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A hand is pointing its index finger towards a glowing, circular light effect. Inside this light effect, the word "Strategy" is written in a large, dark, sans-serif font. The background is a dark blue gradient with abstract, swirling light patterns. A thick, curved band with red, white, and blue stripes arches across the upper half of the image.

Strategy

Challenges Faced By the Kenya Ethics and Anticorruption Commission in Implementing the Strategies Recommended By United Nation Convention against Corruption in Kenya

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Abstract

Purpose: The purpose of the study was to determine challenges faced by the Kenya Ethics and Anticorruption Commission in implementing the strategies recommended by united nation convention against corruption in Kenya

Methodology: The study used the Case Study method and the unit of analysis which was the Ethics and Anticorruption Commission. The study used both Secondary and Primary data. Content Analysis was the tool that was used to analyze the content and information provided by the respondents during the interviews and documentary materials such as EACC reports.

Results: Result findings indicated that slow judicial process, political influence hinder the fight against corruption, weak legal framework, slow process of implementing the auditor general reports, lack of prosecution powers by EACC, lack of seriousness in sentencing corrupt individuals and lack of integrity by the Kenyans elect leaders are some of the challenges affecting the commission.

Unique contribution to theory, practice and policy: EACC needs to be more aggressive in educating the public on UNCAC and corruption, its negative effects on development. They need to get the support of the public to speak out against corruption and demand accountability from the government (county and national) and leaders

***Keywords:* strategy implementation, EACC challenges, corruption**

1.0 INTRODUCTION

Strategy implementation is important because its success or failure rate may have a significant impact on the success and sustainability of the business. The fatal problem with strategy implementation is the de facto success rate of intended strategies. In research studies it is as low as 10 percent. Despite this abysmal record, strategy implementation does not seem to be a popular topic at all. In fact, some managers mistake implementation as a strategic afterthought and a pure top-down-approach. Instead, management spends most of its attention on strategy formulation (Judson, 2007).

Corruption remains a major problem affecting the political, social and economic development in Kenya. It is identified under Vision 2030 and Medium Term Plan (2008-2012) together with governance as one of the challenges besetting socio-economic transformation. Corruption stifles growth and investment and has disproportionate distortionary effects on all productive and service sectors of the economy. It distorts public sector choices and decision making with undesirable consequences such as poor service delivery. By its very nature, corruption is hidden and entails deception and unethical conduct. Furthermore, uncertainty associated with economic transition, unstable social safety nets, and widespread state capture by various interest groups, has created an open environment for corrupt practices (Kenya Anti-Corruption Commission Strategic Plan 2009-2013).

While corruption was once a taboo subject, in the last decade fighting corruption has emerged as a worldwide movement encompassing a range of organizations and tools. NGOs such as Transparency International (TI) and Global Witness exert influence through advocacy efforts, corruption indices, and broad awareness building, while bilateral and multilateral efforts like the U.N. Convention against Corruption, the Organization for Economic Cooperation and Development (OECD), and the World Bank Institute (WBI) have heightened global commitment to anti-corruption work. Existing resources that influence corporate work against corruption include TI's National Integrity System framework, WBI's Business Fighting Corruption portal, and the joint publication "Business against Corruption: A Framework for Action." Further, collective action efforts, such as the United Nations Global Compact (UNGC), the World Economic Forum's Partnering Against Corruption Initiative (PACI), and the Extractive Industries Transparency Initiative (EITI) have emerged within the last 10 years and succeeded in getting countries and corporations to sign on to efforts for reform and collaboration (Hills, Fiske & Mahmud, 2009).

In Kenya, the Ethics and Anti-Corruption Commission (EACC) is a statutory body established under the Ethics and Anti-Corruption Act, No. 22 of 2011 (hereinafter referred to as "the EACC Act"). It replaced the Kenya Anti-Corruption Commission (KACC) after the Constitution of Kenya, 2010 provided for the establishment of an independent Ethics and Anti-Corruption Commission (Matemu, 2012-2013). Parliament enacted the Ethics and Anti-Corruption Commission Act 2011 and Leadership and Integrity Act, 2012. These Acts provide for the functions and powers of the Ethics and Anti-Corruption Commission (EACC) inter alia implementation of Chapter Six of the Constitution. The Acts are being implemented alongside the Anti-Corruption and Economic Crimes Act (ACECA) of 2003. The mandate of the EACC is to combat corruption and economic crime in Kenya through law enforcement, prevention, public education and promotion of sound ethical standards and practices (Matemu, 2012-2013).

1.2 Problem Statement

Strategy implementation is important because its success or failure rate may have a significant impact on the success and sustainability of the business. The fatal problem with strategy

implementation is the de facto success rate of intended strategies. In research studies it is as low as 10 percent. Corruption is a global issue which affects the development of any nation. Kenya has been affected by this vice in all its political and socio-economic spheres. Nairobi County bears the brunt of corruption than all the other counties by virtue of it being the centre of all public and private entities. Some of the major effects of corruption witnessed in the County include; poor infrastructural developments, lack of adequate health facilities, insecurity, illegal acquisition of public properties and political uncertainty. The Government of Kenya in 2003 adopted a three-pronged anti-corruption strategy to fight corruption. However, no meaningful gains were realized through this policy initiative and this is an indicator that challenges to strategy implementation exist. Evidence of failure of strategy is that Kenya's score has remained disappointingly low and stagnant over a long period of time. As at 2013, the rating of Kenya was 136 out of 177 countries and with a score of 27 on a scale of 0 to 100, where 0 is highly corrupt and 100 is very clean (Transparency International –Kenya, 2013).

Kumba (2013) assessed the challenges of curbing corruption in Kenya especially over the period from 2008 to 2012 with a focus on how the Ethics and Anti-Corruption Commission has positioned itself to overcome those challenges. Results revealed that EACC faces a number of challenges ranging from lack of political will and government commitment to lack of prosecutorial powers to manage any given case from beginning to its logical conclusion. From the study it was evident that it takes time, reliable political will and public support to succeed in the war against corruption. Njue (2010) sought investigate and understand the challenges faced by the Kenyan media in the fight against corruption. It was found out that insecurity to journalists was the most important challenge faced by media firms in fighting corruption. Other important challenges faced by media firms in the fight against corruption were identified as lack of political will; poor remuneration of journalists; weak legal framework; and poor technology in that order. Mugo (2012) carried out a study seeking to establish strategy implementation at City Council of Nairobi, examining the challenges faced during the implementation and determine how these challenges were addressed. The study established most of the challenges of implementation as both internal and external stakeholders. To a larger extent the study found out that corporate strategy in itself, organization politics, structure and culture, government decisions, in adequate resources, poor communication, resistance to change and other uncontrollable factors as major challenges encountered during strategy implementation.

Although studies have been carried out on the challenges of strategy implementation; few studies have addressed the Ethics Anticorruption Commission. This study sought to address the challenges faced by the Ethics Anticorruption Commission (EACC) in implementing the strategies recommended by the United Nations Conventions against Corruption. Specifically, what are challenges faced by the Ethics Anticorruption Commission (EACC) in implementing the strategies recommended by the United Nations Convention against Corruption?

1.3 Research Objective

- i. To determine challenges encountered during the implementation of the strategies by EACC.
- ii. To establish the strategies adopted by EACC to address the challenges encountered during implementation.

2.0 LITERATURE REVIEW

2.1 Theoretical Review Institutional

Theory

Institutional theory attends to the deeper and more resilient aspects of social structure. It considers the processes by which structures, including schemas, rules, norms, and routines, become established as authoritative guidelines for social behavior. It inquires into how these elements are created, diffused, adopted, and adapted over space and time; and how they fall into decline and disuse. Although the ostensible subject is stability and order in social life, students of institutions must perforce attend not just to consensus and conformity but to conflict and change in social structures.

The basic concepts and premises of the institutional theory approach provide useful guidelines for analyzing organization-environment relationships with an emphasis on the social rules, expectations, norms, and values as the sources of pressure on organizations. This theory is built on the concept of legitimacy rather than efficiency or effectiveness as the primary organizational goal (McAdam and Scott, 2004). The environment is conceptualized as the organizational field, represented by institutions that may include regulatory structures, governmental agencies, courts, professionals, professional norms, interest groups, public opinion, laws, rules, and social values. Institutional theory assumes that an organization conforms to its environment. There are, however, some fundamental aspects of organizational environments and activities not fully addressed by institutional theory that make the approach problematic for fully understanding NGOs and their environment: the organization being dependent on external resources and the organization's ability to adapt to or even change its environment (McAdam and Scott, 2004).

Researcher such as Meyer and Rowan (1991), DiMaggio and Powell (1983) are some of the institutional theorists who assert that the institutional environment can strongly influence the development of formal structures in an organization, often more profoundly than market pressures. Innovative structures that improve technical efficiency in early-adopting organizations are legitimized in the environment. Ultimately these innovations reach a level of legitimization where failure to adopt them is seen as "irrational and negligent" (or they become legal mandates). At this point new and existing organizations will adopt the structural form even if the form doesn't improve efficiency.

This theory is applicable to this study as it conceptualizes the environment as the organizational field, represented by institutions which may include regulatory structures, governmental agencies, courts, professionals, professional norms, interest groups, public opinion, laws, rules, and social values. The nature of the organizational field influences formulation and implementation of strategies to a great extent.

Noble's Strategic Implementation Model (minimalist model)

Noble (1999) speaks of barriers to effective implementation. The physical distances hindering the necessary, cross-functional collaboration in the organization form physical barriers. Turf barriers are the other side of this coin, representing the differing interests of the distinct units. Interpretive barriers are formed by the different ways different units interpret and comprehend the strategy. Communication barriers need no explanation. Personality barriers reflect the personal characteristics of key personnel, as well as between different groups in the organization's hierarchy. Another important barrier is that of varied goals amidst the organization and its units. Noble's perspective, therefore, is that of the organization as consisting of different units and functional groups with different characteristics. Noble's model communicates a willingness to

overcome the barriers between the content and process paradigms. It combines the strict demarcation between implementation and formulation with concepts from process orientated literature.

Mantere (2000) called it the minimalist model and gave two criticisms to Noble's rather linear view on strategy implementation. The first was the actual linearity, which is not a very realistic view even in the interpretation of a single person. Aberg's three levels of interpretation provided the necessary depth to Noble's model. His notions help me to augment the minimal model of strategy implementation. The second concern was about the difficulty of determining who the communicator is and who the receiver is in various stages of strategy implementation. In addition, he gives a partial answer to this social complexity by speaking of a web in which different levels of interpretation assigns meanings to things and events (Aberg, 2000), which is rather far from being clear. It does not answer questions such as what are the roles of managerial and operational processes in such a network.

Aberg's levels of interpretation provide some sense for the interpretation process but fail to fully address the complexity of the interrelations between interpretation, adoption and enactment. There seem to be, however, some interconnections between interpretation and adoption. If one thinks about the three levels of interpretation presented by Aberg, one notes that the factors essential to adoption would seem to be essential to the connotative and symbolic levels of interpretation as well. Personal values play a role in the connotative layer of interpretation while organizational values play a role in the symbolic, interpersonal layer of interpretation. It might be prudent, therefore not to speak of interpretation and acceptance as separate processes. It would seem that the structural and systemic dimensions can act as strong strategic messages themselves in many cases, which mean that if the structural and systemic properties are not matched with communication practices (directly affecting the life worlds of the organizational members), one is faced with conflicts in the cultural dimension as well. To put it bluntly, if the structures and systems do not support the change effort, it seems as if the organization (or the management) is saying one thing and doing another. Therefore, when designing systems and changing structures to support the strategy, one possible viewpoint would be to endeavor packaging desired strategic message in the structures and systems. This could also be viewed as creating shared meaning. It is, however, important not to confuse creating shared meaning with the programming of the employees. This theory is applicable to this study as it depicts that an organization consists of different units and functional groups with different characteristics. This groups and unit influence formulation and implementation of strategies to a great extent.

2.2 Empirical Review

Elwak, (2013) conducted a study seeking to address the challenges faced by Mazars Kenya in strategy implementation and establish measures to minimize the challenges of strategy implementation. The study adopted a case study where primary data was gathered using the interview guide. Data obtained from the interview was analyzed qualitatively to derive findings, conclusions and recommendations. The results indicated that the industry forces especially competition, changes in economic conditions greatly influence strategy implementation in Mazars Kenya. Further results indicated that employees and managers were fully involved in strategy implementation.

Mbaabu, (2012) sought to identify the strategy implementation practices, determine the challenges facing strategy implementation at the Deposit Protection Fund Board and to establish how the Board has managed challenges of strategy implementation. A review of related literature was undertaken to support the study. The research utilized case study design whereby seven

respondents were interviewed for the study. An interview guide was used to collect data. Content analysis was used to analyze the data. The study found that the board encountered challenges during strategy implementation which include liquidation challenges, policy related challenges resulting from weak frameworks, economic and operational challenges. The study also found that the measures taken to mitigate the challenges were commitment by top management, changing people's cultural mindset and communication of the strategy to the staff especially those participating in the implementation of the organizational strategy. It was finally found that the measures in place to mitigate the challenges were ineffective.

Polle, (2012) sought to determine the challenges facing strategy implementation at GCE and the measures taken by GCE to cope with the challenges. The research was conducted using a case study design since the nature of the research was to determine strategy implementation challenges on a specific consulting firm. The study used primary data collected using guided personal interviews. The respondents were the 5 top level managers in the GCE and 7 directors. Content analysis was employed to process data collected. The study found that there were conflicting priorities in the implementation of strategies and the most important strategies were left unimplemented while the least important were implemented. The study found that strategy implementation at the GCE was facing a challenge in its management styles such as political influence. The measures taken to counter the challenges were strategic goals and initiatives to improve communication skills within the organization and with clients so as to improve the employees' productivity and the organization earnings.

Ng'ang'a, (2012) sought to determine the challenges faced by JHPIEGO Kenya during the strategy implementation process. Primary data was collected through personal interviews with senior and middle-level managers with the aid of an interview guide. The data collected was analyzed qualitatively through content analysis. The findings revealed that challenges faced during implementation emanated from both internal and external sources. Externally, the donors and the government were found to have the great impact on implementation of strategies at JHPIEGO. Internally, inadequate human resources and ineffective rewards and incentives were identified as the most influential factors. It is apparent that successful strategy implementation will largely be determined by how managers of NGOs in the Kenya health sector adapt and align their strategies to changes in both the internal and external environment.

Bui (2010) conducted a study on external risk drivers and risk management strategies in response to government's climate change policies. The author argued that risk exposure emanating from the environment drive changes in organisations' risk management strategies. Organisations move from stable and reactive strategies to anticipatory, proactive and creative strategies. The desired impacts on risk reduction of these strategies also moved accordingly, from reducing consequences of the risk, to reducing or enhancing the likelihood or avoid/seek the risk. It is also found that regulatory uncertainties are the major constraint to investments in low-carbon technologies and carbon credit purchases.

Yousaf (2012) conducted a study on Emission Trading Scheme with a special focus on Risks and Strategies for the Norwegian Petroleum Industry. The author noted that when pursuing indifferent strategies, organization neither opposes nor supports in order to respond to the environmental factors. So, organizations with indifferent strategies do not bring any change in actions or operations for the improvement of the environment.

3.0 RESEARCH METHODOLOGY

The study used the Case Study method and the unit of analysis which was the Ethics and Anticorruption Commission. The study used both Secondary and Primary data. Content Analysis

was the tool that was used to analyze the content and information provided by the respondents during the interviews and documentary materials such as EACC reports.

4.0 RESULTS AND DISCUSSIONS

4.1 Respondents Profile

Analysis of the demographics of the respondents show that they have been involved with EACC on for more than two years and are well conversant with the UNCAC convention. Four of the respondents are lawyers and one respondent has a Master of Art degree in Sociology and Conflict studies.

The respondents were provided with interview guides before the in-depth interviews that sought to find out if the respondents were familiar with EACC's mandate and if they were conversant with the UNCAC. They were also asked what challenges the commission was facing in implementing UNCAC and what strategies had been put in place to overcome these challenges. During the interviews the researcher sought to find out from the respondents if the implementation of UNCAC was aiding in the fight against corruption and what role EACC stakeholder could play in ensuring the effective implementation of UNCAC.

4.2 Content Analysis

4.2.1 Challenges Encountered During the Implementation of the Strategies by EACC This section addressed the first objective of the study which was to determine the challenges encountered by EACC during the implementation of the strategies recommended by UNCAC. The respondents were asked what challenges the encountered by EACC during the implementation of the strategies recommended by UNCAC.

To start with, the Chief Executive of the Commission said that the challenges that they encountered as an organization included; inadequate financial capacity and budget constraints and inadequate capacity in terms of human resources.

Secondly, the senior legal officer working on the implementation of UNCAC at EACC said that the challenges that they encountered as an organization included; weak legal frameworks, staff capacity limitation, public lethargy in getting involved in the fight against corruption, negative public perception, limited technical capacity to deal with the new laws such as mutual legal assistance and no proper legislation to provide for their protection of Whistle blowers.

Thirdly, the Executive Director of Transparency International-K (TI-K) said that the challenges that they encountered as an organization included; the judicial process too slow, political interest are very high and hindering the fight against corruption, weak legal framework, slow process of implementing the auditor general reports, lack of prosecution powers by EACC, lack of seriousness in sentencing corrupt individuals and lack of integrity by the Kenyans elect leaders.

Fourthly, the former director of the commission and currently the Director and CEO of Kenya School of Law said that the challenge that they encountered was a questionable integrity of staff within its ranks and lack of political will. Hostility was also palpable from the Legislature and the Judiciary. He added that the Commission is understaffed and underfunded with an inherited police culture in its approach to investigation. This culture is underlined by its lack of sophistication and expertise. In the area of prevention he said that the Commission collaborated with several public bodies but the formalistic measures put in place ostensibly to fight corruption had minimal impact on the deeply entrenched culture of high tolerance for corruption.

Further, he said that the foregoing notwithstanding the Commission (EACC) relied on the few trained staff and mutual legal assistance which did not work very well because of the Attorney General's penchant for 'second guessing' decisions made on prosecution for political reasons.

4.2.2 Strategies Adopted by EACC to Address the Challenges Encountered During Implementation

This section addressed the second objective of the study which was to establish the strategies adopted by EACC to address the challenges encountered during implementation of strategies recommended by UNCAC. The respondents were asked what strategies they adopted to address the challenges encountered during implementation.

The Executive Director of Transparency International-K (TI-K) gave a response derived from the Corruption Perception Index (CPI) produced by TI-K. He said that the convention has eight (8) chapters and seventy one (71) with strategies to implement the articles. Several of the strategies put in place by EACC for the year 2013 to 2018 are guided by UNCAC provisions, such as

“Enhancing capacity of corruption prevention public, private and civil society actors”.

He also added that EACC is one of the organizations actively involved in implementing the UNCAC convention to aid in the fight against corruption. This is enhanced through cooperation between the commissions with the other organization to implement strategies recommended by UNCAC. For instance, the National Steering Committee on the Review of the Implementation of the United Nations Convention against Corruption that was appointed by the AG and gazetted on 2nd August 2013.

4.3 Discussion of Findings

4.3.1 Challenges Encountered During the Implementation of the Strategies by EACC The respondents identified that one of the challenges faced by EACC is the inadequate financial capacity and budget constraints. Since the EACC relies on funding from the government, the money allocated to the commission to carry out its activities is not enough to meet the demand for the commission's services country wide. These findings are also identified in literature as one of the challenges faced during strategy implementation. According to Hewlett (1999) one of the major constraints in implementing strategy is financial. Hewlett says it is important to include non financial measures at the business level such as market growth so that one can assess what deviations to expect due to changes in the business environment. To overcome this challenge the commission has requested the government to allocate it more money in the next financial year and there are plans to hire more personnel. The commission will also continue to open more regional offices to carry out its mandate in the counties.

4.3.2 Strategies Adopted by EACC to Address the Challenges Encountered During Implementation

The study found that the government focal point on the implementation of UNCAC is at the department of Justice at the Attorney General office and is a key stakeholder of EACC. The study also found that the implementation of the convention requires the involvement of various stakeholders including civil society to monitor the implementation of the convention. Transparency International-K represents civil society in the steering committee that reviews the implementation of UNCAC. EACC and the department of Justice are also represented in this committee. The commission is also the secretariat for the committee whose mandate include:

making recommendations for new legislation or review of existing legislation and regulations to address some legislative gaps, advise the government on measures necessary to comply with UNCAC and after the UNCAC review identify challenges, assistance needs and recommendations. The respondent from TI-K felt the strategy to make the steering committee a standing committee, with very specific terms of reference would help in the implementation of UNCAC strategies. Another strategy suggested by TI-K was the engagement of civil society and the public through the whole implementation process through EACC which is the secretariat. The public should be sensitized in-order to speak out against corruption, demand integrity and ethical behavior from their leaders in government, while holding them accountable. These findings agree with those of Chepkoskei (2012) who found out that employee participation in strategy formulation was the main reason that slowed down the process of strategy implementation.

5.0 DISCUSSION CONCLUSIONS AND RECOMMENDATIONS

5.1 Findings

The study found that the some of the challenges encountered by EACC in the implementation of the UNCAC strategies included limited financial and human resources. To remedy the situation the commission has requested the government for more budgetary allocation in the next financial year and has indicated in their strategic plan strategies to identify other sources of funding. The commission has also undertaken a recruitment exercise to get more staff and has plans to recruit additional staff in the next financial year.

The study also identified the lack of a National Anticorruption Policy and weak legal framework as a challenge. In its strategic plan 2013-2018, the commission indicated that one of the strategies to deal with this challenge is completion of the national anti corruption plan within the planning period. The commission also plans to pursue the strategy to amend the anticorruption laws such as the Ethic and Anti Corruption commission Act, 2011 and the Leadership and Integrity Act, 2012, to make the fight on corruption more effective and to enforce chapter 6 of the constitution of Kenya on Leadership and Integrity. The commission will also continue to lobby for prosecutorial powers to make them deal with corruption more effectively.

5.2 Conclusions

The study concludes that EACC has faced various challenges in the implementation of UNCAC strategies has but developed strategies to overcome these challenges. The study concludes that most challenges faced in implementing these strategies are from the commission's external environment. The weak legal frameworks and lack of a national policy on anticorruption and slow judicial process are external. The study further concludes that the involvement of EACC in the National Steering Committee on the review of UNCAC and to host the secretariat, is an indication of the commitment of EACC to the implementation of UNCAC. The study also concludes that EACC internalisation of the convention as reflected in the structure of its directorates. EACC directorates are structured in a manner that reflects the UNCAC chapters namely Prevention, Legal and Asset Recovery (Criminalisation and Law Enforcement), Investigation and Asset recovery.

5.3 Recommendations

It was evident after the study the success of EACC ability to implement UNCAC depends on the cooperation and support from its stakeholders including government. The success of the work of the commission depends on awareness by the public on the challenge of corruption and its effects on the economy and development. The public needs to be mobilised to support the fight to eradicate

corruption. EACC needs to be more aggressive in educating the public on UNCAC and corruption, its negative effects on development. They need to get the support of the public to speak out against corruption and demand accountability from the government (county and national) and leaders.

The financial constraint is a major challenge and the government needs to allocate more funds for the commissions activities. Also other sources of funding should be identified instead of total reliance on the government. The concern of staff capacity is also tied to the finances available to the commission. The staffing at EACC is critical and should be addressed quickly by hiring enough staff and ensuring they are well trained in the relevant areas. The UNCAC secretariat provides technical support to its member states, and EACC should fully utilise this opportunity.

The challenge in Policy and legal frameworks calls for strengthening of the anticorruption laws and the National Anticorruption Policy needs to be fast tracked and proper timelines for its completion stated. EACC should lobby for the legislature through the AG's office to strengthen the anticorruption laws. To address the slow judicial process and adverse Court decision, EACC should work closely with the DPP and Judiciary to address this challenge.

5.4 Suggestions for Further Studies

Since this study focused on the challenges faced by EACC in the implementation of the UNCAC strategies, there is room to look at what challenges other watchdog organisations in the area of corruption face in implementing UNCAC. This study also took place during the UNCAC review and the findings were not available, so another study can be done to on the findings of the review and recommended strategies to be implemented.

There is also room to look at specific challenges highlighted by this study specifically the Slow Judicial Process and Adverse Judicial Decisions and what strategies can be implemented to streamline this process. Additional studies can be carried out on the Policy and Legal frameworks, what strategies are used to develop the legal frameworks and what strategies can be implemented to strengthen these frameworks and policy.

REFERENCES

- Chepkoskei, S. (2012). *Challenges of Strategy Implementation at Transnational Bank Kenya Limited*. Unpublished MBA Project, University of Nairobi.
- EACC, *Ethics and Anticorruption Commission, Annual Report, 2012/2013*
- Hewlett, C. (1999). *Strategic Planning for Real Estate Companies: Journal of Property Management*, Vol 64 No 1: 264
- Hills, G., Fiske, L. & Mahmud, A. (2009). *Anti-corruption as Strategic CSR: A Call to Action for Corporations*.
- Judson, A. (2007). Invest in a high-yield Strategic Plan, *Journal of Business Strategy*, Vol. 12.
- Kenya Anti-Corruption Commission *Strategic Plan 2009-2013*. On the Frontline against Corruption.
- Kumba, S. (2013). *The Challenges of Curbing Corruption in Kenya: A Case of The Ethics And Anti-corruption Commission*. Unpublished MBA Project. University of Nairobi.
- Mantere, S. (2000). *Concepts, Values and Tacit Knowledge*. Helsinki: HY
- Matemu, M. (2012-2013). *Ethics and Anti-Corruption Commission: Annual Report for the 7th EACC AGM*.

- McAdam, D. & Scott, P. (2004). *Organizations and movements: In Social Movements and Organization Theory*, Cambridge University Press.
- Meyer, J. & Rowan, B. (1991). Institutionalized organizations: Formal structure as myth and ceremony. *American Journal of Sociology*, 83, 340-363.
- Mugo, L. (2012). *Strategy implementation at the City Council of Nairobi*. Unpublished MBA Project, University of Nairobi.
- Njue, J. (2009). *An Investigation of Challenges Faced By Media Companies in the Fight against Corruption*. Unpublished MBA Project, University of Nairobi.
- Noble, H. (1999). The Eclectic Roots of Strategy Implementation Research. *Journal of Business Research*, 45, 119-134.
- Powell Budget Speech For the Fiscal Year 2010/2011 (1st July – 30th June) by Hon. UHURU MUIGAI KENYATTA, E.G.H., M.P. Deputy Prime Minister and Minister for Finance., W. & DiMaggio, P. (1983). *The new institutionalism in organizational analysis*. Chicago: University of Chicago Press. .
- World Bank (June, 2010). Kenya Economic Update. *Running on One Engine: Kenya's uneven Economic Performance with a special focus on the port of Mombasa. Poverty reduction and economic management unit Africa region*. 2nd Ed.
- Elwak, R. (2013). *Challenges Of Strategy Implementation at Mazars Kenya*. Unpublished MBA Project, University of Nairobi
- Mbaabu, G. (2012). *Strategy implementation at deposit protection fund board, Kenya*. Unpublished MBA Project, University of Nairobi.
- Polle, E. (2012). *Challenges of strategy implementation at Geomax Consulting Engineers (GCE)*. Unpublished MBA Project, University of Nairobi.
- Ng'ang'a, M. (2012). *Challenges of strategy implementation at JHPIEGO Corporation Kenya*. Unpublished MBA Project, University of Nairobi.
- Yousaf, H. (2012). Emission trading scheme: risks & strategies for the Norwegian petroleum industry.
- Bui, B., Hunt, C., & Fowler, C. (2008). A Risk-Focused Performance Management System Framework for Planning Change in Organisations Subject to Significant Environmental Pressures and Uncertainty. *Centre for Accounting, Governance and Taxation Research Working Paper*, (61).