A STUDY OF ANTI-CORRUPTION COMMUNICATION PLANNING BY STATE ANTI-CORRUPTION AGENCIES IN KENYA: A CASE STUDY OF THE ETHICS AND ANTI-CORRUPTION COMMISSION.

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DECLARATION

I hereby declare that this is my original research work and has not been presented to any other institution locally or internationally for the award of a degree.

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Declaration by Supervisor

This research proposal has been submitted for examination with my approval as a university supervisor.

Name of supervisor: Mr. Tom Indimuli

Sign ……………………………. Date ………………………..
DEDICATION

To baby Melsovech Albright Otachi for the energy and inspiration
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ABSTRACT

This study sought to examine anti-corruption communication strategy planning by anti-corruption agencies (ACAs) in Kenya in their initiatives, so as to determine their effectiveness in effecting behaviour change. This was prompted by the fact that despite the multiple efforts and initiatives by anti-corruption agencies to combat the vice, Kenya faces the corruption challenge and listed as one of the most corrupt countries in the world. Evidence from relevant literature was evaluated on the significance of communication strategy planning for social behaviour change and encompassed the practice on two theoretical frameworks: communication persuasion and diffusion of innovations. Findings were achieved by way of a case study focusing on the anti-corruption initiatives conducted by the Ethics and Anti-Corruption Commission between the years 2003-2013. Data was collected by document reviews: strategic plans, communication policies and plans, annual reports, and other relevant literature on anti-corruption strategies which were accessed from the anti-corruption agency website and resource centers. The data from the document review was augmented by key informant interviews drawn from communication, governance and anti-corruption agency managers. Thus, the study has identified the principles observed by the ACAs prior to embarking on anti-corruption initiatives as well as challenges faced. Specific recommendations have been generated to address the gaps in designing and effecting anti-corruption communication strategies.
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LIST OF ACRONYMS

ACAs- Anti-Corruption Agencies
ACECA- Anti-Corruption and Economic Crimes Act
ACPU- Anti-Corruption Police Unit
AG- Attorney General
BCC- Behaviour Change Communication
CoK- Constitution of Kenya
CSO- Civil Society Organisation
CP- Community Participation
EACC- Ethics and Anti-Corruption Commission
ERS- Economic Recovery Strategy
IEC- Information, Education and Communication
KACA- Kenya Anti-Corruption Authority
KACC - Kenya Anti-Corruption Commission
KBC- Kenya Broadcasting Corporation
NARC- National Rainbow Coalition
NACCSC -National Anti-Corruption Steering Committee
NAP- National Anti-Corruption Plan
NGOs - Non-governmental Organisations
PBC- Process of Behaviour Change
UON- University of Nairobi
UN- United Nations
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CHAPTER ONE: INTRODUCTION
1.0 BACKGROUND
Corruption is a key governance challenge in Kenya since the country attained independence in 1963 (EACC, 2012). Some scholars suggest that corruption has been the norm throughout human history (Klitgaard, 1988; Neild, 2002). According to the Institute of Economic Affairs (2000), the pervasive and distortionary nature of corruption in Kenya has been acknowledged. Studies have further shown that the effect of corruption on human development is more evident in some countries than others (Waheeduzzaman, 2005). Corruption undermines the rule of law, hampers performance of public institutions and delivery of public services, reduces local and foreign investment, promotes market inefficiency and misallocation of resources, undermines optimal resource allocation and challenges the authority of states (Pope, 1997). It has been further demonstrated that corruption not only makes public power and governance less efficient but also adversely affects countries’ competitiveness and human development (Akçay, 2006).

Corruption and anti-corruption measures, has been studied academically in a multitude of ways over the past sixty years (Akçay, 2006; Arvas & Ata, 2011; Donchev & Ujhelyi, 2009; Leff, 1964; Macrae, 1982; Mauro, 1995; McMullan, 1961; Myrdal, 1970a; Nye, 1967; Rose-Ackerman, 1978, 1999, 2008; Svensson, 2005). The conventional definition used by the World Bank, Transparency International, and most scholars is that corruption is the abuse of public power for private benefit or profit (Amundsen, Sissener, & Søreide, 2000; Gray & Kaufmann, 1998). Corruption can summarily be categorized into three subsets: petty, administrative or bureaucratic corruption which comprises of isolated transactions by individual public officers. Grand corruption is theft or misuse of vast amounts of public resources by state officials. The last type of corruption is state capture and influence peddling, where the functioning of state is fundamentally compromised by the corrupt.
Kenya ranks lowly in anti-corruption studies and surveys that have been conducted on the prevalence and effects of corruption across various sectors (state, non-state and private). A report by international risk consultants Kroll (2004) indicates loss of more than Kshs 140 billion of government money between 1978-2002. A survey by the Ethics and Anti-Corruption Commission 2012 indicates that corruption still remains the most crucial problem with 54.5% of Kenyans rating corruption as an urgent problem compared to 39.2% in 2010. It was also found by the same survey that 41% of those asked for a bribe actually paid the bribe demanded for one reason or another. According to Transparency International’s Corruption Perceptions Index (CPI), Kenya’s position has been dropping and was ranked at position 136 out of 177 in 2013 compared to position 122 in 2003, meaning that we are yet to resolve this issue. According to the East African Bribery Index of (TI-Kenya, 2013) ranked number 4 out of 5 with a score of 7.9% and in 2012 the National index for Kenya was at 29.5% among East African countries in the survey.

In spite of the above findings, there have been numerous efforts by state anti-corruption agencies and other stakeholders to profile corruption as an urgent issue that needs to be tackled. These efforts have included: legislation and oversight, reforms and anti-corruption initiatives: public education and sensitization programmes. The fight against corruption was heightened in the National Rainbow Coalition’s, NARC, campaign agenda during the 2002 general elections and in the early phase of President Kibaki’s regime in 2003. Part of the hopes galvanized around promise by the 3rd president of Kenya to “call upon all those members of [this] government and public officers accustomed to corrupt practice to know and clearly understand that there will be no sacred cows under my government” (State-House, 2003).
According to Anne-Katrin Arnold and Sumir Lal (2011), legislative change and institutional oversight are important cornerstones in the fight against corruption. They further suggest that, no law will change society if it does not become part of a country’s culture, if it does not have an effect on people’s everyday lives. Corruption is therefore not a legal issue alone but is also a cultural issue. Since communication is an integral pillar of culture transmission, effective communication plans can mediate and result in a significant behaviour and attitude change hence an indispensable process in the implementation of anti-corruption initiatives.

1.1 PROBLEM STATEMENT

Fifty years after Kenya’s independence, corruption still remains the most crucial nightmare hindering the country’s growth and development with 54.5% of Kenyans rating it as an urgent problem in 2012, (EACC surveys 2008-2012). There have been multiple efforts aimed at sensitization of the citizens on preventive and other anti-corruption measures by state anti-corruption agencies and other stakeholders to combat the vice. These are and have included public education and awareness programmes through the media, development of Information, Education and Communication (IEC) materials among others. EACC strategic plan 2013-2018 indicates that over 15,000,000 Kenyans were reached with the anti-corruption message raising the hopes that some impact would be realized. Contrary to this; Transparency International’s Corruption Perceptions Index (CPI), Kenya’s position has been dropping and was ranked at position 136 out of 177 in 2013 compared to position 122 in 2003. Further, the Auditor General’s report (2012) indicates an annual loss of 30% revenue (equivalent of Kshs. 338 billion). According to Africog (2009) given the intractability of progress on investigations and prosecutions, the temptation is high to focus on the easier option of engaging in a multiplicity of outreach activities of unclear impact under the guise of educating the public. Could it be that anti-corruption initiatives are conducted without a communication strategy hence the dis-connect between efforts and results?
Kwok and Wai (ICAC) agree that, ‘Fighting corruption requires a well-thought out and comprehensive strategy plan’ initiating anti-corruption programs without such a comprehensive plan is tantamount to engaging in combat operations without a concept of the operation. It just should not happen.

1.2 OBJECTIVE OF THE STUDY

The objective of the study is to examine anti-corruption communication planning by state anti-corruption agencies (ACAs) in Kenya in their initiatives, so as to determine their effectiveness in effecting behaviour change.

1.2.1 Specific Objectives

The specific objectives are to:

a) Examine anti-corruption communication planning by state anti-corruption agencies in promotion of anti-corruption initiatives,

b) Find out the communication principles observed by state anti-corruption institutions with a specific focus on major anti-corruption initiatives,

c) Identify communication planning challenges faced by state anti-corruption institutions in conducting anti-corruption initiatives,

d) Based on findings, make appropriate recommendations on how to improve anti-corruption communication planning for effective social behaviour change and further inquiry into the subject.
1.2.2 Research Questions

This study seeks to examine communication planning by state anti-corruption agencies focusing on the following questions:

a) How do state Anti-Corruption Agencies design and plan their communication strategies in promotion of anti-corruption initiatives?

b) What communication principles do the state anti-corruption agencies observe in designing their communication plans?

c) What communication planning challenges do the state anti-corruption agencies facing in achieving their mandate?

1.3 JUSTIFICATION

It is hoped that the study will provide a basis for finding solutions to the dis-connect between anti-corruption communication efforts in Kenya and behaviour change. Since no other previous research has been conducted in Kenya to address the variance in anti-corruption efforts and continued acceleration of corruption, the study will generate new knowledge advocating for professionalism in the design of communication plans and strategies as a key to influence behaviour change. Finally, the findings of the study will also be a useful resource for students of development communication by availing information regarding design of effective anti-corruption communication plans.

1.4 LIMITATIONS OF THE STUDY

The study assumes the following limitations:

a) Choice of Ethics and Anti-Corruption Commission and state agencies as a study focus area may give a limited view on communication practices by other anti-graft institutions in the non-state sectors.
b) The study will rely on reports and governance assessment indicator surveys based on perception as basis hence less representative of a wholesome academic discourse.

1.5 RESEARCH HYPOTHESIS

Effective communication planning that adheres to sound communication principles by state anti-corruption agencies when implementing anti-corruption initiatives would lead to higher efficiency in effecting anti-corruption behaviour change in Kenya.
CHAPTER TWO: LITERATURE REVIEW

2.0 INTRODUCTION

This chapter looks at relevant literature about the subject in an attempt to demystify and lay concrete ground on the basis of a theoretical framework for effective anti-corruption communication planning.

2.1 HISTORICAL ANTI-CORRUPTION PERSPECTIVES IN KENYA

According to the Kenya National Anti-Corruption Plan (2012), the fight against corruption in Kenya started during the pre-independence days in early 1920s. Kenya has for instance had an anti-corruption legislation (The Prevention of Corruption Act (Cap. 65)) which was in operation from August 1956 to May 2003 when the Anti-Corruption and Economic Crimes Act, No 3 of 2003 became operational and repealed it. Corruption has grown over the years despite the existence of the Prevention of Corruption Act. An effort was made to establish an Anti-Corruption squad within the Criminal Investigation Department of the Police Department, but the squad was later disbanded. The Prevention of Corruption Act (Cap. 65) was amended in 1987 to provide for the establishment of the Kenya Anti-Corruption Authority (KACA, 1997). The following are some of the institutional frameworks for anti-corruption in the country:

The Anti-Corruption Police Unit -2001

The Anti-Corruption Police Unit was established in September 2001 administratively by the Commissioner of Police to investigate corruption and corruption related cases after the disbandment of KACA. The Unit would investigate on its own initiative or as directed by the Attorney General or the Commissioner of Police.
Ministry of Justice and Constitutional Affairs -2003

The Ministry of Justice and Constitutional Affairs was established in 2003 after National Alliance Rainbow Coalition was sworn in after the 2002 General Elections. The Ministry’s role was to formulate policies and strategies in regard to corruption and oversee their implementation. Its roles included coordination and facilitating the fight against corruption.

National Anti-Corruption Steering Committee (NACCSC)-2004

The Committee was established under the Ministry of Justice and Constitutional Affairs with the mandate of carrying out a public awareness campaign on corruption. It was hoped to bring fundamental change in the attitudes and culture of Kenyans towards corruption and thereby assist in the fight against corruption. The NACCSC was grounded on the quest for a corruption free and prosperous nation. The Committee was charged with influencing behaviour change among the public through the education and awareness mandate.

Permanent Secretary in the Office of the President - Governance and Ethics -2003

To demonstrate his commitment to zero tolerance to corruption policy, President Kibaki, upon election into office in 2002, appointed a Permanent Secretary in his office in charge of Governance and Ethics. The role of the office was to advise the President on appropriate programmes to promote ethical behaviour in government and to act as the liaison between the various anti-corruption agencies and the office of the President.

2.1.1 Evolution and mandate of Ethics and Anti-Corruption Commission (EACC)

a) Kenya Anti-Corruption Authority (KACA-1997)

Parliament amended and implemented the anti-corruption law that had been in existence since 1956 creating the Kenya Anti-Corruption Authority (KACA) in 1997 with a mandate to investigate and prosecute corruption. This was the first attempt to establish and institutionalize anti-corruption agencies into law. The Act secured the independence of the Authority by creating the Kenya Anti-Corruption Advisory Board that would recommend to
the President the person who would be appointed as the Director of KACA and also advised KACA in the discharge of its functions. KACA was mandated to take necessary measures for the prevention of corruption in the public, parastatal and private sectors.

On December 22, 2000, the High Court in the case of *Gachiengo V Republic (2000) 1 EA 52(CAK)* made a ruling that the existence of KACA undermined the powers conferred on both the Attorney General and the Commissioner of Police by the Constitution of the Republic of Kenya. In addition, the High Court further held that the statutory provisions establishing the Authority were in conflict with the Constitution. That spelt the death of KACA and the various efforts in the fight against corruption in Kenya. (The agency declared unconstitutional).

**b) Kenya Anti-Corruption Commission (KACC)**

The Kenya Anti-Corruption Commission (KACC) was established by the Anti-Corruption and Economic Crimes Act. The Anti-Corruption and Economic Crimes Act provided for the prevention, investigation, punishment of corruption, economic crimes and related offences. Under its tenure, the (KACC) spearheaded the enactment of the Public Officers Ethics Act (2003) which advances the ethical standards of public officers by providing a Code of Conduct and Ethics for public officers and requiring financial declarations from certain public officers. The structure of KACC was and still is (under the current EACC) a four pronged approach (EACC Strategic plans 2006, 2009), based on investigation; public education; advisory; and civil recovery and restitution.

**c) Ethics and Anti-Corruption Commission (EACC)**

The constitution adopted by referendum and promulgated in 27th August 2010 represents a key milestone in the fight against corruption as it strengthens and entrenches the Ethics and Anti-Corruption Commission under *article 79 (Constitution of Kenya, 2010)*. The functions of EACC include raising public awareness on ethical issues and educating the public on
dangers of corruption and to enlist and foster public support in combating corruption. The constitution also now grants the right to access information and media independence/freedom which are key in the fight against corruption (Article 34,35 of CoK 2010). Chapter 6 of the constitution on leadership and integrity also sets high standards of integrity.

2.1.2 EACC anti-corruption efforts in the past decade (2003-2013)

Corruption thrives on information asymmetry (Gaskins, 2003). One method of reducing corruption has been to reduce the information asymmetry by means of print media and dissemination of Information, Education and Communication materials sensitizing the public. There is evidence that such techniques have a positive impact on the reduction of corruption (Chowdhury, 2004; Reinikka & Svensson, 2005).

The Ethics and Anti-Corruption National Corruption Survey (2012) agrees with this assertion and rates the media at 28.6 % and mobile clinics at 43.1 % very effective means of combating corruption. In summary, public education and sensitization is rated at 34.7% as an effective means of fighting corruption. The same survey recommends public awareness and trainings to the general public as a key measure in the struggle.

Public Education and Awareness Initiatives:

In its 2008-2009 annual report, the Commission indicates to have “sensitised” 42,831 people at various ASK shows around the country. An Africog Assessment Report (2009) indicates that between 2004- 2009, KACC “sensitised” and educated 4.9 million Kenyans through the media and Information, Education and Communication (IEC) materials; a Bible Study Guide was developed for use in religious organisations. Under its public education function, the KACC distributed in the 2008/9 period a total of 98,763 IEC materials to the public; these included Frequently Asked Questions (FAQ) Bulletins, leaflets promoting integrity to schools, and brochures about the Commission.
According to EACC strategic plan for the period 2013-2018, the commission conducted public awareness and education programmes that sought to create an informed public on the dangers of corruption and unethical conduct and to enlist and foster public support in the fight against corruption.

The commission believes that this initiative would impart positive attitudes and behaviours. The EACC reached the public through a variety of communication channels and tools including: outreach clinics to create awareness, media engagement and propagation of anti-corruption messages and content, education and training through workshops and seminars and development of information, education and communication materials. In summary, a total of 15,000,000 Kenyans were reached with the anti-corruption message.

2.2 SIGNIFICANCE OF COMMUNICATION PLANNING FOR BEHAVIOUR CHANGE

Gray and Dean (1999) have defined communication for social change as a process of public and private dialogue through which people define who they are, what they want and how they can get it. Communications plans are varied, multifaceted, highly planned, and strategically assembled media symphonies designed to increase awareness, inform, or change behaviour in target audiences (Day 2009). While there is a narrow deviation in meaning: strategic communication is an evidence-based, results-oriented process, undertaken in consultation with the participant group(s), intrinsically linked to other programme elements, cognisant of the local context and favouring a multiplicity of communication approaches, to stimulate positive and measurable behaviour and social change.

On the other hand; Day (2009) sees programme communication or behaviour change communication as a research-based consultative process of addressing knowledge, attitudes and practices through identifying, analysing and segmenting audiences and participants in
programmes by providing them with relevant information and motivation through well-defined strategies, using an audience-appropriate mix of interpersonal, group and mass-media channels, including participatory methods.

Within the new development paradigm, the discourse of “behaviour change” is linked to “social change” and can be effected in anti-corruption communication plans. While behaviour change implies individual level change; social change seeks to create an enabling and favourable environment for change (McKee & Becker 2004). Thus, a comprehensive communication plan will emphasize meaningful interaction among anti-corruption agencies and the general public.

The Process of Behaviour Change (PBC) framework recognizes that behaviour change—and thus communication intended to influence behaviour change—is a process. People usually move through several intermediate steps in the behaviour change process (Piotrow et al., 1997). Furthermore, this framework suggests that people at different stages constitute distinct audiences. Thus, they usually need different messages and sometimes different approaches, whether through interpersonal channels, community channels, or mass media. It is important to understand where the audience is in relation to these elements before embarking on a strategy. Progress from one element to the next increases the probability of behaviour change and continuation. Inversely, these strategies can influence both individual and collective change, establishing new community norms and, over time, providing support for stronger and more effective anti-corruption policies and programs (Piotrow et al., 1997).

2.2.1 Anti-corruption in the context of communication strategy planning

Oxford dictionary defines anti-corruption as the measures designed to eradicate or prevent dishonest or fraudulent conduct, especially in a political context. In a Vienna Anti-Corruption Report (2008), Mr. Sandage and Minister Hage while acknowledging the importance of
communication in fighting corruption, they argue that without effective persuasion by anti-corruption agencies and increased citizen participation in anti-corruption work, adequate measures and initiatives will not be developed. Elaine (et.al) propose that anti-corruption bodies need to understand that success always occurs on two fronts: being able to explain why the agency’s work is both effective and lay emphasis on establishing effective media strategies that would take proactive measures to get the anti-corruption message to the public.

2.2.2 Critique of the communication efforts and planning

Jeffrey and Lodin suggest that the primary cause of the failure of communication planning has been a combination of two factors: a lack of knowledge of the systems and approaches to anti-corruption and lack of political will.

Other hindrances to the success of communication planning include: the pervasive competing initiatives and lack of capacity on planning for or with opposing messages; inadequate financial resources; the power of social norms and the drive of inaction frequently mean that positive communication planning efforts are not sustained. Careful planning and testing of strategies, content and format with target audiences are, therefore, crucial and can be achieved as illustrated below.

2.3 DESIGNING AND IMPLEMENTING EFFECTIVE ANTI-CORRUPTION COMMUNICATION STRATEGIES

The communication planning process as observed by Elaine et.al (World bank 2010) requires intense deliberation, dialogue, and debate among multiple stakeholders; measuring and observing communication principles. This would inform public opinion; and building support among diverse interest publics and the general citizenry. In general, anti-corruption communication plans should aim to change the citizens’ ethical behaviour, attitude or knowledge in order to reduce corruption. According to Elliott, 1989 such communication plans can achieve the following: increase awareness of a problem or a behaviour; raise the
level of information about a topic or issue; help form beliefs, especially where they are not firmly held; make a topic more salient and sensitize the audience to other forms of communication; stimulate interpersonal influences via conversations with others (e.g. Police, teachers, or parents); generate information seeking by individuals; and reinforce existing beliefs and behaviours.

Effective communication is a product of effective planning (Toman and Bruce 2006). The two suggest that this is both a unidirectional (one-way) and the use of interactive approaches for public outreach. The strengths of these are implied by (Jacobson 1999) who reiterates that effectiveness depends on the ability of resource professionals to determine communication objectives and organize an appropriate approach for outreach before inviting the public into the process. Research also suggests that individuals (public) rely upon particular communication channels during different decision stages (Rogers 2003).

2.3.1 Critical Success factors when designing communication plans

a) Use of theory

According to Rodgers 1995, anti-corruption communication plans should be underpinned by a sound theoretical framework and a careful understanding of determinants of behaviours targeted in the plan. Jacobson 1999, agrees that, there is no “one size fits all” approach and the evidence supports, advisedly, a consideration of a range of behaviour change theories to inform the development and implementation of anti-corruption initiatives would be valuable. These should also be subjected into on-going and regular evaluation in order to ensure appropriate outcomes are attained, Rice et.al 2000.

b) Community Involvement

This overarching success factor builds on the assumption that communities’ knowledge of “what works” in their communities can lead to informed plans. Active involvement of communities and stakeholders may be in the form of developing social approval for anti-corruption-enhancing behaviours.

c) Targeted and tailored

Researched evidence (Friend and Levy 2002, Marshall et al 2004, Milat et al 2005, Noar et al 2007) recommends that mass media interventions should be targeted and tailored to suit the requirements of those whose behaviour it aims to influence. They indicate that targeted and tailored programs are more successful than those without clarity over targeting, which are hence considered to be generic. They further suggest that definition of communication content and tools should come after identification of key groups of people whose behaviour mass media campaign aims to influence.

d) Consider all influencing factors

There is consistent evidence (Niederdeppe et al 2008, Michie et al 2009, Quigley et al 2007, Randolph and Viswanath 2004, Sowden 2009) from the literature which recommends the need to understand and consider all factors that will, or are likely to, influence the target group. There are examples from the literature where failure to address these factors has been a barrier to effective communication. To arrive at this; scholars suggest a formative research to understand target audience perspectives on media use preferences. As part of influencing factors, it is important to consider the literacy needs, language preferences and other cultural values of the target audiences.

e) Appropriate and supportive environment

There is good evidence (Randolph and Viswanath 2004, Sowden 2009) from the literature which recommends the need to create an appropriate and supportive environment for the target audience to be exposed to, and to make, the recommended change.
A recommended implementation plan requires that processes are in place to identify, and target, barriers (social, educational, physical, environmental, policy and process) that prevent the target audience from making the recommended change. For ACAs in Kenya, this would mean analyzing all the factors within the social, educational, cultural and political contexts in the communities and populations upon which they are administering the anti-corruption initiatives.

**f) Comprehensive and integrated strategy**

An integrated strategy which utilises a range of creative interventions should be considered. There is consistent evidence from the literature (Marshall et al 2004, Milat et al 2005, Niederdeppe et al 2008, Noar et al 2007, Sowden 2009) which recommends that mass media interventions should be supported by multiple interventions and a range of products. These should aim at maximizing the exposure of campaign messages to the target audience. Media campaigns can achieve this via paid or donated media time or space. This could be complemented with other media products and other IEC materials. There is also need for complementary other programs such as: community mobilizations, social support, advocacy, policy changes and access.

**g) Assessment and analysis**

The need for rigorous assessment and on-going analysis of an anti-corruption initiative(s), as part of process analysis and exploring opportunities for change, has been paralleled in the literature (Michie et al 2009, Quigley et al 2007, Randolph and Viswanath 2004). While it is important to identify any expected behaviour change, other process markers of success (or lack thereof) of initiatives, such as exposure, are equally important to capture. Inadequate analysis during the developmental and implementation stages of a communication initiative can be a significant barrier to success. This ought to be conducted at all stages of communication plan design i.e. the assessment of initiative objectives, ensuring a clear
justification (based on evidence) for communication initiative and having provisions for on-going and regular evaluations. The evaluation may focus on effectiveness (including cost-effectiveness), equity, safety, acceptability and feasibility of the initiative.

2.3.2. Effecting an anti-corruption communication plan

Effective communication efforts develop vision statements, with the participation of stakeholders and beneficiaries, to set forth the direction that the team should follow and to define clearly and succinctly how the communication activities will affect the broader program/anti-corruption initiative environment. Brunson and Shindler, 2004 suggest that a program/anti-corruption initiative mission statement is also developed to translate the overall thrust of the strategic vision into more management-oriented goals and objectives. Based on the critical success factors above, a sound anti-corruption communication plan encompasses:

a) Analysis of the situation:

This section should help the communication planner identify: i) Purpose (anti-corruption situation that the program is trying to improve) by conducting the analysis so as to identify and understand the specific anti-corruption problem that will be the focus of the proposed communication effort. This should be considered in the context of the overall strategic vision. ii) Key anti-corruption issue(s) (Behaviour or change that needs to occur to improve the situation). This requires having a clear perception of its extent and severity as well as of the behaviours that will prevent and treat the problem. iii) Context (Strengths, Weaknesses, Opportunities, and Threats [SWOT] that affect the anti-corruption initiative situation) iv) Gaps in information available to the program planners and to the audience that limit the program’s ability to develop sound strategy. These gaps will be addressed through research in preparation for executing the strategy v) Formative Research (New information that will address the gaps identified above). Other key issues when conducting situational analysis are described below:
Identifying known barriers to change

Jacobson 2005, Dragon A.G 2001 confirm that understanding the barriers to change—even those that may be beyond the ability of communication to change—is important for making strategic communication decisions. This knowledge will help anti-corruption agencies estimate the degree of change that can be achieved within a given timeframe. Often one of the main barriers to adopting behaviours is the fact that the audience is pre-knowledgeable. Scholars McKee et.al agree that it is vital to consider barriers that go beyond awareness and knowledge and consider categories that give a more complete picture of the situation.

Environment Scan

A critical step in analyzing the situation is to assess key aspects of the environment where the strategy will be implemented. The following considerations should be clarified as part of the process of assessing the environment. These are: availability, accessibility, acceptability and utility of proposed channels and tools of communication to the diverse of potential audiences. Others are the social, economic, and political conditions that can limit anti-corruption communication. Among the issues suggested by scholars are: Crime levels, state of unemployment, poverty levels, and social upheavals.

Summarizing the SWOT

The last step is to summarize lessons learnt so as to form a foundation for designing an anti-corruption communication strategy. It is good to take a participatory approach by involving colleagues and other stakeholders in creating this list. This can essentially cover a review of financial, human, and technological resources that can be devoted to the communication initiative (Yonkler, J. 1998).
b) Determining audiences

This stage is crucial in the overall planning process. The primary audience for a communication strategy will usually be the people who are at risk of or who are suffering from a particular anti-corruption issue e.g. bribes in service delivery. To help identify potential audiences Dagron, A. G. (2001), suggests the need for review of available research about the extent of the condition. Sources of this information include the corruption perception indexes and national surveys. A world renowned communication scholar McGuire, 1969, 1989 opines the need to identify common audience characteristics and grouping them into clusters such as age range, gender, occupation, residence, as well as by lifestyle and access to print, radio, and television media.

It is important to ensure that the analysis is gender-sensitive by considering the different gender roles and relationships among potential audience members. Potential audience groups should be assessed on the degree of perceived social support, which can play an important role in an individual’s ability to change. Identification of influencers to the anti-corruption initiative’s potential audiences should be sought and can be achieved through research as well as feedback on previous anti-corruption initiatives. Eventually for each audience cluster, information should be sought that identifies current anti-corruption behaviours and compared with desired or recommended behaviours.

c) Setting Behaviour Change objectives

Behaviour change objectives are short, clear statements of the intended effect of a communication initiative. It is advised to link the objectives to the outcome or evaluation measures developed for the communication program/ initiative, (Bertrand, J. T. & Kincaid, D. L. (1996)).
Emphasis is laid on the identification indicators that will help measure progress toward objectives, while simultaneously demonstrating the program’s contribution to the overall anti-corruption situation in a given community, region, or country, (Piotrow, Kincaid, Rimon, & Rinehart, 1997). While adhering to the SMART criteria, timeframes should be set that give people enough time to change. Firstly, the anti-corruption agency personnel should identify what they want to achieve by communicating with the public. Objectives may be classified for instance as (1) building awareness or (2) influencing attitude or behaviour change (Atkins 2001, Rogers 2003). Each will be a worthy objective in relation to organizational strategic mission and vision, and each requires a different outreach approach. These scholars opine that strategic communication objectives may be stated in terms of months or years while anti-corruption communication initiatives will often have a shorter duration.

d) Reviewing the key stakeholders

Behaviour change communicators use positioning to determine the best approach to motivate audiences to change or adopt a specific behaviour, (Ries, A. & Trout, J. (1981)) . Taken into context, once communicators in the ACAs have determined the objectives for an audience they need to think about which stakeholders are to be involved and how they are going to position the behaviour to achieve the objectives and maintain the long-term identity. Closely intertwined with the long-term identity, key stakeholders will use their existing networks established that resonate in the minds of the audience an image of the desired behaviour that helps the audience remember it, learn about it, act upon it, and advocate for it. A stakeholder mix has to therefore resonate with the audience, differentiates from the competition, stands out as better than the known single efforts, and provides a benefit that is worth the cost or effort, (Aaker, D. A. (1996).
e) **Message Brief**

A message brief is a summary document that the communication team develops and shares with experts at an advertising agency, PR agency, creative writers and designers, or any other organization or person involved in message development, (Williams, J. R. (1992)). The creative experts use the message brief as a springboard for developing creative concepts. The more precise the message brief is, the more likely it is that the communication will be effective. A “tight” message brief leaves nothing to interpretation and is incapable of being misunderstood. A well-crafted message brief allows the creative experts to explore a variety of approaches, as opposed to a loosely worded brief that confuses the creative experts and leaves them wondering what the client really wants and needs.

To communicate effectively with the intended audiences, the messages need to be on: strategy, relevant, attention getting, memorable, and motivational. All messages, regardless of how they are delivered or by whom, should consistently contain the same core information, (Niederdeppe et al 2008). The message brief presents a way to summarize for the creative experts what we know about the anti-corruption issue and the communication needs of the audience. The message brief also outlines the key fact that will lead to the desired behaviour change and the promise or benefit for the intended audience that ideally will motivate it to adopt the change. Communication team members then define the support for the promise and develop a statement of the ultimate and lasting impression that the audience will take away from the message. It is also expected that the key message points that will be included in all communication delivered by the partners who will implement the strategy.
f) Communication Mix (Channels and tools)

Research indicates that individuals rely upon particular communication channels during these different decision stages (Rogers 2003, Lasswell). Shari Cohen while assessing the effectiveness of diverse media, agrees that the focus here is on identifying and assessing potential resources that can help Anti-Corruption Agencies carry out a communication program. According to O’Sullivan, G.A., Yonkler, J.A., Morgan, W., and Merritt, A.P (2003), communicators define communication channels broadly as a delivery system for messages to reach intended audiences. They have categorized them as “interpersonal,” “community-oriented, “and “mass media.” The latter two channels are particularly effective when the goal is to change community or cultural norms.

**Interpersonal channels** focus on either one-to-one or one-to-group communication. One-to-one channels include peer to peer, citizen to citizen, and anti-corruption agency to citizens. An example of one-to-group communication may be a community-based anti-corruption sensitization public forum.

**Community-oriented channels** focus on spreading information through existing social networks, such as a family or a community group. This channel is effective when dealing with community norms and offers the opportunity for audience members to reinforce one another’s behaviour.

**Mass-media channels** reach large audiences. They are particularly effective at agenda setting and contributing to the establishment of new social norms. Formats range from educational to entertainment and advertising, and include: television, radio, and print media, such as magazines, newspapers, outdoor and transit boards, the Internet, and direct mail.

**Mass, unidirectional outreach** methods (e.g., public service announcements (PSAs), brochures) are particularly useful in the first stage when individuals seek basic information about new practices; interactive communication approaches (e.g. personal contacts, guided
field trips) are more likely to increase citizen support or encourage behaviour change). Accordingly, mass or unidirectional messages can be effective at generating recognition of an issue, sensitizing participants to later messages, and encouraging people to seek additional information (Atkin 2001, Rogers 2003).

In limited cases, mass communication methods can influence attitudes among already supportive audiences or among individuals who understand little about an issue (Toman and Shindler 2005). It ought to be decided which communication channels and tools best will reach the intended audience, Kim, Y. M., Lettenmaier, C., & et al. (1996). It is also advised to ensure there is clear justification (based on evidence) for message and choice of the communication mix (design, development and implementation).

g) Management Plan

Greenberg, R. H., Williams, J. R., Yonkler, J. A., Saffitz, G. B., & Rimon II, J. G. (1996) tells us that identifying the lead organization requires a start by identifying the key functional areas and skills that need to be in place to carry out the strategy. The group designated as the lead organization is often responsible for the overall coordination of the strategy design and implementation. Within this organization, one manager is typically designated as the contact person through whom all information should flow. The contact person often makes sure that all activities are on strategy, within budget, and on schedule and that all partners are involved and kept up-to-date. This organization will write the management plan, coordinate with other groups to implement the plan according to an agreed-upon timeline and budget, and keep the management plan on track.

The lead organization is usually responsible for obtaining all necessary approvals for activities. It often serves as a focal point for issuing status reports and for alerting other groups to problems and issues that require attention.
It is important to clearly set out which process and outcomes will be measured and how they will be captured. Ensuring provisions for on-going and regular evaluations are considered and lessons from these processes “feed-back” into the initiative. The evaluation may focus on effectiveness (including cost-effectiveness), equity, safety, acceptability and feasibility of the plan. Evaluations of these factors are place-dependent and can vary over time and across locations. Accordingly, activities acceptable in one situation may be unacceptable elsewhere (Brunson and Shindler 2004).

2.4 SUMMARY
What the literature emphasizes in this section is the development of comprehensive, long-term approach to anti-corruption initiatives through well-defined communication strategies. This ought to respond appropriately to audience needs while putting into context the operating environment of anti-corruption agencies. A sound and effective anti-corruption communication strategy/plan should be based on an overarching vision of what needs to be achieved to promote a particular anti-corruption initiative. The strategy should be integrated, have a long-term focus, be responsive to individual behaviour change needs, and should maximize the potential for change on a broader societal level. If the above principles are observed in promoting anti-corruption initiatives, the ACAs shall create sustainable efforts that improve anti-corruption outcomes, (Gimon et.al).

2.5 THEORETICAL FRAMEWORK
Based on the above literature; use of theoretical models in anti-corruption communication plans can influence target audiences’ behaviour by influencing the determinants leading to that behaviour (Noar et al. 2007, Randolph and Viswanath 2004, Sowden 2009).
2.5.1 Communication-Persuasion theory

The communication–persuasion model was advanced by McGuire in 1976 and its uses are predominately found in the field of advertising. The key propositions of the theory are advanced around Lasswell’s Communication theory which explores “who says what, in which channels, to whom, and with what effects.” In addition to investigating how messages are created, transmitted, received, and assimilated; a relationship is drawn within external and internal factors such as individual attitudes or beliefs and demographic characteristics such as age or ethnicity that affect communication. Its application has seen the examination of consumer behaviour in response to messages; for example, Kaphingst et al. (2004) uses McGuire’s communication–persuasion matrix to help analyse direct-to-consumer television prescription drug adverts. Further, this theory has guided public health communication particularly in using mass media (Elder 2001).

Corcoran 2007, has described the model as an input-output matrix that can be manipulated and measured to achieve a change. According to the scholar the communication under this theory ‘input’ factors contain five separate stages of communication: source, message, channel, receiver and destination. These input variables thus provide options for ACAs practitioners to select and manipulate. These ‘input’ variables are the main step in achieving the ‘output’ variables.

The output variables (or stages) are a sequence of events that, according to McGuire (2001), must take place in an order (1 Tuning in -Exposure to the message 2 Attending -Paying attention to the message 3. Liking -Liking and being interested in the message 4. Comprehending - Understanding the message 5. Generating Related cognitions 6 Acquiring - Gaining the appropriate skills to act on the message 7. Agreeing -Agreeing the message is correct 8. Storing -Saving the message to memory 9. Retrieval -Retrieval of the message from memory when needed 10. Decision Acting on the message 11. Acting Performing the action
12. Post-action Integration of the action into behaviour 13. Converting - Advising others to behave likewise) to enable the message to have an effect and a change to happen. It is assumed that a person cannot, for example, complete step 6 (acquiring relevant skills) without first completing step 2 (attending to the communication). McGuire is proposing that all of these stages must be completed to reach the final stages of 11 (acting on the message) to 12 (post-action cognitive). The advantage of this model is that it has clear planning stages that can be followed in order to obtain an outcome.

For example, Bull et al. (2001) used the communication persuasion matrix and found that there were a number of features of printed health education materials that can lead to behaviour change in overweight adults. Similarly communication initiatives by ACAs can be tailored to deduce the desired anti-corruption behaviour change in the society. This suggests that these might be areas to focus on when designing anti-corruption communication plans to enable progression through the stages of the matrix. Alcalay and Bell (2000) propose that one advantage of this module is that evaluation has to be included in the communication strategy as it is built into the model. The model can also help practitioners to identify and consider channels and strategies that can influence the campaign outcomes. Given the emphasis on each stage, each message stage can be examined for impact, appropriateness and effectiveness.

2.5.2 Diffusion of Innovations Theory

The theory addresses how new ideas, products, and social practices spread within an organization, community, or society, or from one society to another. According to E.M. Rogers, diffusion of innovations is “the process by which an innovation is communicated through certain channels over time among the members of a social system.” It is hypothesized that diffusion can expand the number of people who are exposed to and reached by successful anti-corruption interventions, strengthening their preventive skills.
In practice, diffusion of innovations that prevent corruption risks and promote integrity behavior requires a multilevel change process that usually takes place in diverse settings, through different strategies. At the individual level, adopting an acceptable value system usually involves lifestyle change. At the organizational level, it may entail starting programs, changing regulations, or altering personnel roles.

At a community level, diffusion can include using the media, advancing policies, or starting initiatives. According to Rogers, a number of factors determine how quickly, and to what extent, an innovation will be adopted and diffused. By considering the benefits of an innovation, practitioners can position it effectively, thereby maximizing its appeal. Effective diffusion requires practitioners to use both informal and formal communications channels and a spectrum of strategies for different settings. Disseminating an innovation in a variety of ways increases the likelihood that it will be adopted and institutionalized. Through the two-step flow of communication, information from the media moves in two stages. First, opinion leaders, (who in our case can be the managers or officers of anti-corruption agencies); who pay close attention to the media, receive the information and convey their own interpretations, as well as the media content, to others for desired action.

Rogers wittingly described the process of adoption as a classic “bell curve,” with five categories of adopters: innovators, early adopters, early majority adopters, late majority adopters, and laggards. When an innovation is introduced, the majority of people will either be early majority adopters or late majority adopters; fewer will be early adopters or laggards; and very few will be innovators (the first people to use the innovation). Similarly anti-corruption communication plans should seek to identify the characteristics of people in each adopter category, and more effectively plan and implement strategies that are customized to their needs.
2.5.3 Relevance of the theories to the study

The theories describe the framework for effective design and dissemination of communication initiatives. Social Behaviour Change communication experts propose that targeted communication campaign can trigger change of behaviour. Nisbet and Gick (2008: 297) summarize that ‘in order for behaviour to change, people must feel personally vulnerable to a threat, view the possible consequences as severe, and see that taking action is likely to either prevent or reduce the risk at an acceptable cost with few barriers”. Effective implementation of the communication and diffusion of innovations theory models would lead to successful advocacy and communication strategies that aim to influence decision makers at various levels; at international, regional, national or local levels.

By combining the models of anti-corruption agencies communicators can have a bigger impact. This ought to be extended into on-going and regular evaluation in order to ensure that appropriate outcomes are achieved. Further, the plans should be underpinned by citizens’ involvement, engagement and partnership with key stakeholders (Marshall et al. 2004, Milat et al. 2005, Quigley et al 2007, Niederdeppe et al. 2008, Wakefield et al. 2003).

It is recommended that the community be involved in the development, implementation and evaluation of communication campaigns so as to be informed by communities’ knowledge of “what works”. This may be in the form of developing social approval for transparency-enhancing behaviours, promoting access (such as leisure activities) and developing and maintaining networks. This study seeks to examine whether the EACC adheres to the procedures prescribed by the two theories.
CHAPTER THREE: METHODOLOGY

3.1 INTRODUCTION
This chapter discusses the research methodology and design that was used to collect data. It gives a description of the study area, data sources and the procedures employed to gather it, the sample design, data analysis and presentation process.

3.2 CASE STUDY SELECTION AND DESCRIPTION
The study was conducted in Kenya with a focus on the Ethics and Anti-Corruption Commission (EACC). The institution was selected as it is the constitutional commission (anchored in article 79 of the constitution of Kenya 2010) mandated to promote ethics and integrity. Key anti-corruption initiatives in a period of ten (10) years (2003-2013) were in focus by assessing their communication planning processes and principles that were observed or not. This decade marked a period of reforms that were occasioned by regime changes and the realization of the new constitution in 2010.

3.3 DATA SOURCES AND COLLECTION METHODS
Data was collected from the Ethics and Anti-Corruption Commission, key informant interviews and document reviews.

3.3.1 Document Review
Document review was conducted to examine the use of recommended communication planning principles in relation to anti-corruption initiatives. Collection of data was done in the first month of study (July 2014). Key documents of the EACC reviewed included: strategic plans, annual reports and relevant literature on anti-corruption strategies in the period 2003-2013. These are official published documents accessed from the anti-corruption agency website and the resource centres.
3.3.2 Key informant interviews

The researcher targeted key designers and implementers of anti-corruption initiatives and communication plans among them: policy makers, Chief Executives, Communication officers and implementing programme officers. The researcher visited EACC offices in the second month of the study (August 2014) to inform and seek authorization to access relevant content and be accorded key informant interviews. The same was done with other respondents. A checklist of pre-tested interview questions was applied to ensure the interviews were streamlined around specific themes. Interview schedules were designed and shared in advance with respondents for purposes of advance preparation in delivery of accurate information. The respondents opted for various communication methods: face to face, phone and skype. The moderator started with providing the background information and posing a broad question before moving to more specific issues, encouraging open and easy discussion to bring out true feelings and thoughts. Although it was not the major data collection method due to the nature of the research, the method proved useful in providing insight to research objectives and collected data on: availability, procedures and methods used in testing, implementation, monitoring and evaluation of the communication plans or lack of.

3.4 SAMPLE DESIGN AND SAMPLING PROCEDURES

The following sampling methods were applicable under each key data source.

3.4.1 Document Review

Using a systematic sampling technique, key anti-corruption initiatives were enumerated over the past 10 years (2003-2012) and examined with corresponding communication plans or lack of. The document review procedure included: development of content categories, units of analysis and coding schedules. The anti-corruption initiatives were thematically arranged in 3 classes/categories as shown in Table 3(i) below:
Table 3(i) Thematic classification of anti-corruption initiatives

The universes of initiatives (2003-2013) were then analyzed against 8 coded key communication strategy elements as shown in Table 3 (ii) below: These were analyzed using percentages attained against the aggregate formulae in Appendix B.

<table>
<thead>
<tr>
<th>Class</th>
<th>Category</th>
<th>Activities/Initiatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Public Education and Awareness</td>
<td>{ Community Outreach, Sensitization Programmes, IEC, BCC materials, Workshops, }</td>
</tr>
<tr>
<td>B</td>
<td>Training, Research, Advocacy and Governance</td>
<td>{ Trainings, Surveys, Capacity Building, Seminars, Lectures, ICT }</td>
</tr>
<tr>
<td>C</td>
<td>Media and Public Relations</td>
<td>{ Shows, Radio, TV, branding, Campaigns, Press, Video/Documentaries }</td>
</tr>
</tbody>
</table>

Table 3(ii): Codes and communication strategy units of analysis (above)
3.4.2 Key Informant Interviews

A sample size of 10 anti-corruption key informants in institutions comprising of the private sector, civil society and government were systematically selected (based on their category, expertise, roles and experience) and interviewed. The information obtained was used to compliment data emanating from the document review. Table 3 (iii) below provides a description of the key informants.

<table>
<thead>
<tr>
<th>Category</th>
<th>Number of informant interviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Sector</td>
<td>2</td>
</tr>
<tr>
<td>Civil Society</td>
<td>2</td>
</tr>
<tr>
<td>Private Sector</td>
<td>2</td>
</tr>
<tr>
<td>Anti-Corruption Experts</td>
<td>2</td>
</tr>
<tr>
<td>Public</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>10</strong></td>
</tr>
</tbody>
</table>

*Table 3 (iii): Key informants targeted*
3.5 DATA ANALYSIS AND PRESENTATION

The collected data was analyzed both analytically and descriptively while interviews were qualitatively analyzed based on the merit of the extent to which they addressed the research objectives. Correlation analysis technique and the aggregate formulae were used to measure the degree of communication planning in the agencies visa-a-vis anti-corruption initiatives conducted/held. The technique was used because it helped the researcher predict and describe the association between the two. Information is presented in chapter four.
CHAPTER FOUR: DATA PRESENTATION AND ANALYSIS

4.0 INTRODUCTION
This chapter concentrates on presentation and correlational analysis of the data collected through
content analysis and key informant interviews methods. The analysis of data is aimed at
responding to research objectives by identifying the effect of communication strategy planning
on anti-corruption initiatives by anti-corruption agencies. The data is presented in tables, graphs,
scatter diagrams and pie-charts.

4.1 DOCUMENT REVIEW FINDINGS
Interrogating the annual reports 2003-2013 and strategic plans (2006-2009, 2009-2013 and 2013-
2018) reflects the following results as shown in table 4 (i) below:

Key for table 4 (i):

a. Classes A,B,C represent thematic categories of anti-corruption initiatives as provided for
in table 3(i) above where: A represents- Public Education and Awareness, B represents –
Training, Research, Advocacy and Governance and C Represents- Media and Public
Relations,

b. The codes SA1,AS2,SO3,SA4,MB5,CM6,MP7 and M&E 8 represent the 8
communication strategy elements as provided for in table 3 (ii) above.

c. A shaded (ticked) box shows that a principle was observed while absence shows that it
was not observed).
## Table 4 (i): Document Review Findings

<table>
<thead>
<tr>
<th>Year</th>
<th>Class</th>
<th>Communication Planning Principles Observed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>SA1</td>
</tr>
<tr>
<td>2003/04</td>
<td>A</td>
<td>√</td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2004/05</td>
<td>A</td>
<td>√</td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2005/06</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2006/07</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2007/08</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2008/09</td>
<td>A</td>
<td>√</td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2009/10</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2010/11</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2011/12</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>2012/13</td>
<td>A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C</td>
<td></td>
</tr>
</tbody>
</table>
The following are Annual Class (Table 4 (ii)) and Communication strategy element (Table 4 (iii)) performance according to findings in Table 4 (i) above:

a) Level of anti-corruption communication planning by ACAs

<table>
<thead>
<tr>
<th>Year</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>Aggregate %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003/2004</td>
<td>4</td>
<td>3</td>
<td>4</td>
<td>46%</td>
</tr>
<tr>
<td>2004/2005</td>
<td>6</td>
<td>4</td>
<td>5</td>
<td>63%</td>
</tr>
<tr>
<td>2005/2006</td>
<td>4</td>
<td>5</td>
<td>4</td>
<td>54%</td>
</tr>
<tr>
<td>2006/2007</td>
<td>4</td>
<td>4</td>
<td>5</td>
<td>54%</td>
</tr>
<tr>
<td>2007/2008</td>
<td>5</td>
<td>4</td>
<td>6</td>
<td>63%</td>
</tr>
<tr>
<td>2008/2009</td>
<td>3</td>
<td>2</td>
<td>3</td>
<td>33%</td>
</tr>
<tr>
<td>2009/2010</td>
<td>2</td>
<td>3</td>
<td>2</td>
<td>29%</td>
</tr>
<tr>
<td>2010/2011</td>
<td>5</td>
<td>4</td>
<td>3</td>
<td>50%</td>
</tr>
<tr>
<td>2011/2012</td>
<td>6</td>
<td>5</td>
<td>4</td>
<td>63%</td>
</tr>
<tr>
<td>2012/2013</td>
<td>5</td>
<td>6</td>
<td>-</td>
<td>45%</td>
</tr>
<tr>
<td>Aggregate</td>
<td>55%</td>
<td>50%</td>
<td>45%</td>
<td>50: 50</td>
</tr>
</tbody>
</table>

Table 4 (ii) Annual Class Analysis: 8 Represents 100 %

The table is a numeric extraction of how the initiatives in Class A, B, C performed annually in observing the 8 communication strategy elements. Each element such as Situation Analysis or SA1 represents a score of 1 and for each year, the maximum expected number of score is 8 which is an equivalent of 100%. An average % mean score has been tabulated across every year and subsequently aggregated against the total number of occurrences or the years under study i.e. 2003-2013. On the other hand, class performance has been aggregated and a % calculated to determine how different initiatives performed across in the decade under study. (The research found that if this aggregate is properly tabulated it is equivalent to individual element performance and can be demonstrated by the aggregate in Table 4 (ii) and that in Table 4 (iii). See more in appendix B)
The table above shows a highest score of 6 or 75% out of 8 (100%) with a lowest score of 2 out of 8 or 25% in some class of initiatives for a complete communication strategy formulation. This implies that other stages are either undocumented or unobserved.

Annually, the year 2004/05 and 2007/2008 share the highest score of 63% in observing the recommended communication strategy principles. However other years score below average with a lowest score of 29% in the year 2009/2010 being observed. This has weighed on the annual performance to just an aggregate weight of 50 with the highest being 100.

**Line representation of annual class performance**

![Graph 1: Annual performance per class of initiatives](image)

*The graph represents how each class performed across all the years based on the number of elements observed in each.*

Graph 1 above, shows a steady trend in annual planning in Class A initiatives, while Class B has some consistency, decline and increase across the years and Class C experiencing extreme deviations and could be alluded to the ad-hoc manner in which the initiatives in class C are conducted.
The graph shows that increase in planning under any of the initiatives reflected on the other initiatives while the reverse is true.

Overall, initiatives in class A are highest scorers across the years with 55% while those in B and C score 50% and 45% respectively and the % share is shown in the pie chart below:

**Annual share score per class:**

![Annual Share Score Pie Chart](image)

*Chart 1: Annual Share per class above. (The chart above is a representation of the overall share of the classes based on the total average score of individual classes).*

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2003/2004</td>
<td>46</td>
<td>63</td>
<td>54</td>
<td>54</td>
<td>63</td>
<td>33</td>
<td>29</td>
<td>50</td>
<td>63</td>
<td>45</td>
</tr>
</tbody>
</table>

*Graph 2: Annual aggregate (shows progress in annual average scores scores).*
An aggregate top score of 63% is shared in the calendar years 2004/2005, 2007/2008 and 2011/2012 while the least score of 29% is attracted in the year 2009/2010.

This indicates that there was some inconsistency in annual communication strategy planning as there was no steady increase, decline or stagnation.

b) Communication planning principles observed by ACAs

Table 4 (iii) below shows performance of anti-corruption initiatives in observing communication planning elements: 10 is the maximum frequency and represents 100 %

<table>
<thead>
<tr>
<th>Element</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>Aggregate $(A+B+C/30)*100$</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA1</td>
<td>3</td>
<td>6</td>
<td>-</td>
<td>30%</td>
</tr>
<tr>
<td>AS2</td>
<td>9</td>
<td>9</td>
<td>7</td>
<td>83%</td>
</tr>
<tr>
<td>SO3</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>33%</td>
</tr>
<tr>
<td>SA4</td>
<td>5</td>
<td>7</td>
<td>3</td>
<td>50%</td>
</tr>
<tr>
<td>MB5</td>
<td>9</td>
<td>5</td>
<td>9</td>
<td>77%</td>
</tr>
<tr>
<td>CM6</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>63%</td>
</tr>
<tr>
<td>MP7</td>
<td>-</td>
<td>2</td>
<td>2</td>
<td>13%</td>
</tr>
<tr>
<td>M&amp;E8</td>
<td>7</td>
<td>4</td>
<td>4</td>
<td>50%</td>
</tr>
<tr>
<td>Aggregate (Sum/80*100)</td>
<td>55%</td>
<td>50%</td>
<td>45%</td>
<td>50: 49.875</td>
</tr>
</tbody>
</table>

Table 4 (iii) Element Analysis per class

The table is a numeric extraction of the scores of the eight elements and how they were observed under each class of initiatives in the 10 years under study. For instance it was hoped that Situational Analysis or SA1 was expected to have been observed 10 times in each class or 100 % (hence a total of 30 times in the three classes). The average score has been tabulated and calculated into a percentage % to reflect the overall performance of the element. An aggregate value has been calculated totaling all the 8 elements and the value found holds true to the aggregate score in Table 4 (ii.) (See more in Appendix B)
Table 4 (iii) above illustrates how the communication strategy elements are being weighed against the initiatives in A, B, C with an aggregate ratio of 50 which is average with the highest being 100.

The aggregate ratio value of 50 in designing and implementing communication plans and a range of 63%–29% across the 10 year period confirms the dis-connect between anti-corruption efforts and social behaviour change.

On the elements observed, Audience Segmentation and Message Briefs are top scorers at 83% and 77% while management plans score the lowest at 13%. Situational Analysis, Strategic Objectives, Communication Mix, Stakeholder Analysis and M&E attain 30%, 33%, 63%, 50% and 50% respectfully.

Initiatives under class A are top in observing the communication planning elements with a score of 55% constituting 37% share while B and C share score 50% and 45% respectively.

*Graph 3 below shows how the elements performed across the classes*
Graph 4: Shows individual element performance across the classes

There is a significant relationship in performance where low, average or high scores in one class was reflected across the classes.

Pie Chart Presentation of Class Initiative Performance

Initiatives in Class A i.e. Public Education initiatives outdo the others (Classes B & C) in planning and could be attributed to being the core function of the EACC which is embedded in the strategic plan and has been repeatedly done over the years.
4.2 KEY INFORMANT INTERVIEWS
A total of 10 key informant interviewees participated in the study and key findings are as below:

4.2.1 Findings from key informant interviews.
On anti-corruption communication planning by state anti-corruption agencies in promotion of anti-corruption initiatives: Key informant interviewees were in agreement that there is a great significance of communication planning for effective anti-corruption work. This was confirmed by the Deputy Director for Communications at the Ethics and Anti-Corruption Commission who reiterated the commission’s commitment on anti-corruption for public awareness and advocacy. Experts from private, civil society and public sectors also observed that state ACAs have not been observing all the critical success factors in designing communication plans hence leading to “poor” or “dismal” performance in the outcomes. There was an acknowledgment of the ever growing appreciation of efforts by ACAs in planning communications for anti-corruption initiatives. However, performance of ACAs is deemed average (as can also be deduced from Table 3 (vi) ) compared to resources and time spent within the 10 year period.

On communication principles observed by state anti-corruption institutions with a specific focus to major anti-corruption initiatives: key informant interviews observed the clarity of the messages and tools that ACAs used to convey to the public but were quick to acknowledge that these were unidirectional.

On communication planning challenges faced by state anti-corruption institutions in conducting anti-corruption initiatives: most respondents agreed that inadequate: documentation, situational analysis, Monitoring and Evaluation of communication planning process were contributing factors to low yields in enhancing anti-corruption behaviour. It is noteworthy to mention that respondents appreciated other environmental factors such as the economy and political will that contribute to corruption prevalence/behaviour.
4.3 SUMMARY
Analysis shows no evidence of a documented communication strategy for all or any of the initiatives under the class A, B, C in the period 2003-2013. This however does not mean absence of planning as some information on communication strategy elements such as objectives, stakeholders, activities and communication mix can be found in the strategic plans and annual reports.
CHAPTER FIVE: CONCLUSION AND RECOMMENDATIONS

5.0 INTRODUCTION
This chapter summarizes the results and interpretation of the findings in the context of research objectives, theoretical framework and implications to the subject of inquiry. The discussions are outlined in accordance with each research question presented in the study. Recommendations and conclusions are presented as well as suggestions for further research.

5.1 SUMMARY
This study examined the anti-corruption communication planning by state anti-corruption agencies in Kenya. A case study of the Ethics and Anti-Corruption Commission was undertaken to act as a representative sample. In general, the findings re-affirm the SWOT analysis in the EACC strategic plans 2006-2009, 2009-2013 and 2013-2018 that inadequate and or lack of communication strategy is a weakness in effecting anti-corruption initiatives.

Discussion of findings

a) How state anti-corruption agencies plan their communications when undertaking anti-corruption initiatives

It was observed that ACAs conduct numerous communication activities which can be thematically classified into three: a) public education and awareness-Class A, training, research and advocacy –Class B and Media and Public relations- Class C. While there is no documented communication strategy, annual reports and the strategic plans reveal some element of planning as shown in table 4 (i). This explains why there is a below average aggregate score of 49.835 or absence of some communication planning elements across the 10 year period. This implies that most ACAs assume that strategic plans or departmental plans can or do replace the communication strategies. It is noteworthy to mention that ACAs know their target audience, communication channels to use and the messages they want to
broadcast as these recorded the highest scores of 83%, 63% and 77% respectfully. However, in light of the communication persuasion theory only the 1st phase (input factors) can be addressed by the amorphous planning i.e. 1. Source -Demographics, credibility, attractiveness 2. Message -Appeal, organization, style 3. Channel -Type of media used, i.e. television 4. Receiver -Demographics, social/psychological factors and 5. Destination. This technically leaves other factors: acquiring, storing, retrieval, decision, acting, post-action and converting. Consequently, inadequate adherence to all the communication planning elements leads to low yields in achieving intended outcomes and social behaviour change towards anti-corruption.

b) Communication principles observed by state anti-corruption agencies in implementing anti-corruption initiatives

Some of the key communication principles observed included audience knowledge, clarity and completeness of the messages, purpose and objectives of communication as shown in graph 2 and 3. This was deduced in some of the radio/TV infomercials and IEC materials that were in distribution and highlighted in appendix F. It is hard to tell if the messages would attract a seamless progression through the stages of the communication persuasion theory matrix. On the other hand, on account of the diffusion of innovations theory, the “innovation” or anti-corruption message as it is being transmitted across the channels and its exposure to society by the early adoptors would be linked to the high number of corruption related reported cases. This can be however affected as there are no management plans in place to coordinate and ensure feedback is shared for constant monitoring and during the evaluation stage. This is confirmed by the low score of 13% in effecting this key element.

However, key informant interviews confirmed starting and reevaluation of programmes, altering personnel roles to meet the new innovation demand in the public. At community level, multiple channels have been used to communicate the anti-corruption initiatives such as barazas and integrity clubs in primary schools. This shows that the anti-corruption
practitioners have started using both informal and formal communications channels and a spectrum of strategies for different settings. This ultimately increases the likelihood that the innovation will be adopted and institutionalized.

**c) Communication planning challenges facing state anti-corruption agencies facing in achieving their mandate**

a) A multi-verse of competing issues such as culture, ethnicity and poverty have negatively impacted measurable anti-corruption social behaviour change. Key informant respondents acknowledged that these caused a huge dis-connect between anti-corruption efforts and results owing to perceived appreciative actions by different “publics” such as condoning of tokens in African culture.

b) Low or negative public perception of ACAs work hence taking time to endear/ attract public support. This was attributed to perceived failure to ensure accountability in major corruption scandals partly been seen as a manifestation of the lack of independence on the part of EACC, according to key informants, further eroding public confidence.

c) Poor documentation of communication strategy/ communication plans facilitates gaps in implementation of all the elements that have an impact. This has been reflected in the document review and the annual disparities reflected in Table 4 (ii) and an aggregate score of 50. Key elements scoring very lowly include: situational analysis-33%, stakeholder participation-50%, impact based M&E frameworks- 43%, management plans 13% and communication objectives 33%. This could be attributed to inadequate technical expertise, finances (dependent on the exchequer) and failure to integrate environmental and affective factors into the communication plans.

d) Failure to integrate behaviour change theory in the planning leaves gaps in anticipating time of exposure to messages and appropriate channels applicable to each unique
audience in their environmental setting. (0 % of all the communication initiatives in the period of study did reflect on any known theory).

e) Engagement in unclear and less impactful communication initiatives without pretesting such as production of IEC materials. This is occasioned by responses from Key informant interviews and a situational analysis score of 3 or 37% in initiatives in class A.

5.2 RECOMMENDATIONS

5.2.1 State Anti-Corruption Agencies

a) Ensure that further design of anti-corruption communication strategies is documented, participatory and observes all the elements;

b) Undertake qualitative and quantitative research to understand the underlying factors for vulnerability and risk reduction before planning a communication programme and that any foreseeable challenges and recommendations arising from situational analysis and previous research are fully addressed;

c) Commit themselves to integrating social behaviour change theories and the critical success factors in the design of anti-corruption communication plans. The knowing of what communication and behaviour change models would be most effective in altering the target audience’s behaviour and prevent corruption behaviour or practices in the given context and culture;

d) Build commitment and collaborations through community and stakeholder/partner engagement. This will include direct/indirect dialogue, encouraging input and feedback;

e) Respond to financial and human resource constraints by using those communication interventions that are feasible;

f) Systematically and rigorously monitor and evaluate the communication programme. The ultimate proof that a strategic communication effort is effective lies in behaviour
outcomes. Evaluation should be designed to gauge increases in audience knowledge, approval, and adoption of ethical behaviors.

5.2.2 Stakeholders

Ensure that the current and future design of anti-corruption communication plans emerge from a participatory process and commitment to fully comply with roles and responsibilities assigned in the management plans and to honour bi-agency treaty obligations to uphold effective planning, implementation and evaluation of anti-corruption communication initiatives.

5.2.3 School of Journalism and Mass Communication (The University of Nairobi)

To design and implement an Anti-Corruption Communication Planning course under the Special Topics Unit so as to give development communication students’ knowledge, skills an upper-hand in developing communication products and strategies geared towards anti-corruption.

5.3 CONCLUSION
Although multiple efforts and immense resources have been spent by anti-corruption agencies and stakeholders to address corruption, there has been minimal impact. While corruption cannot just be tackled by effective communication planning alone, the findings have proven that inadequate communication strategy planning could be hindering the impact of their initiatives. ACAs should attend to the communication planning gaps identified so as to increase impact. Adhering to the entire spectrum of communication planning elements is critical to the success of anti-corruption campaigns and initiatives.
5.4 FURTHER RESEARCH
The study equally weighted individual communication planning elements; further research can explore how each of the elements impact the total effectiveness of communication strategy plans.
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### 7.0 APPENDICES

**APPENDIX A: Thematic analysis matrix**

<table>
<thead>
<tr>
<th>Class</th>
<th>Category</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Public Education and Awareness</td>
<td>{ Community Outreach, Sensitization Programmes, IEC, BCC materials, Workshops, }</td>
</tr>
<tr>
<td>B</td>
<td>Training, Research, Advocacy and Governance</td>
<td>{ Trainings, Surveys, Capacity Building, Seminars, Lectures, ICT, }</td>
</tr>
<tr>
<td>C</td>
<td>Media and Public Relations</td>
<td>{ Shows, Radio, TV, branding, Campaigns, Press, Video/Documentaries }</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Communication Strategy Element</th>
<th>Steps/Description</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Situation Analysis</td>
<td>Baseline/Research/Key Issue</td>
<td>SA1</td>
</tr>
<tr>
<td>Audience Segmentation</td>
<td>Audience targeting(region,literacy,reach,taste,age,gender,religion,occupation)</td>
<td>AS2</td>
</tr>
<tr>
<td>Setting of Objectives</td>
<td>Communication or Organizational clear /SMART objectives</td>
<td>SO3</td>
</tr>
<tr>
<td>Strategic approach (Stakeholders, Review of Key issue)</td>
<td>Key stakeholders and community involvement</td>
<td>SA4</td>
</tr>
<tr>
<td>Message Brief</td>
<td>Positioning, take away message, format to different audiences</td>
<td>MB5</td>
</tr>
<tr>
<td>Communication Mix (Channels and tools)</td>
<td>Multi-channel Tools: TV, Radio, Print, Other</td>
<td>CM6</td>
</tr>
<tr>
<td>Management plan</td>
<td>Lead/coordination agency and teams, budgets, functional and structural skills</td>
<td>MP7</td>
</tr>
<tr>
<td>Monitoring and Evaluation</td>
<td>Regular and periodic M&amp;E against set objectives and timelines</td>
<td>M&amp;E8</td>
</tr>
</tbody>
</table>
APPENDIX B: Aggregate formulae:

For analysis of the elements and the years against the initiatives; the following formulae was found to hold true:

Where:

- \( n \) - represents the number of elements
- \( f \) - represents the frequency/occurrence
- \( \sum_{n=1}^{n} \) - Summation of elements in each frequency/occurrence
- \( nt \) - Total possible number of elements
- \( \sum_{f=1}^{f} \) - Sum of frequencies of each element
- \( \sum_{t=1}^{t} \) - Total possible number of frequencies

Therefore:

\[
\left( \frac{\sum_{n=1}^{n} f}{nt} \right) \times 100 \equiv \left( \frac{\sum_{f=1}^{f} n}{\sum_{t=1}^{t} f} \right) \times 100
\]

Each element has a score of 1 hence Annual Aggregate performance ratio = \( n \times 1 \)

Or \((A+B+C)/3 \times 100\) in each occurrence. and whereas \(A, B, C\) are symbols of thematic initiatives.

The following tables reflect an ideal situation where all the communication strategy planning elements are observed:

<table>
<thead>
<tr>
<th>Year</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>(\sum_{n=1}^{n} f/\sum_{t=1}^{t} f) * 100</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003/04</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
</tr>
<tr>
<td>2004/05</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
</tr>
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<td>2005/06</td>
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<td>8</td>
<td>100</td>
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<td>2006/07</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
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<tr>
<td>2007/08</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
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<tr>
<td>2008/09</td>
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<td>100</td>
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<td>2009/10</td>
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<td>8</td>
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<td>2010/11</td>
<td>8</td>
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<td>8</td>
<td>100</td>
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<tr>
<td>2011/12</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
</tr>
<tr>
<td>2012/13</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>100</td>
</tr>
</tbody>
</table>

\(\sum_{n=1}^{n} f/\sum_{t=1}^{t} f\) * 100:100

<table>
<thead>
<tr>
<th>Element</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>(\sum_{n=1}^{n} f/\sum_{t=1}^{t} f) * 100</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA1</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>100</td>
</tr>
<tr>
<td>AS2</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>100</td>
</tr>
<tr>
<td>SO3</td>
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<td>100</td>
</tr>
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<td>SA4</td>
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<td>10</td>
<td>100</td>
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<td>MB5</td>
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<td>CM6</td>
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<td>100</td>
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<td>MP7</td>
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</tr>
<tr>
<td>M&amp;E8</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>100</td>
</tr>
</tbody>
</table>

\(\sum_{n=1}^{n} f/\sum_{t=1}^{t} f\) * 100:100

Elements against initiatives in an ideal situation
APPENDIX C: Key Informant Interview Questions

Below forms a set of guiding questions under each objective administered to key informant interviews in conducting the study of anti-corruption communication planning in Kenya. The questions are qualitative and open ended in nature.

a) Examine anti-corruption communication planning by state anti-corruption agencies in promotion of anti-corruption initiatives,
   - What is the significance of communication planning in anti-corruption work?
   - How do you rate the anti-corruption initiatives that are implemented by state agencies in regards to communication planning in the period (2003-2013)?
   - To what extent are current communications planning practices achieving desired results?

b) What are the communication principles observed by state anti-corruption institutions with a specific focus to major anti-corruption initiatives?
   - What are the ideals of good communication planning when rolling out anti-corruption initiatives?
   - To what extent are the state agencies observing good communication planning practice?
   - Are there some important stages/components that ACAs miss in their communication planning? And if yes, how does this affect overall objectives/goals?

c) What are the communication planning challenges faced by state anti-corruption institutions in conducting anti-corruption initiatives?
   - Do you feel that there is a dis-connect between anti-corruption efforts and effective communication planning?

d) Based on your insights, make appropriate recommendations on how to improve anti-corruption communication planning for effective social behaviour change and further inquiry into the subject.
   - How can the communication planning in ACAs be improved?
## APPENDIX D: Interview Schedules

The following table provides dates and timelines for key informant interviews:

<table>
<thead>
<tr>
<th>Category</th>
<th>Female</th>
<th>Male</th>
<th>Total</th>
<th>Timelines</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Sector</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>By September 11&lt;sup&gt;th&lt;/sup&gt; 2014</td>
<td>Success</td>
</tr>
<tr>
<td>Civil Society</td>
<td>2</td>
<td>1</td>
<td>3</td>
<td>By August 27&lt;sup&gt;th&lt;/sup&gt; 2014</td>
<td>Success</td>
</tr>
<tr>
<td>Private Sector</td>
<td>-</td>
<td>2</td>
<td>2</td>
<td>By August 27&lt;sup&gt;th&lt;/sup&gt; 2014</td>
<td>Only male targets responded</td>
</tr>
<tr>
<td>Anti-Corruption Experts</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>By July 25&lt;sup&gt;th&lt;/sup&gt; 2014</td>
<td>Success</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4</strong></td>
<td><strong>6</strong></td>
<td><strong>10</strong></td>
<td></td>
<td>All the key informants wished their names or institutions not to be mentioned due to the sensitivity of their work/Information</td>
</tr>
</tbody>
</table>
Our ref: EACC 7/2/Vol. III(160) 21 August 2014

Mr. Jacob Otachi Orina
PO Box 33499 – 00600
NAIROBI

Dear Mr. Orina,

RE: ANTI-CORRUPTION COMMUNICATION STUDY

We acknowledge receipt of your letter dated 7th August 2014 on the above subject matter.

The Ethics and Anti-Corruption Commission is willing to participate in the study and will offer the assistance sought. Please get in touch with the undersigned to arrange an appointment for the purpose of conducting the research.

Yours sincerely,

Dr. George Nyabuga, PhD
Deputy Director, Corporate Communications
For: Secretary/Chief Executive Officer