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Norm Localization: How do developing nations localize international norms promoted by international organizations and why? The Case of Localization of Anti- Corruption Norms in Kenya

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NORM LOCALIZATION:

How do developing nations localize international norms promoted by international organizations and why? The Case of Localization of Anti-Corruption Norms in Kenya

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Abstract

This master thesis looks at how developing nations localize international norms promoted by international organizations. To achieve this aim, a single in-depth case study of how Kenya has localized anti-corruption norms promoted by the World Bank was undertaken. Building from the theoretical argument on norm localization from Amitav Acharya, norm localization is not passive but involves the reinterpretation and adoption of external norms based on the local context. Clearly, the anti-corruption norms were localized into the Kenyan context, but what was the outcome? According to Acharya, the potential outcome of norm localization is either full adoption, partial localization, or full rejection. Process tracing was conducted to identify how the localization occurred, why it happened, and the outcome. Documents from the World Bank, the Kenyan Government and institutions, among others, were studied to indicate the localization process. In line with the analysis conducted on three different outlines of institutionalization, governmental efforts, and legitimacy, the findings showed that partial localization was achieved but was not entirely successful, as corruption cases did not subside in Kenya. The leading cause was that the country was undergoing a major political change, and several significant scandals dismantled the sitting cabinet ministers. This emphasized that understanding the local contexts is vital for localization to occur successfully.

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Norm localization is progressive, not regressive or static. It reshapes both existing beliefs and practices and foreign ideas in their local context. Localization is an evolutionary or 'everyday' form of progressive norm diffusion.

(Acharya, 2004, p.252)

Every individual, nation, multi-governmental body, and international organization has norms that govern them. They are present at different levels in our society, and each norm has been accepted and received by its respective citizens and member countries. As defined by Finnemore and Skkink (1998), norms are shared expectations or standards of behaviour that are considered appropriate within a particular group or society. Forming what is deemed acceptable or unacceptable norms will guide the perceived actions of organizations, individuals, and countries (Finnemore & Sikkink, 1998). Norms generally have a tripartite structure that begins and highlights a problem, value, and behaviour (Winston, 2017). International Organizations play a vital role in the localization of these norms by different nations. Norm localization differs from norm adoption and norm diffusion. I will delve further into this while looking at the theoretical framework.

When we mention norm localization, the focal subject of this thesis, I will use the definition provided by Acharya. Amitav Acharya (2004) defines *norm localization* as the process in which norms are adapted and/or integrated into specific local contexts by key home actors. This highlights that norms are not just accepted and implemented passively, but instead, it is an active process. One needs to be fully aware of the local contexts in the respective nation and fully understand the international norm for reinterpretation, modification, and reconstruction of the international norm. This active role is mainly under the responsibility of the local actor (Acharya, 2004).

The specifics of norm localization are always determined by its local actors (Eimer, Lutz, & Verena, 2016). Through the process, one can witness the dynamic interaction between the local context and the international norm, the active process of localization, and the results it produces. Norm localization is also witnessed as a progressive process that can reshape or improve local norms. This proves that norm localization is a multifaceted negotiation between the international norm and the local context.

Within this context, the research question of this study is: *How do developing nations localize international norms promoted by international organizations and why?* The most appropriate way to study this and deliver accurate findings would be through *process tracing* as an *in-depth single case study*. This single case study will focus on Kenya and how they localized the anti-corruption norms promoted by the World Bank. What context in Kenya made it suitable for localization, and how did it occur? To ensure that the research is valuable, I will explore the specific mechanisms that have led to Kenya's localization of the World Bank anti-corruption norms, looking at the existing institutional frameworks and the local political contexts in Kenya. The study will focus on how the localization took place and why by examining the political situation in Kenya and the relationship between the World Bank Group and Kenya. This will shed light on the complexities of norm localization in developing nations.

This research seeks to add to the literature on the agency of local actors in the localization of norms. Offering insights into the elements that influence the localization of international norms in developing states. It will highlight the importance of understanding the local conditions and indicate the different changes, challenges, and successes of localization. The comprehension we derive from this research will also be significant to other international organizations designing and promoting norms in the context of developing nations. The findings could highlight the approaches that sustain and impact localization - highlighting the

role of local actors in norm localization, proposing a mental shift for international organizations from norm adaptation and diffusion to norm localization, specifically in developing nations.

The findings of this paper bear an important social relevance on many different levels and contexts. As the focus is on the agency of developing nations in the localization of international norms, this research aims to provide insights for other developing nations to learn from and potentially acclimatize to their own countries. This is essential as developing nations increasingly dive and contribute to norm localization in an ever-changing global power dynamics. The findings could contribute to understanding how other developing nations in Africa and institutions engage with anti-corruption efforts. These efforts are emerging and being addressed in several countries, with fluctuating degrees of success (Guttermann & Lohaus, 2018; Ocheje, 2017; Persson, Rothstein, & Teorell, 2010).

In the following pages, I will first engage with previous scholarly work on matters pertaining to norm localization in different theoretical and empirical articles. I will then lay the theoretical foundation of this paper based on *Norm Localization* by Amitav Acharya to provide a strong foundation for the research question. The theory highlights the process in which norms are modified and open to interpretation to fit local contexts and normative behaviours (Acharya, 2004). It will assist in investigating how developing nations, such as Kenya, have dealt with and responded to international norms and understand how political factors could play a role in localizing anti-corruption norms. Thereafter, I will be utilizing *process tracing* as my methodology, enabling me to trace how the norm was localized, leading to three potential responses – *Full Adoption*, *Partial Localization*, and *Full Rejection*. Process tracing will enable me to thoroughly examine the sequence of events that lead to localization and its outcome. As the in-depth analysis focuses on Kenya, I will give a brief background on the situation in Kenya and the unique relationship between Kenya and the

World Bank. The analysis will focus on three main aspects of localization:

Institutionalization, Governmental Effort, and Legitimization. This will then lead us to the comprehensive findings on whether localization occurred and, if so, what the outcome was.

LITERATURE REVIEW

Norms are localized through many different agencies, such as local and transnational actors, but I seek to highlight norm localization through the agency that is developing nations.

Developing nations are not to be considered just nations constantly looking for assistance from developed nations, international organizations, and intergovernmental agencies. They are not just sites for international organization activities such as program implementation and execution (McArthur & Werker, 2016). As public opinion of developing nations is not great, it poses the question of whether they could be used as agents for localizing international norms promoted by international organizations.

The scholarly study on norms is extensive both in theoretical and empirical research, as it identifies, describes, and analyses the diffusion, emergence, localization, and effects of norms in the greater international system and at a country level (Winston, 2017). On the theoretical side, keywords such as diffusion and localization automatically jump out. In political science, these words are not just synonymous with integration and transmission, among others, but represent different theories centred around norms. These theories can seem similar initially, but they take different approaches to transmitting norms. The literature on norms has significantly evolved since the foundational works conducted and presented by Finnemore and Sikkink. The norm diffusion theory presented by Finnemore and Sikkink (1998) can be described as a top-down approach to how they diffuse the norms. The theory highlights how norms spread, generally from an international organization to states and how the norms influence the state's behaviour (Finnemore & Sikkink, 1998). They outline a three-stage

process regarding the diffusion of norms: norm emergence, norm cascade, and norm internalization, as they highlight how norms influence the behaviour of nations through a detailed structured life cycle, and thus, the norm gains legitimacy. The norm localization theory, as proposed by Acharya (2004), takes the opposite approach, the bottom-up approach to the transmission of norms. This theory focuses adapting and localizing of global norms to fit local contexts, cultures, and practices (Acharya, 2004). I will delve deeper into these theories when I focus on my theoretical framework.

Another theory noted is the principle-agent theory, especially in the agency of developing nations to localize international norms (Persson, Rothstein, & Teorell, 2010). The principle-agent theory focuses on the relationship between how norms are transferred and the actors that do the work. In this theory, the principle (*the party that delegated authority*) would share the norm with norm entrepreneurs or nations, referred to as the agents (*the party that carries out the norm provided by the principle*). However, there can be problems with the norms promoted by international organizations in adapting because of the agent (Hawkins, Lake, Nielson, & Tierney, 2006).

On the other hand, there are empirical studies, some focused on specific clusters of norms and others on the internalization of norms in specific countries and contexts. In different contexts, norm localization has been studied in relation to human rights, sovereignty, and democracy, among others. Zimmermann (2016) studies the relationship between norm localization and human rights, examining how human rights norms were modified, interpreted, and integrated into the local context of Guatemala. She used a three-step model of translating the human rights norms that include *discourse, law, and implementation*, which added complexity to the localization of the norm. The interaction between different local actors greatly influences the localization outcome (Zimmermann, 2016). Through research done to examine human rights norms concerning women in Turkey, one notes the role of

local norm entrepreneurs who have reinterpreted the norm to resound the local cultural context and showcased a successful case of norm localization and the effects of aligning it with the local values (Sarigil, 2018). It also highlights the role of local norm entrepreneurs, which has been neglected, and how vital they are in the success of norm localization.

Carla Winston (2017) introduced a new concept of norm cluster rather than single norms as it would give a more precise understanding of how principle-based actors diffuse and evolve in the international system. The idea of contestation does not lead to a decline in norms, but rather, it facilitates the strengthening and adaptation of the norm (Zahringer, 2021). The main argument here is that norm contestation is not all detrimental, as some forms lead to robust interpretations of norms to better fit into specific local contexts (Zahringer, 2021). A gap in this literature is on the lack of universal acceptance of the typology of norms, as some scholars have proposed several classifications, such as constitutive, regulative, and procedural norms (Zahringer, 2021). This would be an interesting gap for future scholars to examine and research.

After his groundbreaking research on norm localization, Acharya studied norm localization in the context of sovereignty and regionalism in the Third World. He argued that local actors would choose to localize the different norms to preserve their autonomy and sovereignty from their powerful central actors' counterparts (Acharya, 2011). This study further segmented the importance of a bottom-up process and the different intricate levels at play in norm dynamics.

Regarding the use of developing nations as the agent in the localization of international norms, one notices a focus on the Sustainable Development Goals and how they can be localized into the local contexts of the developing country being studied (Balle & Netterstrom, 2022; Jonsson & Bexell, 2020). There has been some criticism of how

international organizations frame global norms with their practices while concurrently integrating local frameworks provided by local actors, emphasizing that in order to localize norms, local actors still need to rely heavily on global benchmarks (McArthur & Werker, 2016).

The previous study on anti-corruption norms, especially in developing nations in Africa, has been focusing on creating anti-corruption norms and not on localizing them, and that developing nations are stuck in an implementation contest as they criticize the anti-corruption norms and its conflict with their local norms (Guterman & Lohaus, 2018; Ocheje, 2017). The commitment to the localization of the norm will significantly vary depending on the local context (William, 2009). The research on anti-corruption norms in Africa mainly focuses on the broader issues of corruption and seeks anti-corruption norms to answer the issues that corruption has raised. The studies then check if African nations should create their own anti-corruption norms and if previous anti-corruption norms have been successfully implemented. There is little on the localization of anti-corruption norms that international organizations have promoted, let alone multinational organizations.

This research seeks to fill in the gap in the literature, which focuses on the broader areas of developing nations and international organizations and bring in new perspectives into norm localization by researching it in the specific contexts of anti-corruption norms in developing nations. As shown above, the focus on anti-corruption norms has not been on localizing the norm as promoted by an international organization. This research will fill in this gap. It will also add more literature to the field of norm localization, bringing a new context to how it is applied. It will explore the agency of developing nations in localizing norms promoted by international organizations and how the local environment influences localization.

THEORETICAL FRAMEWORK

To give a strong foundation to the research question, which seeks to understand how Kenya has localized anti-corruption norms as promoted by the World Bank. As presented by Amitav Acharya, the norm localization theory is the most appropriate theoretical framework that will offer me a stable framework through which we can comprehend how international norms are adapted and transformed to fit local contexts.

As formerly mentioned in the literature review, when looking at the norm localization theory, people will stumble upon the Norm Diffusion Theory, which is often mentioned alongside Norm Localization. Now, both theories focus on the transmission of norms, but they take different approaches. This brings up the question of how to differentiate between the two theories and understand why I use the norm localization theory. Let me briefly delve into that and explain the difference between the two.

Norm Diffusion, presented by Finnemore and Sikkink (1998), refers to how norms are shared and spread through different actors. This theory set the foundation for norm localization theory, as Acharya conceptualized it after he had engaged with the norm diffusion theory, which catalysed his mind and made him delve into the studies of norms. Norm diffusion is a process that occurs at various levels and requires the adoption and internalization of the norm by new actors. Norm diffusion has three main diffusion mechanisms: socialization, institutionalization, and transnational networks (Finnemore & Sikkink, 1998). In a much simpler term, norm diffusion mainly occurs top-down. Some could argue that the assumption of a global-to-local flow of norms is inherently simplistic (Zwingel, 2012). This means that an international organization presents an international norm to the respective nation. The theory is heavily presented, studied, and used in the research concerning norms. Several scholars built upon this theoretical framework and began exploring various dimensions of norm dynamics, such as contestation and localization. Acharya presented us with a different

type of theory that mainly focuses on the bottom-up approach to norms, shifting us away from diffusion to localization, norm localization.

Acharya (2004, p. 245) defines localization as ‘... *the active construction (through discourse, framing, grafting, and cultural selection) of foreign ideas by local actors which results in the former developing significant congruence with local beliefs and practices.*’ As such, norm localization is the process that includes the modification and adoption of external norms to suit local contexts and the already normative behaviour (Acharya, 2004). With this theory, a nation (*the local actor*) is expected to reinterpret the global norm and fit it into its specific national context. The local actor is the most significant player in this theory as they must believe that their existing belief is insufficient and can be strengthened through the localization of new ideas; this makes norm localization effectively take place (Acharya, 2004). For clarification, Acharya (2004) refers to *local actors* as a groups or individuals within a specific region or country that are involved in the localization of external norms; for this thesis, I will refer to local actors as the developing country, institutions or ministries in the nation that are involved in the localization of the international norm.

As mentioned, norm localization is an active process in which local actors have to actively reinterpret, integrate, and modify foreign norms into their local contexts, for this ensures that the norm develops a significant congruence with the local practices, beliefs, and ideologies (Haans, 2021). It is critical to associate pre-existing norms within the local framework for the new norm to be successfully localized.

Norm localization does have its challenges. One, the local actor must balance the global standards that come with the norm that has been promoted by an international organization and the local realities on the ground, and this can easily lead to tension in the relationship between the international organization and the nation. This indicates that the new and local

norms have to be compatible in one area or another – either their overall broad topic issue or their goals. If the local beliefs and practices do not align with the external norm, it will prove to be a great hindrance to the localization process (Acharya, 2004). Having a strong local norm will greatly increase the potential for the new norm to be localized (Acharya, 2004). Another issue that arises is the credibility of the local actor (*nation*) in localizing the external norm. I will delve further into this in the research design, for the perception and relationship that the international organization has with the local actor will affect the credibility of the local actor in terms of the localization process (Sun & Yu, 2023).

As the focus is on how anti-corruption norms set forth by the World Bank are localized, this theory will help me investigate how developing nations have localized international norms into their local context. It is a more nuanced understanding of local actors' adoption of international norms. Through this framework, one can also see how political, cultural, and legislative factors have been able to fit and reform the norm to reflect the local context. Scholars have previously conceptualized that social and material vulnerability in states leads to norm localization in the long run (Risse, Ropp, & Sikkink, 1999). However, one can also seek to understand if the relationship between the international organization and developing nations can lead a developing nation into localizing the norms set forth.

RESEARCH DESIGN

To fully comprehend how Kenya has localized the anti-corruption norms set forth by the World Bank Group and why, I will utilize *process tracing*. Process tracing will enable me to systematically trace how the anti-corruption norm was localized and its outcome. Acharya (2004) indicates three potential responses to norm localization in his work: *Full Adoption*, *Partial Localization* and *Full Resistance*.

Table 1: *Potential response and indicators*.

Anti-Corruption Norms	Full Adoption	Legal integration took place, and it was accompanied by widespread acceptance, consistent practices, and institutional support of the anti-corruption norm, which was evident by the creation of new institutions.
	Partial Localization	The developing nation develops a hybrid method that combines the international norm standard with the local context. Certain aspects of the anti-corruption norm have been incorporated, and localization has partly taken place.
	Full Resistance	There is a lack of recognition from partner institutions and governmental agencies, and active resistance to the anti-corruption norm has occurred.

The first response, full adoption, occurs when the local actor fully integrates the international norm within their existing framework without significant modification (Acharya, 2004). In the case of Kenya, having received the anti-corruption guidelines from the World Bank Group, they would then fully adopt it into their framework, producing institutional change regarding the creation of new institutions and creating new units within existing institutions and governmental agencies.

Partial Localization focuses on how the norm is selectively integrated into the system (Acharya, 2004). Elements and specific parts of the anti-corruption norm will be adapted to fit the local context of Kenya. The norm will be modified and integrated into the institutional system, resulting in the modification of the implementation strategies embraced by the institutions that will improve the country and prove to be effective in the anti-corruption campaign.

The final response is full resistance; elite local actors actively resist the localization of the norm as they perceive it to be a threat to their identities, practices, and social structure (Acharya, 2004). In this regard, the Kenyan elites will want to retain the status quo and continue their practices, keeping their social structure the same.

Process tracing will enable me to trace how the anti-corruption norm was localized, leading to one of the three responses indicated above. Process tracing is a qualitative research method that allows researchers to ‘... *trace causal mechanisms using detailed, within-case empirical analysis of how causal mechanism operates in real-world cases*’ (Beach & Pedersen, 2019). This definition does not mean that process tracing is only linked to studying causal mechanisms. However, Beach & Pedersen (2019) also indicate that it can be used for case studies that seek to understand an outcome greatly. It is used to study a sequence of events

that have led to an outcome and enables one to understand why and how the outcome occurred. This method has been broken down into three main components: (i) theorization about causal mechanisms linking causes and outcomes, (ii) the analysis of the observable empirical manifestation of theorized mechanisms, and (iii) the complementary use of comparative methods to a selected case and to enable organizations of finding single-case studies (Beach & Pedersen, 2019: ch.1)

Process tracing is not new to the study of norm localization, as Acharya utilised it in his studies. In his scholarly work, Acharya (2004 & 2011) used this methodology to examine a sequence of events to provide a detailed account of how norms are localized to fit the local context. As a result, this methodology fits well with this research as it will be a guiding light to indicate and show the pathway of how the anti-corruption norm was localized in Kenya and why.

In this research, Kenya has been chosen as the developing country. An intriguing fact about Kenya is that it was the first country in the world to ratify the UN Convention against Corruption (Kaufmann, 2003). Corruption is not new to Kenya and has dramatically affected entire government administrations and significant development projects. Seeing the impact corruption has had in Kenya makes Kenya a valuable developing nation for this study. The country's dynamic relationship with the World Bank further benefits the study. World Bank had a hand in the development of Kenyan Anti-corruption; I will delve further into this in the next section. Also, Kenya has the largest economy in East Africa, which enables it to lead the other countries on many fronts. World Bank is one of the major international organizations in the world, dealing with multiple countries and enabling them to develop in many areas. This gives them great access to their member countries, largely developing nations. I will focus on their anti-corruption norms because they have seen corruption affect multiple developing countries, leading them to develop well-curated anti-corruption guidelines and policies for

their projects and their member countries. Using their anti-corruption ecosystem, they have influenced many countries, institutions, and companies to fight corruption successfully, making their anti-corruption norms effective.

This research looks at the localization of the anti-corruption guidelines set by the World Bank beginning during the third president of Kenya, the late Honourable Mwai Kibaki's tenure in 2002. Following the previous presidential tenure, President Mwai Kibaki came into power after witnessing the success, challenges, and limitations of Kenya's previous anti-corruption initiatives and how corruption was still rampant in the country and sought to fight corruption. During his inauguration in 2002, President Kibaki stated that *'Corruption will now cease to be a way of life in Kenya, and I call upon all those members of my government and public officers accustomed to corruption practices to know and clearly understand that there will be no sacred cows under my government ...'* (Mugambi, 2010). Given the charge, some changes did occur to strengthen the groundwork on anti-corruption by localizing the anti-corruption norms promoted by their strategic financial partner, the World Bank.

To operationalize norm localization, an outline that inspects the process of institutionalization, legitimization, and governmental efforts in the Kenya context that led to institutional reforms will be employed. ***Institutionalization*** explores how the anti-corruption norm became institutionalized within the already existing framework, as the presence of the World Bank and its relationship with Kenya will act as a catalyst to bring about institutional and legislative reforms and provide clear guidelines for future allocation of resources.

Legitimization assesses how institutions and citizens perceive the norm as valid. Looking at how the norm has been promoted by local actors and the factors, if any, that affect its legitimization in the process. The ***governmental efforts*** emphasize the role of the local actors and how they actively participated in the localization of the anti-corruption norm – analysing how Kenya has modified and interpreted the norm based on its context. This study will utilize

process tracing to reveal the sequence of events in the localization of anti-corruption norms with support from document analysis. Both primary and secondary documents will be analysed. Primary documents are those that are directly connected to the anti-corruption norm in Kenya and can be found in the World Bank archive documents spearheaded by the Anti-Corruption Guideline, project and evaluation reports, which will provide the critical guidelines that its member states, including Kenya, must adhere to and what is required of them. The second cluster of documents will include official government documents, institutional reports, and related legislation, allowing me to trace exactly how Kenya localized the norm. Secondary sources are documents that give a second-hand account of the information derived from the primary source, which would include scholarly articles, books, and reports from both international organizations.

The World Bank, Anti-Corruption Norms and Kenya

World Bank is one of the three pillars of the postwar international economic order alongside the International Monetary Fund (IMF) and the General Agreement on the Tariffs and Trade (GATT) (Gavin & Rodrik, 1995). Having been founded simultaneously with the IMF under the Bretton Woods Agreement, the World Bank was set up to *'rebuild the economies of countries devastated by war and increase the economic development of developing countries'* (World Bank Group, 2024). As over 40% of the people living in developing countries were in 'absolute poverty' in the 1970s, Robert McNamara – former World Bank President, launched the twin goals of the World Bank, which are to accelerate economic growth and reduce poverty (World Bank Group, 2024). As the twin goals were officially presented and integrated into the organization, member countries drastically increased, and the focus of their work expanded to rural development, water, sanitation, and others.

The World Bank Group views corruption as the ‘... *single greatest obstacle to economic and social development. It undermines development by distorting the role of law and weakening the institutional foundation on which economic growth depends*’ (Shabbir & Anwar, 2007). It is also the biggest obstacle to their twin goals. As such, they have devoted their time, energy, and money to finding sustainable solutions that they would use to ensure that they eradicate corruption in their member countries and will never find its place within their organizations. One of their efforts to accomplish this led to the development of the anti-corruption guidelines, which they implement in all their dealings with their member states.

The Bank takes two distinctive approaches to dealing with corruption, from within organization-based projects and its member countries, in how they deal with corruption. Concerning the organization-financed projects, the organization places rigorous scrutiny on the project funds and works alongside the client to reduce corruption; such inspections include the *Integrity Vice Presidency (INT)* (World Bank Group, 2023). INT works independently within the Bank that investigates and pursues all sanctions related to corruption and fraud in World Bank financed projects (World Bank Group, 2024). Focusing on its member countries, they work at the country, regional, and global levels to help build capable, transparent, and accountable institutions and designs and implement anti-corruption programs. (World Bank Group, 2023). They work to establish competencies that their member states need to implement the desired policies, practices, and institutions that would significantly improve their stand in the fight against corruption and strengthen public integrity (World Bank Group, 2023). While working with their member countries, they note the importance of having anti-corruption institutional systems and incentives, which can only be accomplished when the local political and social contexts are considered as they influence the level of corruption and reforms (World Bank Group, 2023). The local contexts of their member countries are taken into account as the organization seeks to assist them in growing

economically while implemented relevant, sustainable, and practical legal and institutional reforms to eradicate corruption.

World Bank has set up several initiatives, policies, and guidelines under its Anti-Corruption Initiatives to prevent corruption. These include the World Bank Anti-Corruption Core Program, the Anti-Corruption Guidelines, and the Integrity Vice Presidency, among others. The Anti-Corruption Core Program aimed to *'provide participants from developing countries with the tools to develop a participatory and integrated national action plan of institutional reforms to combat corruption'* (Haarhuis, 2005, p.11). It's based on the ground that mutual accountability is essential between countries and international organizations for there to be effective action plans to combat corruption. The countries who were part of this program were each given an opportunity to learn about the different forms of anti-corruption reforms and corruption, then go back to their country and lobby for anti-corruption reforms while bringing the conversation around it to the political circles. The Anti-Corruption Guidelines, which are implemented in all the Banks' dealings with their member countries (*member countries are the borrowers while the Bank is the lender in the guidelines. This is not to rule out other institutions and individuals who also borrow from the Bank*), are a set of principles and requirements that ensure that the funds released by the organization either on loan or as credit are used effectively and only for their intended purposes in a transparent manner. It also helps to ensure that all the members involved in the handling and use of the funds are accountable to each other. The guidelines aim to be a guiding principle and practice for organizations and governments in their goals of developing their countries and establishing good governance practices. It offers specific requirements and sanctions that reinforce the guidelines. The requirements range from having reporting and transparency mechanisms among others.

Transparency is at the foundation of the Banks' anti-corruption ecosystem upon which all their anti-corruption initiatives and guidelines are founded (World Bank Group, 2019). In their anti-corruption ecosystem, several main goals emerge: *Reducing Opportunities for Corruption, Strengthening Accountability, and Promoting Transparency*, among others. To understand how the anti-corruption norm was localized in Kenya, the focus will be on the goal of **Strengthening Accountability**. Strengthening Accountability is fundamental to the overall purpose of the Anti-Corruption Norms, for it seeks to enhance accountability and transparency among all parties, two words that are overly emphasized in the World Bank Anti-Corruption ecosystem (The World Bank, 2006). By strengthening the accountability of its member states, the Bank seeks to enable them to establish independent agencies that investigate corruption cases and hold the government accountable (Huther & Shah, 2000). How has Kenya localized the principles of strengthening accountability of the anti-corruption norm into their institutions?

The relationship between Kenya and the World Bank Group has not been smooth sailing since they joined the international organization. Kenya is one of the few countries whose lending experience has frustrated the international organization (Mosley, 1991). Kenya is infamously known as a country that confronted the World Bank and got away with it in the 1980s (Mosley, 1991). Kenya has also had significant corruption cases such as the Goldenberg, Anglo-leasing, and the National Youth Service (NYS) corruption scandal (see Grynberg & Singogo, 2023; BBC, 2015; Marita, 2023). This paints Kenya negatively as it is the biggest economic giant in East and Africa. Kenya has made great strides in its work towards economic growth and social development, among others, working to stabilize itself as one of the economic giants of Africa. However, there are still key developmental challenges that they face, such as transparency and accountability, which is a great pillar for the anti-corruption guidelines that the Bank has.

Although Kenya has been ridden with several major corruption scandals, it set out to fight it by establishing anti-corruption regulations and laws that date back to the 1950s. The Prevention of Corruption Act (Cap. 65,) which was passed into law, was operative from August 1956 to May 2003, when it was reformed into the Anti-Corruption and Economic Crimes ACT, No. 3 and then enforced with the Bribery Act (Act No. 47 of 2016) (CMS, 2024). This proves that Kenya had begun to form its own anti-corruption norms in terms of legislation and laid the foundation for any other anti-corruption reforms that were to come about in the future. This makes Kenya the perfect case study for this thesis as they had already begun to formulate their own norms around anti-corruption in their own way, guided by their own beliefs, cultural and political contexts, and environment. Another interesting fact is that in 1999, the World Bank rolled out an Anti-Corruption Core Program to embed political-administrative reforms to raise awareness of corruption and civil society movements in fighting corruption, and Kenya was one of the first seven African countries to participate in the learning program (Haarhuis, 2005). Currently, the World Bank is working to support Kenya's government vision 'Vision 2030'. This development strategy aims to reduce inequality, manage resource scarcity, and accelerate sustainable growth (World Bank Group, 2024). As the anti-corruption association between Kenya and the World Bank began in the 50s, this thesis will focus on the localization that occurred during the tenure of the third president of Kenya, the late Honourable President Mwai Kibaki, from 2002 – 2013.

ANALYSIS

Institutionalization

The anti-corruption norms of strengthening accountability were institutionalized into the Kenyan system through different avenues in different governmental and independent institutions. In a report conducted by the World Bank at the behest of the Kenyan

Government following President Kibaki's ascension to power in 2002, there were indications that the government progress was stagnant in its anti-corruption work (Kaufmann, 2003).

This can be credited to several negative incidents and political changes that were taking place at the time. In World Bank funded projects with Kenya, Kenya had to sign an agreement letter accepting the World Bank Anti-Corruption Guidelines and the consequences that would befall them if they failed to comply. Such consequences would include sanctions and public declaration of ineligibility, either indefinitely or for a short time. Through the World Bank guidance and as a sign of good faith to adhere to the Anti-Corruption Guidelines the Kenya Anti-Corruption Commission (KACC) was formed and its track record was great under President Moi, President Kibaki's predecessor, until it was taken to court. This led to its reformulation as the Ethics and Anti-Corruption Commission (EACC), which commenced its operations in 2011 and was seen as a sign of a renewed commitment by President Mwai Kibaki's administration to fight corruption in Kenya (Ayodeji, 2015).

The World Bank Group provided technical and expert knowledge to the newly reformed EACC as it set out to strengthen the oversight institutions in Kenya and give it the organizations full support (World Bank Group, 2014). The Bank took this approach after its set back with KACC, as during its era, it withdrew funding from Kenya due to the Anglo-leasing corruption case.

The Anglo-leasing scandal spans two administrations – it began during President Moi's administration and continued until it was uncovered under President Kibaki's administration. It involves Anglo Leasing Finance, a British firm, who were contracted to provide Kenya with a *'system to print new high-technology passports; alongside other fictitious companies to supply naval shipd and forensic laboratories* (BBC, 2015). These contracts were never honoured but were handed over from cabinet ministers in one administration to the other. They were nurtured and continued to scam the Kenyan government until they were exposed.

This raised alarms to many international investors in Kenya, including the World Bank, and thus, they put a halt on funding being sent to Kenya until they proved to be earnest in the fight against corruption (Newswire Newsletter, 2006). The Anti-Corruption Guidelines allow the Bank to take any necessary action against any individual, entity, or country that would engage in any corrupt or fraudulent practices, which reinforces the guideline as an accountability and transparency mechanism. Kenya experienced this firsthand, and it affected all the projects that were between the Bank and Kenya, as they all came to a halt. As a result, with the reformulation of the EACC, Kenya involved the World Bank to provide more structure and expert knowledge in shaping the institution. Even though EACC was established to fight corruption and promote ethical standards as an independent body that reports directly to Parliament, they have tried different approaches to eliminate corruption but have yet to find a solution (EACC, 2024). The main task of the EACC is to ‘... *investigate corruption and economic crimes, examine practices and procedures of public bodies and educate the public on the dangers of corruption and economic crimes*’ (Ayodeji, 2015, p. 6).

Aligning itself with the anti-corruption norms by the World Bank in regard to strengthening accountability, EACC has secured its work on holding government officials accountable for their work by formulating and enforcing the Public Officer Ethics Act that states that every public officer must declare their incomes, assets and liabilities once every two years (EACC, 2024). This helps them know the source of their income and will act as an indicator to flag any unusual transactions. They also have programmes that seek to educate the public on anti-corruption, conducting training with county governments and governmental institutions and recommending changes and frameworks that will aid the Kenyan government in fighting corruption from the bottom up (EACC, 2024). In collaboration with the World Bank and other donors, the government established independent committees in every department,

ministry, local authority, and state corporation to mitigate any risk of corruption as they collaborate with the EACC (Kaufmann, 2003).

Governmental Efforts

Given that Kenya needed to prove to the World Bank that they were earnest in fighting corruption in the country following a major scandal that shook President Kibaki's entire administration, leading to a reshuffling of his cabinet, they needed to be the first to show initiative and effort. The political situation at the time was not great as there was a divide in government, leading to Kenya's biggest referendum on the Kenyan Constitution. The formulation of the new Constitution paved the way for Kenya to show initiative and ensure that the Constitution now had specific laws and clauses on matters of corruption and gave Constitutional power to the EACC. The formulation of the EACC came following demand from many donors and lenders to Kenya, including the World Bank and backing of the Constitution made the effort of Kenya legitimate (VOA, 2009). The World Bank had pushed for the creation of an anti-corruption focal point that would provide leadership and smooth out inter-agency conflicts.

This then allowed the World Bank to step in and offer assistance in its formulation. Following input from the World Bank and the lessons learnt from the discarded KACC, they began to understand and know that there needs to be coordination with other institutions and governmental agencies in Kenya from across different sectors. This included the National Anti-Corruption Campaign Steering Committee, Office of the Director of Public Prosecutions, and Parliament, among others (EACC, 2024). They worked together to fight corruption in different areas of the government to investigate and prosecute corruption cases strengthening transparency and accountability. It enabled anti-corruption norms to gracefully localize into the local context and strengthen the pillar of accountability in the country.

Legitimization

When looking at the legitimization of the anti-corruption reforms, it is important to ascertain how they are viewed by the public. The anti-corruption strides that Kenya had taken were constantly faced with setbacks, especially from the political situation at the time. The Anglo-leasing scandal caused the first major setback for Kibaki's administration in their fight against corruption. This scandal also highlighted a major flaw in KACC and EACC's dealing with corruption, and that is the power to prosecute. This caused concerns among the Kenyan citizens and affected the legitimacy of the oversight institution; the power to prosecute lies with the Director of Public Prosecution (ODPP) (EACC, 2024). As a result, there has been no significant progress in the overturn of arrests and convictions by the culprits in the cases they have investigated and filed before the court. This is noted as in the Anglo-leasing scandal only resulted in one conviction in 20 years (Munguti, 2024). However, there have been communication campaigns and public participation exercises to spread awareness of the anti-corruption reforms in Kenya.

To ensure the legitimacy of these reforms, it is vital that they receive the full support of the Kenyan Government. The government would play the role of coordinator between the multiple agencies to have a unified front. Without this, the result is a complete loss of confidence of the public's confidence (Kaufmann, 2003). As the old saying goes, a house divided against itself cannot stand. World Bank has also noted that further work needs to be conducted to ensure that there is a united front on all the anti-corruption mandates that are in Kenya. Anti-corruption should not be viewed as an additional sector but as a lens that helps view all other governmental ministers, institutions, and projects. This way, it would be part of everything the government does and become a norm in all aspects.

FINDINGS

The anti-corruption norms are not new to Kenya, as noted in the relationship between Kenya and the World Bank, which bore the Kenyan anti-corruption norms. For a norm to be localized, the local actor must first believe that the new norm will ‘... *enhance the legitimacy and authority of their extant institutions and practices, but without fundamentally altering their existing social identity*’ (Acharya, 2004, p. 248). Some countries find that the World Bank has too often proposed anti-corruption measures without fully considering the local context or having a clear strategy to win key leaders to their side (Fjeldstad & Isaksen, 2008). This is true, and the advantage Kenya had with the World Bank norms is that the World Bank had a hand in assisting Kenya in formulating its own anti-corruption norms. Having observed the challenges and the failure of the KACA and KACC, President Kibaki knew it was time for something new. As such, they localized global norms promoted by the World Bank into their existing framework.

As is evident, norm localization took place with the reformulation of the KACC to EACC under the watchful eye of the Bank. Signs of partial localization with hints of resistance due to the political environment are evident. This highlights the complex nature of norm localization. The fight against corruption has yielded little victory. There are Kenyan elites, some in high levels of government in Kenya, and political factors that played an important role in blocking anti-corruption reforms (Kaufmann, 2003). This can be noted as there has not been any major improvement in the prosecution of corrupt individuals and longer judicial verdicts of accused corrupt individuals. During the Anglo-leasing scandal, the Attorney General’s office rejected investigating the files that the KACC had handed over (Kaufmann, 2003). After President Kibaki’s tenure in 2013, over 560 billion Kenyan Shillings (Ksh) were lost due to corruption between 2013 and 2018 (Corruption Scandals, 2018).

In the institutionalization section, partial localization occurred, as seen through the reformulation of KACC to EACC, which indicated a hybrid approach to the World Bank anti-

corruption norm to strengthen accountability. Transparency reforms in Kenya, such as this, have largely been neglected, and the progress that can have a major impact is feasible (Kaufmann, 2003). As such, the need for partnerships between the oversight institutions and the World Bank to monitor the bank-funded projects in Kenya is important. In governmental efforts, it's noted that local actors (*meaning the Kenyan Government*) are vital to the localization of the norms. The Government of Kenya needs to make great effort not just to localize the norm but also to sustain it and make it work, which they have been failing to do. Even with the EACC, the evaluation of World Bank funded projects have been subpar, not meeting the required and implementation standards. Corruption on World Bank funded projects in Kenya has not subsided, and the highest levels of corruption occur during an election year (Ensminger & Leder-Luis, 2025). This indicated that even though the anti-corruption norms have been localized, there hasn't been significant progress in Kenya, indicating partial localization. In legitimization, the localization aspect was partial as it did gain the anti-corruption reforms gain positive traction and the trust of the public; however, for just a short period of time, given the political changes that were occurring at the time.

Anti-corruption norms are ever-evolving as corruption practices are constantly changing with time. As such, it's evident that new degrees of anti-corruption norms will continue to emerge, and collaboration between developing nations and international organization will be necessary as no one can fight corruption without the assistance of another. The momentous finding is the importance of the political situation in the developing nation while localization is occurring. This will greatly alter the localization process, including its results. When corruption scandals that shake the political environment of a developing nation are occurring, the result of localization will be partial. In that, localization will take place, but it may not yield the desired results no matter how much backing it receives.

CONCLUSION

This research has examined how developing countries have localized international norms promoted by international organizations through an in-depth single case study on how Kenya has localized anti-corruption norms promoted by the World Bank Group. The anchor for this research is the Norm Localization theory by Acharya, who paved the way from norm diffusion. Norm localization refers to the process in which local actors localised external or international norms into the local context. This process is not passive but involves the reinterpretation of the norms based on the local context. In the context of this research, the localization of the anti-corruption was definitely not passive. However, it involved the reinterpretation of the norm to fit the Kenyan context and reforming existing systems. Interestingly, the World Bank had a hand in building the initial Kenyan anti-corruption norms that governed the country but were constantly facing challenges. Partial localization occurred in Kenya, and the main reason for this outcome was the political environment and corruption scandals that were present at the time. The reforms, such as the reformulation of KACC to EACC, came as a condition for Kenya as the World Bank had ceased funding. The catalyst was the Anglo-leasing scandal that blew up and incriminated high-level members of governments and caused the World Bank to cease funding until an anti-corruption institution was set up. This finding ties back to the theoretical framework by emphasizing that the local environment must be carefully studied in order for norms to be successfully localized into a local context. Acharya notes that having a strong local norm will greatly increase the potential for the new norm to be localized. Given that Kenya had their own anti-corruption scandals already in place, the localization of the new anti-corruption norms from World Bank were possible, although partially. The reforms were set on the World Bank anti-corruption pillar of Strengthening Accountability which all the reforms aimed to enhance accountability and transparency.

For a much deeper understanding of the localization of anti-corruption norms in Kenya and their outcome, more research needs to be done within a bigger time frame. This thesis focuses only on President Kibaki's tenure, 2002-2013 – where there were political shifts and significant corruption scandals. More scandals took place after his tenure, and it would be beneficial to examine if the anti-corruption reforms stood through each scandal, strengthening the accountability of the government, institutions, and individuals. The findings in this research cannot be easily generalized to other developing nations as the situation in Kenya was unique to only Kenya; as such, a comparative study should be conducted in the future with other developing countries to witness how international norms promoted by international organizations were localized.

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