

KENYA OPEN GOVERNMENT PARTNERSHIP

MID TERM REFRESH REPORT FOR KENYA'S 5th NATIONAL ACTION PLAN 2023 – 2027

June 2026

1.0 INTRODUCTION

Kenya joined the Open Government Partnership (OGP) in 2011¹ and has since developed five National Action Plans (NAPs). **NAP 5, Kenya's first four-year action plan covering the period 2023–2027, is assessed as the most ambitious of the five action plans**, with seven of its nine commitments assessed as promising². NAP 5 is aligned with the OGP Refresh strategy, which enabled participating countries to transition from two-year to four-year action plans³.

As part of the OGP refresh, **all four-year action plans are required to undergo a mid-term refresh**. This critical checkpoint enables stakeholders to review progress during the first two years of implementation, identify implementation challenges, draw lessons from the IRM's initial assessment of the action plan, and take into account any unforeseen contextual changes. Based on this review, countries may **update, modify, or add new commitments** that respond to evolving priorities and realities, or that strengthen the implementation of existing commitments. The midterm refresh process requires countries to leverage their Multi-Stakeholder Forum (MSF) to ensure inclusive participation from government, civil society, and development partners.

Kenya conducted its midterm refresh process between April and June 2026, meeting the June 30 submission deadline. The objective of the refresh process was to ensure Kenya's Action Plan remained relevant, effective, and on track to deliver the targeted reforms by 2027⁴.

The Mid-Term Refresh also takes place within a **fast-changing governance and digital transformation context**. Since NAP V was adopted, questions of openness, accountability and participation have become tied to artificial intelligence, digital public infrastructure, data governance, child online safety, cybersecurity, information integrity, platform accountability, digital sovereignty, the environmental sustainability of AI systems, and the future of an open and interoperable internet. Kenya's engagements through the Africa Forward Summit, the G7 Évian Summit, the WSIS+20 process, UNEA-7, and preparations for IGF 2026 have reinforced the case for connecting open government reforms to wider questions of trust, inclusion, rights, infrastructure, capability, environmental sustainability and democratic resilience in the digital age.

Kenya's fifth National Action Plan therefore remains relevant not only as a **domestic reform framework** but also as a platform for demonstrating **how open government principles can guide digital transformation**. The second half of NAP V should **strengthen the link between open government reform and Kenya's broader technology diplomacy**, AI governance, digital public infrastructure, environmental data, sustainable AI, and the trust agenda. It should do so in a way that ensures digital transformation advances transparency, civic participation, public accountability, inclusion, and rights, while strengthening Kenya's capacity to shape regional and global digital governance.

This report documents the refresh process and its outcomes. Specifically, it:

- (i) Documents how the refresh process was undertaken ([section 2.0](#))

¹ Kenya's journey into OGP, its action plans and review reports is available [here](#)

² Kenya Action Plan Review 2023 – 2027 [link](#)

³ OGP Memorandum: Four Year Refresh Process [link](#)

⁴ The Refresh process documentation can be found [here](#)

- (ii) Explains what changed in the NAP and the rationale for the changes ([section 3.0](#) and [Matrix 1](#))
- (iii) Provides a synthesis of implementation performance during the first half of the action plan period ([section 4.0](#) and [Matrix 2](#)), and
- (iv) Concludes with reflections on the OGP Kenya vision, emerging priorities and key issues to monitor for monitoring during the remainder of the action plan period ([section 5.0](#))

2.0: KENYA REFRESH PROCESS



The refresh process was initiated and developed at the MSF level, which provided the overall framework for reviewing commitments and determining how amendments and new commitments would be agreed. The process began with a **self-assessment exercise** in which commitment leads reported progress made, documenting achievements and areas requiring further attention. At this initial stage, the **MSF introduced a "super-cluster" approach**, bringing together commitments with similar objectives and milestones to facilitate coordination, peer support and co-implementation. Four super clusters were subsequently established. The super-cluster approach was **discussed and approved during a retreat held on 8 April 2026**.

This was followed by a **two-day action plan review retreat held on 11–12 June 2026**. Working in their respective super clusters, commitment actors revisited the problem statements and objectives underpinning each commitment and assessed their continued relevance and feasibility. The review also considered progress made to date, implementation bottlenecks, and findings from previous IRM reports, particularly the Action Plan Review. To support a structured and consistent assessment across all clusters, a set of guiding questions was developed and used

to frame discussions. Importantly, participants used the review sessions not only to assess commitments but also to update the progress reports submitted during the self-assessment phase.

The review process was broadly participatory. Government and civil society actors jointly contributed to discussions within the super clusters, and their inputs informed the proposals that emerged from the review. Participation gaps were nevertheless evident in some areas. The Climate Action commitment was not represented during the June retreat, while the Open Contracting and Beneficial Ownership commitments did not have participation from their government counterparts. However, the draft proposals developed during the workshop were subsequently shared with all the actors for review and feedback, which was incorporated into the final proposals. Additionally, commitments 3,4 and 6 had envisaged a lead role for the National Treasury as the

primary government process owner for the specific milestones. However, by the time of the refresh exercise, the National Treasury had not yet assumed an active role either within the MSF or at the commitment level, a factor that was taken into account during the review.

The amendments proposed through the refresh process were shaped by both implementation experience and changes in context. Milestone 9, which stands as a standalone commitment within the fourth super cluster, was reviewed against evolving global and national dynamics. As a result, the commitment background and milestones were comprehensively redrafted to better reflect the intersection between global challenges, Kenya's ambitions, and the lived realities facing citizens. On the other hand, changes to Milestone 5 under Commitment 3 were driven by developments in the legislative process, with the milestone revised from the development of a County Statistics Bill to a Statistics Bill at the national level. Changes to Commitments 4 and 5 reflected progress already made in implementation and were intended to raise the level of ambition from framework development to implementation.

Across the action plan, additional **revisions focused on improving clarity and coherence.** Some milestones were reworded; others were merged with related interventions or repositioned under different commitments to strengthen implementation and monitoring arrangements. Implementing institutions were also reviewed across the commitments, resulting in the removal of actors whose roles were no longer central while prioritizing institutions considered critical to delivery.

In addition to revisions to existing commitments, the **refresh process resulted in the development of one new commitment on access to justice.** The commitment seeks to strengthen Kenya's leadership on Alternative Justice Mechanisms at the continental level.

3.0: OUTCOME OF THE REFRESH PROCESS – CHANGES TO THE ACTION PLAN

The refresh process resulted in a range of amendments that varied in scope and significance. While some focused on improving clarity, strengthening implementation arrangements, or aligning milestones with ongoing policy and legislative developments, others involved more substantive modifications to commitment design and expected results. Two key outcomes are demonstrated in the report:

- (i) Categorization of the commitments into super clusters
- (ii) Specific changes to the commitments and their milestones

Str3.1 First key action is categorization of the commitments into 4 super-clusters.

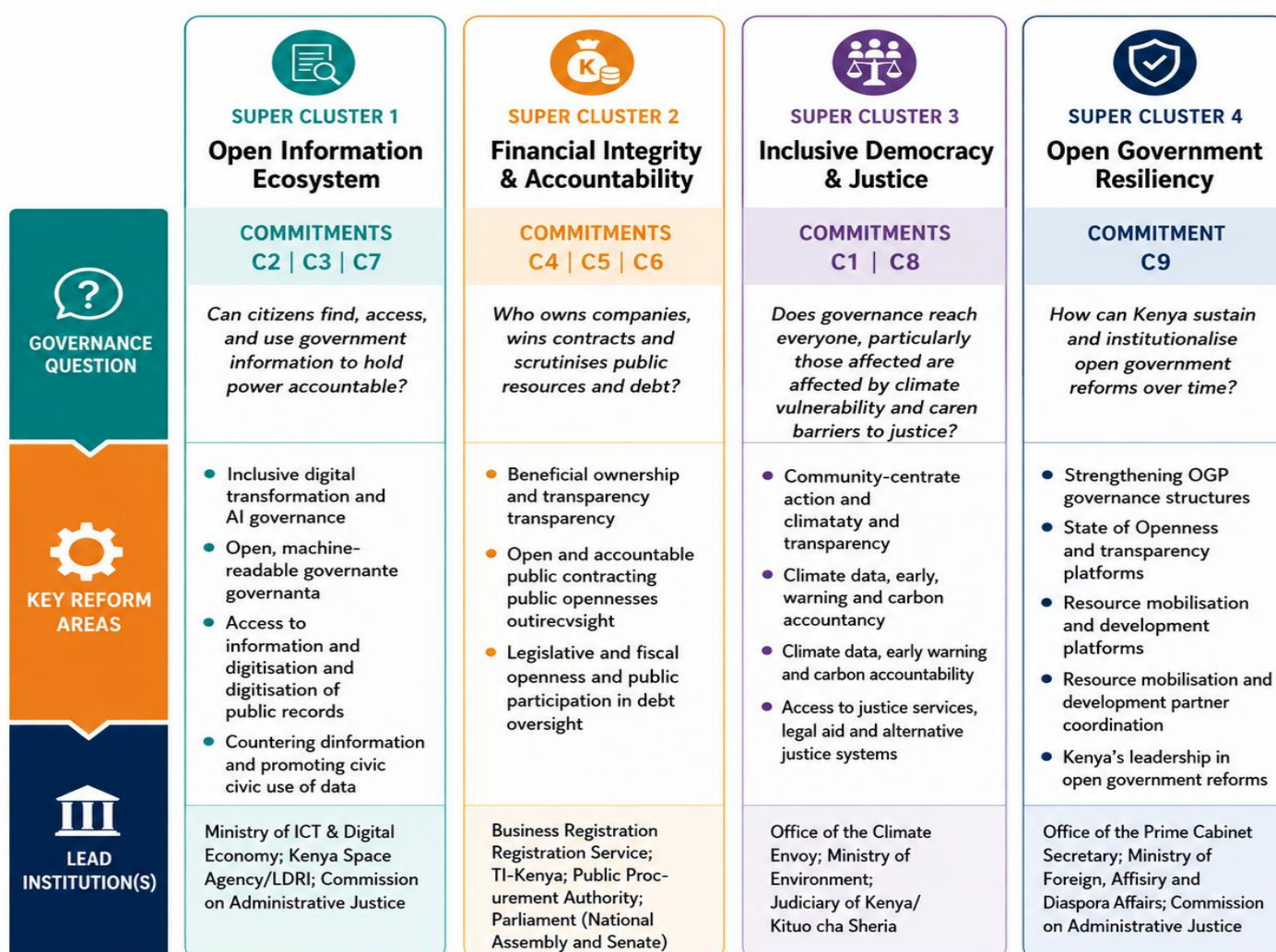


Figure 1: NAP V Super Cluster Categorization

The rationale for the super-cluster approach was to strengthen coordination and implementation while leveraging opportunities for collaboration, peer learning and mutual support among commitment actors. Many of the commitments, although situated in different sectors, sought to address similar governance questions and involved overlapping stakeholders and implementing institutions. The clustering approach sought to bring together commitments that could benefit from closer coordination during implementation. In practice, the commitments were organized around four broad areas relating to information, money, inclusion and resilience, thereby promoting a more coherent approach to implementation and shared leadership among actors working towards similar outcomes.

Each cluster addresses a governance question sharpened by the digital age. The Open Information Ecosystem asks whether citizens, institutions, and oversight actors can find, access, understand, and use government information. Financial Integrity and Accountability asks whether ownership, procurement, budgets, and public debt can be scrutinized in ways that prevent corruption and maintain public trust. Inclusive Democracy and Justice asks whether governance reaches communities facing climate vulnerability, justice barriers, and exclusion; and Open Government Resiliency asks whether Kenya has the institutional, financial, technological, and political capacity to sustain openness through disruption, including electoral transitions, economic shocks, technological acceleration, infrastructure and software dependencies, environmental stress, and declining public trust.

The clustering process also reflected the interconnected nature of the commitments. Participants noted that progress in some reform areas was reinforced by progress in others, and that the effectiveness of certain reforms depended on complementary actions elsewhere in the Action Plan. For example, open data reforms are strengthened when accompanied by effective access to information frameworks, while beneficial ownership reforms are more impactful when linked to open contracting initiatives. Grouping related commitments therefore provided an opportunity to identify these linkages, align implementation efforts, and encourage greater coordination among institutions and stakeholders working on complementary reforms.

Commitment 9 was placed in a standalone super cluster because of its distinct and enabling role across the Action Plan. Unlike the other commitments, which focus on specific reform areas, Commitment 9 is concerned with the institutional arrangements that support implementation of the Action Plan as a whole. This includes sustaining political commitment to the OGP process, strengthening coordination among implementing institutions, mobilizing and aligning resources for implementation, and reinforcing Kenya's leadership in advancing open government reforms. Its standalone status therefore reflects both its cross-cutting nature and its importance in sustaining the governance structures required for effective implementation of the remaining commitments.

3.2 Commitment specific review

Across the Action Plan, stakeholders reviewed commitments against their continued relevance, feasibility, and potential to deliver meaningful results. This resulted in a combination of technical adjustments, milestone revisions, institutional realignments, and targeted additions intended to strengthen implementation and accelerate delivery.

A review of the amendments reveals **five broad shifts across the Action Plan**. First, several commitments were updated to **reflect progress already achieved** and to move the focus from framework development and piloting towards implementation and institutionalization. Second, commitments were revised to **respond to evolving policy, legislative, and operational contexts**, ensuring that milestones remained relevant and achievable. Third, a number of milestones were **consolidated, merged, or repositioned to improve coherence and reduce duplication across commitments**. Fourth, several commitments **increased their level of ambition** by introducing stronger accountability mechanisms, measurable targets, and a greater emphasis on outcomes rather than activities. Finally, the refresh **expanded Kenya's leadership role** in selected reform areas, particularly through commitments that seek to influence regional and continental governance agendas.

Together, these changes strengthen the Action Plan's alignment with OGP values of transparency, civic participation, and public accountability. They also improve the Action Plan's feasibility by grounding commitments in current implementation realities, while enhancing their potential for results through clearer implementation pathways, stronger institutional ownership, and a greater focus on measurable impact.

[Matrix 1](#) | the annex outlines the detailed amendments made to each commitment, the rationale underpinning them, and their implications for the overall ambition, measurability, and feasibility of the Action Plan.

KENYA OGP NAP V REFRESH: KEY CHANGES

Refining commitments. Raising ambition. Delivering greater impact.



The refresh refined and strengthened commitments to reflect implementation experience, evolving context and lessons learned. The changes shift the Action Plan from framework development and piloting towards implementation, institutionalization and impact.

1. FROM FRAMEWORKS TO IMPLEMENTATION



Commitments updated to reflect implementation progress and move beyond framework development and pilots towards full roll-out and institutionalization.

EXAMPLES

- ✓ C4 M6: Shift from developing FATF frameworks to operationalizing reforms
- ✓ C5 M1–M3: From establishing e-GP to full end-to-end implementation and integration
- ✓ C8: From piloting to scaling up AJS

2. ALIGNMENT WITH CURRENT CONTEXT



Milestones revised to reflect legislative, policy, and operational developments, ensuring commitments remain relevant, achievable and grounded in reality.

EXAMPLES

- ✓ C3: From County Statistical Bill to the current National Statistics Bill (2026)
- ✓ C4 M3: Seek AG advisory on BO transparency and data protection before opening the register
- ✓ C5: Updated open contracting milestones to reflect progress and alignment with eGP

3. STRONGER INTEGRATION & COHERENCE



Similar or overlapping milestones merged, repositioned or aligned across commitments to improve coherence and reduce duplication.

EXAMPLES

- ✓ C3 M6 merged with C7 M6: ATI course at Kenya School of Government
- ✓ C8 M3 moved to C5: Access to Justice aligned with procurement
- ✓ C4 M4 expanded and consolidated to publish debarment information on directors, BOs and related entities

4. INCREASED AMBITION & ACCOUNTABILITY



Milestones strengthened with higher targets, verification mechanisms, disclosure requirements and outcome-focused indicators.

EXAMPLES

- ✓ C4 M5: BO compliance target raised from ~54% to at least 80% by 2027 (100% for firms seeking public contracts)
- ✓ C4 M2: Centralized BO verification framework with system integration and performance indicators
- ✓ C6: Stronger public debt scrutiny (public hearings, gender study, citizen debt)

5. REGIONAL LEADERSHIP & INFLUENCE



New milestone positions Kenya as a leader in continental governance and justice reforms, advancing open government beyond national boundaries.

EXAMPLES

- ✓ C8 NEW MILESTONE: NaSCI AJS to work with the African Alliance for People-Centred Justice to develop norms for people-centred justice in Africa and present to the African Commission on Human and Peoples' Rights (ACHPR)
- ✓ C9: Strengthened OGP leadership

OVERALL EFFECT ON THE ACTION PLAN



HIGHER AMBITION
Stronger targets and result-oriented commitments.



GREATER IMPLEMENTATION READINESS
Milestones aligned to current realities with clearer pathways and responsibilities.



STRONGER ACCOUNTABILITY MECHANISMS
Better verification, transparent reporting and disclosure to drive results and public trust.



IMPROVED COHERENCE ACROSS COMMITMENTS
Reduced duplication and better alignment for more efficient implementation.



ENHANCED POTENTIAL FOR RESULTS
Reforms positioned to deliver impact for citizens and communities.



These changes strengthen Kenya's NAP V alignment with OGP values of transparency, civic participation and accountability, and increase the Action Plan's potential to deliver meaningful, lasting impact for all Kenyans.

Figure 2: Refresh changes at a glance

4.0: MID TERM IMPLEMENTATION RESULTS

Implementation during the first half of the Action Plan period (2023–June 2026) demonstrates varying levels of progress across commitments and super clusters. Overall, implementation has balanced establishing the policy, institutional, regulatory, and technological foundations necessary to advance open government reforms, while several commitments have progressed beyond framework development into implementation. Notable examples include increased compliance with beneficial ownership disclosure requirements, operationalization of the national e-Government Procurement (e-GP) system, expansion of Alternative Justice Systems, and the rollout of parliamentary petition platforms. Together, these reforms are beginning to strengthen transparency, participation, accountability, and inclusion across different areas of governance.

A cross-cutting issue from the midpoint assessment is the growing dependence of open government reforms on digital systems, data infrastructure and institutional capability. Several commitments now rely on platforms, databases, portals, digital records, online participation channels, interoperable systems and technology-enabled services. This opens real room for transparency, efficiency and inclusion, but it also introduces governance risks: unequal digital access, weak interoperability, limited public usability of data, vendor lock-in, cybersecurity exposure, opaque automated decision-making, thin feedback mechanisms, the environmental impacts of digital infrastructure, and gaps in the capacity to govern data and emerging technologies. The second half of NAP V should therefore put more weight on implementation safeguards, public accountability, digital inclusion, open standards, auditability, environmental sustainability, and the resilience of critical digital systems.

Key Achievements and Areas Requiring Further Attention

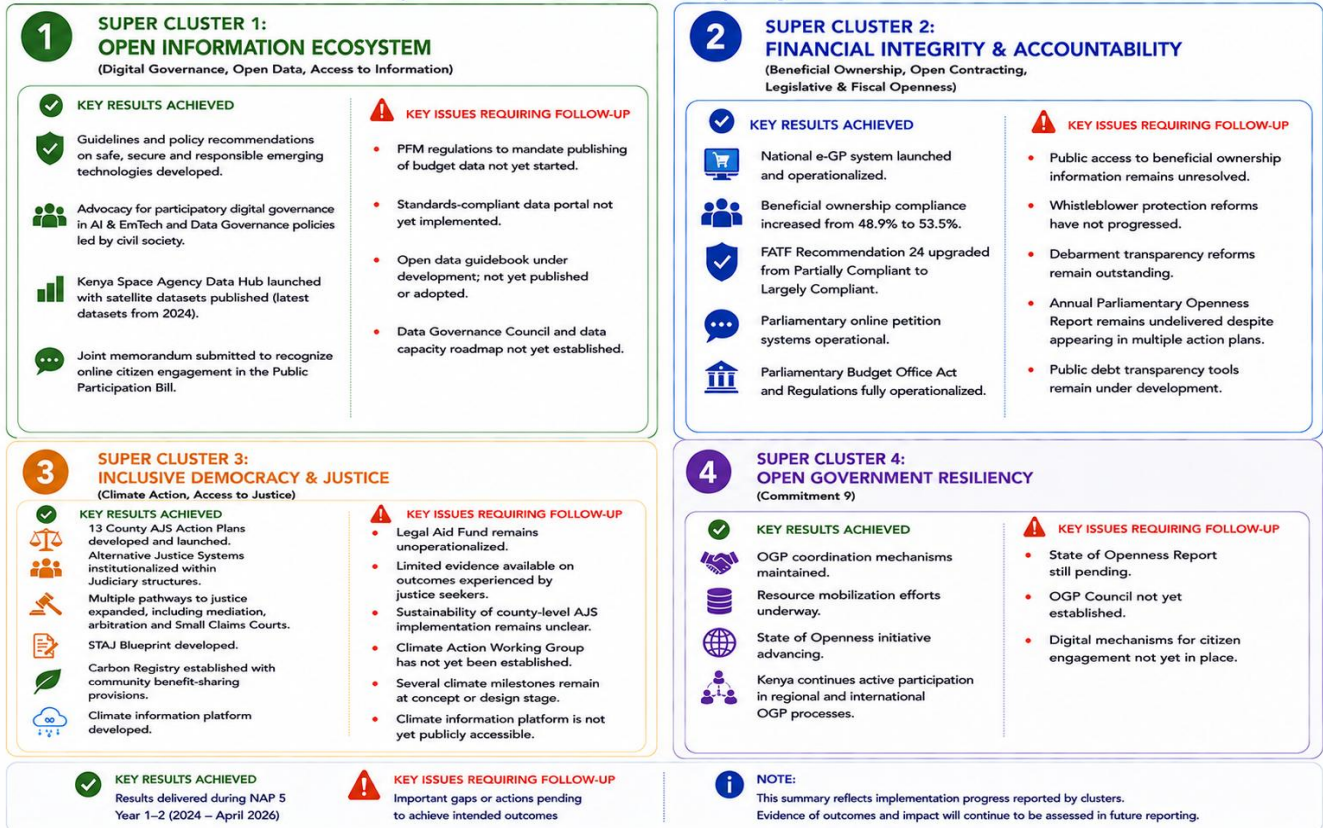


Figure 3: NAP V Mid-Point Implementation Progress Snapshot

Super Cluster 1: Open Information Ecosystem

The Open Information Ecosystem super cluster brings together Digital Governance, Open Data for Development, and Access to Information. These commitments are connected by a common objective: strengthening the ability of citizens, institutions, and oversight actors to access, use, and act on government-held information. At the midpoint, the cluster shows important progress, but much of this progress remains at the level of policy development, institutional preparation, and system design rather than full implementation.

Under Digital Governance, **progress has been strongest in the development and passing of the National Artificial Intelligence Strategy 2025–2030**, which identifies a national AI risk and safety institute as one of the flagship initiatives to be implemented, and also provides a framework for undertaking the rest of the milestones in this commitment. Work has also continued on the draft National Data Governance Policy and AI and Emerging Technology Policy, including proposals for a Data Governance and Emerging Technology Council. The commitment also made progress in relation to public participation in digital spaces. A joint memorandum was developed in 2024 with inputs from the digital governance cluster, recommending improvements to the Public Participation Bill to recognize online citizen engagement, including social media, as a formal channel for public participation. **However, this proposal, alongside the draft policies, remains tied to the progress of the Public Participation Bill and the policy development, and the eventual development of response**

mechanisms for online engagement. The next phase should therefore focus on implementation, resourcing, mandate clarification, and monitoring whether these frameworks influence the actual design and deployment of digital systems. Practical questions for the next phase include whether the online participation will be accompanied by clear feedback obligations, response timelines, and safeguards for rights such as privacy, freedom of expression, and protection from arbitrary disruption of digital spaces.

The next phase should also strengthen the practical governance safeguards needed for responsible digital transformation and AI adoption in the public sector. The National Artificial Intelligence Strategy 2025–2030 and the related emerging technology policy work provide the foundation. Implementation should now move toward measures that guide how public institutions procure, deploy and use AI-enabled systems: responsible public-sector AI use guidelines, AI procurement standards, human oversight requirements, risk assessment, model evaluation, algorithmic accountability, data protection safeguards, transparency obligations, and mechanisms for citizens to challenge or seek explanation for AI-supported decisions that affect their rights, services or access to opportunity. Digital governance should also carry child online safety and children’s rights in the digital age. Kenya’s engagements on child online safety, including at the G7 Évian Summit and related discussions on safer digital spaces for minors, point to the need for digital services and platforms that affect children to be safe-by-design, privacy-preserving, age-appropriate, and accountable. This should sit as an emerging issue under the Digital Governance commitment, with attention to digital literacy, caregiver empowerment, child participation, platform accountability, protection from online exploitation and harmful content, and responsible use of AI systems that affect children.

Digital governance should further reflect the environmental sustainability of AI systems. UNEA-7 Resolution UNEP/EA.7/Res.9, which Kenya proposed and adopted in Nairobi in December 2025, provides this agenda with a reference point that Kenya itself authored. Public-sector AI adoption should therefore weigh not only ethics, safety, inclusion and accountability, but also energy demand, water use, e-waste, emissions, critical minerals, data centre impacts and the environmental footprint of compute. This connects Digital Governance to Climate Action, Open Data and Open Government Resiliency.

For Open Data for Development, progress appears more uneven. The commitment sought to improve access to machine-readable data on public finance, government programmes, project implementation, planning, and monitoring. The intended reforms included amendments to public finance management regulations, development of a budget data portal, publication of an open data guidebook, establishment of data governance structures, and strengthening of county statistics. At the midpoint, **several of these reforms remain under development, mostly attributed to lack of participation by the National Treasury as the substantive process owner.**

The Open Data commitment should broaden from publishing datasets to the data infrastructure that open government depends on. Open data is useful only when it is reliable, machine-readable, interoperable, well-documented, regularly updated, openly licensed, and connected to decision-making. The next phase should therefore prioritize common data standards, APIs, metadata, licensing frameworks, public registers, geospatial data infrastructure, data quality assurance, data exchange systems, county statistics capacity, institutional data stewardship, and secure hosting. This includes open standards and, where appropriate, open-source tools and public repositories. Open source can strengthen transparency, auditability, local innovation, cost efficiency, peer

review, and local adaptation. Government-supported data platforms, dashboards, civic technology tools, non-sensitive public-interest systems, and reference implementations should adopt open-source or open-standard approaches where appropriate. That way, open data is not only published but also accessible, testable, combinable, reusable, and buildable by citizens, researchers, civil society, innovators, journalists, and oversight institutions. Open data and data infrastructure are also the foundation of Kenya's AI capability and digital sovereignty. Access to quality public-interest datasets, interoperable systems, open tools, model evaluation capacity, compute, and local technical talent will determine whether AI supports public value or deepens dependence on external systems. Strengthening this layer supports transparency in public finance, climate action, procurement oversight, responsible AI innovation, research, service delivery, and citizen accountability.

Access to Information equally shows progress. The **National ATI Policy has not yet been finally approved by Cabinet**, but significant progress has been made – the policy has been signed by the Cabinet Secretaries for Information, Communications and the Digital Economy and the National Treasury, as well as the Attorney General, and has been forwarded to the Cabinet Office for tabling through a Cabinet Memorandum. The ATI Amendment Bill, committee report, and related Cabinet documentation also show that the reform has advanced beyond general discussion into a structured legal and policy review process. In addition, **ATI reporting guidelines for public entities and private bodies have been developed, adopted, and disseminated**. Circulars have been issued requiring compliance, with the first reports expected at the end of the 2025/26 financial year. **The true value of the guidelines will depend on whether institutions comply, whether reports are submitted, and whether the information generated is used to improve disclosure practices**. Progress has also been made on ATI capacity building. The ATI curriculum has been developed with the Kenya School of Government, facilitators have been trained, and the course has been rolled out. Notably, the impact of the training on actual institutional compliance is not yet clear. The next phase should therefore track uptake of the course, the number and type of officers trained, and whether trained institutions demonstrate improved ATI performance.

The **weaker area under ATI remains digitization of public records**. Steering and coordination structures have been established, including a multi-agency steering committee and an internal taskforce, but implementation remains at an early stage. The reports indicate that government digitization efforts have largely prioritized service delivery systems rather than the digitization of underlying public records. For the remainder of the Action Plan period, records digitization will need more dedicated attention if ATI reforms are to translate into timely and reliable access to information. **The relationship between access to information and data protection should be treated as a practical implementation issue in the next phase**. Several commitments now sit at the intersection of openness and privacy, including beneficial ownership transparency, open data, public procurement, digital records, public participation data, AI governance, and digital service delivery. The Commission on Administrative Justice and the Office of the Data Protection Commissioner should consider developing joint guidance or implementation principles to help public institutions balance proactive disclosure, access to information, privacy, data protection, and legitimate confidentiality. Guidance of this kind would prevent data protection from being used as a blanket reason for non-disclosure, while keeping openness reforms respectful of privacy and rights. It would also provide practical direction on anonymization, redaction, public interest tests,

publication standards, data minimization, retention, consent, lawful basis for processing, and safeguards for sensitive information.

Super Cluster 2: Financial Integrity and Accountability

The Financial Integrity and Accountability super cluster brings together Beneficial Ownership Transparency, Open Contracting, and Public Participation, Legislative and Fiscal Openness. These commitments address the integrity of public finance and accountability systems by focusing on ownership transparency, procurement data, debt information, parliamentary openness, and public participation in fiscal and legislative processes. At the midpoint, this cluster shows some of the most visible implementation progress, but also some of the most important unfinished reforms.

Under Beneficial Ownership Transparency, implementation has progressed in relation to compliance, data quality, and institutional strengthening. **Beneficial ownership compliance has increased, and additional companies have submitted beneficial ownership information.** Work has also continued to improve verification of beneficial ownership data and strengthen the reliability of the register. Progress has also been made toward linking beneficial ownership information with public procurement systems. While interoperability between beneficial ownership and procurement systems could strengthen conflict-of-interest detection, support anti-corruption investigations, and improve public contracting oversight, the extent to which this interoperability is fully operational and usable still needs to be clearly demonstrated.

The most **important unresolved issue under this commitment remains public access.** The IRM Action Plan Review noted that public access to beneficial ownership information, particularly when linked to contracting data, has significant potential to support anti-corruption and public accountability. However, the same review also noted uncertainty around the government's intention to make beneficial ownership information public. The refresh process therefore needs to clarify the future direction of public access, including how data protection concerns will be balanced with transparency and accountability objectives.

The advisory opinion from the Office of the Attorney General should be prioritized and should address the practical pathway for public access to beneficial ownership information: the level of access to be provided, the categories of users, the safeguards required, the relationship with data protection obligations, and the accountability purposes that public access is meant to serve. Public access should be framed as a tool for procurement integrity, anti-corruption oversight, conflict-of-interest detection, investigative journalism, civil society monitoring, and public trust.

Open Contracting has recorded major progress through the launch and operationalization of the national e-Government Procurement system. The system marks an important shift toward digital procurement and creates the foundation for more complete procurement data across the procurement cycle. Supplier registration has expanded, and the system has the potential to improve efficiency, transparency, and accessibility of procurement opportunities. This is one of the most significant implementation results in the Action Plan because e-GP is a practical system that can change how procurement is conducted and monitored.

However, the open government value of e-GP will depend on how the system is implemented. The key issue is not only whether procurement processes are digitized, but whether procurement data

is complete, accessible, downloadable, interoperable, and usable by oversight institutions, civil society, journalists, businesses, and the public. Further attention is needed on interoperability with the Public Procurement Information Portal, Beneficial Ownership Register and other systems, and mechanisms for public feedback on contract implementation. If these elements are not fully implemented, e-GP may improve internal procurement management without fully delivering its transparency and accountability potential.

The e-GP system should be treated as one of the most important pieces of open government infrastructure under NAP V. Its value should be judged not by whether procurement is digitized, but by whether the system lets the public scrutinize the full procurement cycle. The next phase should track whether procurement data is complete, downloadable, machine-readable, searchable, interoperable and usable by oversight institutions, civil society, journalists, businesses and citizens. e-GP implementation should also carry clear public feedback mechanisms. Citizens and businesses should be able to submit feedback on procurement opportunities, awards, implementation and payments, and procuring entities should be required to publish responses and the actions taken. AGPO transparency deserves particular attention, including publication of awards, contract values, payment status, completion rates and business growth outcomes for women, youth and persons with disabilities.

As procurement systems become more digital, Kenya should also weigh software assurance, auditability and vendor dependency. Critical procurement systems should support data portability, interoperability, audit rights, open standards, and continuity of service, so that procurement transparency is not undermined by closed systems, fragmented platforms, or technical dependencies that limit public oversight.

Some open contracting milestones remain less advanced. **Whistleblower protection measures and supplier debarment transparency remain areas requiring critical attention.** These reforms have been carried forward from NAP IV, with limited progress. The next phase should therefore prioritize key actions, including onboarding other institutions to bolster implementation.

Under Public Participation, Legislative and Fiscal Openness, progress is mixed. There has been clear progress on the online petition platforms for Parliament. Both the National Assembly and Senate platforms for submitting public petitions are active and operational. However, the next question is whether these platforms are being used, how petitions are processed, whether citizens receive feedback, and whether petitions influence parliamentary action. The Public Participation Bill has also progressed, and the draft includes provisions on accessible language and multi-modal participation through channels such as radio, television, internet platforms, and public meetings. The next phase should track whether the Bill is enacted and whether its implementation improves the quality, inclusiveness, and responsiveness of public participation. The PBO Act and regulations have been operationalized, which is a strong result under this cluster, strengthening the enabling environment for civil society organizations and supports civic space.

However, other fiscal openness milestones remain in progress. Public submissions were invited on the 2026 Budget Policy Statement and Medium-Term Debt Strategy- both at the national and county level, and parliamentary budget scrutiny is improving, but a formal commitment to open all debt committee hearings has not yet been confirmed. The study on the impact of public debt on special interest groups remains underway and has not yet been published. Promise Tracker and Publish What You Borrow portals are still in development. The framework for alternative budget proposals

has not yet been formally published. The Annual State of Parliamentary Openness Report also remains outstanding and has reportedly been carried forward from NAP IV without delivery.

Fiscal openness should strengthen the feedback loop between public participation and institutional response. Public debt hearings, budget submissions, parliamentary petitions, and online participation platforms should include published responses, timelines, explanations of decisions, and evidence of how public input shaped legislative, fiscal, or oversight outcomes. This matters in a context where citizens are demanding more transparency and accountability in public finance. The next phase should measure not only whether participation opportunities were offered, but also whether participation was meaningful, inclusive, and responsive, by tracking the number of submissions received, the issues raised, the institutions responsible for the response, the time taken, and the final decision or action.

Super Cluster 3: Inclusive Democracy and Justice

The Inclusive Democracy and Justice super cluster brings together Climate Action and Access to Justice. These commitments are different in subject matter, but they both address how government reaches people and communities facing practical vulnerabilities: communities affected by climate shocks, communities involved in carbon markets and environmental interventions, and people who face barriers to formal justice systems. At the midpoint, the cluster shows uneven progress in climate action and stronger implementation progress in access to justice.

Under Climate Action, important **progress has been made on carbon market governance**. The Carbon Markets Regulations 2024 introduced a framework for carbon market regulation and benefit sharing, and the Kenya Carbon Registry has been launched. However, the other milestones remains uneven. The **Climate Action Working Group**, which was expected to bring together government, private sector, and civil society actors to coordinate and monitor climate initiatives, had **not been established** by the midpoint assessment. The afforestation tracking platform has progressed through concept note development and preliminary research, but the platform has not yet been launched or operationalized. The clean cooking work has advanced through development of the Institutional Clean Cooking Sector Pack, which provides a framework for consolidating demand and quantifying needs across institutions such as schools, health facilities, and correctional centres. However, further action is needed to demonstrate how this pack addresses the original commitment objective around accessibility, impact, transparency, and a just energy transition. The early warning and climate information platform has also progressed, with a platform developed by the Kenya Space Agency, but it is not yet clear whether the platform is open, publicly accessible, or being used by citizens and communities to manage climate risks.

The next phase should strengthen public access to climate and environmental data, including open early warning information, carbon market data, benefit-sharing disclosures, afforestation tracking and geospatial information for planning and resilience. The commitment should also link to environmental data exchange across public institutions. Kenya's work on geospatial data, satellite information, early warning systems and climate platforms is an opening to build more interoperable and publicly accessible environmental data infrastructure, supporting communities, counties, researchers, innovators, civil society and decision-makers working on climate resilience, agriculture, disaster preparedness, biodiversity, water systems and natural resource governance. Efforts should

explicitly reflect UNEA-7 Resolution UNEP/EA.7/Res.9 on the environmental sustainability of artificial intelligence systems. This matters because Kenya proposed the resolution, which was adopted in Nairobi in December 2025, and because Kenya's open government, climate action, and digital governance agendas are increasingly connected. AI and geospatial technologies can support climate resilience, environmental monitoring, early warning, agriculture, disaster preparedness, biodiversity protection and natural resource governance. And the same systems, data centres and compute carry environmental implications: energy demand, water use, land use, emissions, e-waste and pressure on critical minerals.

Implementation of the second half of NAP V should therefore connect Climate Action, Open Data, Digital Governance and Open Government Resiliency by recognising sustainable AI as an emerging open government issue. That means public access to environmental data, cross-institutional data exchange, transparency about the environmental footprint of digital infrastructure, green computing considerations, and responsible deployment of AI systems in climate and environmental governance.

Access to Justice presents a stronger implementation story. The commitment builds on previous action plan milestones and seeks to enhance grassroots justice, digitized justice, justice financing, Alternative Justice Systems, legal aid, and local access to justice. At the midpoint, **AJS has become one of the key innovations in Kenya's Judiciary.** It has moved beyond being a policy idea or pilot and is now increasingly part of the justice sector's institutional reform agenda.

Progress includes the development and launch of County AJS Action Plans in **13 counties, against a target on 1 county pilot.** The Judiciary's Social Transformation through Access to Justice Blueprint has also provided an overarching reform framework, linking access to justice to broader institutional transformation and service delivery. There has also been progress in expanding multiple pathways to justice, including court-annexed mediation, alternative dispute resolution, Small Claims Courts, and the Justice at Your Doorstep initiative. These interventions respond to long-standing barriers to justice, including cost, distance, complexity, delay, and limited awareness of rights.

The refresh process now proposes to build on Kenya's AJS experience by elevating the innovation to the regional level. The proposed new milestone seeks to work with the African Alliance for People-Centred Justice to elaborate norms for a people-centred approach to justice in Africa and present the draft to the African Commission on Human and Peoples' Rights for consideration and adoption.

For Access to Justice, the **next phase should focus on sustainability, financing, quality implementation, and evidence.** As AJS expands, it will be important to document how communities are using these mechanisms, whether vulnerable groups are benefiting, how safeguards are being applied, and how AJS links with formal justice institutions. Continued attention is also needed on legal aid, digital justice accessibility, and financing for grassroots justice. This will help ensure that the commitment does not only expand justice mechanisms but also improves justice outcomes for citizens.

The Access to Justice commitment could also explore the opportunities and the safeguards that come with the use of artificial intelligence in the age of intelligence. As Kenya expands people-centred justice, Alternative Justice Systems, Small Claims Courts, court-annexed mediation, legal aid and digital justice services, AI can support inclusion, efficiency and accessibility where it is

deployed responsibly and under human oversight. AI-enabled tools could lower the practical barriers faced by indigent persons, rural communities, persons with disabilities, linguistic minorities and self-represented litigants. Use cases include translation of court and legal aid information into local languages, transcription of proceedings, speech-to-text support, simplified explanations of procedures, legal information chatbots, triage and referral to legal aid providers, help in completing standard forms, case-status navigation, and documentation of AJS processes. These speak directly to the long-standing barriers of cost, distance, language, delay, complexity and limited awareness of rights.

However, the use of AI in justice requires clear safeguards. Any AI-supported justice system should meet standards for accuracy, explainability, data protection, confidentiality, cybersecurity, non-discrimination, accessibility, language inclusion, and accountability. Special care is owed when tools are used by indigent litigants, children, survivors of sexual and gender-based violence, persons with disabilities, and marginalized communities.

Super Cluster 4: Open Government Resiliency

The Open Government Resiliency super cluster focuses on strengthening the institutional, financial, and collaborative foundations required to sustain open government reforms beyond individual commitments and Action Plan cycles. Commitment 9 serves as an enabling commitment intended to strengthen the governance architecture, coordination mechanisms, partnerships, and accountability systems that support implementation of the broader Action Plan.

Notably, the Independent Reporting Mechanism (IRM) **Action Plan Review assessed the commitment as unclear**. While the commitment sought to institutionalize principles of transparency, accountability, and civic participation across governance frameworks and establish a National Council on Open Government to coordinate alignment of government programmes with OGP principles, the IRM observed that the **objectives and proposed interventions lacked sufficient clarity and did not clearly demonstrate how the intended results would be achieved**. The review further noted that although the commitment had been carried forward from the previous Action Plan, it had been substantially refocused around governance frameworks, coordination, and financing mechanisms.

The refresh process has provided an opportunity to address these concerns. Commitment actors revisited both the problem statement and the commitment objective, resulting in substantial revisions to the commitment narrative and milestones. The revised commitment seeks to better articulate the governance challenges facing open government reforms in Kenya, clarify the intended results, and strengthen the link between the proposed interventions and the broader objective of institutionalizing open government principles across national and subnational governance systems. The changes also reflect evolving global and national governance dynamics, Kenya's leadership role within OGP, and the need for stronger mechanisms to sustain openness, accountability, and citizen participation over time.

Progress toward institutionalizing OGP within government structures stalled. Discussions on establishment of the National Council on Open Government stalled since the Cabinet Memo in 2023. "Framework" progress was recorded under the State of Openness Report initiative. A Multi-Agency Committee was established to provide oversight and coordination, while a Concept Note, detailed

Work Plan, benchmarking studies, and draft data collection tools were developed. Technical consultations were undertaken with national and international partners, and resource mobilization efforts were initiated to support implementation. However, while substantial preparatory work has been completed, the principal deliverable is yet to be produced.

Kenya continued to demonstrate strong leadership within the global open government community, most notably through hosting the OGP Africa and Middle East Regional Meeting in 2024. The event brought together government reformers, civil society organizations, development partners, and OGP leaders from across the region and reinforced Kenya's position as a leading voice on open government reforms. Kenya also remained actively engaged in regional and global OGP processes and peer-learning platforms. In addition, preliminary planning had commenced for the proposed Global Trust Summit, which seeks to advance dialogue on trust, governance, civic participation, and democratic resilience.

Kenya's preparations to host IGF 2026 offer an opportunity to connect NAP V to the wider debate on the open internet, trust, digital sovereignty, AI governance, and democratic resilience. Open government depends on an open, interoperable, neutral, secure and accessible internet. NAP V should recognize the open internet as part of the enabling environment for open government. Kenya can use IGF 2026 to show domestic reforms under NAP V – access to information, open data, digital participation, AI governance, child online safety, procurement transparency, parliamentary openness, justice innovation, climate data, environmental data exchange and digital sovereignty – and so position the refreshed NAP V as both an implementation framework and a contribution to regional and global digital governance.

The engagements around the Africa Forward Summit and the G7 Évian Summit have sharpened the case for African agency, including in global technology governance. Kenya's open government agenda should reflect the country's wider role as a convener and contributor to African and global digital governance. The refreshed NAP V can translate these continental and international engagements into domestic reforms that strengthen transparency, accountability, participation, trust, sustainability and public value.

[Matrix 2](#) provides detailed analysis by commitment and milestones,

5.0: REFLECTIONS

The midpoint refresh process has shown that Kenya's fifth National Action Plan remains a relevant and ambitious framework for advancing open government reforms. It has also highlighted several cross-cutting issues that require deliberate attention if the Action Plan is to deliver transformative and sustained results by 2027 and beyond. These issues relate not only to individual commitments, but also to the institutional, political and resource environment within which OGP is being implemented.

First, resource mobilization remains central to the success of the Action Plan. The proposed Open Governance Development Partners Group presents an important opportunity to create a more structured and strategic framework for mobilizing technical and financial support for Kenya's OGP vision, both at national and county level. Several commitments require specialized technical support, systems development, sustained coordination and implementation financing. Operationalizing and fast-tracking this platform would help align development partner support with Kenya's OGP priorities, reduce fragmentation, and provide a predictable mechanism for supporting implementation across the remaining period of the Action Plan.

Second, the institutionalization of OGP requires renewed attention. Progress has been made towards establishing the National Council on Open Government, including development of the relevant Cabinet Memorandum. However, the **process has taken longer than anticipated** since 2023. The Council and its Secretariat are important because they would provide high-level leadership, coordination and continuity for OGP implementation. They would also help align OGP commitments with government delivery priorities, support follow-up across ministries and agencies, and strengthen accountability for implementation. Fast-tracking establishment of the Council and Secretariat should therefore be treated as a priority for the second half of the Action Plan period.

Third, the upcoming elections and political transition present an important issue to monitor. Kenya has historically sustained OGP momentum at the national level across political cycles, although momentum at county level has at times experienced delays during transitions. The coming electoral period will therefore require deliberate planning to ensure continuity of OGP implementation, protection of institutional memory, and sustained engagement by both national and county actors. This is particularly important for reforms that require legislative action, budgetary support, inter-agency coordination, or county-level implementation.

Fourth, the increased awareness and involvement of citizens in governance processes is an important opportunity for Kenya's open government agenda. Recent public engagement around governance, public finance and accountability demonstrates that citizens are increasingly demanding participation, transparency and responsiveness from public institutions. OGP should leverage this momentum by strengthening meaningful participation channels, improving feedback mechanisms, and ensuring that citizen engagement leads to visible institutional response. This will be important for rebuilding trust and demonstrating that open government reforms are not only procedural, but also responsive to public priorities.

Fifth, the relationship between access to information and data protection is emerging as a cross-cutting issue across several openness initiatives. This is particularly relevant to beneficial ownership transparency, digital governance, access to information, open data and public records reforms. There is a need for greater clarity on how transparency obligations and data protection safeguards should be balanced in practice. The Commission on Administrative Justice and the Office of the Data Protection Commissioner could play an important role in jointly developing guidance, advisory positions or implementation principles to support public institutions working at the intersection of openness and privacy. The second half of NAP V should give more attention to open-source tools, open standards and data infrastructure. Open data reforms need more than published datasets. They need the standards, systems, APIs, metadata, licensing, repositories, data exchange mechanisms, public registers, geospatial infrastructure and stewardship roles that make data usable. Where it fits, open-source approaches can improve transparency, auditability, reuse, local innovation and sustainability, and this is especially relevant for public-interest data platforms, civic technology tools, dashboards, non-sensitive government-supported systems and reference implementations. Strengthening this layer supports open data, AI innovation, climate action, procurement transparency, county statistics, research and citizen accountability.

Sixth, several reform areas have experienced sustained delays and require focused attention. These include public access to the beneficial ownership register, whistleblower protection, and the State of Openness Report. Public access to beneficial ownership information remains central to the accountability potential of the beneficial ownership commitment, particularly in relation to public procurement and anti-corruption oversight. The advisory opinion of the Office of the Attorney General on the public beneficial ownership register should therefore be prioritized. Whistleblower protection has also remained difficult to advance. Although the refresh process proposes repositioning aspects of whistleblower protection under Access to Justice, it will be important to assess whether this placement will improve implementation or whether the action requires clearer institutional ownership, a narrower design, and stronger political support. Similarly, the State of Openness Report has made progress in preparatory work, but now requires movement from design to data collection, analysis, publication and use.

Seventh, the implementation of more technical and system-level milestones will require stronger engagement by central government coordination institutions, particularly the Head of Public Service and the National Treasury. Previous fiscal-related commitments benefited significantly from civil society advocacy and legal reform efforts. However, the current phase of implementation increasingly involves technical systems, interoperability, budget data, procurement platforms, institutional mandates and government-wide coordination. These reforms cannot be delivered by commitment leads and civil society actors alone. The active participation of the Head of Public Service and the National Treasury will be important in unlocking implementation bottlenecks, aligning reforms with government delivery systems, and ensuring that technical commitments receive the institutional authority and resources required for completion.

Eighth, visibility, documentation and compliance with OGP Minimum Standards continue to challenge Kenya's compliance with OGP transparency and information-sharing requirements. During implementation of the previous Action Plan, Kenya was assessed to be **acting contrary to OGP process** due to the absence of an online and regularly updated repository documenting co-creation and implementation activities. In the current Action Plan cycle, important progress was

made through establishment of a public Google Drive repository containing Action Plan documents, implementation reports, meeting records, and related resources. This addressed the repository requirement and improved accessibility of OGP information. However, the IRM Action Plan Review (2023–2027) found that **Kenya still did not meet several minimum participation and co-creation standards** due to the absence of a dedicated OGP website or regularly maintained online platform where stakeholders could easily access information on ongoing activities, opportunities for engagement, timelines, decisions, and implementation progress. As Kenya moves toward institutionalization of OGP through the proposed National Council and Secretariat, **establishment of a sustainable online presence should be prioritized**. This could take the form of a standalone OGP Kenya website, or a dedicated government-hosted portal linked to the proposed Council Secretariat. Such a platform should serve as the official repository for Action Plans, implementation reports, meeting records, consultation opportunities, progress dashboards, and learning products, enabling Kenya to fully comply with OGP minimum standards while improving the visibility, credibility, and long-term sustainability of its open government agenda.

FORWARD LOOKING OUTCOME INDICATORS FOR NAP V AND BEYOND

Super Cluster 1: Open Information Ecosystem

Number of public institutions submitting ATI compliance reports

Average response time to ATI requests

Number of priority datasets published in machine-readable formats

Number of priority datasets with APIs, metadata and open licences

Number of government-supported data platforms using open standards

Number of public-interest digital tools or repositories released as open source where appropriate

Number of public records digitisation projects completed

Number of government digital services with published feedback mechanisms

Number of public institutions trained on responsible AI, data governance and digital participation

Number of environmental datasets made available through interoperable data infrastructure

Super Cluster 2: Financial Integrity and Accountability

Beneficial ownership compliance rate

Percentage of firms seeking public contracts with verified beneficial ownership information

Number of procurement records published across the full procurement cycle

Percentage of procurement data downloadable in machine-readable format

Number of public feedback submissions on procurement and responses issued

Publication of AGPO performance reports, including awards, payments and completion rates

Number of public debt hearings held before major borrowing decisions

Number of parliamentary petitions received, processed and responded to through digital platforms

Super Cluster 3: Inclusive Democracy and Justice

Number of counties with functional AJS action plans

Number of citizens served through AJS and other people-centred justice mechanisms

Evidence of safeguards for vulnerable groups in AJS processes

Number of justice institutions piloting AI-supported translation, transcription or legal information tools

Number of court or AJS proceedings supported by digital transcription tools

Number of public-facing justice materials translated into local languages or simplified formats

Number of indigent or self-represented litigants supported through digital legal aid navigation tools

Number of legal aid referrals generated through digital or AI-supported channels

Existence of safeguards or guidelines for responsible AI use in justice services

Number of climate datasets publicly available

Number of users accessing climate early warning platforms

Publication of carbon market and benefit-sharing information

Operational status of afforestation and environmental monitoring platforms

Number of environmental datasets exchanged across institutions using common standards

Number of public reports or assessments addressing the environmental footprint of AI or digital infrastructure

Super Cluster 4: Open Government Resiliency

National Council on Open Government established and operational

OGP Secretariat established or formally designated

OGP Kenya online platform established and regularly updated

State of Openness Report published

Development partner coordination mechanism operationalised

Number of counties actively participating in OGP implementation
Number of public progress updates issued on NAP V implementation
Assessment completed on critical digital dependencies affecting open government systems
Digital sovereignty and technology dependency risks reflected in the State of Openness Report
Continuity, auditability and data portability requirements included in selected public digital systems
Environmental sustainability considerations included in selected digital infrastructure or AI procurement processes
Kenya's IGF 2026 programme linked to NAP V themes on open internet, digital sovereignty, AI governance, sustainable AI and trust

Matrix 1: Detailed Refresh Outcome – Changes to the Action Plan

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
Commitment 1: Climate Action			
C1, M6	New Milestone	environmental data exchange and sustainable AI, aligned with UNEA-7 Resolution UNEP/EA.7/Res.9 on the environmental sustainability of artificial intelligence systems (proposed by Kenya, adopted in Nairobi, December 2025).	Milestone objective is to leverage the resolution adopted on environmental sustainability of AI systems
Commitment 2: Digital Governance			
C2, M1	Guidelines for safe, secure and responsible emerging technology development and use and developed.	implementation safeguards for responsible public-sector AI adoption: responsible AI use guidance for public officers Example of Key areas: (AI procurement standards, model evaluation, human oversight and algorithmic accountability, safeguards for digital participation, child online safety –(safe-by-design, age-appropriate, privacy-preserving services for minors), and environmental sustainability considerations for AI systems consistent with UNEA-7 Res.9.	Strengthen the commitment to specify guidelines for public sector AI adoption and giving examples of key areas for policy guidelines
Commitment 3: Open Data for Development			
C3, M2	implementation of a standards-compliant data portal	Include development of open data infrastructure	Broaden the milestone ambition for implementation and sustainability by including development on open data infrastructure that supports sustainability of digital data access
C3, Commitment description and proposed solutions	As at the time of developing this action plan, the entry point for county level framework for strengthening data access was the then County Statistical Bill, which had previously failed to pass through the Senate. The commitment then identified as a key enabler, the enactment of a County Statistics Act to provide a legal framework for county governments to implement statistics units for the collection of data and production of statistics to inform policy, programmes and projects.	Change from County Statistical Bill to Statistical Bill (National level legislation)	Reviewed to reflect current situation: At the moment, there's a Statistical Bill 2026, which legislates county statistical offices. Current wording in the milestone is overtaken by events. The milestone will now advocate for the passing of the 2026 Statistics Bill
C3,M6	Revision of the Access to Information course at the Kenya School of Government to include an expanded chapter on standardization, licensing, publication and use of open data, particularly for	Milestone combined with Milestone 6 of Commitment 7- Access to Information	This review enables better implementation when milestones targeting different components of the same activity are put together

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
	those officers designated as Information Officers under the Access to Information Act 2016	(Both milestones speak on th ATI course under the Kenya School of Government)	
Commitment 4: Beneficial Ownership			
C4, M2	Develop a framework/mechanism for data verification after submission to reinforce reliability and accuracy.	Revised Milestone: Develop and publish a centralized BO data verification framework within the eGP system, including disclosure of verification processes, integrated systems, and limitations; Additional Indicator: (a) Number of government systems integrated with BO verification; (b) Percentage of BO records automatically verified through interoperability.	eGP is now operational and with Treasury's effort to fully implement this, the amended milestone provides a critical leverage for linkage and mechanism for data verification, thus strengthening the implementation framework and raising the ambition of the commitment
C4,M3	Make open the public the central public register of beneficial ownership information on legal persons and arrangements operating in Kenya	Obtain Attorney General's advisory opinion on BO transparency and data protection compliance; introduce phased work for making BO register open	This action takes cognizance of the sustained lag in operationalizing this activity across different action plans. OAG's advisory will inform the next steps with regard to this milestone
C4,M4	Develop a mechanism to flag and publish directors and BO data of companies convicted of economic crimes (including bribery, and money laundering) as well as debarred companies under PPADA	Revised Milestone: Publish real-time debarment information including: Directors of debarred companies. Beneficial owners of debarred companies. Related entities where directors or BOs hold controlling interests. Background information explaining grounds for debarment.	Expanded scope of what to publish. Debarment information is currently published; However, information is limited to debarred entities, this review seeks to expand that to publication of directors
C4,M5	Create awareness about the BO legislation in Kenya with the view to improving compliance by 15% by 2027	Revised Milestone Increase BO compliance from approximately 54% to at least 80% by 2027, with 100% compliance required for all firms seeking public contracts. Additional Actions Mandatory BO verification before contract award. Integration of BO verification within e-GP.	BRS reports indicate approximately 54% compliance in BO registration. Awareness campaigns have been undertaken, and compliance data to monitor and report this is documented in BRS annual reports.
C4,M6	Initiate and implement legal and policy framework changes to ensure Kenya's compliance to FATF recommendations 24 and 25	Revised Milestone: Operationalize and monitor implementation of legal reforms adopted to comply with FATF Recommendations 24 and 25.	Significant legal reforms have already been completed; Amendments to AML/CFT laws have strengthened compliance; Progress has been made on beneficial ownership disclosure and trust arrangements. Outstanding regulations still need operationalization – therefore the milestone's ambition is enhanced from developing frameworks to strengthening actual implementation

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
Commitment 5: Open Contracting			
C5, M1,M2 and M3	<p>e-GP system has a public portal publishing all procurement process data</p> <p>e-GP system is interoperable with the PPIP and other procurement entity publishing platforms at both the national and county levels.</p> <p>Draft national policy to standardize and govern procurement system requirements, data publication, implementation and roll out in Kenya</p>	<p>Revise Milestone M1-M3 and add new M4</p> <p>M1: Full migration to end-to-end e-procurement.</p> <p>M2: Public publication of all procurement stages, including payments.</p> <p>M3: Integration with BO, KRA and other government databases.</p> <p>Administrative Action Clarify implementation timelines. Clarify institutional responsibilities between Treasury and PPRA.</p> <p>New M4: CSO engagement and public training on use of the platform.</p>	<p>The e-GP system has since been established; Several national government institutions have begun implementation. Public procurement information is increasingly available online. Progress has been documented through Treasury reports and procurement forums.</p> <p>Persisting Challenges to be addressed in this milestone:</p> <ul style="list-style-type: none"> - Parallel manual and electronic procurement processes continue. - Counties cite connectivity and infrastructure constraints. - Full operationalization remains incomplete. - Limited citizen awareness and use of the platform. <p>Open Contracting and Data Standards principles have largely been incorporated into e-GP.</p>
C5,M4	Improve convenience of accessing procurement opportunities PPIP and EGP	<p>Revised Milestone: Improve digital and mobile access to procurement opportunities for AGPO beneficiaries through:</p> <p>Specific actions:</p> <ul style="list-style-type: none"> o SMS notifications. o Mobile applications. o Subscription alerts. o Accessibility features for persons with disabilities. 	<p>Procurement opportunities are available through PPIP and websites; Some procuring entities use social media.</p> <p>Persistent challenges to be addressed by this milestone include:</p> <ul style="list-style-type: none"> - Information remains difficult to access. - No mobile notification mechanism. - Limited accessibility features for persons with disabilities
C5, M5	PPDA 2015 Amended to provide for the protection of whistleblowers.	<p>Move this commitment to the Access to Justice Cluster.</p> <p>Reason: It is a broader governance and accountability issue beyond procurement.</p>	No significant progress under procurement legislation; National whistleblower legislation remains pending.
C5. M6	Awareness creation to special interest groups (women, youth and persons with disabilities) on AGPO processes	<p>Revised Milestone:</p> <p>Publish annual AGPO performance reports showing:</p> <ul style="list-style-type: none"> o Compliance levels by procuring entity. o Contract value awarded. 	<p>Awareness activities have been conducted, and data exists on AGPO participation.</p> <p>Challenges to be addressed:</p> <ul style="list-style-type: none"> - Lack of impact assessment. - Limited information on contract completion rates.

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
		<ul style="list-style-type: none"> ○ Sector distribution. ○ Payment status. ○ Impact stories and business growth outcomes. 	<ul style="list-style-type: none"> - Lack of data on payments and business growth outcomes. - Some procuring entities still fail to meet AGPO thresholds.
C5,M7	Publish detailed debarment data: Including background information and other legal entities where an individual associated with the debarred firm has controlling interest	Remove this milestone	It now aligns with the revised C4,M4
C5, M8	Develop a mechanism to ensure that public feedback through contract implementation is documented and meaningfully channeled into decision-making.	<p>Redraft the milestone to Integrate feedback mechanism in the e-GP platform.</p> <p>Revised Milestone: Establish an e-GP public feedback module that:</p> <ul style="list-style-type: none"> ○ Captures citizen feedback. ○ Tracks responses. ○ Publishes actions taken. ○ Demonstrates how feedback influences procurement decisions. 	<p>Some complaint and feedback mechanisms exist; Public participation remains weak and fragmented. Challenges to be addressed:</p> <ul style="list-style-type: none"> - Feedback not systematically documented. - Limited evidence that feedback influences procurement decisions.
Commitment 6: Public Participation, Legislative and Fiscal Openness			
C6, M1	Introduce transparency in public borrowing and expenditure by enabling scrutiny of loans through committee public hearings.	<p>Revised Milestone: Institutionalize mandatory public hearings and publication of debt information before approval of major public borrowing decisions.</p> <p>Specific Actions</p> <ul style="list-style-type: none"> ○ Publish loan agreements proactively. ○ Publish debt sustainability assessments. ○ Hold mandatory public hearings before approval. ○ Publish responses to public submissions. 	<p>Public participation opportunities exist in budget-making processes, traditionally by parliament, and more specifically by PDMO (at debt strategy and debt reporting stages, and expanded to county citizen platforms) Challenges to be addressed:</p> <ul style="list-style-type: none"> - Citizens have limited ability to scrutinize debt acquisition before approval. - Participation often occurs after major decisions have already been made.
Commitment 8: Access to Justice			
Commitment description	Operationalization of SGDVC Courts Localizing access to justice using Mombasa County as a pilot	The commitment description and problem statement were revised to reflect implementation progress. The changes update the commitment narrative from a pilot-focused approach to one that reflects the current status of scale-up and institutionalization. For example, activities initially	Enhancing Access to Justice has been assessed as high ambition and promising comment in both NAP IV and V respectively; In NAP IV, Since NAP IV in 2020, AJS has proved to be the most innovative venture by the judiciary in expanding access to justice and enabling a framework

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
		targeting the piloting of County AJS Plans and Sexual and Gender Violence Based Courts (SGBV) in one county were updated to reflect current progress, including the adoption of County AJS Plans in 13 counties.	for interaction between the state-based courts and community justice initiatives Notable progress has been made in advancing AJS, including operationalization of specialized SGBV Courts, expansion of Arbitration avenues, increased the Court Annexed mediation, operationalized the Small claims court, e.t.c;
New Milestone M5	New Milestone	New Milestone M5 Responsible use of AI-enabled tools to support inclusion: Tools to remain assistive and under human oversight, with safeguards for accuracy, privacy, confidentiality, fairness, accessibility, non-discrimination and due process; no automated adjudication. Key areas include: translation of justice information into local languages, transcription of proceedings, simplified legal information, legal aid referral, case-status navigation, and documentation of AJS processes for indigent persons, linguistic minorities, persons with disabilities and self-represented litigants.	New milestone builds on progress in AI policy framework and the guidelines set to be established under commitment 2
New Milestone M4	New Milestone	Kenya National Steering Committee on the Implementation of the Alternative Justice Systems Policy (NaSCI-AJS) enjoin to work with the African Alliance for People-Centred Justice to develop norms for a people-centred approach to justice in Africa and present the draft to the African Commission on Human and Peoples' Rights for its consideration and adoption within one (1) year.	The milestone was introduced to build on Kenya's progress in AJS and elevate this work from the national to the regional level. Through NaSCI-AJS, Kenya has developed significant experience in advancing accessible, community-based, and people-centred approaches to justice. The proposed action seeks to leverage this experience by collaborating with the African Alliance for People-Centred Justice to develop continental norms and principles on people-centred justice for consideration by the African Commission on Human and Peoples' Rights (ACHPR). The milestone strengthens the commitment's alignment with OGP values, particularly civic participation, inclusion, and public accountability, by promoting justice systems that are more responsive to the needs and experiences of citizens. It also raises the ambition of the commitment by moving beyond domestic implementation to continental norm-setting and policy

Commitment	Original Commitment / Milestone	Change Introduced During Refresh	Rationale / Justification
			influence. In doing so, the milestone reinforces Kenya's leadership in governance and justice sector reform across Africa while creating the potential for broader and more sustainable impact beyond national boundaries.
Commitment 9: Building Open Government Resiliency			
C9	The commitment description was set against a background of covid recovery.	<ul style="list-style-type: none"> o Add HOPS as a key stakeholder o Revision of problem statement (reflect Political transitions and electoral disruptions; Geopolitics and shifting regional dynamics, The Youth Question; operational challenges, particularly in digitally underserved areas; Economic shocks and the weight of public debt and Global resourcing constraints on OGP implementation) o Revise commitment description to reflect the balance between Kenya's ambition and lived realities o Redraft of Solutions shared (Embed OGP Commitments in National Priorities; Foster Flexibility; Strengthen Digital Public Infrastructure; Resource Mobilization, Multilateral Cooperation, and Broad Engagement) o Revise expected results: (Enhanced Technological Integration with Equity; Restoration of Trust; Strengthened Democratic Values; Efficient Crisis Management and Service Delivery; Constructive Engagement with Regional Dynamics) 	<p>HOPS is a critical actor given the centrality of his office to the operationalization of OGP commitments across government.</p> <p>The commitment must therefore speak honestly to this landscape not as a catalogue of vulnerabilities, but as an honest reckoning that makes the case for open government as the most durable response Kenya has available.</p> <p>The causes of the problem, revised to reflect current realities, are:</p> <ul style="list-style-type: none"> - Political transitions and electoral disruptions - Geopolitics and shifting regional dynamics - The Youth Question – expectations, participation, and tension - Operational challenges, particularly in digitally underserved areas - Economic shocks and the weight of public debt - Global resourcing constraints on OGP implementation <p>The solutions proposed under this commitment should be read as a deliberate recalibration: moving from commitments that were written in the shadow of a pandemic to ones that are fit for a more complex, more contested, and more consequential moment.</p>
C9, M2	Milestone has focused on regional engagements including the OGP Summit	Add the Internet Governance Forum and the Global Trust Summit as key convenings Kenya will host	IGF and GTS are key convenings bringing together different stakeholders addressing the very foundational challenges to open governance - eroding trust and safe internet use. There is already commitment and progress towards actualizing these events, thus providing low hanging fruits in demonstrating Kenya's leadership.

Matrix 2: Implementation Results Matrix

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
SUPER CLUSTER 1: OPEN INFORMATION ECOSYSTEM (C2- Digital Governance, C3- Open Data for Development and C7 – Access to Information)				
C2. Digital Governance	Multistakeholder Emerging Technologies Institute and Lab	Institutions are not yet in place, but AI strategy has been adopted by the government that has designated as a flagship project the development of a national AI risk and safety institute. (Project 5.2.3) to be implemented over the next 5 years	Kenya AI Strategy 2025 -2030	Meaningful progress made, though important activities remain outstanding, mainly being the implementation of the policy to successfully establish the target institutions. Notably, there is a possibility these institutions will be fully in pace outside the action plan period (policy indicates 5 year timeline)
C2. Digital Governance	Establishment of Multistakeholder mechanism for dialogue on digital economy and transformation	Draft National Data Governance Policy and AI and Emerging Technology Policy are underway, which have proposed an institutional framework to coordinate Data Governance and Emerging Technologies.	The Data Governance and Emerging Technology Council (DGET)	Meaningful progress made. While the policy documents and that will substantially anchor the mechanisms is still in progress, the institutional framework has undergone various stages of validation pending public participation in the next few months.
C2. Digital Governance	Development and use of guidelines for safe, secure and responsible emerging technology	The Ministry of ICT and the Digital Economy is developing the Kenya Artificial Intelligence and Emerging Technologies Policy that will define Kenya’s approaches to emerging technologies and a governance framework and interventions to guide their ethical and secure use and deployment. The ICT Sector Working Group report was also published in June 2024 with policy	Kenya Artificial Intelligence and Emerging Technologies Policy ICT Sector Working Group report	

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
		recommendations for these emerging technologies		
C2. Digital Governance	Increased use and adoption of safe, secure and responsible digital technologies.	<p>The aforementioned approved and draft policies above are being developed with a lens to support the adoption of safe, secure and responsible digital technologies.</p> <p>The data governance policy acknowledges and will institutionalize open data, participation, and transparency through concrete interventions in the policy text, the proposed institutional framework, and the proposed Data Governance Law.</p> <p>Civil society cluster members, led by LDRI, drafted a policy memo on participatory digital governance and submitted the Government of Kenya. The memo articulated recommendations for integrating participatory, transparent, and human rights-centered principles into the AI & EmTech and Data Governance policies under development by the Ministry of ICT and Digital Economy.</p>		
C2. Digital Governance	Public Participation Law reflecting nuances of use of technology in citizen engagement.	A joint memorandum developed in 2024 proposed recognition of online citizen engagement, including social media platforms, as a formal channel for public participation under the Public Participation Bill.	Joint memorandum submitted to Public Participation Bill process.	Progress made through policy advocacy and legislative engagement. If reflected in the final legislation, the reform could expand participation opportunities. However, implementation remains dependent on enactment of the Public Participation Bill and development of practical feedback mechanisms.
C3. Open Data for Development	Amendment of PFM regulations to mandate publishing of budget data	Not started		Milestone not started. MSF recommends onboarding the National Treasury as a key process owner to fastrack such milestones.
C3. Open Data for Development	Implementation of a standards-compliant data portal	Not started		The National Treasury's existing IFMIS portal publishes some budget documents but not in open, machine-readable formats.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C3. Open Data for Development	Publish a guidebook on the publishing of open data by the public sector	A guidebook is under development by LDRI and partners. It has not yet been publicly released.		Milestone is in progress. Beyond publishing the playbook, transformation will be realized if the paybook is socialized and adopted by government agencies.
C3. Open Data for Development	Establishment of a Data Governance Council and development and implementation of a data capacity improvement roadmap	Not started		Milestone not started
C3. Open Data for Development	Enactment of the County Statistics Act to provide a legal framework for county data collection and evidence-informed planning.	The milestone has progressed from developing a county level legislation to a national level framework. The National draft law aims to provide a comprehensive legal framework for the collection, compilation, analysis, production, management and dissemination of official statistics in Kenya, and to align the statistical system with the Constitution and international standards.	Statistics Bill Public Participation for Statistics Bill	During the refresh process, the milestone was revised from development of a County Statistics Bill to a National Statistics Bill to reflect updated progress. A national framework could provide a stronger foundation for official statistics and open data, but progress will depend on advancement of the legislative process.
C3. Open Data for Development	Publishing government satellite data as open data	The Kenya Space Agency has created a data hub and published satellite datasets. However, as at the mid-term refresh, most recent datasets were from 2024.	Kenya Space Agency Data Hub	Milestone is in progress but needs upscaling to avoid delays in data publication and subsequent redundancy of the data portal.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C3. Open Data for Development	Revision of the ATI course at the Kenya School of Government to include an expanded chapter on open data standardization, licensing, and publication.	A study on information officers' training needs is underway. The course revision is planned. Confirmed publication of the revised curriculum has not been publicly evidenced.		Milestone is in progress. Notably, the refresh process recommends moving this milestone to Access to Information commitment since CAJ is the primary lead for the ATI course at Kenya School of Government.
C3. Open Data for Development	Operationalization of shared GIS lab infrastructure at a government data center as proof of concept for MDAs and subnational governments.	Konza Phase 1 horizontal infrastructure was launched in October 2025. The GIS sandbox environment at the Konza Data Center is planned for December 2026.	Media coverage for launch event here and here	Milestone in progress – with the launch and commissioning, key activities to follow up on is th establishment/ operationalization of the Sandbox and ultimate outcomes from these investments in data governance.
C7. Access to Information	National ATI Policy and Legislative Reform	Significant progress was made toward adoption of the National ATI Policy. The Policy was signed by the Cabinet Secretaries for Information, Communications and the Digital Economy and the National Treasury, as well as the Attorney General, and forwarded to the Cabinet Office for consideration through a Cabinet Memorandum. The ATI Amendment Bill, Committee Report and supporting documentation were also developed.	Draft ATI Policy; ATI Amendment Bill; Committee Report; Cabinet Memorandum submitted to Cabinet Office.	Strong implementation progress. The commitment has advanced beyond policy drafting into formal government approval processes. However, Cabinet approval and implementation remain outstanding, and these will determine the reform's practical impact.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C7. Access to Information	ATI Reporting Guidelines	ATI Reporting Guidelines for Public Entities and Private Bodies were developed, adopted by CAJ, and disseminated through formal circulars requiring institutional reporting on ATI implementation.	ATI Reporting Guidelines adopted; Circular No. 3/2025/ATI issued; follow-up circular issued in 2026.	Strong implementation progress. The guidelines establish an important accountability mechanism for monitoring implementation of ATI obligations. Their value will depend on the quality and consistency of reporting by institutions.
C7. Access to Information	ATI Capacity Building	CAJ and the Kenya School of Government developed an ATI curriculum and trained facilitators to support institutional implementation of ATI obligations. The course has been rolled out through KSG programmes.	ATI curriculum developed; facilitators trained; course listed and delivered through KSG.	Meaningful progress made. The reform addresses a key implementation challenge by strengthening institutional capacity. Future assessment should focus on whether training translates into improved compliance and service delivery.
C7. Access to Information	Digitization of Public Records	A multi-agency steering committee and internal taskforce were established to support digitization of public records. However, implementation remains at an early stage and digitization efforts have largely focused on public-facing services rather than underlying records systems.	Steering committee established; taskforce formed; coordination meetings undertaken.	Meaningful progress made, though important activities remain outstanding. Records management remains a foundational requirement for effective ATI implementation. The pace of implementation may influence the extent to which ATI reforms translate into practical access to information.
C7. Access to Information	Public Awareness and Media Engagement	CAJ undertook awareness and advocacy activities through media engagements, radio programmes, press conferences, and stakeholder outreach initiatives.	Media appearances, radio discussions, awareness activities.	Progress ongoing. Public awareness remains essential to realization of ATI rights. Future reporting would benefit from evidence on reach, uptake, and citizen use of ATI mechanisms.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C7. Access to Information	Electoral Information Disclosure	Draft Guidelines on Disclosure of Information During the Elections Cycle were developed and engagements initiated with relevant electoral and media institutions.	Draft disclosure guidelines; stakeholder consultations.	Preparatory progress achieved. The reform has potential significance ahead of the 2027 elections. Adoption and implementation of the guidelines will be important in strengthening electoral transparency and access to information.
SUPER CLUSTER 2: FINANCIAL INTEGRITY AND ACCOUNTABILITY (C4- Beneficial Ownership Transparency, C5- Open Contracting and C6- Public Participation, Legislative and Fiscal Openness)				
C4. Beneficial Ownership Transparency	Beneficial Ownership Compliance and Disclosure	Compliance with beneficial ownership disclosure requirements increased from 48.96% to 53.49%, while the number of companies declaring beneficial ownership information increased from 382,854 to 448,424.	BRS compliance statistics and beneficial ownership filings.	Meaningful progress made. Increased compliance demonstrates growing uptake of beneficial ownership disclosure requirements. However, compliance remains below the commitment target, and continued efforts will be required to improve coverage and completeness of declarations.
C4. Beneficial Ownership Transparency	Verification and Data Quality Improvements	Verification of company records improved from 46.84% to 49.92%, while data cleaning and harmonization across business registration systems progressed significantly.	Verification statistics; master records harmonization process.	Meaningful progress made, though important activities remain outstanding. Efforts have focused on improving reliability and accuracy of beneficial ownership information, which is essential for effective oversight and enforcement.
C4. Beneficial Ownership Transparency	Interoperability Between BO and Procurement Systems	Work progressed toward integration of beneficial ownership information with other government systems, including the e-GP platform and business registration systems.	Integration efforts between BRS, e-GP and related government databases.	Meaningful progress made. Interoperability has potential to strengthen detection of conflicts of interest and improve oversight of public contracting. Full operational integration remains a key next step.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C4. Beneficial Ownership Transparency	FATF Compliance Reforms	Kenya's rating under FATF Recommendation 24 improved from Partially Compliant to Largely Compliant following reforms addressing deficiencies in beneficial ownership regulation and oversight.	FATF re-rating; CBK guidance to financial institutions.	Strong implementation progress. The reforms have strengthened Kenya's regulatory framework and international standing on beneficial ownership transparency.
C4. Beneficial Ownership Transparency	Public Access to Beneficial Ownership Information	The milestone remained under implementation, but no substantive progress update was reported regarding public access to beneficial ownership information.	Commitment reporting.	Limited progress evident by the midpoint assessment. Public access remains one of the most significant unresolved issues under the commitment. Clarification on the legal and policy direction for public disclosure will be important in determining the commitment's contribution to transparency and accountability.
C5. Open Contracting	Operationalization of the National e-Government Procurement System (e-GP)	The national e-Government Procurement system was launched in April 2025 and became fully operational from July 2025. By April 2026, the system had onboarded over 40,000 suppliers and nearly 1,500 procuring entities.	e-GP implementation statistics; National Treasury implementation reports.	Strong implementation progress. This represents one of the most significant reforms under the Action Plan and establishes a foundation for greater procurement transparency, efficiency, and accountability.
C5. Open Contracting	Procurement Data Integration and Transparency	Progress was made toward integration of e-GP with the Public Procurement Information Portal and other government systems through PPRA implementation guidance and technical integration efforts.	PPRA Circular No. 02/2025; integration activities.	Meaningful progress made. Interoperability will be important in improving oversight and reducing fragmentation of procurement information.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C5. Open Contracting	Inclusion of AGPO Beneficiaries and Suppliers	Procurement opportunities and procurement activity are increasingly available through e-GP and associated procurement portals.	Supplier registration data; procurement system statistics.	Meaningful progress made, though important activities remain outstanding. The next phase should focus on data usability, completeness, accessibility, and alignment with open contracting standards.
C5. Open Contracting	Debarment Transparency Reforms	Awareness and engagement activities targeting youth, women and persons with disabilities continued through civil society and government-led outreach initiatives.	Outreach activities and stakeholder engagements.	Progress ongoing. While awareness efforts continue, additional evidence would be useful on participation outcomes, contract awards, and business opportunities generated through these initiatives.
C5. Open Contracting	Whistleblower Protection Measures	No substantive implementation update was reported under this milestone.	Commitment reporting.	Limited progress evident by the midpoint assessment. Whistleblower protection remains a longstanding reform area and continues to require stronger institutional ownership and implementation focus.
C6. Legislative and Fiscal Openness	Digital Citizen Engagement and Parliamentary Petitions	Online petition platforms for both the National Assembly and Senate became operational and are available for public use.	National Assembly and Senate petition portals.	Strong implementation progress. This is a concrete citizen-facing reform that expands opportunities for public engagement with Parliament. Future assessment should consider uptake and responsiveness to petitions submitted.
C6. Legislative and Fiscal Openness	Public Participation Frameworks	The Bill progressed through the legislative process and includes provisions on accessibility, plain language, and multiple participation channels. Public hearings were undertaken during the reporting period.	Public Participation Bill 2025; public hearings.	Meaningful progress made. If enacted and effectively implemented, the Bill could strengthen consistency and inclusiveness in public participation practices across government.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C6. Legislative and Fiscal Openness	Parliamentary Budget Office Reforms	The Parliamentary Budget Office Act became operational and supporting regulations were published during the reporting period.	PBO Act; PBO Regulations 2026.	Strong implementation progress. The reforms strengthen Parliament's analytical and oversight capacity and provide a stronger institutional basis for fiscal scrutiny.
C6. Legislative and Fiscal Openness	Public Debt Transparency and Participation	Parliament invited public submissions on the Budget Policy Statement and Medium-Term Debt Strategy. Additional debt transparency initiatives remain under development.	Parliamentary submissions process; debt transparency initiatives.	Some progress achieved, though important activities remain outstanding. Efforts to improve public engagement around debt management are underway, but several intended outputs remain incomplete.
C6. Legislative and Fiscal Openness	Parliamentary Openness Reporting	A study examining the impact of public debt on special interest groups was underway but had not yet been published.	Mzalendo Trust implementation update.	Progress ongoing. Publication of the study will be important in generating evidence for public debate and policy discussion.
SUPER CLUSTER 3: INCLUSIVE DEMOCRACY AND JUSTICE (C1- Climate Action and C8- Access to Justice)				
C1. Climate Action	Establish and sustain a multi-stakeholder Climate Action Working Group to collaboratively accelerate and monitor climate initiatives.	The multi-stakeholder Climate Action Working Group had not been established by the midpoint assessment. Discussions on onboarding government stakeholders and establishing coordination arrangements remained ongoing.	Climate Action implementation reports.	Limited progress evident by the midpoint assessment. The Working Group was expected to play a central coordination role across the commitment. Continued delays may affect coherence and coordination across climate-related reforms.
C1. Climate Action	Carbon Markets Governance and Benefit Sharing	The Carbon Markets Regulations 2024 introduced a framework for regulation of carbon markets, including provisions on benefit sharing and community development agreements.	Carbon Markets Regulations 2024. Kenya Carbon Registry.	Strong implementation progress. The regulations provide an important governance framework for carbon market activities and strengthen transparency around community participation and benefit sharing

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
		The Kenya Carbon Registry, launched in February 2026, provides a centralized, transparent infrastructure for recording, tracking, and verifying carbon credit transactions and associated financial flows. It enables end-to-end visibility from credit generation to revenue allocation, strengthening traceability of funds reaching communities, including indigenous and local group		.The Registry provides an important institutional tool for transparency and oversight within Kenya's emerging carbon market ecosystem.
C1. Climate Action	Afforestation Tracking Platform	Preliminary research and a concept note were completed to guide development of the platform. The platform itself had not yet been operationalized.		Some activity undertaken, but outputs remain modest relative to expectations. Progress has focused on design and preparatory activities. Operationalization of the platform remains an important next step.
C1. Climate Action	Clean Cooking Sector Coordination	An Institutional Clean Cooking Sector Pack was developed to support planning, coordination, and investment in clean cooking interventions across public institutions.	Institutional Clean Cooking Sector Pack.	Meaningful progress made. The initiative provides a useful framework for coordinating clean cooking investments. Future reporting should demonstrate how it contributes to accessibility, adoption, and a just energy transition.
C1. Climate Action	Climate Information Platform	A climate information platform was developed by the Kenya Space Agency. However, it was not yet open or publicly accessible by the midpoint assessment.	Concept note and research outputs.	Meaningful progress made, though important activities remain outstanding. Public accessibility will be critical if the platform is to contribute to transparency, participation, and climate accountability objectives.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C8. Access to Justice	Institutionalization of Alternative Justice Systems (AJS)	Thirteen County AJS Action Plans had been developed and launched by June 2026, with the most recent launched in Embu County.	County AJS Action Plans.	Strong implementation progress. The commitment has successfully moved from policy development toward county-level implementation and localization of justice reforms.
C8. Access to Justice	County Alternative Justice Systems Action Plans	Progress was recorded in expansion of court-annexed mediation, arbitration, Small Claims Courts, specialized SGBV courts, and Alternative Justice Systems.	Judiciary implementation reports.	Strong implementation progress. These reforms expand access to justice and provide citizens with multiple avenues for dispute resolution beyond conventional court processes.
C8. Access to Justice	Social Transformation through Access to Justice (STAJ) Blueprint	Nationwide e-filing was introduced across courts, replacing paper-based filing processes.	Judiciary e-filing system.	Strong implementation progress. Digitization has the potential to improve efficiency and accessibility, although attention should continue to be paid to inclusion of digitally excluded populations.
C8. Access to Justice	Expansion of Multiple Pathways to Justice	The Attorney General launched a nationwide programme to provide legal aid and justice services to underserved communities.	Justice at Your Doorstep programme.	Meaningful progress made. The initiative strengthens outreach and contributes to reducing barriers to justice for vulnerable and underserved populations.
C8. Access to Justice	Justice at Your Doorstep Initiative	Progress was made in development of Legal Aid Fund guidelines and allocation of resources to multi-door justice initiatives. However, full operationalization of the Legal Aid Fund remains pending.	Legal Aid Fund Guidelines; Judiciary budget allocations.	Meaningful progress made, though important activities remain outstanding. Sustainable financing remains important for long-term effectiveness of justice reforms.
C8. Access to Justice	Court-Annexed Mediation and Alternative Dispute Resolution	The Social Transformation through Access to Justice (STAJ) Blueprint was developed as a strategic framework	STAJ Blueprint.	Meaningful progress made. The Blueprint provides strategic direction and coherence across multiple justice-sector interventions.

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
		guiding implementation of justice reforms.		
C8. Access to Justice	Legal Aid and Inclusion Initiatives	During the refresh process, actors proposed a new milestone aimed at advancing people-centred justice norms through engagement with the African Alliance for People-Centred Justice and the African Commission on Human and Peoples' Rights.	Refresh proposal.	Not an implementation result under the original Action Plan. However, the proposal reflects growing maturity of Kenya's AJS reforms and an ambition to position the country's experience within broader continental justice reform discussions.
SUPER CLUSTER 4: OPEN GOVERNMENT RESILIENCY (C9- Building Open Government Resiliency)				
C9. Open Government Resiliency	Digital Strategy for Transparent Governance and Citizen Participation	Limited progress was reported against the development of the envisaged digital platform for citizen participation, multimedia campaigning, transparency, accountability and open governance. While Kenya has continued to advance various digital governance and participation initiatives under other commitments, evidence of a dedicated platform delivering the outputs envisaged under this milestone was not provided by the midpoint assessment.	No specific implementation evidence reported against the milestone outputs, including citizen engagement reach, campaign reports, engagement metrics, or trust surveys.	Limited progress evident by the midpoint assessment. The milestone remains important as a potential mechanism for expanding citizen engagement and strengthening public trust. However, implementation appears to have lagged behind other areas of the commitment and may require renewed ownership, clearer scope, and alignment with ongoing digital governance reforms.
C9. Open Government Resiliency	Regional Leadership and OGP Peer Exchange	Kenya continued to play an active leadership role within regional and global OGP processes. A major milestone	OGP Africa and Middle East Regional Meeting (2024); regional and global OGP engagements;	Strong implementation progress. Hosting the Regional Meeting was a significant achievement and reinforced Kenya's leadership position within the global OGP

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
		<p>was the successful hosting of the OGP Africa and Middle East Regional Meeting in 2024, which brought together government reformers, civil society actors, development partners, and OGP leaders from across the region. Kenya also remained active in regional and global OGP engagements and peer learning platforms. In addition, preliminary planning is underway for the proposed Global Trust Summit, which seeks to advance dialogue on trust, governance, civic participation, and democratic resilience.</p>	<p>Global Trust Summit planning discussions.</p>	<p>community. The milestone has strengthened opportunities for peer learning, reform exchange, and visibility of Kenya's open government reforms. The proposed Global Trust Summit provides an opportunity to further advance Kenya's leadership on governance innovation and trust-building.</p>
<p>C9. Open Government Resiliency</p>	<p>National Council on Open Government and Institutionalization of OGP</p>	<p>Progress has been made toward establishment of the National Council on Open Government, including preparation of a Cabinet Memorandum and continued engagement on institutional arrangements. However, the Council and its Secretariat had not yet been formally established by the midpoint assessment.</p>	<p>Draft Cabinet Memorandum; consultations on institutionalization arrangements.</p>	<p>Meaningful progress made, though important activities remain outstanding. The Council remains one of the most important institutional reforms under the Action Plan. Once established, it could provide high-level leadership, strengthen coordination across government, improve alignment with planning and budgeting cycles, and enhance sustainability of OGP reforms beyond individual action plans. The delay since 2023 suggests that renewed attention may be required to advance the reform.</p>
<p>C9. Open Government Resiliency</p>	<p>Resource Mobilization and Financing Mechanism for OGP</p>	<p>Efforts were undertaken to engage development partners and explore financing arrangements for OGP implementation. Discussions</p>	<p>Development partner engagements; donor consultations; resource mobilization efforts linked to OGP</p>	<p>Some progress achieved, though important activities remain outstanding. Sustainable financing remains a key requirement for implementation of several commitments. Operationalization</p>

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
		<p>around establishment of a structured Open Governance Development Partners framework have continued, while resource mobilization efforts were also undertaken in support of the State of Openness initiative. However, the envisaged multi-donor programme had not yet been operationalized by the midpoint assessment.</p>	<p>implementation and the State of Openness initiative.</p>	<p>of a structured development partners framework could strengthen coordination of support, reduce fragmentation, and provide more predictable financing for OGP reforms at both national and county levels.</p>
<p>C9. Open Government Resiliency</p>	<p>State of Openness Report and Institutionalization of Open Governance Practices</p>	<p>Notable progress was made toward development of the State of Openness Report. A Multi-Agency Committee was established, a Concept Note and detailed Work Plan were developed, benchmarking and technical consultations were undertaken, and draft data collection tools were prepared. Resource mobilization efforts and technical partnerships were also initiated to support implementation. However, pilot testing, data collection, analysis, validation, publication, and dissemination of the inaugural State of Openness Report remained pending by the midpoint assessment.</p>	<p>Multi-Agency Committee established; Concept Note; Work Plan; draft methodology and tools; benchmarking exercises; technical support from partners including UNESCO and UNODC.</p>	<p>Notable progress made, though important activities remain outstanding. Significant groundwork has been completed in terms of governance structures, methodology development, partnerships, and implementation planning. However, the principal deliverable—the inaugural State of Openness Report—had not yet been produced. The next phase should focus on implementation and publication so that the framework can begin serving its intended monitoring, accountability, learning, and evidence-generation functions across government.</p>

Commitment	Milestone / Result Area	Progress Achieved (2023–June 2026)	Evidence / Key Outputs	Remarks / Implications
C9. Open Government Resiliency	Digital Strategy for Transparent Governance and Citizen Participation	Limited progress was reported against the development of the envisaged digital platform for citizen participation, multimedia campaigning, transparency, accountability and open governance. While Kenya has continued to advance various digital governance and participation initiatives under other commitments, evidence of a dedicated platform delivering the outputs envisaged under this milestone was not provided by the midpoint assessment.	No specific implementation evidence reported against the milestone outputs, including citizen engagement reach, campaign reports, engagement metrics, or trust surveys.	Limited progress evident by the midpoint assessment. The milestone remains important as a potential mechanism for expanding citizen engagement and strengthening public trust. However, implementation appears to have lagged behind other areas of the commitment and may require renewed ownership, clearer scope, and alignment with ongoing digital governance reforms.



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