.

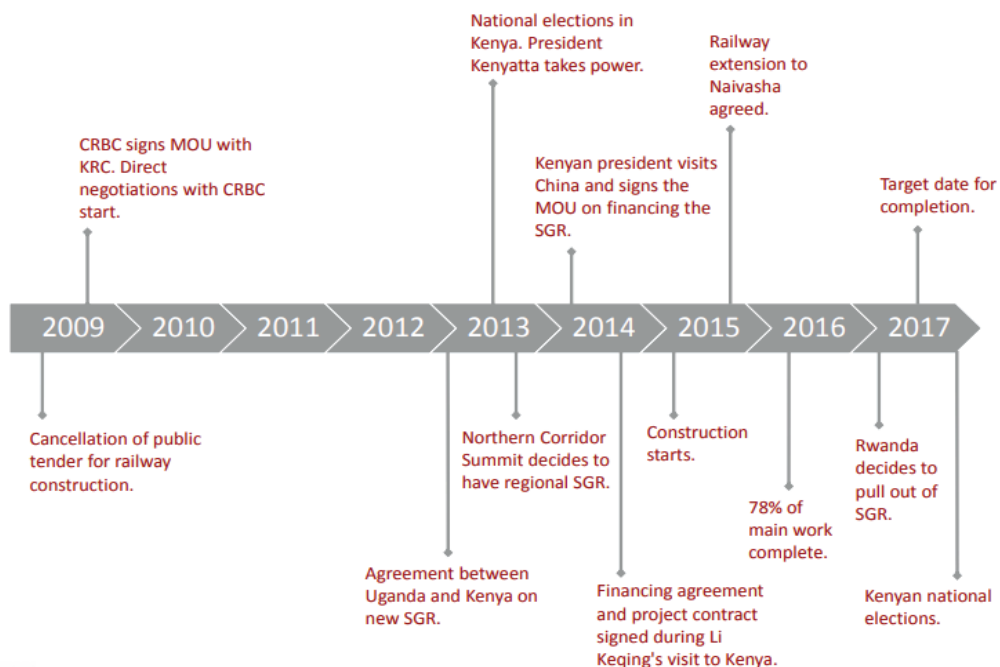


Figure 6: Timelines of the Standard Gauge Railway Construction: Source: Wissenbach & Wang (2017)



2.2.1 AGENCY CONTEXT - THE KENYA RAILWAY THE STANDARD GAUGE RAILWAY CORPORATION

The Kenya Railway Corporation is a state corporation which was established in 1978 under the Kenya Railways Corporation Act (Cap 397) as the governing body responsible for the Standard Gauge Railway. Kenya is slated to commence the expansion of the Standard Gauge Railway from Naivasha to Kisumu and Malaba in February 2026 indicating a significant infrastructure development. The Kenyan government is eyeing Ksh 390 billion bond to fund the SGR extension to Malaba from Naivasha signalling the unwillingness of China to finance the project. The infrastructure sector is a major driver of economic growth and development but one of the most corruption-prone sectors. This often results in increased risk of public infrastructure projects ending in wasted resources, evident gaps in infrastructural provision and debt distress. As Kenya plans to commence the expansion of the SGR it is important to map out and address corruption risks throughout the project lifecycle and mitigate any governance related shortcomings that may arise from this project.

The assessment on the agency context - in this case being the Kenya Railway Corporation involved eleven assessment criteria matrixes namely: The Executive management; External influence in agency operation; Professional interaction within the agency; Professional and technical capacity; Openness of communication; Transparency on budget and program; Grievance mechanisms; Agency and leadership reputation; Vested interests; Agency industry relationships; Community engagements. On each of the a forementioned assessment criteria's, scoring was done, on a scale of 1 - 5,



Figure 7: Likert Scale with 1 indicating low risk to corruption vulnerability and 5 indicating very high risk to corruption vulnerability.

with 1 indicating very good performance - low risk and 5 indicating extremely poor performance - very high risk.

The scoring under each of the eleven assessment criteria was systematically evidence based determined after going through an extensive and thorough data collection process that included: *open-source data search, information request, fact finding and verification mission, multi - stakeholder engagements and contextual analysis*, ultimately collating and synthesizing the findings and arriving at the final score. The agency aspects having very high-risk rating of either between 4 or 5, were identified and listed as key areas of concerns

Under the agency context the average rating score was 4.49- which is categorized as high risk. The key areas of concerns which were identified as contributing factors to the high risk were:

1) Grievance mechanism - grievance resolution processes were unclear and difficult to access, especially due to the opaque contractual and dispute resolution arrangements. With disputes regarding SGR handled through arbitration in Beijing China,

" If no settlement is reached through friendly consultation each party shall have a right to submit a dispute to the China International Economic and Trade Arbitration Committee for arbitration"- The contract reads

2) Transparency on budget and program - Bleak transparency gaps in project selection and opaqueness of the contracts. There was limited public disclosure of full project costs, loan terms, and detailed expenditure reduced transparency and public oversight. - rushed signing of the SGR contracts - The contracts for the Standard Gauge Railway were signed in a record two weeks, from the day a "feasibility study" was approved. Details from the contracts notes that the Kenyan government cannot disclose or release contents of these contracts, courtesy of the non- disclosure clauses placed on them without the full approval of the China Exim Bank (financer of the SGR) and the China Roads and Bridges Corporation (the executor).

" Each party understands to maintain the commercial confidentiality of any information data or document which it gains during the performance of this contract and not to make such information data or document available to any third party" The confidentiality clauses

3) Community engagements - Public consultation meeting for the Nairobi Naivasha Standard Gauge Railway Project Environmental and Social Impact assessment was done unethically. The meeting notice was issued on an extremely short notice (letter dated 19th September 2016 - arrived 21st - first hearing on 22nd September 2016) - as such there was no avenue for any meaningful public consultation/ engagements.

4) Vested interests - Conflict of interest issues were frequent. The China Roads and Bridges Corporation (CRBC) were given the leeway by the Kenyan government to do their own "feasibility study" and implement it, additionally they were given the contract to build the SGR, provision of rolling stock - supplying, leasing, and the procurement of railway locomotives - allowed to supervise themselves and given all the rights to form a company that runs and operates the SGR . CRBC was exempted from tax on all imported equipment and materials and given the permission of adjusting the prices of individual components of the contracts by making the bill of quantity non-binding.

The open-ended nature of the contracts led to uneven variation in prices on various occasions, making it challenging to even know the exact amount that SGR cost. A case in point, the supplying and installation of facilities, locomotives and stock contract was done in US dollars while the civil works contract was done in Kenyan shillings.



2.2.2 PROJECT SELECTION TYPE

The process used to select and authorise a major infrastructure project can vary considerably between countries and, to some extent, between various agencies within a country. For this project there are two stages in project selection which featured in every type of process:

- a) **Project identification:** In which the type, location and scale of the project are identified from among a range of other potential projects and options, narrowed down to a likely candidate, and preliminary budget or financing is provided to prepare the project.
- b) **Project authorisation:** In which the candidate project and design options are evaluated, due diligence is conducted to assess the value and impacts of the project in relation to expectations and applicable regulations, and formal budget authorisation is given.

The approach to these two stages in the project selection process can also vary considerably in detail - from a detailed systematic approach with many control or decision points, to a more streamlined approach with fewer control points, to a short process with only a couple of control or decision points. In special cases, the process may run almost entirely outside official government processes when the project is led by private investors - as it was the case for the Standard Gauge Railway.

Under the project selection there were four different categories that informed the project assessment. These were as follows:

- a) **Process Type A: Detailed & Systematic Process:** A Detailed and Systematic Process typically has many stages and control points where the options and impacts are reviewed before a decision is made to proceed to the next stage.
- b) **Process Type B: Streamlined Process:** A Streamlined Process typically has only a few control and decision points, restricted to only the most critical stages. The streamlining improves efficiency while maintaining quality through the use of established processes and guidelines.
- c) **Process Type C: Short Process:** In the short process, all the steps in the identification and authorisation phases are internalised within the project agency, often with little or no communication with the public until the selection has been made. This process is the fastest and most efficient, using least resources, and is commonly found in small states or agencies.
- d) **Process Type D: Investor-led, non-public process:** In this instance the key proponent or investor of an infrastructure project is a non-public party, outside government, which may be a private sector proponent or investor, or a foreign or international financing entity. A public-private partnership is placed in this general category.

The Standard Gauge Railway was assessed and categorized under - Process Type D: Investor-led, non-public process - based on the following criteria:

- ✓ **Identification** - preferably selected from existing plan or pipeline. Unsolicited proposals need scrutiny for technical, sustainability, economic and financial viability
- ✓ **Evaluation** - level of scrutiny & compliance requirements set by government.
- ✓ **Consultation** - minimal or no information disclosure unless required by government.
- ✓ **Approval** - conditional on compliance if requirements have been set; often fast-tracked

2.2.3 PROJECT ASSESSMENT

The project assessment is used to identify red flags which indicate that the selection of the project might have been the result of corruption. To inform this assessment the research team needed to have a good understanding of the project and how decisions were made, whether consultations were conducted, whether needs, benefits, impacts, beneficiaries and mitigation plans and assessments were conducted and whether they were adequate. The following were identified as the possible red flags:

- a) **Funding models**, impartiality and oversight measures - heavy reliance on external loan financing, with limited independent oversight and constrained parliamentary and public scrutiny
- b) **Cost and value-** High construction and financing costs which have raised concerns about value for money and long-term debt sustainability. With the Court of Appeal pronouncing the project contract illegal due to a failure to follow proper procurement laws.
- c) **Fit for purpose** - A number of questions have been raised on alignment between projected freight/passenger demand and actual utilization levels.



The Standard Gauge Railway which was part of former President Kenyatta manifesto was a brilliant project that sought to propel development, enhance economic growth and the improve the countries GDP. The Standard Gauge Railway was intended to enhance economic growth and trade along the East African corridor and beyond. The SGR economic belt was envisioned to promote trade along the East African corridor. However poor governance and corruptions hijacked this particular project with claims being made that key contracts related to SGR remain secret, procurement procedures in many instances disregarded, and there was inadequate public participation. Governance failures and corruption concerns—including secrecy of contracts, procurement irregularities, and inadequate public participation—created very high corruption risks, for the SGR project subverting its intended purpose of propelling inclusive development, regional trade and economic transformation

Construction Works Sgr Face 1-2



2.3 AFFORDABLE HOUSING PROGRAMME

Affordable housing can be described as housing plan that is appropriate for the needs of a range of very low to moderate income households and priced so as these households are also able to meet other basic living costs such as transport, food, clothing, education and medical care. The BOMA Yangu project which acts as the portal for Kenya Affordable Housing Project initiative was launched in 2017 by former President Uhuru Kenyatta as a key pillar for the Big Four Agenda . The initiative aimed to provide decent and affordable housing to all Kenyans from different walks of life. Under the **big four agenda** for former President Uhuru Kenyatta, his administration developed its own definition of affordable housing as follows:

- 1. Social Level:** This category includes individuals with monthly income below Kshs 19,999, which represents 2.6% share of formally employed people in the country,
- 2. Low-Cost Level:** This category includes individuals with monthly income between Kshs 20,000 - Kshs 49,999, which represents 71.8% share of formally employed people in the country, and,
- 3. Mortgage Gap Level:** This category includes individuals with monthly income between Kshs 50,000 - Kshs 149,000, which represents 22.6% share of formally employed people in the country.

Through this initiative the government aimed to deliver 1 million homes in the next 5-years - 2017 to 2022 - out of which 800,000 are affordable housing (bedsitters, 1, 2 and 3-bed units costing KES 0.8 million - 3.0 million) while 200,000 are social housing, which involved redevelopment of slums (1-2 room units costing Kshs 0.6 million- 1.0 million). However at the end of his tenure President Uhuru Kenyatta had delivered approximately 3000 units compared to a target of 800,000 units.

Fast forward to August 2022, President Uhuru Kenyatta retired and President William Ruto took over the leadership of the country. President Ruto the BETA manifestos outlined housing and settlement as one of their key assignment particular in improving the rural and urban housing and settlement through growing the number of mortgages to 1,000,000 by enabling low-cost mortgages of less than Ksh.10,000. To enable this - the current administration enacted the Affordable Housing Act, 2024. The Act establishes the affordable housing fund providing funds and legal frameworks for the design, development and maintenance of affordable housing, institutional housing and any associated social and physical structures. Under the Affordable Housing Act, 2024, there is the Affordable Housing Levy Act, which states that an employer is required to remit in respect of each employee the employer's contribution at 1.5% of the employee's monthly gross salary and the employee's contribution at 1.5% of the employee's monthly gross salary. The Affordable Housing Act 2024 provides four categories of housing units as follows:

- 1. A Social housing unit** - according to the Act this housing unit is targeted to a person whose monthly income is below 20,000 Kenyan shillings.
- 2. An Affordable housing unit** - this housing unit is targeted a person whose monthly income is between 20,000 and KES 149,000
- 3. Affordable middle class housing unit** - this means middle to high income housing targeted at persons whose monthly income is over KES 149,000
- 4. Rural Affordable housing unit** - this housing unit is targeted at a person living in any area that is not an urban area.

In light of this, Transparency International - Kenya, decided to assess the systemic vulnerabilities and corruption risks in the BOMA Yangu housing project by comparatively comparing *The Kiambu Civil Servants Housing Scheme* - which was done under The Big Four Agenda by Former President Uhuru Kenya with *Vihiga Affordable Housing Project* under The Bottom Up Economic Transformation Agenda by President William Ruto. By comparatively comparing these two infrastructure projects, this analysis sought to empirically identify patterns of governance and financial management risks and gaps across different policy regimes.

2.3.1 AGENCY CONTEXT: THE STATE DEPARTMENT FOR HOUSING AND URBAN PLANNING

Domiciled under the Ministry of Lands, Public Works, Housing and Urban Development the State department for housing and urban planning is organized into five Divisions namely: Housing Policy Management and Implementation, Human Settlements, Housing Finance and Incentives, Appropriate Building Materials and Technology (ABMT); and Housing Sector Monitoring and Evaluation. The State department for housing and urban planning is the primary government entity driving the affordable housing program. The Affordable Housing Program which was part of the **Big Four Agenda** and now scaled up under **Bottom Up Economic Transformation Agenda** is championing the delivery of 250,000 affordable homes per annum as articulated under the current administration’s manifesto.

2.3.2 THE KIAMBU CIVIL SERVANTS HOUSING SCHEME

The Kiambu Civil Servants Housing Scheme - under the State Department for Housing and Urban Planning - was constructed as part of the Affordable Housing Program initiated under President Uhuru Kenyatta’s administration. Located near GK Prisons along Boma Road, this project includes 193 units (one to three bedrooms) funded by the Civil Servants Housing Scheme Fund to support homeownership for government employees. On this housing scheme civil servants can acquire units either by tenant purchase or through mortgages arrangements which can be facilitated by the government and other partners as well.



Figure 8: Kiambu Civil Servants Housing Scheme Acquisition Model for Civil Servants

The assessment on the agency context - in this case being the State Department for Housing and Urban Development -involved eleven assessment criteria matrixes namely: The Executive management; External influence in agency operation; Professional interaction within the agency; Professional and technical capacity; Openness of communication; Transparency on budget and program; Grievance mechanisms; Agency and leadership reputation; Vested interests; Agency industry relationships; Community engagements. On each of the a forementioned assessment criteria's, scoring was done, on a scale of 1 - 5,

Figure 9: Likert Scale with 1 indicating low risk to corruption vulnerability and 5 indicating very high risk to corruption vulnerability.



with 1 indicating very good performance - low risk and 5 indicating extremely poor performance - very high risk. The scoring under each of the eleven assessment criteria was systematically evidence based determined after going through an extensive and thorough data collection process that included: open-source data search, information request, fact finding and verification mission, multi - stakeholder engagements and contextual analysis, ultimately collating and synthesizing the findings and arriving at the final score. The agency aspects having high-risk rating of either between 4 or 5, were identified and listed as key areas of concerns

Under the agency context the average rating score was 3.24 - which is categorized as moderately susceptible to corruption risks. The key areas of concerns which were identified as contributing factors to the high risk were:

- 1) **Conflict of interest and procurement of integrity concern/ vested interest** - there were reports of internal conflict within the National housing corporation, with the internal conflict pointing to tender manipulation and politically linked interest. Additionally, conflict-of-interest concerns were repeatedly raised, especially in procurement, partnerships, and land-related processes.
- 2) **Transparency on budget and program** - budgets and programs are regularly published but there exist gaps in details expenditure and implementation against the budget allocated.

2.3.2.1. PROJECT SELECTION TYPE

The process used to select and authorise a major infrastructure project can vary considerably between countries and, to some extent, between various agencies within a country. For this project there are two stages in project selection which featured in every type of process:

- a) **Project identification:** In which the type, location and scale of the project are identified from among a range of other potential projects and options, narrowed down to a likely candidate, and preliminary budget or financing is provided to prepare the project.
- b) **Project authorisation:** In which the candidate project and design options are evaluated, due diligence is conducted to assess the value and impacts of the project in relation to expectations and applicable regulations, and formal budget authorisation is given.

The approach to these two stages in the project selection process can also vary considerably in detail - from a detailed systematic approach with many control or decision points, to a more streamlined approach with fewer control points, to a short process with only a couple of control or decision points. Under the project selection there were four different categories that informed the project assessment. These were as follows:

- e) **Process Type A: Detailed & Systematic Process:** A Detailed and Systematic Process typically has many stages and control points where the options and impacts are reviewed before a decision is made to proceed to the next stage.
- f) **Process Type B: Streamlined Process:** A Streamlined Process typically has only a few control and decision points, restricted to only the most critical stages. The streamlining improves efficiency while maintaining quality through the use of established processes and guidelines.
- g) **Process Type C: Short Process:** In the short process, all the steps in the identification and authorisation phases are internalised within the project agency, often with little or no communication with the public until the selection has been made. This process is the fastest and most efficient, using least resources, and is commonly found in small states or agencies.
- h) **Process Type D: Investor-led, non-public process:** In this instance the key proponent or investor of an infrastructure project is a non-public party, outside government, which may be a private sector proponent or investor, or a foreign or international financing entity. A public-private partnership is placed in this general category.

The Kiambu Civil Servants Housing Scheme was assessed and categorized under - Process Type A: Detailed & Systematic process - based on the following criteria:

Identification - A formal policy published for infrastructure sectors - policy-driven framework under the Big Four Agenda (2018-2022). The candidate project is identified from the priority lists, with preliminary budget allocation

Project appraisal - appraisal of viable alternatives; preferred option; preliminary design; economic evaluation.

Impact analyses - evaluation of environmental and social impacts, and potential mitigation.

Consultation - Meaningful consultation with affected stakeholders, businesses, communities, indigenous peoples, etc.

2.3.2.2 PROJECT ASSESSMENT

The project assessment is used to identify red flags which indicate that the selection of the project might have been the result of corruption. To inform this assessment the research team needed to have a good understanding of the project and how decisions were made, whether consultations were conducted, whether needs, benefits, impacts, beneficiaries and mitigation plans and assessments were conducted and whether they were adequate. The following were identified as the possible red flags:



a) **Likely adverse impacts** - from the available Environment Impact Assessment - The project showed high vulnerability because it was associated with risks of loss of green spaces, inadequate environmental planning, and potential violation of environmental conservation requirements, which could deprive residents of a clean and healthy environment.

b) **Type of intervention** - The project showed high vulnerability because limited publicly accessible project design details, technical plans, and implementation documentation made it difficult to fully assess what was planned and how it would be executed.

The ICRA assessment in the Kiambu Civil Servants Housing Scheme ascertained that indications of corruption risk were moderate. The figure below shows the assessment results of the Kiambu Civil Servants Housing Scheme.

The Kiambu Civil Servants Housing Scheme under the big four agenda - affordable housing - which was part of former President Uhuru Kenyatta manifesto intended or rather aimed to provide housing for all Kenyans and bring to bear the right to safe, affordable, sustainable and secure shelter. Through the Affordable Housing Programme, the Uhuru Kenyatta administration sought to address a 2 million housing shortage via public - private partnership, and reduce low-income housing gap by 60%. However less than 10 % of the target was achieved. These shortcomings were attributed to bureaucratic and procurement delays as well as limited private investors interest due to regulatory and market risks.



Kiambu Civil Servants Housing Scheme

2.3.3 VIHIGA COUNTY AFFORDABLE HOUSING PROJECT

In line with President **Ruto Bottom -Up Economic Transformation Agenda**, Vihiga County **Affordable Housing project** was commissioned in October 2023, set to have 220 houses which are constructed on a three acre piece of land, was/ is an intervention that seeks to sought housing crisis for the increasing population . The affordable housing project in Vihiga County under the **Boma Yangu platform / Affordable Housing Program** is managed by the Affordable Housing Board (AHB) and citizens are deducted 1.5% of their gross income to fund for the Affordable Housing Programme.

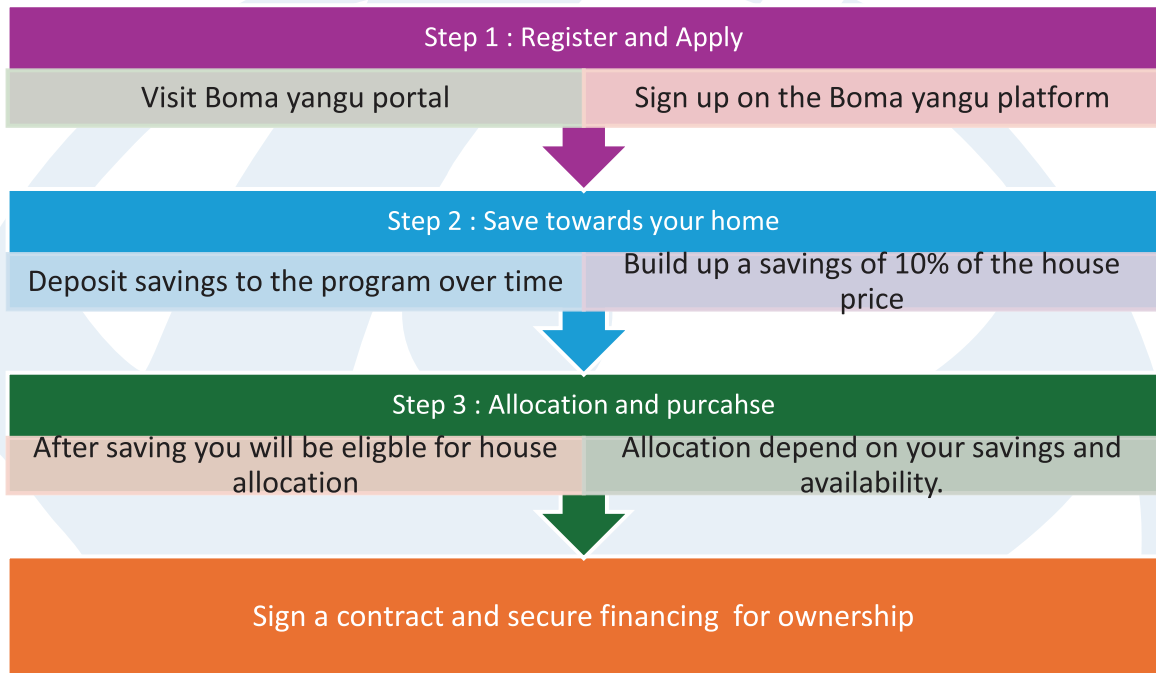


Figure 10: Affordable Housing Ownership Process

The assessment on the agency context - in this case being the State Department for Housing and Urban Development -involved eleven assessment criteria matrixes namely: The Executive management; External influence in agency operation; Professional interaction within the agency; Professional and technical capacity; Openness of communication; Transparency on budget and program; Grievance mechanisms; Agency and leadership reputation; Vested interests; Agency industry relationships; Community engagements. On each of the a forementioned assessment criteria's, scoring was done, on a scale of 1 - 5,

Figure 11: Likert Scale with 1 indicating low risk to corruption vulnerability and 5 indicating very high risk to corruption vulnerability.



with 1 indicating very good performance - low risk and 5 indicating extremely poor performance - very high risk.

The scoring under each of the eleven assessment criteria was systematically evidence based determined after going through an extensive and thorough data collection process that included: open-source data search, information request, fact finding and verification mission, multi - stakeholder engagements and contextual analysis, ultimately collating and synthesizing the findings and arriving at the final score. The agency aspects having high-risk rating of either between 4 or 5, were identified and listed as key areas of concerns

Under the agency context the average rating score was 3.56 - which is categorized as moderately susceptible to corruption risks. The key areas of concerns which were identified as contributing factors to the high risk were:

1) Missing important project documentations - such as the Environmental Impact Assessment, Environmental and Social Impact Assessment, Feasibility study, bill of quantity - accelerating corruption and disaster risks. Lack of these crucial documents makes it challenging in justifying the allocated budget of 536 million Kesh cost. In our recent engagements, key informant one said that -

"I have strong doubts as to whether the Environmental Impact Assessment for Vihiga Affordable Housing was done. As strong evidence alludes that the EIA was never done."

2) Unprocedural community engagements - have been identified as weak, curtailing the project's legitimacy and ownership. There have been instances where the community said that they were not involved in the project inception phase, terming the project as misplaced. There is limited evidence on community-engagement for Vihiga county affordable housing project, as well as whether in-depth consultation with the impacted communities was done in a right manner. Evidence suggests that community engagement / public participation was conducted later during the project cycle and not before the project commenced - which ideally should have been the case.

3) Conflict of interest and procurement of integrity concern/ vested interest - potential conflict-of-interest exists - Yes, former impeached deputy president said that -

"If you want to construct the houses, you have to sign a sub-contract from the Housing Principal Secretary with the company to sell you cement, metal and roofing sheets."

2.3.3.1 PROJECT SELECTION TYPE

The process used to select and authorise a major infrastructure project can vary considerably between countries and, to some extent, between various agencies within a country. For this project there are two stages in project selection which featured in every type of process:

a) Project identification: In which the type, location and scale of the project are identified from among a range of other potential projects and options, narrowed down to a likely candidate, and preliminary budget or financing is provided to prepare the project.

b) Project authorisation: In which the candidate project and design options are evaluated, due diligence is conducted to assess the value and impacts of the project in relation to expectations and applicable regulations, and formal budget authorisation is given.

The approach to these two stages in the project selection process can also vary considerably in detail - from a detailed systematic approach with many control or decision points, to a more streamlined approach with fewer control points, to a short process with only a couple of control or decision points. Under the project selection there were four different categories that informed the project assessment. These were as follows:

- a) **Process Type A: Detailed & Systematic Process:** A Detailed and Systematic Process typically has many stages and control points where the options and impacts are reviewed before a decision is made to proceed to the next stage.
- b) **Process Type B: Streamlined Process:** A Streamlined Process typically has only a few control and decision points, restricted to only the most critical stages. The streamlining improves efficiency while maintaining quality through the use of established processes and guidelines.
- c) **Process Type C: Short Process:** In the short process, all the steps in the identification and authorisation phases are internalised within the project agency, often with little or no communication with the public until the selection has been made. This process is the fastest and most efficient, using least resources, and is commonly found in small states or agencies.
- d) **Process Type D: Investor-led, non-public process:** In this instance the key proponent or investor of an infrastructure project is a non-public party, outside government, which may be a private sector proponent or investor, or a foreign or international financing entity. A public-private partnership is placed in this general category.

The Vihiga Affordable Housing Project was assessed and categorized under - Process Type A: Detailed & Systematic process - based on the following criteria:

Identification - A formal policy published for infrastructure sectors - policy-driven framework under the Affordable housing Act 2024. The candidate project is identified from the priority lists, with preliminary budget allocation.

Project appraisal - appraisal of viable alternatives; preferred option; preliminary design; economic evaluation.

Impact analyses - evaluation of environmental and social impacts, and potential mitigation.

Consultation - Meaningful consultation with affected stakeholders, businesses, communities, indigenous peoples, etc.

2.3.3.2 PROJECT ASSESSMENT

The project assessment is used to identify red flags which indicate that the selection of the project might have been the result of corruption. To inform this assessment the research team needed to have a good understanding of the project and how decisions were made, whether consultations were conducted, whether needs, benefits, impacts, beneficiaries and mitigation plans and assessments were conducted and whether they were adequate. The following were identified as the possible red flags:

- a) **Funding model, impartiality, and oversight measures**-This project relies on conditional financing funded through the mandatory 3% employee/employer contributions (capped at KES 2,500), increasing the risk that limited public funds could be misallocated without sufficient competition or transparency safeguards. Additionally, limited public oversight, insufficient competitive bidding, and minimal stakeholder consultation, raises risks of favoritism or conflicts of interest.
- b) **Purpose and needs** - Inadequate needs assessments and community engagement creates uncertainty about whether the housing interventions truly matched local demand and social priorities.

The ICRA assessment in the Vihiga County Affordable Housing establishes that indications of corruption risk were moderate but concerns remain regarding the modalities for community engagement, vested interests, projects cost and value as well as key project documentations such as the Environmental Impact Assessment, which has the potential of creating transparency, accountability and governance challenges if not sufficiently addressed . The figure below shows the assessment results of the Vihiga County Affordable Housing Project.

The Vihiga Affordable Housing Project is aimed at responding to rapid population growth and urban housing needs - under the **bottom-up economic transformation agenda**. The project currently under construction has 220 housing units is expected to be complete by early 2026, boosting the county infrastructure. However, missing key documents - notably EIA, EA and feasibility information) creates significant integrity and disaster-risk concerns, together with limited community engagement and transparency gaps all which heighten governance risk.

Vihiga Affordable Housing Project



3.0 CONCLUSION

Globally, an estimated USD3-4 trillion on an annual basis through 2030 is required to meet the infrastructure needs of 1.2 billion people who lack electricity; the 663 million who lack adequate drinking water sources; the 1 billion who live more than two kilometre's from an all-weather road; and the many millions of populations who are unable to access work and other opportunities due to the absence or high cost of transportation services. As the surge for infrastructure needs rises so does the corruption appetite in the infrastructure rise as well. The high stakes that come with these infrastructure projects provide a leeway for corruption in the project's identification, selection and planning processes. To provide evidence-based knowledge on the existing corruption in the infrastructure sector in Kenya - using the Infrastructure Corruption Risk Assessment Tool (ICRAT), on three case cases the Standard Gauge Railway, the Kiambu Civil Servants Housing Scheme and the Vihiga Affordable Housing Project - TI - Kenya assessed the corruption risks on these infrastructure projects.

The corruption risk assessment in these three projects illustrates varying corruption risks ranging from very high risks in the SGR project to moderately high risks in the two housing projects. Weak and limited public participation, inadequate documentation, opaque procurement processes catalysed by vested interests were some of the red areas spotlight that magnify the risk of corruption in the three assessed infrastructure projects. These findings underscore the pressing needs for institutional accountability and enhanced transparency in the nations investment management processes ensuring that infrastructure projects in the country deliver value for money - serving their intended purposes contributing to sustainable and inclusive development that meets the community needs.



APPENDICES

Annex 1: Country Context Assessment Matrix

Governance Aspect	Assessment questions	Risk Description & Benchmark			Rating 1-5
		1	3	5	
Country Context					
1 Election process	Are elections periodic, free and fair? Is the integrity of the ballot adequately ensured? Are candidates free to express opinions without interference? Is the right to establish a political party, the role of opposition, and gender balance ensured and respected? Is vote buying a regular practice? Are lobbying and campaign contributions transparent?	Open, contestable, free & credible	Partly fair but notable interference	Repressive, restrictive, & ballot fraud likely	
2 Legal, judicial system and whistle-blowers	How independent are the courts from government, partisan or commercial influence? Are conditions for a fair trial adequately ensured? Is due process ensured as a matter of law? Are court decisions rendered within reasonable time? How effective are the provisions and enforcement to protect whistleblowers? Do whistleblower provisions protect women from gender-specific forms of retaliation?	Independent, transparent, efficient	Functional, but uneven quality	Weak, prone to external influence	
3 Public finance and procurement	Is public procurement open and transparent? Is expenditure of public funds open, accountable, and audited? Can civil society monitor the allocation of public resources and the conduct of procurement? Are oversight agencies independent and properly resourced? Does the agency have ongoing support or capacity development programs with multilateral organisations such as the World Bank, Asian Development Bank? Does the agency receive loan or grant funding, and use multilateral organisation-endorsed procurement guidelines and/or processes?	Open, accessible, and compliant	Signs of bias, fast-tracking	Hidden, not published, prone to political control	
4 Cultural hierarchy	Are there strong cultural ties or loyalties which dominate business and government appointments and decisions? For example: ethnic, family or business dynasty, religious, military, cartel-related, etc.	Impartial, fair	Signs of affiliation, preferences	Dominant influence, affects outcome	
5 Access to information	Is there a right to information granted to all citizens? Are freedom of information laws and processes effective and enforceable? Can civil society and the public easily access information? How prohibitive are access barriers such as costs and delays? Is any information released usually complete or heavily redacted? Do women face additional barriers to access to information (such as literacy, location of information)?	Open and accessible	Moderate access, conditions apply	Non-existent laws and process. Access denied	
6 Openness of media	Is the media free to report on sensitive matters of public interest? What is likelihood of crimes against journalists (intimidation, harassment, arbitrary detention, digital attacks, murder) going unresolved? Are there signs of organised disinformation campaigns?	Open and active	Passive, politically aligned	Controlled, restricted and/or threatened	

LEVEL 01

Governance Aspect	Assessment questions	Risk Description & Benchmark			Rating 1-5
		1	3	5	
Country Context continued					
7 Civil society activity	Are public groups active in drawing attention to issues of concern? Are individuals free to express opinions on sensitive matters of public interest without fear of surveillance or retribution? Is there academic freedom? Is there active engagement with authorities on social matters, such as gender, disadvantaged communities, or others of concern? Are women's rights organisations able to operate freely or if their ability to operate is constrained is this more so than other civil society organisations?	Active	Passive	Controlled, restricted and/or threatened	
8 Corruption perceptions	What are the general perceptions of corruption in the country (as measured by Transparency International's published Corruption Perceptions Index (CPI) ¹³)?	High CPI 70-100%	Medium CPI 40-69%	Low CPI <40%	
Country Context – Average Rating					
Add country context ratings and then divide by 8.					
Enter this number into the appropriate box on Worksheet 1 A					

Annex 2: Agency Context Assessment Matrix

Governance Aspect	Assessment questions	Risk Description & Benchmark			Rating 1-5
		1	3	5	
Agency Context					
1 Executive management	Does the agency head report directly to a politician or to an independent board? Are nominations for board and senior management roles merit-based? Is the agency executive accountable for the performance and expenditure of the agency?	Independent, well-qualified	Political choice, qualified	Political appointment, not merit-based	
2 External influence in agency operation	Are there signs that agency actions or decisions are strongly influenced by political, industry or other external interests? Or that technical considerations and community concerns are downplayed in favour of external preferences?	Minimal	Occasionally evident	Strong or dominant	
3 Professional interaction within agency	Are professionals in the agency able to make technical decisions and to give frank and impartial advice? Is there a focus on thorough investigation and analysis? Is there a focus on due diligence and integrity in reporting?	Strong, active	Limited oversight or training	Lacks professional guidance	
4 Professional and technical capacity	Do agency officials have appropriate experience and qualifications for their roles and responsibilities? Is there sufficient technical capacity to undertake the workload?	Strong	Average or mixed	Severely lacking	
5 Openness of communication	How frequent is the sharing of information with the public? Is information made available to all who request access to information? Is it timely?	Regular, proactive, credible	Limited releases or information	Highly controlled, unreliable	
6 Transparency on budget and program	Are budgets and programs published on a regular basis? Are they in sufficient detail to be verifiable? Is information on actual expenditure and implementation performance disclosed against budget allocations?	Clear and informative	Formal, but not informative	Inadequate or not credible	
7 Grievance mechanisms	Does the agency have a working grievance mechanism? Are women able to access it or are there specific barriers for women's access such as lower literacy, gender norms or lack of formal title to land? Is there an impartial person or ombudsman to manage complaints when the outcome of the grievance mechanism is unsatisfactory? Is there disclosure on the agency's performance in handling grievances? Is there effective protection for whistle-blowers?	Strong and effective	Exists but limited effectiveness	No mechanism and/or not effective	
8 Agency & leadership reputation	What is the agency's reputation for work performance, fairness in employment and openness in communications? How frequently are criticism, complaints or red flags raised about agency projects, integrity or leadership?	Good press, few complaints	Occasional problems, complaints	Frequent issues, poor reputation	

LEVEL 01

Governance Aspect	Assessment questions	Risk Description & Benchmark			Rating 1-5
		1	3	5	
Agency Context continued					
9 Vested interests	Are conflict-of-interest issues frequent or apparent? Are there powerful groups or individuals – business interests, wealth, voting blocs, etc. – influencing agency decisions? Is there a culture of exchange of gifts and hospitality that could undermine the integrity of decision-making?	Not obvious	Occasional association or influence	Obvious and frequent influence	
10 Agency-industry relationship	Are there conflict of interest disclosures by key agency officials? Is there disclosure of ownership and directorship of industry companies doing business with the agency? Is there open and impartial communication between the agency and industry players to ensure technical and economic efficiency in the delivery of infrastructure?	Respectful, impartial	Occasional conflicts or alliance	Undue influence and bias	
11 Community engagement	In general, does the agency consult regularly with communities who will be impacted by its decisions? Are consultations meaningful and inclusive, including women and marginalised groups? How likely are the consultations to be effective?	Timely, meaningful and inclusive	Occasional but not meaningful	Rare and not meaningful	
Agency Context Average Rating					
Add country context ratings and then divide by 11.					
Enter this number into the appropriate box on Worksheet 1 A					

Annex 3: Categorizing Project Selection Process

Process Type A DETAILED & SYSTEMATIC	Process Type B STREAMLINED	Process Type C SHORT	Process Type D INVESTOR-LED
Identification phase			
<p>Policy: A formal policy published for infrastructure sectors such as transport, roads, energy or water.</p> <p>Plan or program: A multi-year plan or pipeline (3–10+ years) of major infrastructure projects, based on needs assessment, technical grounds, and policy.</p> <p>Prioritisation: Prioritisation by technical, economic and readiness criteria.</p> <p>Identification: The candidate project is identified from the priority lists, with preliminary budget allocation.</p>	<p>Sector Goals: A specific policy or general sector goals.</p> <p>Program: Short-term pipeline of projects updated every 3–5 years.</p> <p>Identification: Identification based on available budget. Disclosure limited to identified pipeline.</p>	<p>Identification: Projects identified annually or 2–3 years with little reference to priorities or a plan.</p>	<p>Identification: Preferably selected from existing plan or pipeline. Unsolicited proposals need scrutiny for technical, sustainability, economic & financial viability.</p>
Authorisation phase			
<p>Project appraisal: Appraisal of viable alternatives; preferred option; preliminary design; economic evaluation.</p> <p>Impact analyses: Evaluation of environmental & social impacts, and potential mitigation.</p> <p>Consultation: Meaningful consultation with affected stakeholders, businesses, communities, indigenous peoples, etc.</p> <p>Budget approval: Detailed review of cost estimate, economic viability, impacts & mitigation compliance, and financing arrangements; fiscal approval.</p>	<p>Project appraisal: Preliminary design, economic analysis, environmental and social impact analysis by internal guidelines.</p> <p>Consultation: Statutory requirements met, but limited.</p> <p>Budget approval: Technical, economic & safeguard justification submitted on budget guidelines. Budget approval is fast-tracked.</p>	<p>Evaluation: Evaluation is limited and internal, with few gateway steps and no public consultation (may be integrated with Identification)</p> <p>Budget approval: The budget proposal constitutes project disclosure; approval often fast-tracked.</p>	<p>Evaluation: Level of scrutiny & compliance requirements set by Gov't.</p> <p>Consultation: Minimal or no information disclosure unless required by Gov't.</p> <p>Approval: Conditional on compliance if requirements have been set; often fast-tracked.</p>

Annex 4: Assessing the Project Selection for Vulnerabilities (Possible Red Flags)

Project Aspects	Assessment questions	Red Flag Rating		
		Low (1)	Medium (3)	High (5)
1 Purpose and need	Is the purpose of the project clear and valid in relation to the public/community needs? Have the actual needs been indicated and verified? Does the project have community support? Are planning documents published. E.g. Needs assessment, public hearing notice, market studies, feasibility study.	Valid & verified	Unclear	Not valid, contested
2 Type of intervention	What is planned to be built? Is there sufficient information available to assess what is planned? Is there a project plan document available to the public?	Clear, sufficient	Needs more information	Not clear, insufficient
3 Location	How appropriate is the location of the project? Is it where it is needed the most? Or may the choice be biased? Does it align with planning and zoning requirements? Have there been changes to land use requirements or protections for this project to proceed?	Fit	Maybe	Not fit
4 Size and scope	Does the project seem too large or too small for the intended purpose? Too elaborate or else inadequate?	Fit	Maybe	Not fit
5 Fit for purpose	Does the project as proposed appear to be overall fit for the purpose and need – in location, type of intervention, size, scope, etc.?	Fit	Maybe	Not fit
6 Timing	Is this the right time for the project? Could it be done much later, or cancelled altogether?	Reasonable	Maybe	Not reasonable
7 Likely benefits	Are the benefits stated, credible and valid? Are they sufficient to justify the project and any adverse impacts? What is the benefit of the project from a gender perspective?	Obvious	Yet to be determined	Not obvious
8 Likely beneficiaries	Will the project help the right people, groups and communities (including marginalised group and men and women)? Who will the project help the most?	Well targeted	Help is indirect, or not yet determined	More hurt than helped, or misdirected
9 Likely adverse impacts	How substantial are the likely adverse impacts? Is an evaluation publicly available and credible? Have impacted communities (men and women) been consulted? e.g. Environment – land, water, protected areas, wildlife, air? Social – livelihoods, groups (women, Indigenous, people with disabilities, poor, etc), resettlement, cultural heritage? Has an EIS been published?	Not likely or not significant	Yet to be determined	Potentially significant, or misrepresented, or evaluation not credible
10 Impact mitigation plans	Are impact-mitigating measures indicated? Do they seem adequate? Have they been agreed to by affected communities? Have risk provision plans been published	Indicated & likely to be adequate	To be determined	Mitigation inadequate or neglected
11 Cost and value	Does the estimated cost appear high: relative to the agency budget, to the apparent value or benefits of the project, or to similar projects? For large, complex or significant projects was a formal economic analysis conducted and published?	Seems reasonable	Unclear or unable to determine	Seems very high, needs review
12 Funding model impartiality, and, oversight measures	The funding model and impartiality of the funder or financiers can influence the corruption risk. Who is funding or financing the project? Are there vested interests that may override the interests of citizens, harm long-term sustainability and social equity, or divert benefits? Are there short- or long-term conditionalities in the agreement that may limit the rights of access of citizens, adversely impact natural resources or induce long-term indebtedness? How much provision did the financier make for citizen consultation and inputs, and redress? What integrity and impartiality oversights are required by the funding model? Is information on the funding model transparent and publicly available?	Impartial funding without external vested interests. Comprehensive, impartial oversight measures in place.	Funding with restrictions on vested interests. Oversight measures may be limited or partly ineffective.	Funding with strong external interests and few public controls. Oversight measures generally not public or not effective.
13 Other urgent or better value alternatives?	Are there other projects which seem more urgent? Other ways to meet the needs which are less expensive or damaging?	No, not obvious	Maybe	Yes
14 Disaster risks	Is the project exposed to significant disaster risk? Would a different selection have lower exposure? How were these considered? e.g. Earthquake, tsunami, cyclone, flood, sea level rise, bushfire	Risk not significant, well considered	Disaster risk needs evaluation	Risk significant, or not considered
Result calculation	Count answers in each column:			
	Assigned risk value	1	3	5
	Product = count × risk value			
	Sum of products			
Vulnerability rating	Average score = Sum of products ÷ 14			

Annex 5: Assessment results of the Standard Gauge Railway

Project	Vulnerability	Risk classification	Context assessment	Indicative risk of corruption
The Standard gauge railway	Substantial	4.49	8.61 - Indicative risk of corruption in the Project selection case is very high.	Very high

Annex 6: Indicative Corruption Risk in Project Selection Initial Assessment - Standard Gauge Railway

INDICATIVE CORRUPTION RISK IN PROJECT SELECTION-INITIAL ASSESSMENT	
Project Name	The Standard Gauge Railway Phase 1 & 2
Project brief description	<p>The Standard Gauge Railway (SGR) - with the project developer being Kenya Railway Corporation - was conceived as a flagship project under Kenya vision 2030 development agenda was officially commissioned in 2017 by former President Uhuru Kenyatta.</p> <p>Phase 1 of the SGR which connects Mombasa to Nairobi, costed approximately KES327bn (\$3.8bn). With China Exim Bank contributing around 90% of the financing while the remaining 10% was provided by the Kenyan Government. The SGR is one of the largest infrastructure projects to be carried in Kenya - supporting passenger and cargo transportation.</p> <p>Phase 2 of the SGR - which is an extension from Nairobi to Naivasha was opened up in 2019 with the extension costing approximately \$1.5bn. There are plans to expand the railway to Kisumu and Malaba, however this is pegged on regional commitments.</p> <p>The Standard Gauge Railway has created national and regional economic growth with revenue collections rising by 18.6 percent to Kesh 21.4 billion in 2025 - which was from passenger traffic and cargo haulage. Much as the SGR has amplified economic growth, the sustainability of the SGR model has raised concerns from development experts mostly due to the high debt challenge - with the Kenya Railway Corporation defaulting on a Sh167.5 billion loan borrowed</p>

	from China for the SGR, representing 62% of the total Sh266.5 billion debt owed to the Treasury by State agencies for the 2024/25 financial year
Project owner/agency	Kenya Railways Corporation /Ministry of Transport and Infrastructure
Project vulnerability	Substantial
Key project Vulnerabilities	<ol style="list-style-type: none"> 1. Purpose and need 2. Size and scope 3. Fit for purpose 4. Cost and value 5. Funding model, impartiality, and oversight measures
Other Project Vulnerabilities	<ol style="list-style-type: none"> 1. Timing 2. Likely benefits 3. Alternatives that are more urgent or of better value. 4. Planned mitigation 5. Disaster risks
Governance Risk classification	High
Governance Context Assessment	8.61- Very high which is likely to have undue influence or corruption
Key governance areas of Concern	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Legal, Judicial system and whistleblowers 2. Public finance and procurement 3. Cultural hierarchy 4. Access to information 5. Openness to media 6. Corruption Perceptions <p>Agency aspects:</p> <ol style="list-style-type: none"> 1. External influence in agency operation 2. Openness of communication/ information disclosure 3. Transparency of budget and program 4. Grievance mechanisms 5. Agency and leadership reputation 6. Vested interests 7. Agency-industry relationship 8. Community engagement
Other areas to be considered	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Election process 2. Civil Society activity <p>Agency aspects:</p> <ol style="list-style-type: none"> 3. Professional and technical capacity
Project selection process type	Investor-led non-Public - The key proponent or investor of an infrastructure project is a non-public party, outside government, which may be a private sector proponent or investor, or a foreign or international financing entity.
Indicative Risk of corruption in the Project selection case	Very high

Narrative	<p>Briefly describe the context of the project and reason for doing the assessment.</p> <p>The Standard Gauge Railway which was part of former President Kenyatta manifesto was a brilliant project that sought to propel development, enhance economic growth and the improve the country's GDP. The -SGR economic belt was envisioned to promote trade along the East African corridor. However poor governance and corruptions hijacked this particular project with claims being made that key contracts related to SGR remain secret, procurement procedures in many instances disregarded, and there was inadequate public participation. As such this project was deemed to having high corruption risks necessitating its assessment.</p>
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Annex 7: Assessment results of the Kiambu Civil Servants Housing Scheme

Project monitored	Vulnerability	Risk classification	Context assessment	Indicative risk of corruption
The Kiambu Civil Servants Housing Scheme	Moderate	3.24	5.69 - Indicative risk of corruption in the Project selection case moderately high.	Moderately high

Annex 8: Indicative Corruption Risk in Project Selection Initial Assessment - Kiambu Civil Servants Housing Scheme

INDICATIVE CORRUPTION RISK IN PROJECT SELECTION-INITIAL ASSESSMENT	
Project Name	The Kiambu Civil Servants Housing Scheme
Project brief description	The Kiambu Civil Servants Housing Scheme domiciled under the State Department for Housing and Urban Planning is implemented by the Civil Servants Housing Scheme Fund - CSHSF. A national programme

	<p>established in 2004 under the National Housing Policy to help civil servants rent or own decent housing through construction projects and mortgage financing.</p> <p>The Kiambu Civil Servants Housing Scheme was an initiative of former President Uhuru Big 4 agenda . Upon completion this project consisted of 193 units (one to three bedrooms). With the new administration of President Ruto, the Kiambu Civil Servants Housing Scheme has overlapped with the broader Affordable Housing Programme, branded as Boma Yangu - which targets low and middle income earners including civil servants and other citizens.</p>
Project owner/agency	The State Department of Housing and Urban Development
Project vulnerability	Moderate
Key project Vulnerabilities	<ol style="list-style-type: none"> 1. Likely adverse impacts 2. Disaster risks 3. Funding model, impartiality and oversight measures
Other Project Vulnerabilities	<ol style="list-style-type: none"> 1. Type of intervention
Governance Risk classification	High
Governance Context Assessment	5.69 - Moderately high which is likely to have undue influence or corruption
Key governance areas of Concern	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Legal, Judicial system and whistleblowers 2. Public finance and procurement 3. Cultural hierarchy 4. Access to information 5. Openness to media 6. Corruption Perceptions <p>Agency aspects:</p> <ol style="list-style-type: none"> 1. External influence in agency operation 2. Transparency of budget and program 3. Vested interests
Other areas to be considered	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Election process 2. Civil Society activity

	Agency aspects: 1. Grievance mechanisms
Project selection process type	Detailed and systematic - A formal policy was published for infrastructure sectors - policy-driven framework under the Big Four Agenda (2018-2022). After which the project is identified from the priority lists, with preliminary budget allocation.
Indicative Risk of corruption in the Project selection case	Moderately High
Narrative	Briefly describe the context of the project and reason for doing the assessment. The Kiambu Civil Servants Housing Scheme - which was done under The Big Four Agenda by Former President Uhuru Kenya and implemented by the Civil Servants Housing Scheme Fund was chosen for this assessment due to its unique context. As a targeted housing model that specifically targeted civil servants and its eligibility restricted to public sector employees. Unlike the present-day affordable housing projects where citizenry are deducted 1.5% of their gross income to fund for the Affordable Housing Programme - the Kiambu Civil Servants Housing Scheme which was funded through the national government civil servants housing scheme fund, making it a more targeted model appropriate for this assessment.

Annex 9: Assessment results of the Vihiga County Affordable Housing Project

Project monitored	Vulnerability	Risk classification	Context assessment	Indicative risk of corruption
The Vihiga County Affordable Housing Project	Moderate	3.56	5.74 - Indicative risk of corruption in the Project selection case	Moderately high
			moderately high.	

Annex 10: Indicative Corruption Risk in Project Selection Initial Assessment - Vihiga County Affordable Housing Project

INDICATIVE CORRUPTION RISK IN PROJECT SELECTION-INITIAL ASSESSMENT	
Project Name	The Vihiga Affordable Housing Project
Project brief description	<p>As part of President Ruto, Bottom up economic transformation agenda - his administration targets <u>500,000</u> affordable housing units by 2026. The <u>Affordable Housing Board</u> established under the Affordable Housing Act, 2024 oversees the development of affordable homes.</p> <p>1.5% Affordable Housing Levy of an employee’s gross salary is deducted and channelled towards the National Housing Development Fund (NHDF) to fund Kenya’s affordable housing initiative</p> <p>The project consists of <u>220 units</u> featuring one-bedroom, two-bedroom, and three-bedroom options. The housing units are priced ranging from <u>1.5 million to Sh3 million</u> for a single room to three bedrooms respectively.</p>
Project owner/agency	The State Department of Housing and Urban Development
Project vulnerability	Moderate
Key project Vulnerabilities	<ol style="list-style-type: none"> 1. Likely adverse impacts 2. Disaster risks 3. Type of intervention 4. Cost and value
Other Project Vulnerabilities	<ol style="list-style-type: none"> 1. Funding model, impartiality and oversight measures.
Governance Risk classification	High
Governance Context Assessment	5.74 - Moderately high which is likely to have undue influence or corruption

Key governance areas of Concern	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Legal, Judicial system and whistleblowers 2. Public finance and procurement 3. Cultural hierarchy 4. Access to information 5. Openness to media 6. Corruption Perceptions <p>Agency aspects:</p> <ol style="list-style-type: none"> 1. External influence in agency operation 2. Community engagements 3. Vested interests
Other areas to be considered	<p>Country aspects:</p> <ol style="list-style-type: none"> 1. Election process 2. Civil Society activity <p>Agency aspects:</p> <ol style="list-style-type: none"> 1. Grievance mechanisms 2. Agency - industry relationship
Project selection process type	Detailed and systematic – A formal policy was published through the Affordable Housing Act, 2024 and the Affordable Housing Regulations, 2024 that enabled the government to operationalize the Affordable Housing Programme – under the Bottom – Up Economic Transformation Agenda.
Indicative Risk of corruption in the Project selection case	Moderately High
Narrative	<p>Briefly describe the context of the project and reason for doing the assessment.</p> <p>The Population in Vihiga County is projected to have grown to 622,746 comprising of 299,422 males and 323,324 females, with population density of 1,104 persons per square kilometre. The population is estimated to grow to 634,074 persons - the growth rate is 0.9 % annually. As part of the intervention measures the government through Bottom up economic manifesto, sought to build affordable housing – with Vihiga County Affordable Housing Project part of this project.</p> <p>Unlike the President Uhuru Affordable housing project where employees were not taxed – the current</p>

	<p>affordable housing program has a mandatory affordable housing levy of 1.5% where an employee's gross salary is deducted to fund the affordable housing initiative, necessitating us doing the assessment of this project and comparing it with The Kiambu Civil Servants Housing Scheme.</p>
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