



**The Kenyan Section of the International Commission of Jurists**

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## INTRODUCTION AND SUMMARY

- ICJ Kenya is a non-governmental membership organization constituting a body of jurists drawn from members of the Bench and Bar in Kenya and the region. It is Africa's only autonomous national section of the International Commission of Jurists. ICJ Kenya has been working in Kenya and around Africa since 1959, and its mission is to promote human rights, democratic governance, justice, and the rule of law in Africa.
- The report is subdivided into 2 clusters of Civil & Political Rights and Economic, Social and Cultural Rights.

## ISSUES & RECOMMENDATIONS

### A. CIVIL AND POLITICAL RIGHTS

#### Access to Justice- Legal aid service delivery in Kenya

1. **Issue:** The enactment of the Legal Aid Act 2016 marked a significant step towards accelerating legal aid mechanisms to the indigent who are negatively impacted by the high cost of accessing legal services. While this is a positive advancement, challenges to the implementation of this Act have been apparent, as a result, achieving its objectives have been slowed. A major challenge has been the limited budgetary allocations to operationalize the legal aid fund which is obligated to defray expenses incurred in the representation of persons granted legal aid and to meet the expenses of the operations of the National Legal Aid service. In this breadth, the 2022/2023 state of the judiciary and the administration of justice annual report documents a budgetary deficit of 51% of the total budgetary requirement.<sup>i</sup> This deficit demonstrates financial constraints in the legal aid delivery sector, spearheaded through NLAS. In addition, studies have been conducted to demonstrate the cost benefit analysis of legal aid; the findings reveal that legal aid programs provide tangible benefits in form of efficiency gains to the justice system through efficient court processes as a result of legal representation by legal aid litigants.<sup>ii</sup> This therefore calls for an increased budgetary allocation to NLAS through the judiciary.

#### **Recommendation**

- **Increase the funding allocation for legal aid services to 30% of the judiciary budget.**
- **The Government should detach NLAS from the Office of the Attorney General (OAG).**

#### Constitutional reforms and implementation

2. **Issue:** The Independent Electoral and Boundaries Commission is established under Article 88(1) and incorporated as a body corporate under Article 253 of the Constitution of Kenya, 2010. The Commission is mandated under Article 88(4) of the Constitution of Kenya, 2010 to conduct or supervise referenda and elections to any elective body or office established by the Constitution, and any other elections as prescribed by an Act of Parliament. The tenure of all Commissioners came to an end in January 2023 and since then the IEBC has

had no Commissioners. The lack of commissioners has hampered the delineation of boundaries process and stalled election processes from being conducted thus a violation of the civil and political rights of Kenyans.

**Recommendation:**

- **The Government should prioritize the appointment of the IEBC Commissioners in tandem with the Kriegler report recommendations of not more than two years before a General Election.**
- **The Government should prioritize Boundaries delineation process as prescribed in the Constitution of Kenya.**
- **The Government should ensure all election amendment laws including those proposed from the NADCO process are enacted at least a year before the General election.**

**Judicial reforms and strengthening/ access to justice**

3. **Issue:** Kenya's 2010 Constitution guarantees the independence of the Judiciary<sup>iii</sup> and specifically insulates the institution from the control or direction of any person or authority.<sup>iv</sup> Internationally the Bangalore Principles of Judicial Conduct and Latimer House guidelines,<sup>v</sup> Universal Declaration of Human Rights (UDHR)<sup>vi</sup> , and the International Convention on Civil and Political Rights (ICCPR)<sup>vii</sup> recognise the independence of the judiciary. The Judiciary of Kenya continues to remain underfunded with less than 1% of the National Budget apportioned to it which has an impact on access to justice.

**Recommendation:**

- **The Government of Kenya should increase funding to the Judiciary to the International Best Standard of 2-3% of the National Budget.**
- **The Government of Kenya should operationalise and resource the Judicial Fund.**
- **The Government of Kenya should foster and champion the respect of the rule of law by ensuring obedience to court orders.**
- **The Government of Kenya should invest and promote the Multi-Door Approach to Justice by promoting Alternative Justice system which is a pathway to ensuring access to justice for all particularly persons at the grassroots.**
- **The Government of Kenya should promote access to justice by capacitating the Judiciary with the compliment of Judges, Magistrates and Officers required for optimal performance as illustrated in the Blueprint For Social Transformation Through Access To Justice 2022- 2033.**

## **Enforced disappearances**

4. **Issue:** Enforced disappearances in Kenya continue largely unaddressed, with limited accountability or prosecution for those responsible, particularly among security forces targeting individuals suspected of terrorism or political dissent in counties like Garissa, Lamu, and Kwale. Weak oversight, inadequate investigations, and a lack of legal frameworks criminalising enforced disappearances enable impunity and disregard for the rule of law. Civic space is shrinking as arbitrary arrests, detentions, and intimidation stifle public dissent, impacting communities through psychological trauma, economic hardship, and barriers to justice. Despite existing national legislation, Kenya has not ratified the International Convention for the Protection of All Persons from Enforced Disappearance, leaving mechanisms to protect victims insufficient and perpetrators largely unaccountable.

### **Recommendations:**

- **The Government should commit to the Full implementation of the National Police Service, Kenya Prison Service and National Youth Service Reforms Taskforce Report.**
- **The Government should champion the use of the Minnesota Protocol.**
- **The Government should adhere to the rule of law and court orders appertaining to applications of habeas corpus and institute guidelines for the enforcement of the writ by security sector actors.**
- **The Government should enhance/digitize the Missing Persons Database to ensure that bodies of unknown persons who are potentially disappeared are cross-referenced for identification.**
- **The Government should fully capacitate the Government Chemist and DCI Forensic lab with reagents to ensure DNA identification of bodies is done expeditiously.**
- **The Government should ratify the International Convention for the Protection of All Persons from Enforced Disappearances.**
- **The Government should establish a local legal framework to prevent and criminalise enforced disappearances in Kenya.**
- **The Government should ensure full implementation of the National Coroners Service Act 2017, the Prevention of Torture Act 2017 and the Victim Protection Act 2014.**

## **Decriminalisation of petty offences**

5. **Issue:** Petty offences are minor offences for which the punishment is prescribed by law as a warning, community service, a low value fine or short-term imprisonment often for the failure to pay the fine. Most of the offences punished include, idleness, begging, loitering, drunkenness, disorderliness, prostitution, indecent exposure, nuisances and generally offensive conduct. The enforcement of laws that provide for petty offences often target specific groups such as women, young men, street families, low-income people, minority groups, refugees and the disadvantaged. According to an audit of the criminal justice system by the National Council on Administration of Justice (NCAJ) petty offences such as offences relating to lack of business licenses, being drunk and disorderly and creating disturbance comprise of 70 % of the offences that are processed in the criminal justice

system.<sup>viii</sup> 68% of arrests and detention are for petty offences and majority of the offenders are persons without means.<sup>ix</sup>

#### **Recommendation:**

- **The Government should decriminalize and reclassify all petty and minor offences.**
- **The Government should fast-track the Criminal Code Amendment and Penal Code Amendment Bills that seek to decriminalize and reclassify some petty offences.**
- **The government should apply the NCAJ Guidelines on the Management of Petty Offenders.<sup>x</sup>**
- **The Judiciary should apply the Sentencing Policy 2024 when dealing with petty offenders.<sup>xi</sup>**
- **The Office of the Director of Public Prosecutions should apply the Diversion policy to divert petty offenders from the criminal justice system.**

#### **Death penalty**

6. **Issue:** The last known execution to ever take place in Kenya was in 1987, being that of Hezekiah Ochuka for the 1982 attempted coup. Most of those sentenced to death have had their sentences commuted to life imprisonment; the late Mwai Kibaki did so in 2009 of at least 4,000 inmates on death row, Mr. Uhuru Kenyatta in 2016 commuted at least 2,747 to life imprisonment, and most recently, Mr. William Ruto commuted those on death row. On 21<sup>st</sup> July 2023, His Excellency Dr. William S. Ruto commuted all persons serving the death sentence as of 21<sup>st</sup> November 2022 to life imprisonment via advice from the Power of Mercy Advisory Committee. Kenya is no stranger to the discourse on the death penalty, By Judgment dated 14 December 2017 in Francis Karioko Muruatetu v. Republic of Kenya<sup>xii</sup>, the Supreme Court of Kenya at Nairobi declared the mandatory nature of the death penalty contained in section 204 of the Penal Code (Cap 63) to be unconstitutional because it violates the right to a fair trial in Article 50(2) of the Constitution of Kenya, 2010. The Supreme Court in 2021 further gave additional guidance that the precedent set in 2017 only applied to persons charged of the offence of murder. The Court of Appeal in the case of *Julius Kitsao Manyeso v. Republic* found that life imprisonment is unconstitutional. On 1<sup>st</sup> September 2023, Hon. Opiyo Wandayi, introduced a bill to the National Assembly referred to as the Penal Code Amendment Bill 2023, which seeks to replace the death penalty with life imprisonment for capital offences. If passed by Parliament, the Bill would effectively abolish the death penalty from the Penal Code and subsequently trigger reforms on other laws that carry an optional death sentence such as the Kenya Defence Forces Act 2012.

#### **Recommendations:**

- **The Government should abolish the death penalty and replace it with a sentence that is fair, proportionate, and respects international human rights standards.**

- **The Government should abolish indeterminate sentences and introduce sentence a determinate life sentence.**
- **The Government should reconstitute the modus operandi of the Power of Mercy Committee to ensure it is responsive to the needs of persons deprived of liberty and particularly those who are vulnerable such as the terminally ill and the elderly who are on death row or on a life sentence.**
- **The Government should ensure access to legal representation for persons charged with offences that carry the death sentence.**
- **The Government should ratify the Second Optional Protocol to the ICCPR.**
- **The Government should fast-track the Criminal Procedure Code and the Penal Code Amendment Bills before Parliament.**

### **Data Privacy and Protection**

7. **Issue:** Kenya enacted the Data Protection Act, 2019 which gave effect to Article 31(c) and (d) of the Constitution; to establish the Office of the Data Protection Commissioner; to make provision for the regulation of the processing of personal data; to provide for the rights of data subjects and obligations of data controllers and processors; and for connected purposes. With the growing Kenya's digital economy there has been an increase in the collection and processing of personal data, with weak safeguards in place. A good example is the Worldcoin biometric data scandal<sup>xiii</sup>, which raised serious concerns over consent, transparency, and accountability in Kenya.

### **Recommendations**

- **Strengthen enforcement of the Data Protection Act of 2019, ensuring that data controllers and processors are fully compliant<sup>xiv</sup>.**
- **Conduct regular audits and assessments of data collection initiatives.**
- **The Data Commissioner to adopt clear guidelines for emerging digital activities, such as the use of cryptocurrencies and biometric data collection, ensuring they meet international data protection standards.**

### **Freedom of Expression**

8. **Issue:** During periods of political unrest, the government has resorted to internet shutdowns and network throttling, curtailing freedom of assembly and information sharing.<sup>xv</sup> For example despite the public commitment from the Communications Authority of Kenya not to shut down the internet during the Tuesday **#RejectFinanceBill2024** protests, the country experienced nationwide internet disruption, which also affected internet access in neighbouring countries like Uganda, Rwanda and Burundi. These acts have infringed on the right to internet access, which provides that all people must be able to access the Internet in order to exercise and enjoy their rights to freedom of expression and opinion, and other fundamental human rights.

### **Recommendations:**

- The government to respect the right to freedom of expression, information, privacy, association, and assembly for all Kenyans in line with the Constitution of Kenya;
- The government to cease and desist from interfering with internet access as it has a significant and adverse impact on citizens' rights including access to mobile money services, healthcare, and other emergency services.

### **Surveillance and Cybersecurity**

9. **Issue:** The increasing use of digital surveillance tools by state agencies, often without proper oversight, threatens citizens' privacy and other rights. This has been evident during anti-government protests where technology is used to track, harass, or arbitrarily detain activists.

### **Recommendations:**

- Establish independent oversight mechanisms for the use of surveillance tools by government agencies, ensuring transparency, accountability, and adherence to legal standards.
- Amend Section 23 of the Computer Misuse and Cybercrimes Act, 2018 to decriminalize defamation.

## **B. ECONOMIC, SOCIAL AND CULTURAL RIGHTS.**

### **High Cost of Living and Inflation**

10. **Issue:** In recent years, Kenya has witnessed a substantial increase in the cost of living, significantly affecting the populace. The inflation rate surged to 8.5% in 2023, as reported by the Kenya National Bureau of Statistics (KNBS).<sup>xvi</sup> This spike has been primarily attributed to rising food and fuel prices, which account for a significant portion of household expenditures. According to a report by the World Bank, the rising cost of essential commodities has exacerbated poverty levels, with an estimated 36% of the population living below the poverty line.<sup>xvii</sup>

Government interventions to mitigate the effects of inflation have proven inadequate. A lack of effective fiscal policies and safety nets has left many families struggling to meet basic needs, including food, healthcare, and education.<sup>xviii</sup> The World Food Programme indicated that food insecurity affects more than 13 million Kenyans, highlighting the urgent need for comprehensive policy measures.<sup>xix</sup>

Moreover, inflation disproportionately impacts vulnerable populations, particularly women, who allocate a larger portion of their income to basic needs. A study by Oxfam revealed that women often face a double burden of economic hardship and caregiving responsibilities, further exacerbating their vulnerability during inflationary periods.<sup>xx</sup>

### **Recommendations:**

- i. Implement comprehensive fiscal policies targeting inflation control.

- ii. **Introduce targeted social safety nets to protect vulnerable populations, particularly women.**
- iii. **Develop gender-responsive policies to reduce the disproportionate economic burden on women.**

### **Youth Unemployment**

**11. Issue:** Youth unemployment remains a critical issue in Kenya, with the youth unemployment rate estimated at 35% in 2023.<sup>xxi</sup> Several factors contribute to this alarming rate, including a mismatch between educational qualifications and job market requirements, a lack of practical skills, and limited opportunities in the formal sector.

Government initiatives, such as the Youth Empowerment Programme, aimed at addressing youth unemployment, have had limited success due to inadequate funding and poor implementation.<sup>xxii</sup> Furthermore, the COVID-19 pandemic worsened the situation, resulting in significant job losses, particularly in sectors heavily reliant on youth employment, such as hospitality and tourism.<sup>xxiii</sup>

The lack of job opportunities fuels social unrest and discontent among the youth. The National Council for Population and Development indicated that youth unemployment is a key driver of radicalisation and engagement in criminal activities.<sup>xxiv</sup> To effectively combat youth unemployment, it is essential to align educational curricula with market demands and enhance vocational training opportunities.<sup>xxv</sup>

#### **Recommendations:**

- **Align educational curricula with market demands to improve employability.**
- **Increase funding for youth-targeted employment initiatives and enhance implementation strategies.**
- **Expand vocational training programmes to equip youth with practical, in-demand skills.**

### **Affordable Housing Programme**

**12. Issue:** The affordable housing programme launched in 2017 as part of the "Big Four Agenda," aims to provide low- and middle-income Kenyans with access to affordable housing. However, the programme has faced numerous challenges, including high construction costs, bureaucratic inefficiencies, and inadequate financing options for potential homeowners.<sup>xxvi</sup>

Critics argue that the programme primarily benefits developers and the elite rather than addressing the needs of the most vulnerable populations. A Kenya Human Settlements Network report highlighted that over 80% of Kenyans cannot afford the proposed housing units, undermining the programme's objectives.<sup>xxvii</sup> The failure to prioritise inclusivity in the housing agenda has resulted in continued urban poverty and informal settlements, where the majority of Kenyans reside.<sup>xxviii</sup>

The government must re-evaluate its approach to the affordable housing programme, ensuring that it prioritises the needs of marginalised communities. Effective stakeholder



engagement and transparent allocation of resources are crucial for the success of the programme.<sup>xxix</sup>

#### **Recommendations:**

- **Re-evaluate the affordable housing programme to prioritise the needs of marginalised communities.**
- **Ensure transparency in the allocation of resources and foster inclusive stakeholder engagement.**
- **Adopt a people-centred approach that ensures the availability of housing for low-income populations.**

#### **Anti-Finance Bill Protests**

**13. Issue:** The Finance Bill 2024 was proposed in response to rising public debt and economic challenges and sought to increase revenue generation. However, it faced widespread criticism from the people, civil society organisations (CSOs) and opposition parties, who argued that it disproportionately impacted the poor and marginalised.<sup>xxx</sup>

Proponents of the bill argued that it was necessary to promote fiscal discipline and reduce the debt burden on future generations. Nonetheless, the lack of public consultation in the drafting process raised concerns about its democratic legitimacy and potential impact on essential services such as healthcare and education.<sup>xxxi</sup>

In the future, the government's approach to fiscal policy must balance economic growth with social equity to avoid exacerbating existing inequalities. Moreover, a comprehensive review of a bill's potential consequences on vulnerable populations is essential in informing policymaking.<sup>xxxii</sup>

#### **Recommendations:**

- **Ensure broad public participation and consultation in fiscal policymaking.**
- **Conduct comprehensive impact assessments to evaluate how proposed financial policies affect vulnerable populations.**
- **Balance fiscal discipline with social equity to promote economic justice.**

#### **Transparency and accountability (Adani Takeover)**

**Issue:** The Adani JKIA saga, involving the controversial takeover of the Jomo Kenyatta International Airport (JKIA) by the Adani Group, raises significant concerns regarding transparency, accountability, and potential economic implications. Critics have expressed alarm about the agreement's lack of public engagement and scrutiny, which could undermine Kenya's sovereignty and economic interests.<sup>xxxiii</sup>

The deal has the potential to increase costs for consumers and diminish the quality of services provided at the airport. Additionally, concerns about the involvement of foreign entities in key infrastructure projects have sparked debates about their implications for local businesses and employment.<sup>xxxiv</sup>

A transparent and accountable framework is essential to ensure that such agreements benefit the Kenyan people and contribute to sustainable economic development. Public engagement in the negotiation process is vital to build trust and ensure that local communities reap the benefits of foreign investments.<sup>xxxv</sup>

**Recommendations:**

- **Ensure that infrastructure deals, such as the Adani JKIA agreement, are subject to transparent negotiations with public participation.**
- **Establish mechanisms to protect local businesses and workers in key national projects.**
- **Develop a clear and accountable framework for foreign investments that prioritises Kenya's economic interests.**

## End notes

- <sup>i</sup> <https://judiciary.go.ke/downloads-reports/#:~:text=Indigenous%20Jurisprudence%20A%20Synopsis%20of>
- <sup>ii</sup> <https://icj-kenya.org/wp-content/uploads/2022/05/A-Cost-Benefit-Analysis-of-Legal-Aid-in-Kenya.pdf>
- <sup>iii</sup> Article 160 of the constitution of Kenya 2010 available at <http://kenyalaw.org:8181/exist/kenyalex/actview.xql?actid=Const2010/>
- <sup>iv</sup> Ibid Article 160(1)
- <sup>v</sup> The Latimer Principles are a set of Commonwealth Principles that were developed and intended to set out the relationship between the judiciary and the executive in member countries. The Principles were launched at the Commonwealth Secretariat in London, UK on the 12th May 2014. For more information, please see <http://thecommonwealth.org/history-of-the-commonwealth/latimer-principles>,
- <sup>vi</sup> Section 10 of the UN General Assembly, Universal Declaration of Human Rights, 10 December 1948 available at <http://www.unhcr.org/refworld/docid/3ae6b3712c.htm>
- <sup>vii</sup> Section 14 of the UN General Assembly, International Covenant on Civil and Political Rights, 16 December 1966 available at <http://www2.ohchr.org/english/law/ccpr.htm>
- <sup>viii</sup> NCAJ., “Criminal Justice System in Kenya: An Audit Understanding pre-trial detention in respect to case flow management and conditions of detention,” (2017) Available at <https://ncaj.go.ke/wp-content/uploads/2019/10/Criminal-Justice-System-in-Kenya-An-Audit>, p. xxiv
- <sup>ix</sup> Ibid, p ccclxii
- <sup>x</sup> <https://ncaj.go.ke/wp-content/uploads/download-manager-files/GUIDELINES-ON-LAW-AND-PRACTICE.pdf>
- <sup>xi</sup> <https://judiciary.go.ke/download/sentencing-policy-guidelines-2023/>
- <sup>xii</sup> [2017] eKLR, Petition No. 15 of 2015 (as consolidated with Petition No 16 of 2015) [Muruatetu].
- <sup>xiii</sup> <https://www.africanews.com/2023/08/02/kenya-suspends-worldcoin-cryptocurrency-data-protection-probe/#:~:text=Kenya%20announced%20on%20Wednesday%20that,data%22%20collected%20by%20the%20com> pany.
- <sup>xiv</sup> The Data Protection Act, 2019 (Kenya), governs the processing of personal data, ensuring the rights to privacy are upheld. The Act outlines the duties of data controllers and processors and requires their compliance with data protection principles. Accessed via <https://www.kentrade.go.ke/wp-content/uploads/2022/09/Data-Protection-Act-1.pdf>
- <sup>xv</sup> <https://www.kictanet.or.ke/kenyas-internet-disrupted-during-protests-a-violation-of-human-rights/>
- <sup>xvi</sup> Kenya National Bureau of Statistics. (2023). Monthly Inflation Rate. Retrieved from <https://www.knbs.or.ke/>
- <sup>xvii</sup> World Bank. (2023). Kenya Economic Update: Responding to the Crisis. Retrieved from <https://www.worldbank.org/en/country/kenya/publication/kenya-economic-update-responding-to-the-crisis>
- <sup>xviii</sup> Oduor, L. (2023). The High Cost of Living in Kenya: A National Crisis. *The Standard*. Retrieved from <https://www.standardmedia.co.ke/article/2001268097/the-high-cost-of-living-in-kenya-a-national-crisis>
- <sup>xix</sup> World Food Programme. (2023). Food Security in Kenya: An Urgent Call to Action. Retrieved from <https://www.wfp.org/countries/kenya>
- <sup>xx</sup> Oxfam. (2022). Women and Economic Justice: The Hidden Costs of Inflation. Retrieved from <https://oxfam.org/en/women-and-economic-justice>
- <sup>xxi</sup> International Labour Organization. (2023). Global Employment Trends for Youth 2023. Retrieved from [https://www.ilo.org/global/publications/books/WCMS\\_896763/lang--en/index.htm](https://www.ilo.org/global/publications/books/WCMS_896763/lang--en/index.htm)
- <sup>xxii</sup> Karanja, J. (2023). The Challenge of Youth Unemployment in Kenya. *The Standard*. Retrieved from <https://www.standardmedia.co.ke/article/2001267945/the-challenge-of-youth-unemployment-in-kenya>
- <sup>xxiii</sup> National Council for Population and Development. (2023). Youth Unemployment and Social Cohesion in Kenya. Retrieved from <https://www.ncpd.go.ke>
- <sup>xxiv</sup> Karanja, J. (2023). Bridging the Gap: Education and Employment in Kenya. *The Nation*. Retrieved from <https://www.nation.africa/kenya/news/bridging-the-gap-education-and-employment-in-kenya-4124900>
- <sup>xxv</sup> Kenya Human Settlements Network. (2022). Housing for All: An Analysis of the Affordable Housing Programme. Retrieved from <https://www.khsk.org/housing-for-all>
- <sup>xxvi</sup> Mwaniki, S. (2023). Affordable Housing Programme: Progress and Challenges. *The Nation*. Retrieved from <https://www.nation.africa/kenya/news/affordable-housing-programme-progress-and-challenges-4124900>
- <sup>xxvii</sup> Ochieng, P. (2023). The Anti-Finance Bill: What It Means for the Average Kenyan. *Daily Nation*. Retrieved from <https://www.dailynation.africa/news/the-anti-finance-bill-what-it-means-for-the-average-kenyan>

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- <sup>xxviii</sup> Mutua, R. (2023). Economic Policies and Social Equity in Kenya. *African Economic Research Consortium*. Retrieved from <https://aercafrica.org/publications/economic-policies-and-social-equity-in-kenya>
- <sup>xxix</sup> Ombok, A. (2023). The Adani JKIA Saga: Implications for Kenya's Economy. *The Standard*. Retrieved from <https://www.standardmedia.co.ke/business/article/2001268050/the-adani-takeover-concerns-and-opportunities-for-kenya>
- <sup>xxx</sup> Njoroge, K. (2023). Adani Group's Controversial Takeover of JKIA: What You Need to Know. *The Star*. Retrieved from <https://www.the-star.co.ke/news/2023-04-10-adani-groups-controversial-takeover-of-jkia-what-you-need-to-know>
- <sup>xxxi</sup> Ngugi, M. (2023). Assessing the Economic Impact of the Anti-Finance Bill. *ICJ Kenya*. Retrieved from <https://www.icj-kenya.org/news/assessing-the-economic-impact-of-the-anti-finance-bill>
- <sup>xxxii</sup> Ndung'u, J. (2023). Economic Policies and Social Equity in Kenya. *African Economic Research Consortium*. Retrieved from <https://aercafrica.org/publications/economic-policies-and-social-equity-in-kenya>
- <sup>xxxiii</sup> Ombok, A. (2023). Ensuring Transparency in Public-Private Partnerships: Lessons from Adani JKIA. *Transparency International Kenya*. Retrieved from <https://www.tikenya.org/en/news/ensuring-transparency-in-public-private-partnerships-lessons-from-adani-jkia>
- <sup>xxxiv</sup> Muriuki, W. (2023). Foreign Investments and Local Economic Development: The Case of Adani JKIA. *The East African*. Retrieved from <https://www.theeastafican.co.ke/tea/news/east-africa/foreign-investments-and-local-economic-development-the-case-of-adani-jkia-4124900>
- <sup>xxxv</sup> Kibet, J. (2023). Ensuring Transparency in Public-Private Partnerships: Lessons from Adani JKIA. *Transparency International Kenya*. Retrieved from <https://www.tikenya.org/en/news/ensuring-transparency-in-public-private-partnerships-lessons-from-adani-jkia>