# PRIVATIZATION COMMISSION

## STRATEGIC PLAN

## 2016 – 2021


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**October 2016**
**(Revised June 2019)**

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## ABBREVIATIONS AND ACRONYMS

| Abbreviation | Meaning |
|---|---|
| **BSC** | Balanced Score Card |
| **BCS** | Business Continuity Strategy |
| **COMESA** | Common Markets of Eastern and Southern Africa |
| **CSR** | Corporate Social Responsibility |
| **EAC** | East African Community |
| **EACC** | Ethics and Anti-Corruption Commission |
| **ERM** | Enterprise Risk Management |
| **GOE** | Government Owned Entity |
| **HR** | Human Resources |
| **ICT** | Information Communication Technology |
| **IFMIS** | Integrated Financial Management Information System |
| **IPO** | Initial Public Offer |
| **ISO** | International Organization for Standardization |
| **KENGEN** | Kenya Electricity Generating Company |
| **NA** | National Assembly |
| **NEMA** | National Environmental Management Authority |
| **NT** | National Treasury |
| **PE** | Public Enterprises |
| **PESTLE** | Political, Economic, Social, Technological, Legal and Environmental |
| **PM** | Performance Management |
| **PMS** | Performance Management System |
| **PP** | Privatization Programme |
| **PPP** | Private Public Partnership |
| **PR** | Public Relations |
| **SOE** | State Owned Enterprises |
| **SWOT** | Strengths, Weaknesses, Opportunities, Threats |
| **TNA** | Training Needs Analysis |

## STATEMENT BY THE CHAIRMAN

Privatization Commission's mandate as derived from the Privatization Act, 2005; is to formulate, manage and implement Kenya's Privatization Programme. A major contribution of privatization is to transform Government Owned Entities thereby making them more competitive, efficient and self-sustaining and in general more effective in fulfilling their mandates. Significant progress has been made in spite of delays in the required approvals at various levels and the completion of State-Owned Enterprises reforms approved in 2013.

The Commission is committed, through this Strategic Plan, to address the challenges faced in the last few years to ensure a streamlined and successful implementation process that will pave way for the next phase of the Strategic Planning period. This will include, but will not be limited to engagement with the Government to expedite review of the Privatization legal framework and enhanced stakeholder engagement amongst others. In this regard, the Commission intends to take a lead role in rallying and supporting the other Government agencies involved in privatization, to achieve the desired goals.

I am delighted that the objectives set in this Strategic Plan have been substantially achieved and for this, I commend the Commission and Management for a job well done. Additionally, after this review, mitigation measures have been proposed for any foreseen challenges.

I look forward to a successful completion of the implementation of this Plan.

**Hon. Dr. Paul Otuoma, EGH**
**Chairman**

## FOREWORD FROM THE CHIEF EXECUTIVE OFFICER

The review of this Strategic Plan was an effort by the Commission to ensure that its 2018/2019 activities were aligned to the MTP III and incorporated the "Big Four" initiatives and other national priorities. It commenced with a thorough analysis of the Implementation Matrix to determine the extent to which the objectives formulated during the planning period had been achieved.

From the review, it was noted that in spite of many external factors beyond the control of the Commission, the activities and initiatives that were necessary to meet agreed strategic objectives were substantially implemented with a few challenges here and there.

Strategic objectives that had not been fully met on account of exogenous factors, related strategic issues and objectives of a continuing nature were also identified and mitigation measures proposed and which will now be addressed in the remaining period of this Plan.

Management will relentlessly seek to achieve and exceed the targets to meet our overall organizational goals. As we do this, we will also continuously review our role as an enabler in the achievement of the Big Four Agenda.

I wish to thank the Commission Members and Management for the team work and active participation during the Strategic Plan review process.

**Joseph Koskey**
**Executive Director/CEO**

# CHAPTER 1: INTRODUCTION

## 1.1. Background of Privatization in Kenya

Since Independence in 1963, there have been major policy changes regarding direct public sector participation in commercial activities. For example, in the 1960s and 1970s, Kenya deliberately invested heavily in State Corporations to redress regional imbalances, increase participation of Kenyans in the economy, promote indigenous entrepreneurship and promote foreign investment through joint ventures.

Rethinking this strategy was found necessary following findings from the Report on the Review of Statutory Boards (1979) and the report of the working party on Government expenditure (1982). These reports revealed that State Corporations were absorbing a significant portion of the Budget while their productivity remained low. The reports therefore recommended that Government should: act more as a creator of an enabling environment within which people can develop themselves and the economy; divest from investments in commercial and industrial enterprises; reduce its exposure to risk in areas which the private sector could assume such risk; dismantle hitherto existing administrative hurdles that discourage private sector involvement and inherently create opportunities for corruption; and reform the legal and institutional framework regarding monitoring and supervision of Public Enterprises.

In July 1992, through the Policy Paper on Public Enterprises Reform and Privatization, the Government outlined the scope of the public sector reform programme, the institutional framework and the guidelines and procedures for privatizing Public Enterprises (PEs). The policy paper identified 240 commercial PEs with public sector equity participation and classified them into two categories:

1) 207 Public Enterprises were classified as "non-strategic enterprises" , which constituted Government Privatization Programme and which were to be privatized and

2) Thirty three (33) commercial PEs which were designed as "strategic enterprises "to be structured and retained under public sector control for the time being.

By the end of the first phase of the programme (1992-2003) most of the non-strategic enterprises had been partially or fully privatized.

By 2002, the direction of thinking regarding structuring and retention of a number of strategic corporations under Government operation and control had also changed due to: inadequacy of public sector resources to finance the requisite investments in infrastructure facilities; the need to arrest continued deterioration in infrastructure services; lessons learnt from other countries which had succeeded in improving their infrastructure services through Public Private Partnerships; and restructuring which resulted in separation of commercial activities from regulatory functions, making it possible to privatize commercial activities while ensuring the Government‘s continued presence in the privatized sectors through establishment of strong legal and institutional regulatory frameworks. As a result of the change in thinking, the Government implemented a number of key privatization transactions under the Economic Recovery Strategy for Wealth and Employment Creation, (ERSWEC) 2003-2007. These included the KENGEN (IPO), Kenya Railways (concession), Mumias Sugar Company (second offer), Kenya Reinsurance Corporation (IPO), Telkom Kenya (sale of shareholding to a strategic partner) and Safaricom (IPO). Through these transactions, the country mobilized over Kshs. 80 billion, which was used to support the country’s recovery and overall development agenda.

The Privatization Commission, a body corporate was established following the enactment of the Privatization Act 2005 under the guidance of the policy paper on public enterprises reforms. It was operationalized in December 2007 to implement the inaugural Privatization Programme under the Act, comprising twenty six (26) enterprises and projects, which was approved by the Cabinet in December 2008. Subsequently the list was gazette by the National Treasury in August 2009.

The Commission has completed Phase One of the privatization of Kenya Wines Agencies Limited (KWAL) which was approved by the Cabinet in November 2011 and by Parliament in January 2013. This involved the sale of 26% of the company’s shares to Distell of South Africa. This transaction raised Ksh.860 million which was used to support country’s overall development agenda. Implementation of the privatization of other entities in the Programme is at various stages.

### 1.2. Mandate of the Privatization Commission

The mandate of the Commission is to formulate, manage and implement Kenya’s Privatization Programme. The Programme consists of the list of investments and assets approved for privatization under the Privatization Act.

### 1.3. Commission's Core Function

The Commission's core functions are as follows:

1. Formulate, manage and implement the Privatization Programme;
2. Make and implement specific proposals for privatization in accordance with the Privatization Programme;
3. Carry out such other functions as are provided for under the Act; and
4. Carry out such other functions as the Commission considers advisable to advance the Privatization Programme.

### 1.4. Literature Review

The formulation of the Strategic Plan 2016-2021 took into consideration policies issued by the Government. These policies broadly included the Vision 2030, the Privatization Act, 2005, the Sector Performance Standards, current Performance Contract Guidelines and the report of the Presidential Taskforce Parastatal Reforms *and the "Big Four Agenda"* among other policy documents.

The Privatization Act, 2005 continues to provide the basic legal framework within which the Commission operates. The Act empowers the Commission to formulate and implement a Privatization Programme. The limitations of the Act have been identified and proposed amendments forwarded to the National Treasury for approval before onward submission to the Cabinet and eventually to the National Assembly. Major challenges that have been identified have been highlighted and also addressed in the plan.

The report of the Presidential Taskforce on Parastatal Reforms released in October 2013 outlined the strategy to harmonize Parastatals in order to enhance efficient service delivery to the public. The report proposed the formation of a Government Investment Company which among other changes will take over the mandate and operations of the Commission. This however is no longer certain as the GOE Bill omitted the repealing of the Privatization Act. Meanwhile, the reforms have taken a toll on the Commission ability to achieve its core mandate: by initially freezing the Privatization Programme in 2013 and subsequently limiting implementation of the Programme to only a few transactions in 2014.

Vision 2030 continues to play a key role in the economic development of the Country. The Commission's mandate falls under the Economic Pillar of the Vision 2030. Under this pillar, contribution expected from the Privatization Programme include the improvement of the efficiency of the Kenyan economy by making it more responsive to market forces, mobilization of resources required to rehabilitate, modernize and expand productive capacity under commercial SOEs, the reduction of the demand for Government resources and the generation of additional Government revenues. Upon effective implementation of the transactions benefits are expected to accrue to millions of Kenyans who rely on the affected enterprises for livelihood.

The Commission continues to comply fully with the annual performance contracting with the Government. In so doing, the Commission is cognizant of the Sector Performance Standards (SPS) that guide the setting and implementation of the Performance Contract targets. The SPS were structured to include key performance targets for the Vision 2030 and the Medium Term Plans. The National Treasury, under which the Commission falls, is expected to, among other key result areas, ensure: "effective mobilization and management of public resources". The Commission during the current planning period revised the current Strategic Plan to incorporate the medium term plans by the Government. This Plan incorporates the medium term plans in its formulation.

The Constitution of Kenya 2010 also remains an overarching legal document on which the Commission's activities are continually anchored. Among other issues, the Constitution provides for Public participation, high standards of ethical behavior, leadership and integrity, service delivery, corporate governance and the mainstreaming of gender, youth and persons with disability. The Strategic Plan 2016-2021 has entrenched the requirements of the Constitution in its body, text and spirit. Implementation of constitution has an impact on the privatization Act,

The Commission is cognizant of the Government's pronouncement of the 'Big Four Agenda', which will guide the development agenda of the country in the period 2018-2022 as to focus on key basic needs that are critical in uplifting the standard of living of

Kenyans on the path to becoming an upper middle-income country by 2030.

Prioritized in the ‘Big Four Agenda’ are:

1. Provide at least five hundred thousand (500,000) affordable new houses to Kenyans by 2022, and thereby improve the living conditions for Kenyans;
2. Provide Universal Health Coverage thereby guaranteeing quality and affordable healthcare to all Kenyans;
3. Focus on initiatives that guarantee food security and nutrition to all Kenyans by 2022 through expansion of food production and supply, reduction of food prices to ensure affordability and support value addition in the food processing value chain; and
4. Support value addition and raise the manufacturing sector’s share to GDP to 15 percent by 2022. This will accelerate economic growth, create jobs and reduce poverty.

Chapter 2 has tackled in detail review of the 2013-2016 Strategic Plan, the lessons learnt and the challenges that were faced during implementation.

# CHAPTER 2: REVIEW OF THE 2013-2016 STRATEGIC PLAN

## 2.1 Introduction

The 2013-2016 Strategic Plan was modeled around the following five strategic objectives:

a) To attain enhanced public awareness, image and perception.
b) To achieve an enabling legal framework in the privatization process.
c) To enhance linkages and maintain symbiotic relationships with our stakeholders and partners.
d) To enhance political and administrative support to the Privatization Programme.
e) To build adequate capacity for an efficient and effective privatization process.

The full term of the Commission's Strategic Plan for the period 2013-2016 is not yet over. There is however urgent need for a comprehensive review, in view of challenges relating to the on-going State Owned Enterprises reforms. This has created an early opportunity to formulate the 2016-2021 Strategic Plan. The review process shows that the Commission has made substantial achievements of the above objectives as follows:-

**a) To attain enhanced public awareness, image and perception.**

The Communications policy and Corporate Social Responsibility policy were developed by management and approved by the Commission during 2013/14 FY. The Commission undertook several CSR activities carried in 2013 and 2014 along the four pillars of education, environment, health, and natural disasters. The Commission also implemented several aspects of the Communication policy ensuring enhanced public awareness, image and perception on the Commission's activities.

**b) To achieve an enabling legal framework in the privatization process.**

The Privatization Act and other relevant laws were reviewed to streamline the privatization process. These were approved by the Commission and recommendations submitted to the National Treasury in 2013/14 FY.

**c) To enhance linkages and maintain symbiotic relationships with stakeholders and partners.**

The Commission enhanced linkages with stakeholders and key partners which is a key factor in carrying out successful privatization transactions. In this regard, a Stakeholder Engagement Plan was developed during the 2013/14 FY together with a Collaboration Framework prepared in conformity with the Vision 2030. In addition, stakeholders' workshops have been held for most of the transactions. However, this is a continuous objective for the Commission.

**d) To enhance political and administrative support to the Privatization Programme**.

The Commission now has in place a Collaboration Framework which identifies areas of political and administrative support and the offices concerned. The Commission's steering Committees also constitute the different identified offices such as parent Ministries, the entities to be privatized, the National Treasury and the Attorney General's office.

With regard to eliminating conflict of interest, the Commission revised its Code of Conduct in line with the Leadership and Integrity Act, 2012. The Commission Members and Staff have signed and accepted the Code of Conduct.

**e) To build adequate capacity for an efficient and effective privatization process.**

The Commission has taken several steps towards capacity enhancement. Specifically; annual Capacity Building/Training programme has been implemented, various Human Resource policies were developed, reviewed and implemented during the strategy implementation period, a revised Organogram is in place and has partially been implemented while the Performance Management System is in place and is still under implementation.

### 2.2 Challenges and Lessons Learnt

In spite of the achievements, some challenges identified in 2013-2016 still remain and have been recurring overtime and some of them have contributed to other challenges. Some of these challenges include:-

a) Delays encountered in the privatization process. The privatization process requires approvals at various levels within Government including the National Treasury, the Cabinet and the National Assembly. Receipt of approvals for submitted Detailed Proposals is often delayed.
b) Delay in appointment/reconstitution of Commission Members, approval to recruit staff is a challenge that will need to be addressed.

c) Government policies and decisions
d) Opposition by stakeholders to sabotage any presentations that are made to educate the public and seek stakeholder consensus.
e) Transition in the implementation of the Constitution with regard to the relationship between the County and National assets. This needs to be clearly defined as some of the functions carried out by State Corporations have been placed under County Governments, without consideration for availability of technical expertise; and
f) Reluctance, and in some cases refusal, by some of the entities to furnish the Commission with information required to prepare due diligence and options reports.

Some of the lessons learnt during the implementation process include the following:-

a) Ownership of the Strategic Plan should be both at the corporate level and the individual level. In addition, while every member of staff should own their part in the implementation process, there should be a central office vested with the responsibility of ensuring overall compliance.
b) The external environment can have a major impact on the implementation process.
c) There is need for periodic reviews to be carried out, preferably as workshop sessions held at half yearly as a minimum. This will help to institutionalize the Strategic Plan reviews and implementation activities.
d) Need to undertake a comprehensive review of the Strategic Plan so as to identify early enough the targets that should be monitored.

# CHAPTER 3: SITUATIONAL ANALYSIS

This chapter provides an analysis of the Commission's working environment using conventional analytical frameworks namely the assessment of Strengths, Weaknesses, Opportunities and Threats (SWOT) and the Political, Economic, Social, Technological, Environment and Legal (PESTEL). It also presents in a tabular form a stakeholder analysis focusing on the expectations of the Commission from its stakeholders and vice versa.

## 3.1. PESTEL Analysis

A PESTEL framework is an analysis of the Political, Economic, Social, Technological, Environmental and Legal factors likely to influence (positively or negatively) the achievement of the mandate of the institution and implementation of the proposed strategy:-

### Political and Legal Factors

The country's political environment has continued to be stable since independence in 1963 and after the promulgation of the new Constitution. The new Constitution brought in a new system of government comprising of the national and the county governments. Since some of the entities identified for privatization are located in the counties, the Commission needs to continue engaging and partnering with the county governments to ensure a smooth privatization process.

Review of Government policy on privatization from time to time may also impact adversely on the speed of privatization. A good example in this respect is the ongoing rationalization of state owned entities and related restrictions that have impacted on the Commission's functions and ability to deliver. Issues relating to staff contracts and procurement have been limited to immediate needs without due consideration for continued capacity for effective implementation of the Programme with respect to resources base and succession management.

From a legal point, the Privatization Act is considered rather restrictive. This is mainly due to the onerous requirements for obtaining approvals. While approvals at various levels may be good for accountability purposes, expected benefits from privatization could be diluted by such delays. A more enabling legal framework is necessary and this could be achieved through flexibility that would shorten the approval levels and time.

**Economic Factors**

At the economic front, Kenya has in the past few years continued to experience a relatively stable macroeconomic environment, characterized by low inflation rates and a moderate economic growth. However, while this trend is projected to continue, the exponential rise in public expenditure and in inflation over the last few months have been a concern, with calls from the public for the expediting of privatization of public entities that continue to depend on the exchequer. Privatization will therefore continue playing a key role in mobilizing investments that are necessary to supplement the Government's efforts in financing operations of commercial entities under its ownership.

**Social Cultural Factors**

At the social level, the Commission has continued to experience some resistance on account of lack of appreciation on the benefits that can accrue from privatization and a general skepticism on account of past privatizations that have failed to achieve the desired results.

The Commission needs to structure and implement on-going transactions in a manner that creates a positive opinion on privatization.

**Technological Factors**

Globally, there has been an incredible change and adoption of technological innovations including internet networks and use of social media. The Commission is expected to take advantage of these innovations so as to enhance communication, information dissemination as well as knowledge sharing with its stakeholders and other key partners.

The Commission should also continue to leverage on the use of ICT so as to improve the efficiency and effectiveness of its internal processes.

**Environmental Factors**

Kenya has in place environmental laws and regulations which are administered by NEMA. PC is expected to ensure full compliance with the relevant laws and regulations. In addition, the value of some of the entities being privatized e.g. in the sugar Industry may be affected by certain environmental factors. Adequate environmental studies/due diligence may be required for to ensure that privatization proceeds are not over-discounted on account of adverse environmental factors.

### 3.2. SWOT Analysis

SWOT analysis was undertaken to critically assess the strengths and weaknesses, Opportunities and threats facing the Commission.

**Table 3.1SWOT Summary**

| Strengths | Weaknesses |
|---|---|
| • The Commission has competent highly motivated and multi-disciplinary staff<br>• Privatization Act provides for competitive recruitment of Commission Members<br>• The Commission has adequate and comprehensive Governance structures in place. This is in line with the Mwongozo code.<br>• The Commission is ISO 9001:2015 certified.<br>• The financial and operational structures of the Commission are strong with adequate internal controls in place.<br>• The Commission is ranked highly in parastatal category PC8A<br>• Approved HR instruments | • Access to the Commission's offices located on 11th floor can be a challenge to people with disabilities especially when the sole operational lift that serves the Commission's offices is grounded.<br>• The office space is limited, especially space for the storage of files<br>• Weak ICT infrastructure |
| **Opportunities** | **Threats** |

| | |
|---|---|
| • Budgetary pressures - Government policies geared towards privatization to mobilize resources required by SOEs.<br>• Government support.<br>• Enabler for implementation of "big four" agenda<br>• Stiff competition to Government owned entities by private entities<br>• Existence of pool of commercial state owned which could be added to the programme<br>• Government policy to move out of commercial ventures<br>• Existence of willing investor to participate in the privatization. | • Delay in approval to fill in vacant position resulting to understaffing.<br>• The Commission has several multi-layered stakeholders with varied interests.<br>• Political interests of the different stakeholders.<br>• Disputes between County and National Government on ownership of the state corporations/assets to be privatized<br>• Multi-stakeholders directives issued to the Commission which at times result in conflict.<br>• Provisions under the PPP Act which presents the PPP framework as an easier and flexible option for mobilization of resources.<br>• Changes in Government policies towards privatization.<br>• Conflict of interest by the stakeholders whereby the players perceive that they will lose their interests if the entity is privatized; this poses a threat to the Privatization Programme<br>• All Commission Members appointments were made at the same time and with no mechanism for staggering in place.<br>• Privatization done outside the Privatization Act<br>• Delayed approval of privatization proposals<br>• Weak financial status of the entities in the privatization programme<br>• Declining budgetary allocations<br>• Perception that entities to be privatized are loss making entities. |

## 3.3 Stakeholder Analysis

Stakeholders play a critical role in the success of the Commission's activities. Consequently, the Commission has been working in closely and collaborating with key stakeholders in the execution of its mandate. The table below summarizes the Commission's key stakeholders; their expectations from the Commission and the Commission's expectations from them.

**Table 3.2: Stakeholder Analysis**

| STAKEHOLDER | STAKEHOLDERS EXPECTATIONS FROM THE COMMISSION | COMMISSION'S EXPECTATIONS FROM THE STAKEHOLDERS | KEY ISSUES |
|---|---|---|---|
| **Parliament** | • Patriotism in designing and implementing transactions<br>• Strict adherence to the law<br>• Consultations and briefings<br>• Value for money<br>• Transparency in the process<br>• Adequate response to invitations by Parliamentary Committees | • The Commission expects political support and timeliness in approvals on matters presented to Parliament. | • Delay in granting necessary approvals |
| **Cabinet** | • Professional management and implementation of the Privatization Programme.<br>• Regular review of the Privatization Programme.<br>• Timely preparation and submission of detailed Privatization Proposals.<br>• Timely request for approvals and submission of relevant reports<br>• Value for money.<br>• Timely responses to all queries. | • Timely approvals on submissions requiring approval.<br>• Support for Privatization Programme in general and approved transactions at various stages. | • Delay in granting approvals<br>• Change in Government policy on privatization<br>• Parastatal reforms |
| **National Treasury** | • Professional management and implementation of the Privatization Programme.<br>• Regular review of the Privatization Programme.<br>• Timely preparation and submission of detailed Privatization Proposals.<br>• Timely preparation of budgets, performance | • Timely approvals on submissions requiring approval.<br>• Budgetary, Administrative and political support.<br>• Timely release of budgeted funds.<br>• Mobilization of support for Privatization Programme in | • Delay in granting approvals<br>• Change in Government policy on privatization<br>• Parastatal reforms |

| | | | |
|---|---|---|---|
| | contracts and related reports.<br>• Timely request for statutory and other approvals and reports.<br>• Total compliance with financial regulations.<br>• Value for money.<br>• Adequate time for consultations and submission of required information and clarifications.<br>• Timely responses to all queries. | general and approved transactions at various stages.<br>• Timely appointment of Commission Members.<br>• Timely processing of detailed proposals and subsequent submission to the Cabinet.<br>• Facilitation of meetings with key stakeholders within Government when necessary for briefings to enhance the Programme's support | |
| **County Governments** | • Strict adherence to the law.<br>• Consultations and briefings.<br>• Value for money.<br>• Transparency in the Privatization process | • Co-operation<br>• Strict compliance with the law. | • Need to retain control of assets within their counties<br>• Overlap/lack of clarity of functions between county and National government |
| **Ministry responsible for Investments identified for Privatization** | • Consultations to ensure inclusiveness and ownership of privatization process.<br>• Timely responses to all queries | • Submission of any required information.<br>• Participation in Steering Committee meetings and activities.<br>• Secretarial, administrative and political support to the process.<br>• Adequate time for consultations.<br>• Review of reports submitted by consultants. | • Accessibility to required information |
| **Investing Public (including farmers and** | • Well structured transactions<br>• Attractive transactions<br>• Fairness and transparency.<br>• Value for money.<br>• Responses to all queries within seven days. | • Participation in stakeholder forums.<br>• Participation during implementation phase of the transactions (such as | • Inadequate participation<br>• Perception issues due to poorly |

| | | | |
|---|---|---|---|
| **employees of entities where shares have been ring-fenced/held in Trust)** | • Announcement of approved investment opportunities.<br>• Accountability | participating in the privatization).<br>• Visits to PC offices or website.<br>• Email info@pc.go.ke<br>• Call or write to the ED/CEO<br>• Reading newspaper announcements and gazette notices, visits to offer agents to obtain prospectus, booking appointments when necessary and clarity and courtesy. | performing privatized entities |
| **Entities in the Privatization programme** | • Consultations to ensure inclusiveness and ownership of privatization process from the Commission.<br>• Confidentiality.<br>• Adequate time for consultations and submission of required information and clarification. | • Adequate time for consultations and submission of required information and clarification.<br>• Timely approval of all requests.<br>• Responses to all queries within seven days.<br>• Provision of information to consultants.<br>• Timely review of reports submitted by consultants. | • Accessibility to required information |
| **Regulatory Agencies** | • Adequate consultations.<br>• Timely submission of request for approvals.<br>• Timely responses to all queries.<br>• Sharing of market information. | • Timely approvals.<br>• Support for Privatization Programme<br>• Facilitation of transaction through provision of necessary regulatory approvals and interactions. | • Potential delays in granting approvals |
| **Kenyan Public** | • Value for money/return on investment.<br>• Timely responses to all queries<br>• Transparency and accountability in implementing the Programme.<br>• Improved quality of services<br>• Focus on Vision 2030 | • Participation in stakeholder forums/consultations<br>• Participation at implementation stage during actual sale of assets or eventual privatization.<br>• Visits to PC offices or website. | • Perception issues due to poorly performing privatized entities<br>• Lack of interest/participation in privatizations |

| | | | |
|---|---|---|---|
| | • Creating employment<br>• Fair transaction process<br>• Better performance of the economy. | • Email info@pc.go.ke. Call or write to the ED/CEO.<br>• Reading newspaper announcements and gazette notices, visits to offer agents to obtain prospectus, booking appointments when necessary and clarity and courtesy. | |
| **Kenya National Audit Office** | • Total compliance with financial regulations.<br>• Timely response to audit queries. | • Professionalism.<br>• Fairness.<br>• Timely audits. | • None |
| **Media** | • Up to date and verified information.<br>• Timely clarification to queries<br>• Education on the Privatization Programme. | • Fair and objective coverage<br>• Write requests for clarifications. | • Misrepresentation of facts<br>• Awareness of PC's mandate |
| **Commission staff** | • Fairness and equity;<br>• Conducive working environment;<br>• Performance–based reward and sanction system;<br>• Continuous capacity building;<br>• Environment which nurtures professionalism and independent thinking | • Commitment to the Commission's work and ideals.<br>• Team work<br>• Professionalism<br>• Accountability<br>• Fairness in service delivery. | • Job insecurity |

# CHAPTER 4: VISION, MISSION AND CORE VALUES

The revised mission, vision and core values of the Privatization Commission are as highlighted below:

## 4.1. The Vision

A world class Privatization Agency, innovatively transforming public enterprises for accelerated economic growth.

## 4.2. The Mission Statement

To unlock the potential of public enterprises through a well-designed Privatization Programme to meet desired national objectives.

## 4.3. The Core Values

**Integrity**

We employ the highest ethical standards, demonstrating honesty and fairness in every action that we take.

**Transparency**

We are open in our decisions and actions. Our processes are transparent and confidential information is shared on need to know basis.

**Accountability**

We ensure compliance with laws, regulations and rules. We take full responsibility for our actions that relate to our customers and fellow workers. We take responsibility for our performance in all our decisions and actions.

**Professionalism**

We uphold professional ethics in discharging our mandate.

**Fairness**

We act justly, respect people, respect privacy, minimize harm and keep our promises.

The commission ensures equitable distribution of resources and opportunities.

**Inclusiveness**

We involve stakeholders in decision making.

## 4 .4 Corporate Strategy

Our corporate strategy is to leverage our external environment and strengthen our capacity to effectively deliver the Kenya Privatization Programme. Table 4.1 presents a summary of Key Results Areas of focus in the coming five year tenure which will enable the Commission achieve its core mandate as outlined in its Mission and Vision statements:

**Table 4.1: Strategic Focus**

| Strategic Goals/ Key Results Areas | Strategic Objectives |
|---|---|
| **1. Effective and efficient implementation of the privatization programme** | To finalize implementation of the current privatization programme by 2021 |
| | To achieve a harmonious legal framework for the privatization programme |
| **2. Strengthening Institutional Capacity** | To improve on existing infrastructure and foster innovation |
| | To attract, develop and retain adequate capacity for efficient and effective implementation of the Privatization Programme |
| | To establish a functional resource centre by 2021 |
| **3. Enhance Corporate Governance** | To enhance public awareness, image and perception |
| | To implement the risk management strategy |
| | To enhance linkages and maintain working relationships with stakeholders and partners |
| **4. Mobilization and optimal utilization of funds** | To effectively lobby, utilize and account for financial resources |

# CHAPTER 5: IMPLEMENTATION AND COORDINATION

## 5.1 Strategic Implementation:

Implementation of this plan is summarized in form of matrix presented in Annex I which shows the strategies, activities, measures, targets and budget for five year strategic plan period. The matrix has the following key parameters:

i. ***Measures:*** These are units or ways used to assess the extent, magnitude or degree of desired output in order to track progress. This strategic plan should be data driven and thus measures in the implementation framework will make it possible to visualize the extent of strategic implementation.
ii. ***Targets:*** These are Indicators of the desired extent of fulfillment of the specific strategy and they are quantitative, qualitative and/or time based.
iii. ***Responsibility:*** The specific office or officer to be responsible for the specific action.
iv. ***Budget Estimates:*** Quantification of the cost of each of the initiatives will aid in planning and ensuring adequate resources are available as required.

The implementation matrices will form the basis for annual action plans, both part of the process in ensuring the actualization of the plan. Implementation will be facilitated by cascading the corporate strategic plan to the departments, teams and individuals levels. This will provide a higher level of detail on how the strategies will be implemented to achieve the objectives. Additionally, it will also facilitate departments and personnel carrying out different strategies in pursuit of the same objective. To achieve this, regular meetings by the Commission and Management to track progress and ensure coordination of activities and the exploitation of synergies is highly recommended.

## 5.2 Role of the Commission in Strategic Plan Implementation

Successful Implementation of this strategic plan will depend on Commission's commitment to the process. Specifically, the Commission:

I. Will work closely with PC's management, the parent ministry and all stakeholders to steer the SP implementation as well as overseeing proper management frameworks for successful implementation of the Plan.

II. Ensure that the Strategic Plan is implemented through timely preparation of annual work plans and performance contracts derived from the Plan and regular monitoring and evaluation through quarterly Commission meetings.

III. Support Implementation through lobbying for strengthening of relevant policies and legal frameworks required to achieve the goals and objectives in this strategic plan.

### 5.3 Role of Management in Strategic Plan Implementation

I. Management team will oversee the day-to-day implementation of this strategic plan; cascading and development of this plan to departmental teams and individuals.

II. Together with the Commission, the management will also be required to develop annual work plans and incorporation into the performance contract; and initiating and coordinating the mid-term strategic plan review.

### 5.4 Resource mobilization strategy for SP implementation

Resources are the inputs (manpower, money, material & machine) that are consumed by the Commission to achieve its strategic objectives and goals. Resource mobilization is the expansion of relations with the resource providers, and the skills, knowledge and capacity for proper use of resources. Also includes seeking new sources of resources as well as correct and maximum use of the available resources.

- PC's main sources of funding are GoK allocation and internal revenue generation. Throughout the implementation of this strategic plan, GoK is likely to continue being the main sources of funds for the commission. PC shall use the various strategies to mobilize additional resources as detailed below:
    a) ***Government of Kenya Funding-***PC will lobby for more funds and support from GoK to fast track privatization programmes. The Commission expects to mobilize adequate funding to meet annual expenditure requirements
    b) ***Internal Funding-*** Internal funding will be mainly through enhanced enterprise activities including sale of bid documents

c) **Infrastructure-**PC plans to upgrade its internal infrastructure and acquire additional office space

### 5.5 Measures to eliminate wastage and loses

In order to effectively and efficiently implement this plan, the following measures will be put in place to manage wastage and loss:

- Updating and Implementation of the Risk Management Framework ;
- Succession plan
- Adherence to all applicable laws Monitoring and Evaluation
- Enterprise Resource Planning

### 5.6 Risk Management

This section entails the high impact risks whose details such as root cause, measures are detailed in the Enterprise Risk Management Framework

The Commission shall employ Risk Management Strategy (RMS) in mitigating risks associated with implementation of the strategic objectives as in Table 5.1.

**Table 5.1: Risk Management**

| Risk | Mitigating Measures |
| --- | --- |
| Resistance to privatization | • Explore continuous dialogue with stakeholders<br>• Building leadership capacity to resolve resistance issues strategically<br>• Inclusion of employee ownership schemes in privatization proposals<br>• Publicizing of PC activities through media to enhance public acceptance<br>• Push for strengthening of legal structure supporting PC to overcome vested interests and monitor institutions post privatization |
| Staff Turnover | • Offering Staff incentives<br>• Improving terms and conditions of service<br>• Staff Trainings |
| Economic instability | • Appropriate economic policies<br>• Fiscal discipline |
| Bureaucracy | • Public service reforms<br>• Implement Change management<br>• Pursue Transformative leadership |

| | |
|---|---|
| Technological change | • Change management<br>• Policy review<br>• Training<br>• Procurement |
| Political interference | • Lobbying and consensus building<br>• Dispute resolution mechanism<br>• Strengthening legal framework |
| Organizational culture | • Transformative leadership<br>• Change management<br>• Team building sessions |

# CHAPTER 6: MONITORING AND EVALUATION

Monitoring and Evaluation (M&E) is a critical component geared towards ensuring that the various strategies are implemented.

**Monitoring** is an ongoing process of data collection that allows managers in an organization to examine positive and negative trends and adjust their strategies accordingly. It focuses on measuring all aspects of an organization's strategy including inputs, processes, outputs and impact/consequences. The Strategic Plan has been designed to ensure that the Commission fulfils its mandate and Mission.

**Evaluation** is the process of assessing the value of an activity, project or programme. Evaluation helps the programme participants answer the critical question 'what is the value of this activity'?

Proper monitoring and evaluation provides for timely and regular information for evidenced-based decision making geared towards attainment of an organization's goals. It provides information on progress being made towards attainment of objectives, challenges being encountered and identification of any emerging issues. Further, M&E allows for the information produced to be used to promote a culture of learning and for the application of lessons learnt. The Commission will put in place an adequate Monitoring & Evaluation framework, right at the onset to ensure that the implementation of the Strategic Plan is successful.

## 6.1 Monitoring and Evaluation Framework

Monitoring, follow up and control systems will be established at all levels. These will include progress reports, review meetings and reports, budgets and budgetary control systems and reports.

At the beginning of each year, all units will set performance targets as part of their annual work plans as derived from their developed cascaded strategic plan. This should be complementary to the Government Performance Contracting process. The M&E framework will be based on the balanced scorecard/performance management system (PMS) with an emphasis on keeping track of Key Performance Indicators (KPI) associated with each of the strategies. Thus, the developed targets will be anchored on the balanced scorecard. This will ensure that both performance and drivers of performance are measures that are monitored and evaluated to ensure stated objectives are met.

At the management level, the following M&E measures will be considered:-

- Performance standards and targets: The annual performance contracts of the management team will include targets drawn from the Strategic Plan.

Review meetings will be held between the management and the Commission. During these meetings, the Commission will receive and review progress reports from management indicating overall progress made on key strategic objectives. The nature and scope of reporting will include:

- Progress made against Plan;
- Causes of deviation from Plan;
- Areas of difficulties and alternative solutions that may adversely affect implementation.

The reviews meetings between management and the Commission's Commission will be conducted half yearly, with midterm and end of period reviews to measure the outcomes and impact of the Strategic Plan. In the half year reviews, the Commission will engage a facilitator to give the process an external and objective review.

# APPENDICES

## APPENDIX I: BALANCED SCORE CARD BASED IMPLEMENTATION MATRIX

| STRATEGIC GOAL 1: EFFECTIVE AND EFFICIENT IMPLEMENTATION OF THE PRIVATIZATION PROGRAMME | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Strategic Objective** | **Strategies** | **Activities** | **Measure** | **5yr Target** | **Responsibility** | **Budget Estimates(Ksh. Millions)** | | | | | **Total** |
| | | | | | | **16-17** | **17-18** | **18-19** | **19-20** | **20-21** | |
| **1. To finalize implementation of the privatization programme by 2021** | Update/Complete preparatory work for 17 entities in the Privatization programme | a) Complete /Update preparatory work for 17 enterprises. | No. of due diligence and option analysis reports completed and approved | 17 | CMT | 30 | 47 | 644 | 887 | 257 | 1,608 |
| | | b) Finalise and submit detailed proposals to National Treasury | No. of detailed proposals completed and submitted to National Treasury | 17 | CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| | | c) Develop and implemen | Quarterly report on follow ups | 20 | | Nil | Nil | Nil | Nil | Nil | Nil |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | t follow up framework on outstanding approvals | | | CMT | | | | | | |
| | Implementation of approved transactions and review of the privatization programme | a) Implement Privatization of approved entities | No. of entities privatized | 17 | CMT | Nil | Nil | Nil | 75 | 75 | 150 |
| | | b) Review and submit the privatization programme | No. of PP reviews submitted to the National Treasury | 10 | CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| 1.2 To achieve a harmonious legal framework for the privatization programme. | Review current legal framework to be in conformity with emerging issues | a) Follow-up with the National Treasury on implementation of recommendations for review of the Act; | Bi-annual report on follow ups Implementation report | 4 | CMLA | Nil | Nil | Nil | Nil | Nil | Nil |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | b) Conduct a review of the legal framework and additional areas requiring update; | No. of reports on proposed amendments | 2 | CMLA | Nil | Nil | Nil | 2.5 | 2.5 | 5 |
| | | c) Ensure harmonization of the various laws affecting the Privatization Programme upon approval of the proposed amendments; | No. of Reports on Harmonization of relevant laws | 2 | CMLA | Nil | Nil | Nil | 2.5 | 2.5 | 5 |
| | | d) Prepare and submit to National Treasury a draft revised | No. of draft Revised Acts | 2 | CMLA | Nil | Nil | Nil | Nil | Nil | Nil |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Act upon approval of proposed amendments for consideration and onward submission to Parliament; | | | | | | | | | |
| | | e) Stakeholder participation in and support for Legislative changes upon approval of the revised amendments. | No. of Stakeholder sensitization Workshops | 3 | CMLA | Nil | Nil | Nil | Nil | 5 | 5 |

| STRATEGIC GOAL 2: STRENGTHEN INSTITUTIONAL CAPACITY | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Strategic Objective** | **Strategies** | **Activities** | **Measure** | **5yr Target** | **Responsibility** | **Budget Estimates(Ksh. Millions)** | | | | | **Total** |
| | | | | | | **2016-2017** | **2017-2018** | **2018-2019** | **2019-2020** | **2020-2021** | |
| **2.1 To build and retain adequate capacity for an efficient and effective implementation of the Privatization Programme** | Enhance skills and competences for Commission staff | a) Carry out annual training needs analysis; | TNA Report | 5 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Develop and implement approved annual training programme; | % of no. of trainings implemented | 100% | HRAM | 9 | 12.3 | 11 | 19 | 20 | 71.3 |
| | | c) Undertake annual training effectiveness assessment. | Training effectiveness Reports | 5 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | Strengthen performance management | a) Review the performance management system tool after every two years. | Approved PMS tool | 3 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | b) Implement and monitor staff performance on yearly basis | Annual Report on staff performance | 5 | HRAM | Nil | Nil | Nil | 1 | 1 | 2 |
| | Motivate Commission Staff | a) Develop and implement Performance based rewards and recognition | Rewards and recognition implementation Report | 5 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | a) Develop and implement work life balance policy | Work life balance implementation Report | 2 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Review and implement HR instruments | HR instrument implementation Report | 2 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | c) Recruit and retain competent staff | Annual Report on staff turnover | 5 | HRAM | 80 | 118 | 228 | 396 | 448 | 1,270 |

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| | | d) Conduct and implement recommendations from employee satisfaction surveys. | Employee satisfaction implementation Report | 2 | HRAM | 1 | Nil | 1 | Nil | 1 | 3 |
| | | e) Conduct and implement work environment surveys. | Work environment implementation Report | 3 | HRAM | 1 | Nil | 1 | Nil | 1 | 3 |
| | Culture change | a) Conduct survey on the existing culture and value in the Commission | Culture change survey report | 2 | HRAM | Nil | 3.5m | Nil | 4m | Nil | 7.5m |
| | | b) Implement the survey recommendations | Culture change implementation report | 2 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |

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| **2.2 Establish a functional resource centre by 2021** | Establish Knowledge management systems | a) Benchmark document and implement best practices in all functional areas | Annual Report on implemented best practices | 5 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Develop and implement the Commission's KM Policy; | Annual Report on KM implementation | 5 | HRAM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | c) Carry out research on various aspects of transaction management; | No. of research papers completed and approved | 2 | CMT | Nil | Nil | Nil | Nil | Nil | Nil |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | d) Create/update database of prioritized recommendations for innovation from the research results; | No. of Data base established | 1 | CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| | | e) Implement the research recommendations for innovation. | % of No. of recommendations implemented | 10% | CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| | Enhance operational efficiency | a) Review and implement Commission's policies and procedures | Annual report on review and implementation Policies and procedures | 5 | MR | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Transit to ISO 9001:2015 certification and conduct regular audits | Audit reports | 4 | MR | Nil | 1 | 1 | 1 | 1 | 4 |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| **2.3 To improve on existing ICT infrastructure and foster innovation.** | Implement Automation plan | a) Carry out ICT infrastructure assessment | Annual Assessment report | 5 | ICT | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Implement ICT Assessment report | Annual report on implementation ICT assessment report | 5 | ICT | 9 | 3 | 27 | 68 | 69 | 177 |
| | | c) Adopt new opportunities to leverage on IT. | No. of opportunities adopted and implemented | 5 | ICT | Nil | Nil | Nil | 5 | 5 | 10 |

| STRATEGIC GOAL 3: ENHANCE CORPORATE GOVERNANCE | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Strategic Objective** | **Strategies** | **Activities** | **Measure** | **5yr Target** | **Responsibility** | **Budget Estimates(Ksh. Millions)** | | | | | **Total** |
| | | | | | | **2016-2017** | **2017-2018** | **2018-2019** | **2019-2020** | **2020-2021** | |
| **3.1 To enhance linkages and maintain working relationships with stakeholders and partners** | Build and strengthen strategic alliances with key partners/institutions | a) Review the stakeholders database; | Annual report on stakeholders database | 5 | CAO/ CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Prepare and implement 9 stakeholders engagement Strategies; | No of implemented stakeholder engagements | 9 | CAO/ CMT | Nil | Nil | Nil | Nil | Nil | Nil |
| **3.2 To enhance public awareness, image and perception** | Improve corporate Image | a) Conduct a branding assessment | Report on branding assessment | 1 | CAO | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Develop and implement the Commission's branding strategy; | Annual report on branding strategy implementation | 5 | CAO | Nil | Nil | Nil | Nil | Nil | Nil |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Showcase and celebrate the Commission's successes | a) Review and implement Communication Strategy; | Annual report on implementation of communication strategy | 5 | CAO | **16** | **16** | **30** | **35** | **55** | **152** |
| | | b) Implement the CSR strategy at the Commission | Number of CSR initiatives implemented | 20 | CAO | **2** | **3** | **3** | **4** | **5** | **17** |
| | Embrace and uphold good Corporate Governance | a) Implement the Mwongozo Code of Corporate Governance for State Corporations; | Annual reports on implementation of Mwongozo | 5 | CMLA | Nil | Nil | Nil | Nil | Nil | Nil |
| | | b) Build capacity for corporate governance at the Commission; | Annual report on Capacity building on corporate governance | 5 | HRAM | Nil | Nil | 3.5 | 3.7 | 4 | 11.2 |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | c) Comply with the Leadership and Integrity Act, 2012; | Annual compliance reports on leadership and integrity Act | 5 | RCM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | d) Comply with the Commission's Code of Conduct and Ethics. | Annual compliance reports on Code of Conduct and Ethics | 5 | RCM | Nil | Nil | Nil | Nil | Nil | Nil |
| 3.3 Risk Management. | Enhance the practice of risk management and business continuity | a. Review the Commission's ERMF every two years; | No of ERMF Revisions | 3 | RCM | Nil | 3 | Nil | 3 | Nil | 6 |
| | | b. Train the Commission and staff on ERM every two years; | No of ERM trainings | 6 | RCM | Nil | 3 | Nil | 3 | Nil | 6 |
| | | c. Incorporate ERM in the Commission's induction program; | Annual reports on ERM induction | 5 | RCM | Nil | Nil | Nil | Nil | Nil | Nil |

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | d. Review risk occurrence and escalate to the Commission's HR & Risk Committee; | Quarterly Reports to HR & RM Committee | 20 | RCM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | e. Conduct business continuity tests annually. | Annual BCM test reports | 5 | RCM | 1 | Nil | 1 | Nil | Nil | 2 |
| | Provide assurance on effectives of risk management | Prepare risk based audit plan | Annual Audit plan | 2 | IAO | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Carry out risk based audits on quarterly basis | Audit reports | 8 | IAO | Nil | Nil | Nil | Nil | Nil | Nil |

| STRATEGIC GOAL 4: MOBILIZATION AND OPTIMAL UTILIZATION OF FUNDS | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Strategic Objective** | **Strategies** | **Activities** | **Measure** | **5yr Target** | **Responsibility** | **Budget Estimates(Ksh. Millions)** | | | | | **Total** |
| | | | | | | **2016-2017** | **2017-2018** | **2018-2019** | **2019-2020** | **2020-2021** | |
| 4.1 To effectively lobby, utilize and account for funds | Ensure adequate funding | Lobby for adequate allocation of funds | Percentage increase in government funding | 50% | FM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Identify and seek external sources of funds/grants/donations | Percentage of external funds received based on printed estimates | 1% | FM/ CMT | Nil | Nil | Nil | .5 | 1 | Nil |
| | Optimize value for money through effective procurement | Competitive Procurement | Percentage of competitive procurement | 100% | PM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Conduct price analysis for services and goods after every two years | Report on updated price list | 3 | PM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Negotiate with prospective service/ goods providers | Annual report on negotiated procurements | 5 | PM | Nil | Nil | Nil | Nil | Nil | Nil |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Optimal utilization of resources | Budget and budgetary control | Annual budgets Expenditure reports | 5 | FM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Proper recording and accounting of transactions | Audited financial statements | 5 | FM | Nil | Nil | Nil | Nil | Nil | Nil |
| | | Carry out Compliance Audits | No of compliance audit reports | 4 | IAO | Nil | Nil | Nil | Nil | Nil | Nil |