



TRANSPARENCY
INTERNATIONAL
KENYA

INFRASTRUCTURE CORRUPTION RISK ASSESSMENT REPORT

Why Infrastructure Sector

WHY INFRASTRUCTURE MATTERS



DRIVES ECONOMIC GROWTH

Powers inclusive development and achieves the SDGs.



BUILDS STRONG COMMUNITIES

Improves access to education, health and markets.



BUILDS CLIMATE RESILIENCE

Helps communities adapt and build resilience.



BETTER GOVERNANCE, BETTER FUTURE

Transparent investment delivers quality projects and lasting impact.



THE RISKS WHEN OVERSIGHT FAILS



DEBT DISTRESS

Wrong projects lead to heavy debt, high interest payments and less money for essential services.



LACK OF TRANSPARENCY

Opaque appraisal, lending and procurement increase the risk of corruption and poor outcomes.



WASTED RESOURCES

Poor, overpriced or unviable projects waste public resources and deliver little impact.



RIISING GLOBAL RISK

Debt distress is rising due to unviable projects, higher interest rates and slowing global growth.

CONTEXT



Has the potential to support more than **80%** of the 169 targets



Key in addressing **pressing global** challenges



Politics shapes infrastructure



☐ On average about **a third** of infrastructure spending is lost globally



☐ **50%** losses in low- and medium income countries



INFRASTRUCTURE PROJECT CYCLE



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KENYAN CONTEXT – INFRASTRUCTURE

Challenges undermining value for money and public trust



1. THE SCALE OF THE PROBLEM



**Sh600
BILLION**

in stalled and
mismanaged public
infrastructure projects



**RESOURCES LOST.
PROJECTS STALLED.
DEVELOPMENT DELAYED.**

2. DIRECT IMPACT



HIGHER DEBT BURDEN

Strains public finances
and limits investment in
other critical sectors.



AFFECTS CITIZENS

Poor infrastructure
lowers quality of life and
hinders economic growth.

3. CORRUPTION CHALLENGE



Kenya's score in the
Corruption Perception Index
remains largely stagnant,
reflecting the persistent
challenge of corruption
in the country.



**STAGNANT SCORES.
LOST TRUST.
LIMITED PROGRESS.**

4. RISE OF PPPs IN INFRASTRUCTURE



- Infrastructure delivery under the **Public-Private-Partnership (PPP)** model has increased.
- PPPs have become a popular strategy for infrastructure development, especially in high capital requirement projects.



ROADS



RAIL



ENERGY



WATER



SOCIAL
INFRASTRUCTURE

PPP POTENTIAL: Mobilize private capital,
transfer risk, improve efficiency.

5. GOVERNANCE CHALLENGES IN PPPs



WEAK IMPLEMENTATION

Laws and policies exist,
but are not effectively
enforced.



LIMITED OVERSIGHT

Inadequate monitoring and
accountability frameworks.



POLITICAL INTERFERENCE

Decisions influenced by
political interests rather
than value for money.



These weaknesses raise concerns
on whether PPPs truly serve the
public interest.

THE CONSEQUENCE



WASTED PUBLIC
RESOURCES



PROJECT
DELAYS



MISSED
OPPORTUNITIES



SLOWER
NATIONAL
DEVELOPMENT



**STRONG GOVERNANCE. TRANSPARENCY.
ACCOUNTABILITY.
PPP DONE RIGHT CAN DELIVER FOR KENYA.**

WHY ICRAT MATTERS

The Infrastructure Corruption Risk Assessment Tool



ICRAT

Better Infrastructure.
Stronger Accountability.



Identifies loopholes that enable corruption early in the infrastructure project cycle.



Focuses on risks during the selection and design stage of projects.



Supports accountability during commissioning of public infrastructure.



KEY STEPS OF CONDUCTING THE INFRASTRUCTURE CORRUPTION RISK ASSESSMENT

1

ASSESSING THE CONTEXT



- Understand the country/sector environment
- Legal & institutional framework
- Governance & integrity context
- Stakeholder mapping

2

CATEGORIZING THE PROJECT SELECTION PROCESS



- Map the project pipeline
- Categorize selection mechanisms
- Identify decision makers & gatekeepers

3

PROJECT ASSESSMENT – VULNERABILITIES & INDICATIVE RISK OF CORRUPTION



- Identify vulnerabilities at each decision point
- Assess likelihood & impact
- Determine indicative risk of corruption

4

SUMMARY ASSESSMENT – INDICATIVE RISK OF CORRUPTION



- Consolidate findings
- Rate overall risk (Low / Moderate / High)
- Identify priority risks & key mitigation actions

COMMUNICATION & ADVOCACY



- ✓ Share findings
- ✓ Engage stakeholders
- ✓ Promote transparency & accountability
- ✓ Drive reforms & change



ICRAT helps ensure the **RIGHT PROJECTS** are chosen, the **RIGHT WAY**, for the **RIGHT REASONS**—delivering better infrastructure for all.

METHODOLOGY

01 LITERATURE REVIEW

- ✓ Comprehensive literature review.
- ✓ Engaged investigative journalists
- ✓ Focus Group Discussions and Key Informant Interviews
- ✓ Fact Finding Mission

02 FACT-FINDING MISSION



03 FGD FOCUS GROUP DISCUSSION



04 INFORMATION REQUEST



MULTI – DISCIPLINARY MEETING

providing an opportunity for the stakeholders to share insights to the assessment reports on the mapped infrastructure projects – while suggesting recommendation that will strengthen transparency, integrity and accountability in Kenya's public infrastructure projects



INFORMATION REQUEST

The research team submitted official information request to several institutions including, National Treasury, NEMA, State dept for Environment and Climate change, Controller of Budget, OAG, KRC, National Lands Commission , State Dept of Transport, Ministry of Lands, Housing and Urban Planning

MAPPED PROJECTS



Why this projects?



The SGR is one of the largest and most financially significant infrastructure investment in Kenya – under **vision 2030**



01

BETA – DRIVEN

Built on evidence, transparency, accountability and citizen action.



02

COMPLEX FINANCING, PROCUREMENT AND MULTIPLE actors in place.

03

PUBLIC INTEREST PROJECTS

Large-scale investment that affect millions of Kenyans and public resources.



04

BASIS OF REFORMS AND LESSONS.

Findings will inform reforms, strengthen systems and leave lasting lessons for future projects.



Ensuring transparency, accountability and value for money
in one of Kenya's most transformative infrastructure projects.

RESEARCH FINDINGS



COUNTRY CONTEXT



RISK SCORE

4.1
HIGH RISK



4.1 – HIGH RISK

Overall assessment indicates a high risk of corruption within the country context.



THE LEGAL, JUDICIAL AND WHISTLEBLOWER

Gaps remain in judicial efficiency, perceived independence, and strong whistleblower protection enforcement.



PUBLIC FINANCE AND PROCUREMENT

Strong legal frameworks – PFM ACT 2012 exist, but implementation gaps, procurement irregularities, and political influence risks remain.



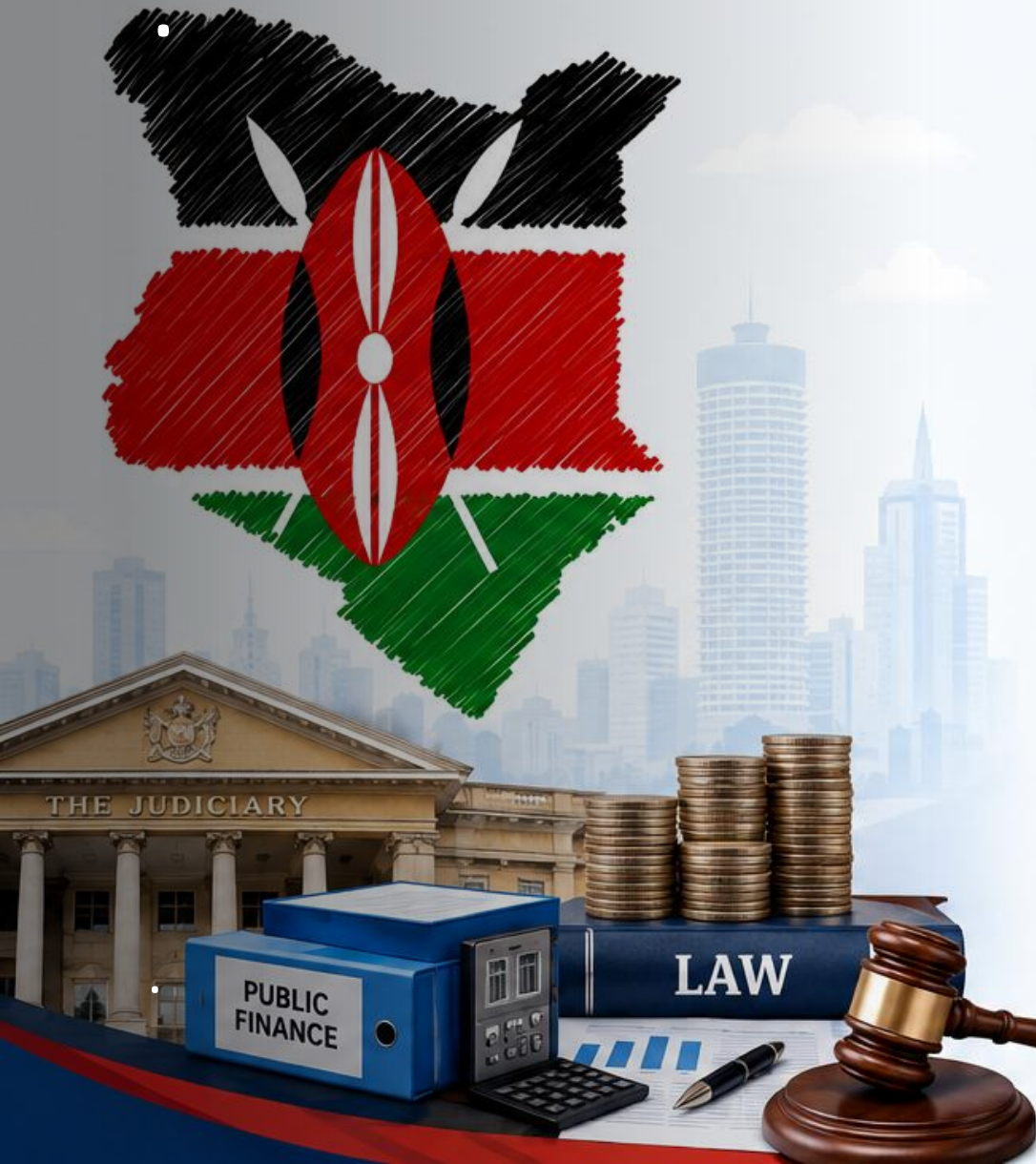
CORRUPTION PERCEPTIONS

Kenya scored 30 out of 100, dropping from position 32 in 2024 in the 2025 corruption perception index.



ACCESS TO INFORMATION

Legal access exists – Access to information Act, 2016, but delays, limited proactive disclosure, and restricted project-level transparency persist.



AGENCY CONTEXT



WHY IT MATTERS

RISK LEVEL



RISK SCORE

4.49
HIGH RISK



• 4.49 – HIGH RISK

The overall risk score indicates a high risk of corruption within the agency context.



• LIMITED PUBLIC PARTICIPATION

The cultural hierarchy – elite networks and patronage systems continue to influence public decision-making and resource allocation.



• VESTED INTERESTS

Project decision-making was influenced by political and commercial interests.



• TRANSPARENCY ON BUDGET

Limited public disclosure of full project costs, loan terms, and detailed expenditure reduced transparency and public oversight.

PROJECT SELECTION PROCESS



INVESTOR LED



IDENTIFICATION

Preferably selected from existing plan or pipeline. Unsolicited proposals need scrutiny for technical, sustainability, economic & financial viability.



EVALUATION

Level of scrutiny & compliance requirements set by Gov't.



CONSULTATION

Minimal or no information disclosure unless required by Gov't.



APPROVAL

Conditional on compliance if requirements have been set; often fast-tracked.



SGR Project vulnerabilities – 4.49 (*Very High*)

The loan agreements were kept confidential,



The objective to reduce trucks traffic on the road not achieved.



Very high cost with the economic analysis of the project not publicly available.



Phase 2 termination at Murtoto - Suswa viewed as not ideal.



The SGR lacks the "door-to-door" advantage that trucks provide.



Kiambu Civil Servants Housing

Acquisition Models for Civil Servants

Kiambu Civil Servant Housing Units

Tenant Purchase Scheme



- Rent-to-Own Plan
- Check-Off Payments from Salary

Mortgage Option



- Affordable Home Loans
- Long-Term Mortgages

Acquisition Pathways





AGENCY CONTEXT

KIAMBU CIVIL SERVANTS HOUSING PROJECT



OVERALL RISK SCORE



3.24

MODERATELY HIGH RISK



TRANSPARENCY ON BUDGET AND PROGRAM

Budget and programs are regularly published but there exist gaps in details expenditure and implementation against the budget allocated.



CONFLICT OF INTEREST AND PROCUREMENT INTEGRITY CONCERNS



Strengthening transparency, closing implementation gaps and ensuring integrity will **reduce risk and build trust.**

PROJECT SELECTION PROCESS – HOUSING PROJECT



DETAILED AND SYSTEMATIC

Many stages and control points where the options and impacts are reviewed before a decision is made to proceed to the next stage. The use of multiple control points aims to improve quality and reduce the risks of undue influence and corruption.

WHY DETAILED AND SYSTEMATIC?



01 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.



02 PROJECT APPRAISAL

Appraisal of viable alternatives; preferred option; preliminary design; economic evaluation.



03 IMPACT ANALYSES

Evaluation of environmental and social impacts, and potential mitigation.



04 CONSULTATION

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



THROUGH A DETAILED AND SYSTEMATIC PROCESS, we ensure quality projects, responsible use of resources, and **better outcomes for communities.**



INDICATIVE RISK OF CORRUPTION – KIAMBU CIVIL SERVANTS HOUSING PROJECT

 Project	 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

AGENCY CONTEXT – VIHIGA AFFORDABLE HOUSING PROJECT



3 BEDROOM MARKET UNIT

79 SQM

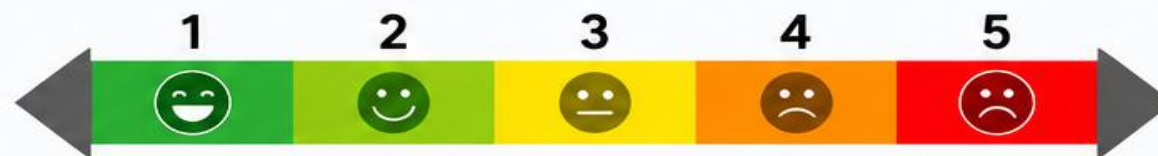


LEGEND

- 1 Entrance Lobby
- 2 Kitchen
- 3 Living Room
- 4 Shower
- 5 Washroom

- 6 Kitchen Yard
- 7 Master Bedroom
- 8 Master Washroom
- 9 Bedroom 02
- 10 Bedroom 03

OVERALL RISK SCORE



3.56

MODERATELY HIGH RISK



UNPROCEDURAL COMMUNITY ENGAGEMENTS

There is limited evidence on community-engagement for this project, with in-depth consultation with the impacted communities reported to be lacking.



MISSING IMPORTANT PROJECT DOCUMENTATIONS

EIA, ESIA, 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**.



Strengthening community engagement and ensuring complete project documentation will **reduce risks**, **promote accountability** and **deliver quality housing**.



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PROJECT SELECTION PROCESS - VIHIGA AFFORDABLE HOUSING PROJECT



DETAILED AND SYSTEMATIC

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. The use of multiple control points aims to improve quality and reduce the risks of undue influence and corruption.



WHY DETAILED AND SYSTEMATIC?



01 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.



02 PROJECT APPRAISAL

Appraisal of viable alternatives; preferred option; preliminary design; economic evaluation.



03 IMPACT ANALYSES

Evaluation of environmental and social impacts, and potential mitigation.



04 CONSULTATION

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



A detailed and systematic process ensures quality projects, **responsible use of resources** and delivers sustainable, **affordable housing** for communities.



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PROJECT VULNERABILITIES – VIHIGA AFFORDABLE HOUSING PROJECT



SCORE, RATING & KEY FINDINGS



3.56

MODERATE



FUNDING MODEL

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.



PURPOSE AND NEED

Inadequate needs assessments and community engagement creates **uncertainty about whether the housing interventions truly matched local demand** and social priorities.



Conditional financing
3% employee/employer
contributions (**capped
at KES 2,500**)



**Adequate needs
assessment &
community
engagement**



**Transparency &
safeguards are
critical**



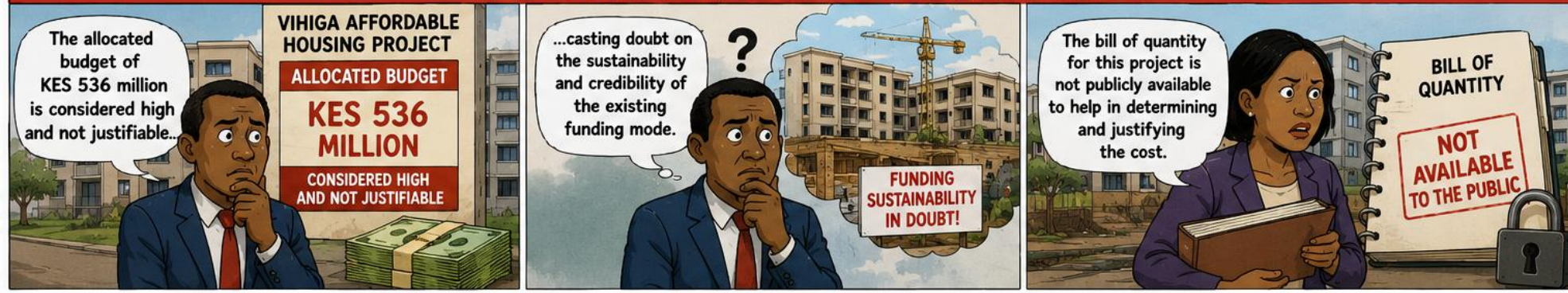
Strengthening financing safeguards, improving needs assessments and community engagement will **reduce risks** and ensure that resources deliver **real, lasting impact for communities**.



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KEY PROJECT VULNERABILITIES - VIHIGA AFFORDABLE HOUSING PROJECT

1. COST AND VALUE CONCERN – FUNDING MODEL



2. GOVERNANCE AND COMPLIANCE: FIT FOR PURPOSE



3. ABSENCE OF CRITICAL ENVIRONMENTAL COMPLIANCE DOCUMENTATION



KEY RECOMMENDATIONS

for Responsible and Accountable Infrastructure Investment



TRANSPARENT PROJECT PUBLICATION

Publish all project information proactively to ensure public awareness, final contracts, and accountable investment processes.



LEGISLATION AND OVERSIGHT

Strengthen legislation and oversight to promote responsible infrastructure investment and robust evaluation processes.



MANDATORY DISCLOSURE OF DOCUMENTS

Disclose procurement and regulatory documents to ensure transparency and informed public oversight.

KEY RECOMMENDATIONS

for Responsible and Accountable Infrastructure Investment



VALUE FOR MONEY AND PRINCIPLES

Ensure infrastructure policies align with value for money and deliver returns based on sound investment principles.



VALUE FOR MONEY IN PROJECTS

Plan and implement projects that deliver maximum public value within approved budgets.



ALIGN PPP PROJECTS TO POLICY

Ensure PPP projects follow national policies, frameworks, and multi-year infrastructure plans.



PREVENT ABUSE OF PIP IN PPP

Prevent misuse of the PIP process and promote competitive, high-value infrastructure investments.

KEY RECOMMENDATIONS

for Responsible and Accountable Infrastructure Investment



INFRASTRUCTURE CORRUPTION RISK ASSESSMENTS

Strengthen oversight and collaborate to identify, assess and address corruption risks early.



ACCOUNTABILITY & SUSTAINABLE INFRASTRUCTURE

Implement accountability mechanisms and deliver sustainable infrastructure for long-term socio-economic benefits.

THE CHOICE WE MAKE TODAY

Better governance. Better infrastructure. Better future for all.

THE CHALLENGE



POLITICAL PRIORITIES OVERRIDE GOOD GOVERNANCE

Public Investment
Management bypassed.



POOR PROJECT SELECTION

Projects don't
represent value
for money.



WASTED RESOURCES. DEBT DISTRESS.

Impacts communities
and weakens entire
economies.



POPULAR BUT NOT QUESTIONED

Large projects are popular,
so political priorities
rarely challenged.

WASTED
RESOURCES

← CORRUPTION
& WASTE

TRANSPARENCY
& INTEGRITY →

INFRASTRUCTURE
SHOULD BUILD
COMMUNITIES,
NOT DEBT.

CITIZEN VOICE
STRONGER OVERSIGHT
BETTER OUTCOMES

THE SOLUTION



TRANSPARENT & ACCOUNTABLE DECISIONS

Strengthen and follow
Public Investment
Management.



VALUE FOR MONEY PROJECTS

Better planning,
rigorous appraisal,
real impact.



STRONGER COMMUNITIES. STRONGER ECONOMIES.

Resources used wisely.
Debt risks reduced.



CITIZENS & CIVIL SOCIETY AT THE TABLE

Meaningful participation
leads to better outcomes
and less corruption.



CORRUPTION COSTS
EVERYONE.



INTEGRITY BUILDS
A BETTER FUTURE.
LET'S CHOOSE WISELY.

Thank you!



A corruption-free society

For FREE assistance on CORRUPTION related cases contact our Advocacy and Legal Advice Centres helpline:

Call **0800-720-721** or Sms **40019**

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