

**T.C.
SAKARYA UNIVERSITY
INSTITUTE OF SOCIAL SCIENCES
DEPARTMENT OF POLITICAL SCIENCE AND PUBLIC
ADMINISTRATION**

**COMPARATIVE ANALYSIS OF LOCAL GOVERNMENT
STRUCTURES IN KENYA AND TÜRKİYE IN THE CONTEXT OF
GOVERNANCE**

Abdisalan Mahamed IBRAHIM

MASTER DEGREE THESIS

Thesis Supervisor: Prof. Dr. Aziz TUNCER

JUNE - 2025

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“This thesis was defended online on 24/06/2025 and was unanimously accepted by the jury members, whose names are listed below”

JURY MEMBER	APPROVAL
Prof. Dr. Aziz TUNCER	Successful
Prof. Dr. Zeynel Abidin KILINÇ	Successful
Assist. Prof. Duygu DEMİROL DUYAR	Successful

ETHICS STATEMENT

According to the Similarity Report received by your institute within the framework of the Implementation Principles, the similarity rate of the thesis work, whose information is given above, does not contain any plagiarism; I declare that I accept all kinds of legal responsibility that may arise in a possible situation where the opposite is determined and that I have received the approval document if Ethics Committee Approval is required.

Is an ethics committee approval document needed?

Yes ☐

No ☒

(The studies that require the approval of the Ethics Committee are as follows:

- All kinds of research are conducted using qualitative or quantitative approaches, which require data collection from participants through surveys, interviews, focus group work, observation, experiments, and other techniques.
- The use of humans and animals (including material/data) for experimental or other scientific purposes,
- Clinical studies on humans,
- Research on animals,

Retrospective studies in accordance with the personal data protection law.)

Abdisalan Mahamed IBRAHIM

24/06/2025

THE PREFACE

This thesis, titled "**Comparative Analysis of Local Government Structures in Kenya and Türkiye in the Context of Governance**", represents the culmination of my academic journey in the fields of Political Science and Public Administration. In this research, I have sought to analyse and compare the structures, functions, and effectiveness of local government structures in Kenya and Türkiye, with particular attention given to governance practices and administrative frameworks.

The process of completing this thesis has been both intellectually enriching and personally fulfilling. It has allowed me to deepen my understanding of comparative public administration and to develop a more nuanced perspective on the various challenges and opportunities that exist within different governance contexts.

I wish to express my sincere gratitude to my supervisor, Professor Dr. Aziz TUNCER, for his unwavering support, guidance, and valuable insights throughout the research process. His expertise in strategic studies has played a crucial role in shaping the direction and depth of this work.

I am also profoundly thankful to Professor Dr. Zeynel Abidin KILINÇ and Dr. Asst. Prof. Duygu DEMİROL DUYAR for their constructive feedback and editorial assistance. Their thoughtful comments and encouragement have significantly contributed to the refinement and completion of this study, and I appreciate their service as members of my thesis jury. Above all, I extend my heartfelt appreciation to my father, Mohamed Ibrahim Farah [Fanah], whose steadfast encouragement, prayers, and unwavering support have been a constant source of strength and motivation throughout my academic pursuits. His belief in the importance of education has inspired me at every step.

This work stands as a testament not only to my academic endeavours but also to the support and mentorship of those who have guided me along this journey.

Abdisalan Mahamed IBRAHIM

24/06/2025

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ABBREVIATIONS

ADCs	: African District Councils
AKP	: Justice and Development Party
BRT	: Bus Rapid Transit
CDF	: Constituency Development Fund
CHP	: People's Republic Party
CIMES	: County Integrated Monitoring and Evaluation System
CoG	: The Council of Governors
CRA	: Commission on Revenue Allocation
DACs	: District Advisory Committees
DFRD	: District Focus for Rural Development
ECDE	: Early Childhood Development and Education
GPT	: Graduated Poll Tax
ICT	: Information and Communication Technology
IMM	: Istanbul Metropolitan Municipality
KADU	: Kenya African Democratic Union
KANU	: Kenya African National Union
LASC	: Local Authority Service Charge
LASDAP	: Local Authorities Service Delivery Action Plan
LATF	: Local Authority Transfer Fund
LNCs	: Local Native Councils
MCAs	: Members of the County Assembly
MDP	: Ministry of Devolution and Planning
NMS	: Nairobi Metropolitan Services
OAG	: Office of the Auditor General
PECs	: Provincial Executive Committees
PPPs:	: Public-Private Partnerships
SPAs	: Special Provincial Administrations
SRDP	: Special Rural Development Programmes
UNDP	: United Nations Development Programme

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ABSTRACT	
Title of Thesis: Comparative Analysis of Local Government Structures in Kenya and Türkiye in the Context of Governance.	
Author of Thesis: Abdisalan Mahamed IBRAHIM	
Supervisor: Prof. Dr. Aziz TUNCER	
Accepted Date: 24/06/2025	Number of Pages: viii (pre text) + 95 (main body)
While extensive research exists on the local administration systems of Kenya and Turkey individually, there is a notable lack of comparative studies examining their governance frameworks, legal structures, and administrative processes. This study aims to bridge that gap by comprehensively comparing the local governance models in both countries. The analysis focuses on three core dimensions: organisational structures, legal frameworks, and governance mechanisms. It explores how administrative authority is distributed, how local and national governments coordinate, and how effectively services are delivered. It also examines the constitutional and legislative provisions guiding local governance, including fiscal decentralisation and the autonomy of local authorities. Additionally, the study assesses mechanisms for citizen participation, accountability, and transparency. Since local governments are often the most accessible level of government for citizens, they play a crucial role in democratic participation, service provision, and inclusive policymaking. This research identifies best practices and challenges within the Kenyan and Turkish local governance systems and offers policy recommendations to enhance efficiency, strengthen local autonomy, and improve accountability. The findings are based on a rigorous review of official documents and expert interviews conducted with local government officials in Nairobi County, Kenya, and Istanbul Municipality, Türkiye.	
Keywords: Local Governance, Decentralisation, Devolution, Local Administration, Kenya vs Türkiye	

ÖZET	
Başlık: Kenya ve Türkiye’de Yerel Yönetim/İdare Yapılarının Yönetişim Bağlamında Karşılaştırmalı İncelenmesi.	
Yazar: Abdisalan Mahamed IBRAHIM	
Danışman: Prof. Dr. Aziz TUNCER	
Kabul Tarihi: 24/06/2025	Sayfa Sayısı: viii (ön kısım) + 95 (ana kısım)
Kenya ve Türkiye'nin yerel yönetim sistemleri üzerine ayrı ayrı kapsamlı araştırmalar mevcut olsa da, yönetim çerçevelerini, yasal yapılarını ve idari süreçlerini inceleyen karşılaştırmalı çalışmaların eksikliği dikkat çekmektedir. Bu çalışma, her iki ülkedeki yerel yönetim modellerini kapsamlı bir şekilde karşılaştırarak bu boşluğu doldurmayı amaçlamaktadır. Analiz üç temel boyuta odaklanmaktadır: örgütsel yapılar, yasal çerçeveler ve yönetim mekanizmaları. İdari yetkinin nasıl dağıtıldığı, yerel ve ulusal yönetimlerin nasıl koordine edildiği ve hizmetlerin ne kadar etkili bir şekilde sunulduğu araştırılmaktadır. Ayrıca mali adem-i merkeziyetçilik ve yerel yönetimlerin özerkliği de dahil olmak üzere yerel yönetişi yönlendiren anayasal ve yasal hükümler de incelenmektedir. Çalışma ayrıca vatandaş katılımı, hesap verebilirlik ve şeffaflık mekanizmalarını da değerlendirmektedir. Yerel yönetimler genellikle vatandaşlar için en erişilebilir yönetim düzeyi olduğundan, demokratik katılım, hizmet sunumu ve kapsayıcı politika yapımında çok önemli bir rol oynamaktadır. Bu araştırma, Kenya ve Türkiye'deki yerel yönetim sistemlerindeki en iyi uygulamaları ve zorlukları tespit etmekte ve verimliliği artırmak, yerel özerkliği güçlendirmek ve hesap verebilirliği geliştirmek için politika önerileri sunmaktadır. Bulgular, resmi belgelerin titiz bir şekilde incelenmesine ve Kenya'nın Nairobi İlçesi ile Türkiye'nin İstanbul Belediyesi'ndeki yerel yönetim yetkilileriyle yapılan uzman görüşmelerine dayanmaktadır.	
Anahtar Kelimeler: Yerel Yönetişim, Desantralizasyon, Yetki Devri, Yerel İdare, Kenya vs Türkiye	

INTRODUCTION

Background

Governance is the process through which public policy decisions are formulated and implemented. Glass & Newig (2019) note that governance is derived from relationships, interactions with other sectors- public sector, government, civil society and private sector. Governance involves negotiation, decisions and the power relations between these stakeholders in terms of who gets what, when and how (Ansell & Gash, 2008). Additionally, this relationship between the different sectors and the government determines service provision. Therefore, governance is more than just having a “good government” as it broadly shapes service provision in terms of how they are managed, planned and regulated in different socio-economic and political systems.

Local governance encompasses various formal and informal institutions, processes, and relationships that influence decision-making and resource distribution at the local level (Clingermayer & Feiock, 2001). Local government refers to the governing bodies of towns, cities, townships, municipalities, districts, counties or other political subdivisions within a state at the local level (Slack, 2004). The structures of local government typically encompass political figures such as mayors, councils, committees, and various administrative services.

Local governance is a fundamental component of national development and governance, ensuring that administrative structures are proximate to citizens and responsive to their needs. In numerous countries, local authorities play a pivotal role in delivering essential services, fostering local development, and implementing national policies at the grassroots level as posited by Grindle (2009). There are several benefits to these roles. Involvement in local government by community members can facilitate a more direct democratic process, enabling the voices of everyday individuals to be more readily acknowledged. Also, the proximity of local government to the populace fosters opportunities for meaningful dialogue, debate, and discussion aimed at addressing community issues (Bingham, Nabatchi & O'Leary, 2005). Additionally, citizen engagement in local governance provides individuals with insights into community matters that would typically be reserved for public officials and administrators. Finally, active participation in local government by citizens often strengthens relationships among

community members, fostering a self-sufficient and collaborative environment. Therefore, an in-depth understanding of local governance systems is crucial for enhancing governance efficiency and improving service provision.

Kenya and Türkiye exhibit distinct historical, political, and socio-economic contexts that have shaped their local governance systems. In Kenya, local administration has evolved through colonial and post-colonial transitions, heavily influenced by decentralisation policies aimed at empowering local governments, as noted by Ibrahim (2024). The promulgation of the 2010 Constitution introduced a devolved governance system, establishing 47 county governments with substantial autonomy (Hope, 2014). This transformation sought to address historical marginalisation, promote equitable development, and bring public services closer to the populace.

Conversely, Türkiye's local governance system traces its origins to the Ottoman administrative framework and has undergone continuous restructuring since the establishment of the Republic in 1923. The Turkish system is characterised by a strong central government with local administrative units operating under considerable central oversight (Bayraktar & Massicard, 2012). Despite numerous reforms aimed at enhancing local autonomy, the balance of power between central and local authorities in Türkiye remains a subject of ongoing debate.

Comparing the local governance systems of Kenya and Türkiye provides valuable insights into how diverse administrative structures influence the effectiveness of local governments in service delivery and local development. By examining the similarities and differences between these systems, this study aims to contribute to a broader understanding of local governance and offer lessons applicable to other nations facing similar governance challenges.

Problem Statement

Local governance is key to shaping various political and socio-economic aspects of a country. Countries have adopted a decentralised form of governance to enhance service delivery, improve infrastructure, and provide opportunities for citizens to exercise their democratic responsibilities through public participation (Bingham, Nabatchi, & O'Leary, 2005). While there is a growing body of literature on local governance in Kenya and Türkiye individually, there is a notable gap in direct comparative studies between the two.

This study aims to fill this gap by providing a comprehensive analysis of their local administration systems, examining organisational structures, legal frameworks, and governance mechanisms. The comparison is valuable for understanding how different administrative structures influence service delivery and local development, identifying best practices for policy and practice.

Moreover, by having a comparison of the local governance systems in the two countries, the study can highlight the best practices, lessons learned and areas for governance improvement. Findings from the research will further contribute and add depth to the wider conversation surrounding local governance by offering insights that can guide the development and execution of policies in both Kenya and Türkiye. Furthermore, the study will present actionable recommendations aimed at improving the efficiency of local administration, ensuring that governance frameworks adequately address the needs of local communities. In conclusion, this research will serve as a significant resource for policymakers, academics, and practitioners who aim to enhance local governance models in comparable settings across the globe.

Research Questions

This study seeks to address the following key research inquiries:

Main Research Question.

- How are governance structures shaped within the different local administration Structures of Kenya and Türkiye?

Sub-questions,

1. What are the key similarities and differences between the local governance structures of Kenya and Türkiye?
2. How have the governance structures in both countries influenced local service delivery and local development?
3. What are the primary challenges and opportunities faced by local governments in Kenya and Türkiye?

Objectives of the Study

The principal objectives of this study are:

Main Objective.

- To develop scientifically grounded recommendations for improving service delivery efficiency and promoting local development through a comparative analysis of local governance structures in Kenya and Türkiye, while contributing to the academic literature on local governance.

Sub-objectives,

1. To analyse and compare the organisational, functional, and governance frameworks of local governance structures in Kenya and Türkiye.
2. To assess the influence of local governance structures on public service delivery and local development outcomes in both countries.

Subject of the Study

This study examines and compares the local government structures of Kenya and Türkiye, focusing on governance frameworks, decentralisation models, and institutional performance. It analyses how historical, legal, and administrative systems influence service delivery, local development, and citizen participation. The research contributes to the field of comparative public administration by identifying key differences, similarities, and policy implications in both contexts.

Significance of the Study

This study is significant for contributing to the academic literature on comparative governance, offering insights into two diverse systems. It provides practical implications for policymakers in Kenya and Türkiye, highlighting areas for improvement, such as enhancing county capacities in Kenya and increasing local autonomy in Türkiye. It also serves as a resource for other countries reforming local governance, enhancing understanding of historical contexts shaping current structures, and informing future policy decisions.

Scope of the Study

This study focuses on the local administration systems of Kenya and Türkiye, with a particular emphasis on Nairobi County in Kenya and Istanbul municipality in Türkiye. The thematic scope addresses the organisational structures, roles, legal frameworks, and service delivery mechanisms of local governments in both countries.

Study Limitations

This study has several limitations. Its focus on Kenya and Türkiye restricts the generalisability of the findings to other national contexts with different administrative systems. Access to up-to-date government data, particularly in Türkiye, was often hindered by bureaucratic issues and language barriers. Translating official documents from Turkish may have introduced interpretative inaccuracies. As a qualitative study, it involves subjectivity in interpreting interviews and documents, though efforts like triangulation and systematic coding were made to reduce bias. The research reflects a specific timeframe (2024–2025), possibly missing future policy changes. Lastly, the lack of quantitative performance metrics limits the ability to statistically measure governance outcomes, which could enhance the analysis.

Methodology of the Study

This part outlines the research design, data collection methods, data analysis techniques, and ethical considerations adopted in this comparative study of local administration in Kenya and Turkey. The methodology ensures a systematic approach to analysing governance structures, decentralisation, and administrative efficiency in both countries.

Research Design

This study employs a comparative research design, a widely used methodological approach in governance studies, to analyse the similarities and differences between administrative structures in different countries. Comparative research enables a systematic examination of governance patterns, institutional frameworks, and policy implementations across diverse contexts (Landman, 2008). This approach is particularly valuable for understanding how decentralisation policies and governance structures function within distinct political and socio-economic environments. By comparing Kenya's devolved governance system with Türkiye's centralised model, the study aims to identify best practices, governance challenges, and potential policy improvements.

A qualitative research approach is adopted in this study to facilitate an in-depth exploration of governance mechanisms. Qualitative methods are particularly effective for examining complex administrative interactions, policy implications, and institutional dynamics that may not be easily quantifiable (Creswell, 2014). The approach involves

analysing legal and policy documents and conducting expert interviews to generate rich, descriptive data on governance efficiency and administrative practices in both Kenya and Türkiye.

The rationale for employing a qualitative comparative design is based on the need to understand the underlying principles, motivations, and operational challenges of local governance. This design allows for contextual analysis while providing flexibility in interpreting governance trends that emerge from both primary and secondary data sources.

Data Collection Methods

A combination of primary and secondary data collection methods will be used to ensure a comprehensive and well-rounded analysis of governance structures in Kenya and Türkiye. The study will employ two key data collection techniques: document analysis and expert interviews.

Document Analysis

Document analysis is a fundamental data collection method in governance research, allowing for the systematic review of policy frameworks, legal structures, and administrative guidelines. According to Bowen (2009), document analysis involves the examination of texts to derive insights into historical developments, policy effectiveness, and governance trends. This study will analyse various primary and secondary sources, including constitutional provisions, local government acts, decentralisation policies, and governance reports.

The documents to be analysed include official government publications, legal frameworks, and scholarly research on governance. Key sources will consist of:

- The 2010 Constitution of Kenya provides the foundational principles for devolved governance.
- Kenya's County Governments Act (2012) and Public Finance Management Act (2012) define the operational and financial management structures of county governments.
- Turkey's Municipal Law No. 5393 (2005), Metropolitan Law No. 5216 (2004), 6360 (2012), the first being Decree Law No. 195 of 1984 and Metropolitan Municipality Law

No. 3030 of 1984. Outline the regulatory framework governing municipal and metropolitan governance.

- Reports from international organisations such as the World Bank, UNDP, and OECD provide insights into governance efficiency and decentralisation trends.
- Academic journal articles, policy briefs, and research papers from reputable institutions analysing the effectiveness of local governance structures in Kenya and Türkiye.

The documents will be sourced from government archives, official websites, university libraries, and governance research institutions. The analysis will focus on identifying governance trends, historical developments, and institutional strengths and weaknesses in both countries.

Data Analysis Techniques

Descriptive Content Analysis

Descriptive content analysis was applied to code and interpret qualitative data. This technique enables the identification of recurring codes, categories, and themes (Schreier, 2012).

Code	Category	Theme
Public Forums	Participation.	Participatory Governance
Budget Oversight	Accountability	Fiscal Transparency
Service Delivery	Performance	Administrative Efficiency

Table 1: Sample Coding

Source: (Created by the Author)

Comparative Analysis

Comparative analysis refers to the systematic study of administrative practices and systems across different governance contexts. It is widely used to identify best practices and explain why certain models succeed or fail in various environments (Peters, 1998).

A comparative analysis was used to examine the governance structures of Kenya and Türkiye systematically. It allows for the evaluation of different institutional arrangements and how they shape service delivery, autonomy, and governance efficiency (Landman, 2008).

Comparative Public Administration

Comparative Public Administration (CPA) focuses on the cross-cultural and cross-national study of public administration systems. It helps in understanding how historical, social, and institutional factors shape public management outcomes in different countries (Jreisat, 2002). This theoretical approach underpins the analysis in this study.

Ethical Considerations

Informed Consent

All interview participants will be briefed on the study's objectives, their role, and the intended use of the collected data. Participants will be required to provide informed consent before engaging in interviews, ensuring ethical compliance and voluntary participation (Israel & Hay, 2006).

Confidentiality

To protect participants' identities and privacy, all responses will be anonymised. Personal identifiers will be removed from transcripts, and respondents will be referred to using general descriptors such as "government official" or "policy expert." This approach aligns with ethical research standards on confidentiality and data protection (Flick, 2018).

Data Security

All collected data will be securely stored in encrypted digital formats, with restricted access limited to the research team. Hard copies of documents, if any, will be stored in locked cabinets to prevent unauthorised access. Data security protocols will be implemented in compliance with international research ethics guidelines (Berg, 2001).

Research Integrity

The study will adhere to principles of academic integrity, ensuring fairness, transparency, and objectivity in data interpretation. Findings will be presented accurately, avoiding selective reporting or misrepresentation. Any potential conflicts of interest will be disclosed, and the research will maintain ethical standards of neutrality and rigour (Silverman, 2013).

By integrating these methodological approaches, this study seeks to provide a robust comparative analysis of local governance in Kenya and Türkiye. The combination of qualitative research methods, comparative analysis, and ethical safeguards ensures that the findings contribute meaningfully to governance scholarship and inform practical policy recommendations.



CHAPTER 1: LITERATURE REVIEW

Local governance and administration are essential to the functioning of the national government and overall economic and political systems of a nation. Local governments are the primary interaction points between the citizens and the state, offering a critical role in infrastructural development, policy implementation, service delivery and other planning mechanisms (Robson, 2021). Türkiye and Kenya have different political and historical histories, but they are similar in their adoption of decentralised governance aimed at improving accountability and facilitating efficiency in local services and participation.

This chapter reviews existing literature on local governance and administration, providing a conceptual and theoretical foundation for the comparative analysis of Kenya and Türkiye. It explores key models of governance, the historical evolution of local administration in both countries, and the role of local governments within their broader national governance frameworks.

1.1. Conceptualising Local Governance and Administration

¹Local governance and administration are critical components of all democracies. Conceptualising these terms offers a concrete foundation for comprehending their role and usage in the research process. The section offers a definition of key concepts, the significance of these concepts and offers a conceptual framework to guide the comparative analysis of Kenyan and Turkish local governance systems.

1.1.1. Definition of Local Governance

The UN-Habitat. (2022) defines local governance as the institutions, processes and mechanisms that facilitate communities and local communities to deliver services, make decisions and have a say on how public resources are managed. Bardhan & Mookherjee (2006) posit that local governance incorporates the administrative, political and fiscal

¹ While the terms local administration, local government, and local governance may seem interchangeable in this study, it's important to recognise and respect their distinct meanings. Local administration focuses on the delivery of public services within a community. Local government refers to the formal structures of elected bodies that hold political and administrative power. In contrast, local governance encompasses a collaborative, multi-stakeholder approach to management that involves not just the public sector, but also the private sector and civil society. The terms employed in this thesis are used according to their specific definitions, as outlined in the relevant academic literature. By the Author (Ibrahim, A.M).

dimensions of governance on the local level. The role of local governance is to emphasise accountability, citizen participation and respond to the needs of the community. Local governance operates across three main dimensions as noted by John (2001). First is the political dimension. Under the dimension, local governance encompasses the processes and structures for decision-making, representation and citizen participation on a local level. The public dimension includes elected officials, participatory budgeting and public consultations. The administrative dimension entails the human resources, organisational structures and processes under which the local authorities manage public services and implement formulated policies. The final dimension is fiscal, which handles the systems needed to generate, allocate and manage the financial resources needed to fund infrastructural projects and services to benefit the local community (John, 2001).

1.1.2. Definition of Local Administration

Local administration emphasises the organisational frameworks, roles, and procedures that local authorities utilise to execute policies and provide services (Ahmed, 2024). These encompass bureaucratic systems, public officials, and administrative structures that put governance decisions into action. While governance pertains to the processes of decision-making and engagement, administration underscores the implementation of those decisions (Koliba et al., 2017).

1.2. Conceptual Framework

A conceptual framework visually represents the connections between variables, emphasising the relationship between independent and dependent variables (Mugenda & Mugenda, 2003).

The conceptual framework illustrates the perceived link between the independent variable (local administration systems) and the dependent variable (governance outcomes), as moderated by citizen participation and transparency mechanisms.

The conceptual framework organises key elements of local governance under three primary dimensions: organisational structures, legal framework, and governance mechanisms. Based on these dimensions, the framework compares Kenya and Türkiye's local administration systems and evaluates their impact on governance outcomes.

Concept	Kenya	Türkiye	Outcome
Organizational Structures			
Governance Model	Devolved System	Deconcentrated System	Degree of Autonomy
Administrative Structure	County Governments	Municipalities and Districts	Service Delivery Efficiency
Coordination Mechanism	Intergovernmental Relations Act	Centralised Administrative Oversight	Policy Implementation Effectiveness
Legal Framework			
Constitutional Basis	2010 Constitution (Devolution)	Constitutional Articles on Local Administration	Legal Autonomy of Local Units
Local Government Laws	County Government Act, Urban Areas and Cities Act	Municipality Law, Special Provincial Administration Law	Clarity and Functionality of Local Governance
Fiscal Decentralisation	Counties control budgets	Central government allocates budgets	Financial Sustainability of Local Governments
Governance Mechanisms			
Citizen Participation	High through Public Forums	Moderate through Local Councils	Responsiveness to Local Needs
Accountability Mechanisms	Independent Oversight Bodies	Central Government Supervision	Transparency and Public Trust
Service Delivery	County-level service provision	Centrally supervised service provision	Efficiency in Public Services

Table 2: Compares Kenya and Türkiye's Local Administration Systems & Evaluates Their Impact on Governance Outcomes

Source: (Created by the Author).

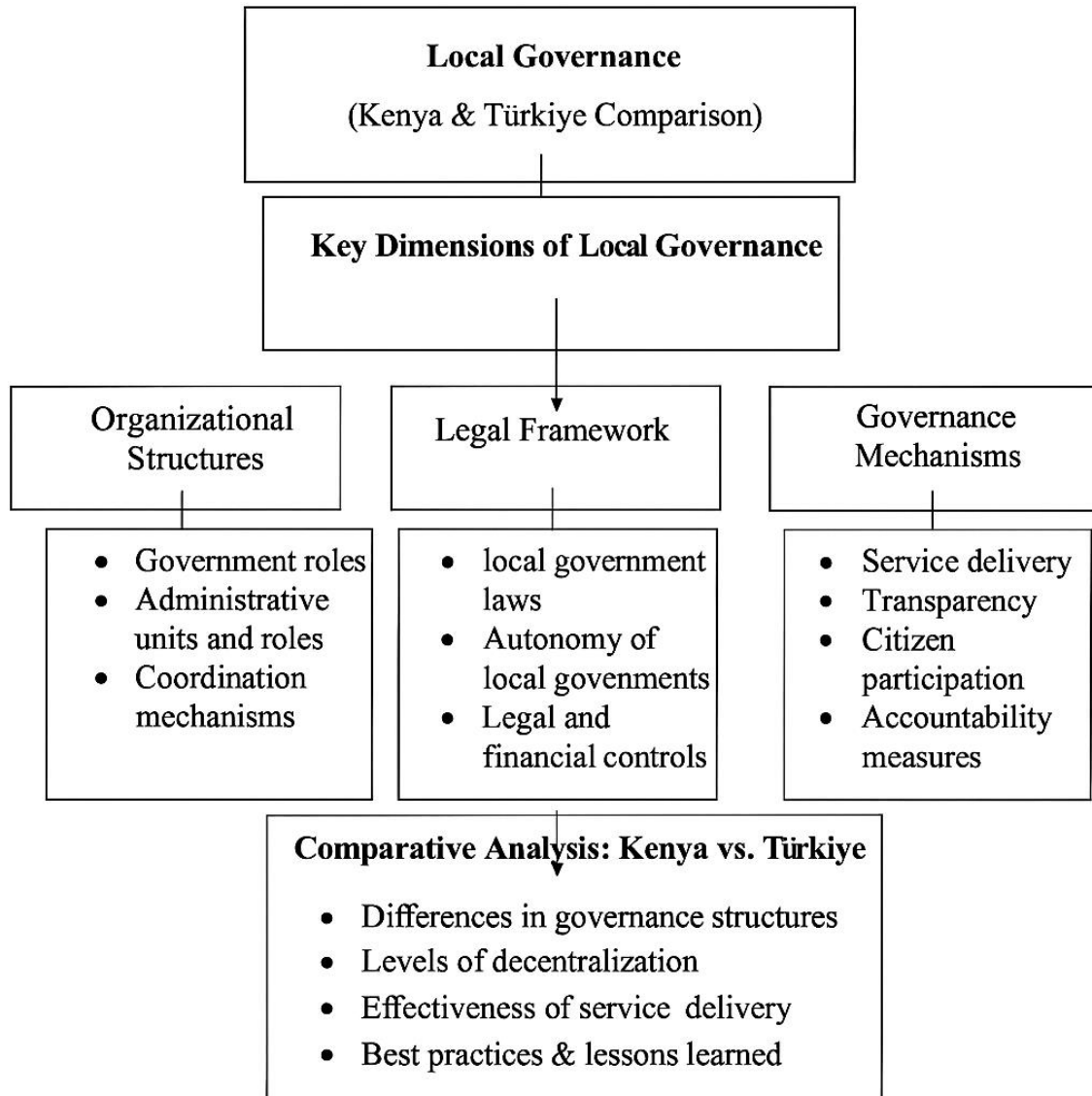


Figure 1: Conceptual Framework

Source: Created by the Author.

1.3 Theoretical Perspectives

Local governance differs from one country to another due to political, historical and institutional factors. To offer a comprehensive study of the Kenyan and Turkish Local Administration Systems, the Decentralisation theory and Comparative Public Administration Theory in the research study.

1.3.1 Decentralisation Theory

According to Hope (2000), decentralisation, as a component of local governance, facilitates a transition from state-centric viewpoints to encompass factors that are frequently perceived as external to the public policy framework. Consequently, the

concept of local governance can be viewed as an effort to address the challenges associated with state-centred approaches to local administration.

Decentralisation refers to the process of redistributing power, authority, or responsibility for decision-making, planning, management, or resource allocation from the central government to various entities (Rondinelli, 2017). These entities may include field units, district administrative bodies, local governments, regional or functional authorities, semi-autonomous public agencies, parastatal organisations, private sector entities, and non-governmental or voluntary organisations. (Rondinelli, 2017). A government has not decentralised unless the country contains autonomous elected subnational governments capable of taking binding decisions in some policy areas, as Treisman (2007) writes.

Decentralisation can also be defined from a public choice perspective. Standard public literature provides both ex-ante and ex-post arguments for decentralisation (Cremer, Estache & Seabright, 1994). However, the general basic definition of decentralised governments is regarded as having better knowledge of local preferences, either in the sense of having access to information denied to central governments, or in the sense of observing preferences with less noise.

There are various ways in which the government can be decentralised.

1. Deconcentration- The process occurs when the central government relocates personnel, equipment, and offices from the capital to various cities and towns across the nation. Despite this redistribution, the chains of command, reporting structures, and accountability mechanisms, along with fiscal flows related to spending and taxation, largely remain intact (Yuliani, 2004). The primary objective is to move public officials from the central hub to the periphery. This approach can prove advantageous as it facilitates the incorporation of more precise and comprehensive information regarding local needs and conditions into governmental decision-making. Additionally, by distributing central government salaries and expenditures more equitably throughout the country, it can gain political favour and may help mitigate inequalities between the centre and the periphery.

2. Delegation- Delegation refers to the process by which the central government transfers managerial responsibilities for specific expenditures or the provision of services to entities that operate outside the conventional bureaucratic framework, including quasi-autonomous public agencies (Yuliani, 2004). While the chains of command, reporting

structures, and accountability mechanisms for the relevant services may experience some modifications, the incentives for public officials remain aligned with the central authority, and the overarching structure of the central government is likely to remain largely unaffected.

3. Devolution- Devolution represents a more profound reform by redistributing power and resources from central government officials to local government officials who possess independent mandates beyond the control of the central authority (Kanyinga, 2016). This transformation fundamentally alters accountability for the resources and responsibilities that have been decentralised. For instance, instead of the central Ministry of Education overseeing the operations of a specific primary school, governance of that school is transferred to an elected local government. Consequently, parents and local community members aiming to enhance the school's performance can directly approach local officials, whose electoral success is influenced by these constituents. As a result, the incentives for education officials shift from focusing on senior officials within the ministry to prioritising the needs and preferences of voters.

4. Privatisation- Privatisation refers to the transfer of public responsibilities to the private sector through the sale or allocation of associated assets (Yuliani, 2004). This process is often justified by the expectation of enhanced innovation and managerial efficiency, which are believed to arise from restructuring public services to operate on a profit-oriented basis. Typically, privatised public goods and services are subject to stringent regulation, particularly when they involve essential services such as healthcare and water supply, or when they represent natural monopolies like electricity. Among the various forms of decentralisation, privatisation stands out as the most extreme.

In the Kenyan context, the government embraced devolution following the promulgation of the 2010 constitution. The constitution granted significant autonomy to county governments (Kanyinga, 2016). This contrasts with Turkey's system, which, despite having local administrations, remains largely centralised with strong oversight from the central government. Turkey leans towards decentralisation. Türkiye operates under a unitary system, where administrative powers are centralised but distributed to regional offices. Provincial governors (vali) and district governors (kaymakam) are appointed by the central government, specifically by the Ministry of the Interior (Bayraktar & Massicard, 2012). While these officials have localised responsibilities, they ultimately

report back to Ankara. Under this structure, the central government maintains control over decision-making while relocating personnel and services closer to the people.

1.3.2. Comparative Public Administration Theory

Comparative public administration involves the examination of administrative institutions, processes, and behaviours across various organisations, transcending national and cultural boundaries. The theory focuses on the comparative analysis of public administration, emphasising rigorous cross-cultural evaluations of the structures and processes that govern the management of public affairs (Fitzpatrick et al., 2011). As a result, the study of comparative public administration offers valuable insights into diverse administrative systems shaped by distinct social, geographical, and cultural contexts. It facilitates the comparison of various democratic institutions and administrative frameworks, including an exploration of the factors contributing to their successes and failures, as well as the application of administrative systems in different nations (Manjo, Y2021). In summary, comparative public administration is essential for the scientific exploration of public administration and has the potential to enhance the efficiency of administrative systems in various countries.

The comparative public administration theory is critical to the research as it will help in the analysis of the degree of autonomy between local governments in Kenya and Türkiye. It also helps in examining the roles of the central government in local government's ability to make decisions and the overall effectiveness of local governments in service delivery. Overall, a comparison can be made on how to improve governmental structures in the countries.

1.4. Role of Local Governments in National Governance

Local governments are integral to the framework of national governance, serving as the most immediate level of authority for citizens. They are tasked with delivering vital services, encouraging citizen engagement, and executing national policies within their jurisdictions. The following outlines their key functions:

1. Provision of Essential Services

Local governments are charged with the delivery of critical services such as infrastructure development (including roads, water supply, and sanitation), public health, education, and

social welfare. They oversee local resources, maintain public areas, and safeguard the health and safety of their communities (Agranoff, 2014). Responsibilities include managing planning and construction permits, waste disposal, and public health facilities. In Kenya, for example, water is a devolved function of the government. The responsibility for delivering water and sanitation services is assigned to county governments, which share sectoral functions with the national government. The national government primarily holds the authority for national legislation and policy formulation, while the actual delivery of water and sanitation services is entrusted to the county governments. Reforms in the water and sanitation sector commenced in 2002 with the enactment of the Water Act 2002 (Maarifa Centre, 2023). However, the introduction of the Constitution of Kenya in 2010 required a reorganisation of water and sanitation responsibilities to ensure compliance with the existing constitutional framework.

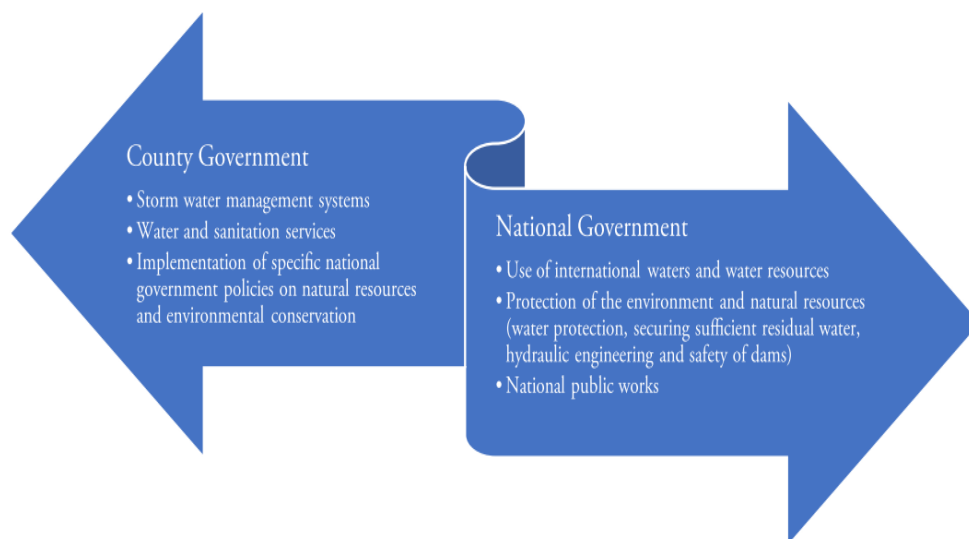


Figure 2: Differentiated Water Functions of National and County Governments

Source: Maarifa Centre (2023).

In Türkiye, Municipalities and metropolitan municipalities are responsible for providing drinking water, wastewater management, and sanitation services within their jurisdictions. Municipalities operate water supply networks, sewage systems, and treatment plants (Kibaroglu & Baskan, 2011). They are also tasked with the management of water services through Water and Sewerage Administrations (SKIs).

2. Encouraging Citizen Engagement and Representation

Local governments serve as vital platforms where citizens can actively participate in shaping their communities and express their needs and concerns. They organise public consultations to foster open dialogue, encouraging residents to share their insights and feedback on various issues. In this collaborative environment, local governments strive to incorporate community input into their initiatives, ensuring that decisions reflect the collective voice of the people they serve, as explored by Devas & Grant (2003). This approach ensures that local policies and services align with the requirements of the populations they serve.

In Kenya, the Public is fundamental to the process of devolution and serves as a crucial factor in the effectiveness of both the County and National Governments' strategies and policies. This principle is firmly established in the Constitution of Kenya, 2010 and is further reinforced by the Public Participation Act applicable to all counties in Kenya (Maarifa Centre, 2023). The involvement of the public is essential in decision-making processes that affect their overall well-being.



Image 1: A Poster Announcing Public Consultation at Kariokor Social Hall (Ng'ethe, 2024)

Source: <https://images.app.goo.gl/JpifYMW1ysapbVzM9>

Citizen participation in governance encompasses the engagement of individuals in various policy-making activities and processes. This includes determining service levels,

planning, setting budget priorities, establishing performance standards, and assessing the acceptability of physical construction projects. Such involvement aims to align government initiatives with community needs, foster public support, and promote a sense of unity within neighbourhoods (Maarifa Centre, 2023). Engagement in the devolved government systems signifies that citizens play a role in the planning and decision-making processes of County Governments, thereby enhancing their influence over service delivery, equitable allocation of devolved resources, and the formulation of beneficial policies and programs that positively impact their social and economic conditions. Municipal governments in Türkiye have also been keen on engaging citizens in policy formulation and the use of public resources. This approach necessitates effective public sector management, accountability, transparency through the exchange of information, and a legal framework that upholds justice and respects human rights and freedoms (Temel, 2022).



Image 2: A Public Participation Meeting on The Marmara Basin’s Significant Water Management Issues Organised In Istanbul (2023)

Source: <https://images.app.goo.gl/41HGKFXCmdMweWRZ8>

3. Execution of National Policies and Programs

Local governments function as the primary implementers of national policies and programs at the community level. They are responsible for translating national objectives into actionable steps within their locales. This encompasses the enforcement of

regulations, management of local resources, and provision of services in line with national standards.

In Türkiye, local governments are essential in executing national policies and programs within communities (Göktolga, 2016). Nevertheless, their operations are subject to stringent oversight from the central government, resulting in a more restricted autonomy compared to nations with greater devolution, such as Kenya. For instance, while municipalities are responsible for maintaining school infrastructure, the Ministry of National Education governs the curriculum and teacher appointments. Additionally, local governments contribute to public health initiatives, such as vaccination campaigns; however, hospitals and clinics remain primarily under the jurisdiction of the Ministry of Health. In the realm of public transportation, metropolitan municipalities manage local transport systems, including Istanbul's metro, yet they rely on funding and oversight from national agencies.

In Kenya, the county governments, which were created as a result of devolution, hold the responsibility of executing national policies and programs within their designated areas, as specified in the Constitution and the Fourth Schedule. Additionally, they are empowered to develop and implement their own policies, concentrating on sectors such as agriculture, healthcare, and infrastructure, among others. These policies and developmental projects must align with the national developmental goals of Kenya's Vision 2030 (Maarifa Centre, 2023). For example, in a bid to grow Kenya to become an industrial haven, county governments have established different industries. Makueni County has established the Makueni Fruit Processing Plant, which helps mango farmers reduce post-harvest losses and improve earnings.

The Makueni Fruit Processing Plant (MFPP) was established in accordance with the Government of Makueni County's Vision 2025 Strategic Approaches to Economic Transformation, specifically addressing Strategic Interventions No. 4 and No. 6. Strategic Intervention No. 4 emphasises the management of post-harvest losses through the promotion of value addition, aimed at extending product shelf life and enhancing food processing infrastructure (MCFDMA, 2025). Conversely, Strategic Intervention No. 6 is dedicated to fostering value addition and marketing by supporting the construction, commissioning, and operationalisation of the Makueni Fruit Processing Plant. Manufacturing and value addition are key components of the national government's Big

Four agenda. The Makueni County Fruit Development and Marketing Authority (MCFDMA) plays a vital role in this agenda by processing mangoes into 100% natural puree, which will subsequently be reconstituted into ready-to-drink juice. The Plant is equipped to process 5 metric tons of raw mangoes, yielding 3,000 litres of mango puree per hour (MCFDMA, 2025).



Image 3: The Makueni County Fruit Development and Marketing Authority

Source: <https://images.app.goo.gl/gZ5dUTtc3b7QkWJx5>

4. Fostering Local Development and Economic Advancement

Local governments are essential in driving local economic development by attracting investments, supporting local enterprises, and generating employment opportunities. They also promote sustainable practices, environmental protection, and an improved quality of life for residents (Cities, 2013). Their activities include land use management, tourism promotion, and support for local industries.

County governments in Kenya play a crucial role in fostering local development and economic advancement by implementing policies, managing resources, and delivering services tailored to the specific needs of their communities. Their functions are outlined in the Constitution of Kenya (2010) and the County Governments Act (2012). Part of their roles in local development and economic advancement include the development of infrastructure, agricultural and rural development, trade and industrialisation, education, health, tourism and cultural development. For example, in meeting the agricultural function to support economic growth, Makueni County distributed subsidised seeds, fertilisers, and pesticides to farmers, boosting maize and fruit production (Maarifa Centre,

2023). Nyandarua County provided certified potato seeds to smallholder farmers, increasing yields and reducing reliance on imports.

In Türkiye, the municipalities have similar roles in supporting economic development as those in Kenya. Local governments build and maintain roads, bridges, and public facilities to support economic activities. In Istanbul, the metropolitan municipality has invested in public transportation projects like the metro expansion, easing mobility and boosting business operations (Gerçek & Demir, 2008).



Image 4: Metro Istanbul- The Backbone of Mobility in Istanbul

Source: Global Infrastructure Magazine (2021). <https://images.app.goo.gl/x1rfyqESciaE7iBc9>

Promoting Accountability and Transparency

Local governments hold a duty to their constituents and are required to function with transparency and efficiency. They must manage public resources judiciously, deliver consistent updates regarding their operations, and address inquiries from citizens (PowerDMS, 2025). This approach cultivates trust and confidence in local governmental institutions.

County governments in Kenya are mandated by the Public Participation Act and the Constitution of Kenya (2010) to involve citizens in decision-making processes. For instance, Makueni County has established Citizen Forums that enable residents to deliberate on budget priorities and monitor the execution of projects. Additionally,

counties utilise online platforms to disseminate financial reports and procurement information, thereby mitigating corruption. An example of this is Nairobi County's implementation of the Integrated Revenue Collection System, which facilitates transparent payment for services and allows citizens to monitor expenditures online. The Office of the Auditor General (OAG) conducts regular audits of counties and reports instances of financial mismanagement (Maarifa Centre, 2023).



Image 5: Makueni County Engaging Its Residents Through The Citizen Forums

Source: Government of Makueni County (2024). <https://images.app.goo.gl/ih5f4KfE2LhyonZ67>

In Türkiye, local governments are obligated to conduct public hearings prior to the initiation of significant projects. The Court of Accounts (Sayıştay) is responsible for auditing municipal expenditures and investigating any irregularities.

1.5 Models Through Which Central Governments Share Power with Subnational Governments

The relationship between central and subnational governments forms the foundation of territorial governance. In unitary states, such as Türkiye and (formerly) Kenya prior to the 2010 constitutional reforms, this relationship has traditionally been hierarchical, with central governments exercising authority over all levels of administration. However, modern governance challenges, including demands for democratic participation, efficient service delivery, and regional equity, have prompted central governments to share power

through a variety of models. These models—deconcentration, delegation, devolution, federalism, and asymmetrical decentralisation—vary in their degree of autonomy, institutional design, and political intent.

Deconcentration refers to the administrative redistribution of decision-making authority from central government ministries to their field offices or regional branches, without altering the unitary nature of the state (Rondinelli et al., 1983). Under this model, appointed officials such as regional governors or district commissioners implement national policies locally while remaining accountable to the central government.

The model enhances territorial reach and administrative responsiveness without conferring political autonomy.

In Türkiye, deconcentration is a defining characteristic of its local administration system. Provincial governors (vali) and district governors (kaymakam) are appointed by the Ministry of the Interior and represent the central state at subnational levels. Although municipalities exist as elected local bodies, these governors exercise administrative tutelage (vesayet) powers, including oversight of local government decisions (Güler, 2010). Thus, deconcentration reinforces central control under the guise of regional administration.

Delegation involves the transfer of specific administrative or quasi-legal functions from the central government to semi-autonomous public agencies, local authorities, or parastatal organisations. These delegated bodies enjoy operational autonomy but remain legally accountable to the central government (Smith, 1985). Delegation is often used in sectors requiring technical expertise, such as environmental management, health, or education.

In the Turkish context, delegation is evident in the operation of metropolitan municipalities, where specific functions—such as transportation planning or waste management—are assigned to municipal enterprises or specialised units (Bayraktar & Massicard, 2012). However, these delegated bodies often rely on funding and approvals from central agencies, thereby limiting their real independence. In Kenya, prior to the 2010 Constitution, local authorities such as municipal and county councils operated under delegated authority from the Ministry of Local Government. Although elected councillors existed, these entities lacked fiscal and legislative autonomy, resulting in inefficiency and political marginalisation (IEA Kenya, 2005).

Devolution represents the most extensive form of decentralisation, involving the legal and constitutional transfer of political, administrative, and fiscal powers to elected subnational governments. Devolved units possess their own decision-making authority, budgets, and institutional frameworks, and are often protected by constitutional guarantees (Cheema & Rondinelli, 2007). Kenya's 2010 Constitution provides a paradigmatic example of devolution. The establishment of 47 county governments marked a structural break from previous centralised governance, with counties granted autonomy over functions such as health, trade, agriculture, and local infrastructure (Republic of Kenya, 2010). Counties have their legislatures (county assemblies) and executives (governors) and receive a constitutionally guaranteed minimum of 15% of national revenue annually. In contrast, Türkiye has not undertaken full devolution. While municipal governments perform a range of public services, they operate within a framework of administrative tutelage, lacking the constitutional autonomy characteristic of devolved systems. Their financial dependence on centrally allocated resources further limits their ability to function as autonomous subnational entities (Yıldırım, 2013).

Federalism constitutes a form of territorial power-sharing wherein sovereignty is constitutionally divided between a central authority and constituent political units—typically referred to as states, provinces, or cantons—each with independent legislative and fiscal competencies (Watts, 2008). Unlike devolution, federalism implies a permanent constitutional arrangement that is not easily altered by the central government. While neither Türkiye nor Kenya is a federal state, federalism remains an important comparative benchmark. Countries like Germany, Canada, and the United States use federalism to accommodate regional diversity, protect minority rights, and promote balanced development. Some scholars have suggested federal arrangements for Türkiye as a solution to longstanding ethno-political conflicts, particularly in the Kurdish regions (Heper, 2007), although such proposals remain politically sensitive.

Asymmetrical decentralisation refers to a model in which some regions or territories within a unitary or federal system are granted special governance powers or privileges, often due to historical, cultural, or geographic uniqueness (Keating, 1998). This model is designed to accommodate diversity within a unified legal and political framework. Kenya's Constitution provides for asymmetry in fiscal transfers and resource distribution

through mechanisms such as the Equalisation Fund, which targets historically marginalised counties (Republic of Kenya, 2010). This approach acknowledges regional inequalities and attempts to address them without altering the unitary structure of the state.

Türkiye, on the other hand, has largely resisted asymmetrical models, favouring uniform governance structures across all provinces. However, limited decentralisation initiatives, such as the EU-funded Development Agencies, introduced region-specific programming to stimulate economic development, particularly in eastern provinces (Kutlu & Kahraman, 2020). Despite this, asymmetry remains underdeveloped in both legal and practical terms.

The models through which central governments share power with subnational units vary widely in terms of their legal structure, degree of autonomy, and political intent. Deconcentration and delegation allow for administrative efficiency without political autonomy, whereas devolution and federalism imply a reallocation of power that strengthens local democracy and governance. Kenya's post-2010 constitutional framework demonstrates a robust application of the devolution model, while Türkiye remains firmly within the deconcentration-delegation spectrum, with occasional hybrid characteristics.

Understanding these models is essential for evaluating the effectiveness, inclusiveness, and sustainability of local governance reforms. The comparative experience of Kenya and Türkiye highlights the importance of constitutional guarantees, fiscal autonomy, and participatory mechanisms in determining the depth and success of decentralisation.

1.6. Historical Context of Local Governance of Kenya and Türkiye

The historical context of local governance will discuss how the administrative structures have evolved over the years.

1.6.1. Kenya: From Colonial to Devolved Governance

Local Governance from The Pre-Colonial Period

During the pre-colonial period, communities in present-day Kenya had decentralised leadership structures led by elders, chiefs, and clan-based leaders. These communities co-existed and engaged in social and economic interactions, such as barter trade, without a

centralised governance system. The establishment of colonial rule in the 1890s led to the formalisation of governance structures. The British government declared Kenya a protectorate in 1895, consolidating administrative control. The colonial administration divided the country into provinces and districts, headed by Provincial and District Commissioners. To enforce local control, the Village Headman Ordinance of 1902 allowed the appointment of village headmen, and the Native Authority Ordinance of 1912 expanded their powers, introducing chiefs who oversaw village councils (Maarifa Centre, 2023).

Local governance in European-settled areas evolved separately. From 1905, European settlers formed informal committees to represent their interests. These committees became formal District Advisory Committees (DACs) in 1919, tasked with responsibilities like road maintenance. In 1928, the District Councils Ordinance transformed DACs into local authorities, introducing elective positions, though membership was limited to Europeans. In African areas, the 1912 Native Authority Ordinance was amended in 1924 to establish Local Native Councils (LNCs). Unlike the European councils, members of LNCs were appointed by Provincial Commissioners, who retained significant control (Maarifa Centre, 2023). In 1937, reforms introduced elections for some LNC representatives, giving them responsibilities in health, education, land use, markets, and agriculture.

Further reforms in 1952 transformed LNCs into African District Councils (ADCs), professionalising local administration. Meanwhile, European local governance adopted a two-tier system of county and urban/rural councils (Bosire, 2010). At independence in 1963, the racially segregated local government system was unified under a single structure.

Local Governance at Independence- Majimbo System

As Kenya approached independence, negotiations took place between the colonial government and Kenyan leaders regarding the future system of governance. Two opposing political groups emerged: the Kenya African National Union (KANU) and the Kenya African Democratic Union (KADU). KANU, led by Tom Mboya, James Gichuru, and Oginga Odinga, advocated for a centralised government, arguing that national unity and development required a strong central authority. In contrast, KADU, led by Ronald

Ngala, Daniel Moi, and Masinde Muliro, supported a federal system (Majimbo) to allow regional self-governance and development, as noted by Kariuki (2014).

At the Lancaster House independence talks in London, a compromise was reached to implement a semi-federal system. The Independence Constitution established eight regions (Coast, North Eastern, Rift Valley, Nyanza, Western, Eastern, Central, and Nairobi as a special region), each governed by a President elected indirectly by a regional assembly (Maarifa Centre, 2023). A civil service, led by regional civil secretaries, was also created, with colonial-era Provincial Commissioners serving as interim civil service heads.

At the national level, a Senate was established to represent regional interests, with 41 elected senators (from 40 districts and Nairobi). This structure aimed to balance regional autonomy with national governance (Maarifa Centre, 2023). However, after KANU's victory in the independence elections, the party systematically weakened the federal system. Through constitutional amendments, KANU gradually dismantled regional governance, ultimately abolishing Majimbo in 1966, and consolidating power under a centralised government.

The Local Government System after Independence

At independence, Kenya introduced Local Government Regulations to unify the previously racially segregated local governance structures from the colonial era. These regulations remained in effect until the Local Government Act was enacted in 1977.

The post-independence local government system maintained four types of local authorities. County councils were aligned with the 40 administrative district boundaries. Major urban areas were designated as municipal councils, while smaller urban centres became town councils. Additionally, urban councils (county divisions) were created for even smaller areas, with the potential to grow into town councils. Nairobi retained its status as a city council under a 1952 Royal Charter, as discussed by Maarifa Centre (2023).

Local authorities were responsible for essential services such as health, education, road maintenance, markets, slaughterhouses, water and sanitation, and street lighting. In practice, most local authorities focused on garbage collection, market maintenance, and road upkeep, while a few larger municipalities managed primary schools and health

services (Maarifa Centre, 2023). However, there was little differentiation in responsibilities across the various types of local authorities.

The central government, through the Minister of Local Government, exercised significant control over local authorities. The minister had the power to alter boundaries, create or dissolve local authorities, hire senior staff, and approve all expenditures. By 1963, Kenya had 39 county councils and seven municipalities, but by 2010, the number of local authorities had expanded to 175, including one city council, 45 municipal councils, 67 county councils, and 62 town councils (Maarifa Centre, 2023).

Local Government Challenges and Decentralisation Reforms in the 1990s

After independence, Kenya's local governments faced significant challenges due to centralisation policies that limited their autonomy and effectiveness. One major issue was the unilateral decision-making by the central government, such as the removal of hospital user fees and direct salary negotiations with teachers, despite local authorities being responsible for these services (Maarifa Centre, 2023). These decisions, combined with chronic underfunding, hindered local governments from effectively carrying out their mandates.

In 1969, the central government took over key functions previously handled by local authorities, including primary and secondary education, health services, and infrastructure. These responsibilities were transferred to national ministries, stripping local authorities of about 80% of their revenue (Menon & Mutero, 2008). Without alternative funding sources, local governments became financially unstable and less relevant to local needs. To address financial challenges, the government introduced the Graduated Poll Tax (GPT) and central government grants, but both were abolished by the mid-1970s. A new revenue mechanism, the Local Authority Service Charge (LASC), was introduced in 1989 but came too late to prevent the fiscal decline of local authorities (Barasa & Eising, 2010).

During the 1970s and 1980s, the central government sought to shift development planning to the district level through initiatives like the Special Rural Development Programmes (SRDP) and the District Focus for Rural Development (DFRD) (Maarifa centre, 2023). However, these efforts were largely ineffective due to centralised decision-making, bureaucratic inefficiencies, and limited accountability to local communities.

In the mid-1990s, reforms were introduced to strengthen local governance, including the Local Authority Transfer Fund (LATF), which allocated a percentage of national income tax to local authorities. The Local Authorities Service Delivery Action Plan (LASDAP) was also established to improve transparency, efficiency, and public participation in local development (Maarifa Centre, 2023). While these reforms led to some improvements, bureaucratic resistance within the Ministry of Local Government slowed progress.

As local services continued to decline, Parliament enacted the Constituency Development Fund (CDF) Act in 2003, allocating 2.5% of national revenue to fund local projects through parliamentary constituencies (NGCDF, 2025). While the CDF improved service delivery in marginalised areas, it also shifted political power over local development to Members of Parliament, weakening the role of local authorities. The creation of a parallel local bureaucracy further undermined the effectiveness of traditional local governance structures.

Devolution after the Promulgation of the Constitution

The Constitution of Kenya 2010 firmly establishes devolution as a core principle of governance, ensuring that sovereign power is exercised both at the national and county levels (Njuguna, 2016). Article 1 affirms that sovereign power belongs to the people and is vested in various state organs, including legislative and executive structures within county governments. This recognition highlights the autonomy of the 47 county governments and their role in governance.

Article 6 further cements the role of devolution by defining county governments as integral state units within Kenya's territorial boundaries. It mandates cooperation between national and county governments, emphasising their distinct but interdependent nature (Maarifa Centre, 2023). This principle prevents excessive control by the national government over counties, promoting consultation and negotiation in governance.

Access to services is also a key constitutional requirement. Article 6(3) ensures that national and county government institutions must provide reasonable access to their services across the country (Maarifa Centre, 2023). This obligation aligns with the objectives of devolution, as outlined in Article 174, which aims to promote equitable development, public participation, and the protection of marginalised communities.

Article 10 reinforces the constitutional framework for devolution by listing national values and principles of governance, such as democracy, participation, equity,

inclusiveness, and accountability (Maarifa Centre, 2023). These values align closely with the goals of devolved governance under Article 174, ensuring that county governments operate in a manner that reflects good governance principles.

Furthermore, the Constitution provides strong legal protection for devolved structures. Any amendment affecting the objects, principles, or structure of devolution must be approved through a national referendum, highlighting the entrenchment of devolution within Kenya's governance framework (Hope, 2014). This safeguard prevents arbitrary changes that could undermine the autonomy and functions of county governments.

Structure of County Governments in Kenya

In Kenya, each of the 47 counties has a government structure consisting of a County Assembly (legislative) and a County Executive Committee (executive), headed by a Governor and Deputy Governor, with the County Assembly overseeing the executive's actions.

County Assembly (Legislative Arm)	County Executive Committee (Executive Arm)
Composition: - Elected members from each Ward - Nominated members (gender balance, marginalized groups) - Speaker	Composition: - Governor (Chief Executive) - Deputy Governor - County Executive Committee Members (appointed by Governor, approved by Assembly)
Functions: - Makes laws & policies - Monitors County Executive - Represents County residents	Functions: - Implements laws & policies - Provides public services - Represents County at national, regional & international levels

Table 3: Structure of County Governments in Kenya.

Source: Created by the Author.

Role	Responsibilities
Governor	- Chief Executive of county - Leads County Executive Committee - Signs & assents to county bills - Delivers Annual State of County Address - Issues official county decisions
Deputy Governor	- Acts as Governor in their absence
County Executive Committee Members	- Lead various technical departments
County Assembly	- Serves as a watchdog for the public

Table 4: Roles and Responsibilities of County Leaders.

Source: Created by the Author.

1.6.2. Türkiye: From Ottoman to Modern Local Administration

Local Administration in the Ottoman Empire

The Ottoman Empire (1299–1922) operated under a predominantly centralised administrative framework, where local governance was largely overseen by the central authority, specifically the sultan and his bureaucratic apparatus. Nonetheless, the empire also integrated decentralised aspects, particularly in its interactions with various ethnic and religious groups. The administrative structure of the Ottoman Empire was organised into several units, each managed by officials designated by the central authority. Eyalets (Provinces) served as major administrative divisions led by a Beylerbeyi (Governor-General), who was responsible for military, taxation, and judicial functions (Özel, 2006). Sanjaks (Districts) were subdivisions of Eyalets, overseen by a Sanjakbeyi, who managed law enforcement and tax collection. Kazas (Subdistricts) were administered by Kadıs (Islamic judges), who dealt with legal matters and local governance. Nahiyes (Towns and Villages) represented the smallest administrative units, governed by local leaders and village elders under the oversight of the central government. This system was marked by a military-oriented governance approach, with officials primarily selected based on their loyalty to the sultan rather than through local representation.

The Millet System and Local Autonomy

A distinctive feature of the Ottoman local governance was the Millet System, which provided religious and ethnic minorities with a certain level of self-administration. Christian and Jewish communities were permitted to oversee their own religious, legal, and educational matters, as argued by Çevik (2024). Each Millet, or community, was led by a representative who served as a liaison between the central authority and the local populace. This arrangement fostered stability and reduced the need for direct central involvement in the affairs of minority groups.

Tanzimat Reforms and Local Governance (1839–1876)

In the mid-19th century, the Ottoman Empire implemented the Tanzimat Reforms (1839–1876) with the objective of modernising its governance and local administration. Notable reforms included the Vilayet Law of 1864, which restructured provinces (Vilayets) into a more organised system, thereby diminishing the autonomy of local leaders (Kawtharani, 2018). Additionally, the establishment of Local Councils allowed for the election and appointment of members who were assigned limited administrative duties. The tax collection process was also modernised, centralising it to mitigate corruption and inefficiency at the local level. However, despite these initiatives, local administration continued to be dominated by the central government, resulting in minimal citizen involvement in governance.

Local Administration in Early Republican Türkiye (1923–1980s)

After the dissolution of the Ottoman Empire in 1922, Mustafa Kemal Atatürk founded the Republic of Turkey in 1923, initiating significant administrative reforms. Atatürk implemented a centralised governance structure that diminished the power of religious and traditional local authorities. Notable reforms included: the Abolition of the Millet System, which established uniform national laws for all citizens; the Introduction of Municipalities (Belediyeler), modelled after European systems, which were tasked with managing local services such as sanitation and infrastructure (Merryman, 2013). Another reform was the appointment of Provincial Governors (Valis) by the central government, who oversaw provincial administration to ensure robust national control.

The 1961 Constitution and Limited Decentralisation

The Constitution of 1961, established following the military coup, initiated a degree of decentralisation in local governance. It granted municipal governments increased

financial and administrative powers, as noted by Kpentey (2020). Nevertheless, provincial governors, who were appointed by Ankara, maintained considerable influence over local decision-making. In spite of these advancements, Türkiye's local administration continued to be predominantly bureaucratic and state-dominated, with minimal involvement from citizens.

Contemporary Local Administration in Turkey (1980s–Present)

Since the 1980s, Turkey has implemented a series of incremental administrative reforms aimed at enhancing governance and the provision of local services. The 1982 Constitution, established following the military coup, preserved significant central authority while permitting some local governance reforms. Municipalities were granted greater responsibilities in areas such as urban planning and infrastructure development. Additionally, new legislation enabled local governments to raise their own funds through local taxes and service charges (Bayraktar, 2007). Nevertheless, governors (Valis) remained appointed by the central government, thereby sustaining state control over local administration.

The 2004 Public Administration Reform

In the early 2000s, a notable transition towards decentralisation took place under the leadership of the Justice and Development Party (AKP). The Public Administration Reform of 2004 sought to empower local governments by delegating additional responsibilities to them. The Metropolitan Municipalities Law of 2004 granted increased autonomy to larger cities in areas such as planning, budgeting, and service provision. Additionally, the introduction of Local Participation Mechanisms fostered greater citizen involvement in the decision-making processes.

Türkiye's Current Local Government Structure

Türkiye's local administration system today consists of three levels:

1. Provincial Level (İl Yönetimi):

81 provinces, each led by a centrally appointed *Vali (Governor)*. Governors oversee local administration, law enforcement, and public services.

2. Municipal Level (Belediyeler):

Metropolitan Municipalities: Cities with over 750,000 people have expanded authority. A good example is Istanbul and Ankara.

District Municipalities: They handle local services like transport, sanitation, and education.

Mayors (Belediye Başkanı) are elected but operate under strict central oversight.

3. Village and Neighbourhood Level:

- Villages (Köyler)- Governed by *Muhtars* (village headmen), who manage small-scale local affairs.
- Neighbourhoods (Mahalleler)- Urban subdivisions with elected *Muhtars* but limited administrative power.



CHAPTER 2: COMPARATIVE ANALYSIS OF LOCAL GOVERNMENTS IN KENYA & TÜRKİYE

The chapter offers a comparative examination of the local administration systems in Kenya and Turkey, emphasising their organisational structures, operational functions, legal frameworks, and effects on service delivery. It highlights case studies of Nairobi County in Kenya and Istanbul Municipality in Türkiye, underscoring the governance challenges faced and the potential opportunities for reform.

2.1. Structural Analysis

Kenya

Article 6 of the Constitution of Kenya, enacted in 2010, establishes Kenya as comprising 47 county governments. Chapter 11, specifically Articles 174 to 200, outlines the framework for devolved governance, including Article 184, which addresses the establishment of appointed boards for urban areas and cities as part of the decentralisation process within the counties. Although the constitution does not explicitly safeguard sub-county local governments, it does stipulate that “Every county government shall decentralise its functions and the provision of its services to the extent that it is efficient and practicable to do so (Kenya, 2013).

Structure of Local Government

The county government is structured into two main components: the county assembly and the county executive.

County Assembly

The county assembly includes representatives elected by voters from each ward, a selection of special seats filled by political party nominations to maintain gender balance—ensuring that no more than two-thirds of the assembly is of the same gender—members representing marginalized groups such as individuals with disabilities and youth, also nominated by political parties, and a speaker (Kenya, 2012).

County government elections coincide with those for the presidency and the national assembly, as county governments are disbanded following the dissolution of parliament. The county assembly is responsible for overseeing the functions of the county executive, which includes monitoring both the county executive committee and other related executive bodies (Kenya, 2012). The Senate is tasked with the overall oversight of county

government, which encompasses determining the distribution of national revenue among counties and supervising the national funds allocated to them. At the conclusion of each financial year, financial statements are required to be submitted for auditing by the controller and the auditor general.

County Executive

Each county is governed by an executive committee, which includes the county governor, the deputy county governor, and other members appointed by the county governor with the assembly's approval, all of whom must not be assembly members. The size of the executive committee is limited to a maximum of 10 members or one-third of the county assembly members, whichever is smaller. The county governor serves as the chief executive, while the deputy county governor acts as the deputy chief executive (Kenya, 2012). In the absence of the county governor, the deputy county governor assumes the role of acting county governor. Members of the County Executive Committee bear responsibility to the county governor for their conduct in office and the manner in which they exercise their powers.

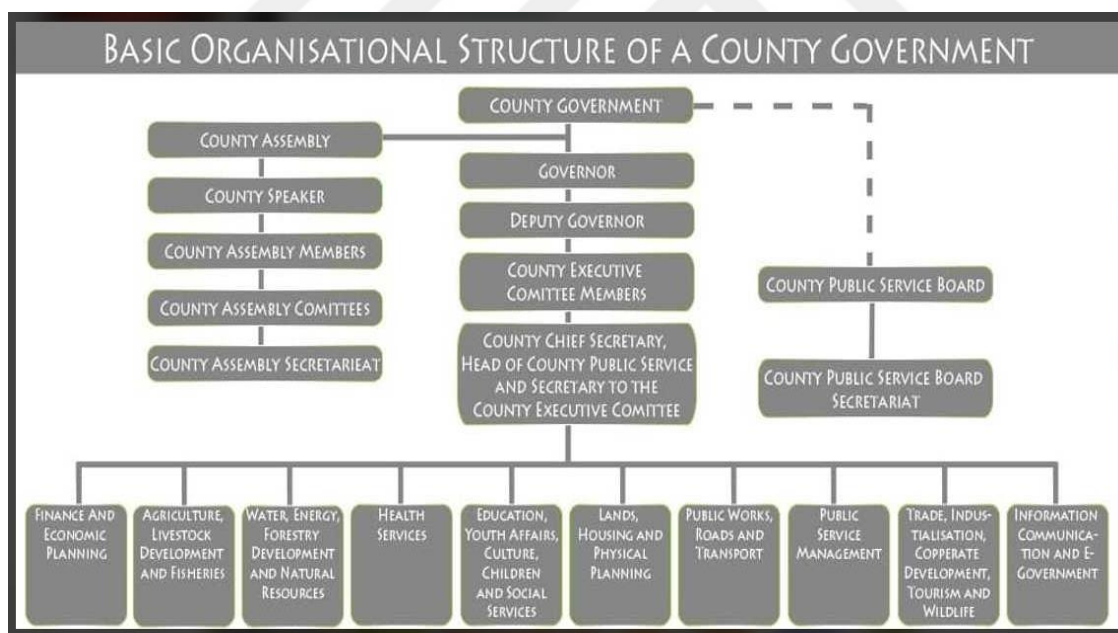


Figure 3: Kenya County Government Structure

Source: County Government of Nairobi (2024). <https://images.app.goo.gl/psaApCUjaAHxfizU7>

The State Department of Devolution, part of the Ministry of Devolution and Planning (MDP), is responsible for overseeing devolution in Kenya. The primary objective of the MDP is to "provide leadership, coordination, and an enabling environment for planning,

enhanced public service delivery, and the management of the devolved government system (Kimemia, 2022)" Although the constitution grants significant autonomy to the counties, the MDP plays a crucial role in facilitating intergovernmental relations and executing the County Governments Act of 2012. Additionally, the Department of Devolution is tasked with coordinating the implementation of all devolved programs and projects, guided by a devolution sector plan that aligns with the medium-term framework of Kenya Vision 2030.

The State Department for Devolution has led the development of a monitoring and evaluation framework designed to track the implementation of the devolved system of government. This framework will facilitate the identification and demonstration of outcomes resulting from the devolution policy, programs, and projects. County governments have adopted a county performance framework, and each has established a County Integrated Monitoring and Evaluation System (CIMES) to monitor the execution of programs and projects at the county level (Warinda, 2019). Performance reports generated from the CIMES are required to be prepared and disseminated to key stakeholders, including the Council of County Governors and the national government.

The constitution, along with two key pieces of legislation—the County Governments Act of 2012 and the Urban Areas and Cities Act of 2011—facilitates the decentralisation of county government responsibilities and service delivery to both urban and rural sub-counties (Kimemia, 2022). Currently, this framework encompasses one city (Kisumu), two municipalities (Nakuru and Eldoret), and 103 towns. The Urban Areas and Cities Act of 2011 has established one city, two municipalities, and 103 towns, which will be overseen by boards appointed by the county government (Kimemia, 2022). Each board may consist of no more than eleven members, with six members selected through a competitive process by the county executive committee, subject to the approval of the county assembly. The remaining five members will be nominated by various representative organisations, including professional associations, the private sector, the informal sector, neighbourhood associations, and an association representing urban areas and cities. Board members will serve a term of five years, and the county executive is responsible for ensuring gender equity and adequate representation of individuals with disabilities, youth, and marginalised groups in the appointments (Kimemia, 2022). Elected representatives in city and municipal councils are to be overseen by a chairperson

who is appointed by the county governor and must receive approval from the county assembly.

Funding County Governments

County governments in Kenya access funding from several sources as delineated in the Constitution and pertinent legislation. These include equitable transfers from nationally collected revenue, conditional grants from the national government, local revenue, and grants or funds from donors (KIPPRA, 2023).

According to Article 209(3) of the Constitution, county governments are empowered to impose property rates and entertainment taxes. Additionally, Article 209(4) permits counties to levy charges for services they provide. These "own-source" revenues are vital for enhancing the autonomy and accountability of county governments, reflecting their financial independence and encouraging public scrutiny over local taxation and service delivery (KIPPRA, 2023).

Despite the significance of own-source revenue, county governments predominantly rely on transfers from the national government to fulfil their mandates. From the Financial Year 2013/14 to 2021/22, county governments generated a total of KES 271 billion through their own revenue sources. In contrast, they received KES 2.5 trillion as an equitable share, KES 142 billion from national government conditional grants, and KES 191 billion in loans and grants from development partners during the same period (Commission on Revenue Allocation [CRA], 2022).

This heavy reliance on national transfers is partly due to the structure of devolved governance, which allocates significant revenue-raising powers to the national level. Nonetheless, optimising local revenue collection remains crucial for county governments to enhance their financial autonomy and accountability (National Treasury, 2021).

Equitable Share

The Equitable Share serves as the primary revenue source for Kenya's county governments, significantly influencing their operational effectiveness. The Constitution mandates that county governments receive no less than 15% of the national government's revenue, based on the most recent audited accounts approved by the National Assembly (Kenya Law Reform Commission [KLRC], n.d.).

Article 203(1) of the Constitution outlines the criteria for determining the equitable share allocation. These include national interests, public debt obligations, the needs of the

national government, the functions and capacity of county governments, fiscal capacity and efficiency of county administrations, developmental needs, economic disparities, affirmative action for disadvantaged groups and regions, economic optimization in each county, incentives for revenue generation, and the need for flexibility in responding to emergencies (KLRC, n.d.).

Between the financial years 2013/14 and 2021/22, county governments received a total of KES 2.6 trillion as their Equitable Share allocation (Commission on Revenue Allocation [CRA], 2022).

Loans and Grants

County governments in Kenya can secure loans to enhance local revenue. Nonetheless, this process requires a guarantee from the national government and must receive approval from the county assembly (Kenya Law, 2012). Additionally, the Public Finance Management Act limits borrowing to capital financing exclusively (Kenya Law, 2012). In 2020, the National Treasury introduced the Public Debt and Borrowing Policy, which outlined the procedures for both national and county borrowing (National Treasury, 2020).

The Equalisation Fund and Conditional Grants

The Constitution of Kenya established the Equalisation Fund as an affirmative action initiative to enhance service delivery in marginalised regions. This fund is allocated 0.5% of all revenue collected by the national government each year, as stipulated in Article 204(1) of the Constitution (Kenya Law Reform Commission, n.d.). Its primary objective is to provide essential services—including water, roads, health facilities, and electricity—to marginalised areas, aiming to elevate these regions to a level of development comparable to the rest of the nation (Equalisation Fund, n.d.).

Conditional grants from the national government to county governments have supported various initiatives, particularly in the health sector. These grants have funded Level 5 hospitals, waived hospital user fees, promoted universal healthcare, facilitated free maternal healthcare, and supported the leasing of medical equipment. Between the financial years 2013/14 and 2020/21, county governments received conditional grants from the national government amounting to KES 170.8 billion (Commission on Revenue Allocation [CRA], 2023). In the financial year 2021/22, four specific conditional grants—allocations to Level 5 hospitals, user fees foregone, Road Maintenance Levy Fund, and

grants for the rehabilitation of village polytechnics—were converted into part of the equitable share allocation to counties (CRA, 2023).

Türkiye

Türkiye, with a population exceeding 83.4 million (The World Bank, 2020), is a founding member of NATO and is situated between the Mediterranean and Black Seas (Şarbak, 2017). The governance structure has transitioned from a parliamentary democracy to a presidential system following the constitutional referendum in 2017. Officially known as the Republic of Turkey, the country signed the European Charter of Self-Governance in 1988, achieved candidate status for full European Union membership in 1999, and commenced negotiations with the EU in 2005 (Yakar, n.d.). Administratively, Türkiye is organised into 81 provinces, over 921 districts, 395 towns, and 18,322 villages (Şarbak, 2017, p.5-6). The local governance system in Türkiye is tripartite, comprising Special Provincial Administrations, Municipalities, and Villages. Special Provincial Administrations (SPAs) existed before the Republic of Türkiye was founded in 1923 and continued to operate until 2005 under a law enacted in 1914. However, in 2014, SPAs were dissolved in 30 metropolitan municipalities, with their responsibilities transferred to the municipalities. In non-metropolitan areas, SPAs continue to perform specific functions and operate similarly to municipalities in rural regions.

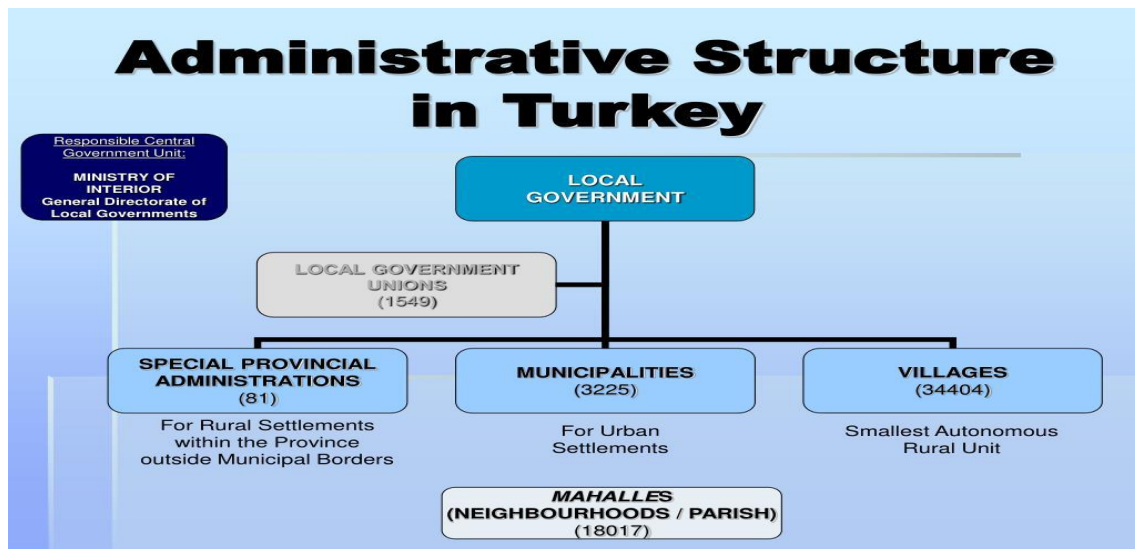


Figure 4: Structure of Turkish Local Government

Source: Toksöz (2019). <https://images.app.goo.gl/PJRp7Qh1fo85yczTA>

Special Provincial Administrations (SPAs)

The Special Provincial Administrations represent the oldest form of local governance in Türkiye, drawing inspiration from the French administrative framework during the Ottoman Empire. Since their inception, SPAs have undergone numerous reforms, with significant changes occurring after the establishment of the republic (Kavruk, 2004). Presently, these administrations are responsible for a wide array of functions, which primarily encompass education, health services, law enforcement, infrastructure development, agriculture, rural services, industry, trade, environmental management, emergency response, youth and sports initiatives, cultural affairs, tourism, and recreational services beyond municipal limits (Law on Special Provincial Administration, 2005). The structure of SPAs consists of three principal components: the General Provincial Council, the Provincial Executive Committee, and the Governor (Law on Special Provincial Administration, 2005).

The General Provincial Council serves as the decision-making body for Special Provincial Administrations (SPAs) and possesses the same functions and authority as municipal councils. Its members are elected through direct voting by residents, akin to the election process for members of municipal councils (Ertas, 2016). According to Law No. 5302 enacted in 2005 regarding SPAs, the head of the council is to be elected by its members, a shift from the previous system where the governor held this position (Law on Special Provincial Administration, 2005). This legislation also grants Provincial Councils specific powers and responsibilities (Law on Special Provincial Administration, 2005).

Provincial Executive Committees (PECs), along with the Governors, oversee the executive functions in non-metropolitan provinces. These committees are composed of three members elected by the General Provincial Council and three members appointed by the governor, who also serves as the committee's head. Together, they execute the primary decisions made by the General Provincial Councils. In certain instances, this body may function as a decision-making entity regarding the sale or lease of properties belonging to the Special Provincial Administration and other technical issues (Yakar, n.d.).

The Governor serves as the local representative of the central government and leads the executive committee of the Special Provincial Administration. Prior to the 2005 Law on Special Provincial Administrations, the Governor also held the position of head of the

Provincial Council. However, this law established that the council members would elect their own chairperson. Consequently, under the current framework, the governor functions as the chair of the Provincial Executive Committee.

Municipalities

Municipalities in Türkiye play a crucial role in sub-national governance. Their origins can be traced back to the Ottoman period, with the establishment of the first municipality in Beyoğlu, Istanbul, in 1885 (Şarbak, 2017). The significance of local governance increased notably during the 1960s, as this was the first time citizens were allowed to elect mayors in modern Türkiye. The initial legislation governing municipalities was enacted in 1930 and remained in effect until 2005, spanning 75 years (Ertaş, 2016).

As urban populations have surged, various reforms have been implemented to enhance the efficiency of municipalities. Key motivations for these reforms include the decentralisation of authority, economic scaling, and the process of integrating with the European Union (Oktay, 2017; see also Yılmaz & Güner, 2017). Turkish municipalities are divided into two main categories: Provincial Municipalities and Metropolitan Municipalities. Provincial municipalities are further classified into provincial, district, and town municipalities, while metropolitan municipalities are designated for metropolitan areas only (Ertaş, 2016). Initially introduced in the three largest cities, the current number of metropolitan municipalities has reached 30 (Derdiman, 2016). Additionally, metropolitan municipalities operate under a two-tier system, consisting of district metropolitan municipalities and metropolitan municipalities (Özkal, 2013).

Recently, Türkiye has undertaken significant reforms in the structure of local governments, driven by its aspirations for European Union membership and the rapid increase in its population, which has led to the establishment of metropolitan cities. The introduction of metropolitan municipalities in Türkiye's local governance system dates back to the 1980s, coinciding with urban expansion, when these municipalities were first established in Istanbul, Ankara, and Izmir. A transformative change was enacted through Law No. 6360, which introduced notable modifications to metropolitan municipalities and other provinces. This new legislation has resulted in a reduction in the number of smaller municipalities and the addition of 14 new metropolitan municipalities (Özkal, 2013). The 2014 regulations concerning metropolitan municipalities abolished Special Provincial Administrations in 30 metropolitan cities, thereby enhancing the powers of

metropolitan municipalities. In these metropolitan areas, there are two tiers of municipalities: metropolitan and district municipalities, both responsible for delivering local services. While the recent reforms have eliminated town municipalities and villages within metropolitan municipalities, town municipalities still exist within the district municipalities of metropolitan cities, albeit without legal status (Esen, 2016).

Municipalities are composed of three primary elements: the Municipal Council, the Municipal Committee, and the Mayor (Özkal Sayan, 2013). The Mayor, elected through a direct vote by the populace, serves as the municipality's leader for a term of five years. This arrangement enhances the mayor's authority within municipal structures (Özkal Sayan, 2013). The Municipal Council functions as the decision-making entity of the municipal administration, with the number of council members varying based on the city's or town's population. Elections for the municipal council members utilise a proportional representation system. The Assembly meets on a predetermined day during the first week of each month, with the exception of a one-month recess. The Municipal Committee, chaired by the mayor, serves as both the executive and advisory body of the municipality. It comprises seven members in provincial municipalities and those with populations exceeding one hundred thousand, while other municipalities have five members (Özkal Sayan, 2013).

In metropolitan provinces, the Municipal Council has become the primary decision-making authority, alongside the mayor, who possesses veto power over council decisions and sets the agenda for each meeting. Additionally, the frequency of council meetings has been increased to enhance the council's efficiency, and members are incentivised to attend by receiving compensation for each meeting. In non-metropolitan municipalities, the Special Administration for Provinces functions similarly to municipalities for rural areas. Furthermore, the number of villages with populations under 2,000 has been reduced.

Funding

The funding for local governments in Türkiye primarily derives from transfers from the central government, local taxes, fees, and external funding sources. In 2020, central government transfers constituted the largest portion, representing about 75.2% of the revenue for subnational governments. The central government allocates a share of national tax revenues, including income tax and VAT, to local authorities. Following the administrative reforms implemented in 2014, metropolitan municipalities receive 6% of

national tax revenues, district municipalities receive 4.5%, other municipalities receive 1.5%, and special provincial administrations (SPAs) receive. Furthermore, special-purpose grants are provided to support infrastructure and urban development, exemplified by the 496.2 billion lira (\$14.15 billion) regional development plan announced in 2024 to assist southeastern provinces (Reuters, 2024). The equalisation fund plays a crucial role in redistributing resources to less-developed municipalities, promoting balanced regional development (OECD & UCLG, 2022).

In addition to these sources, local governments generate revenue through local taxes and fees, which accounted for 24.8% of subnational revenue in 2020. The property tax is the most significant contributor, making up approximately 65% of local tax revenue and 6.7% of total subnational government revenue; however, at 0.2% of GDP, it remains below the OECD average of 1.0%. Other municipal taxes include the electric and gas consumption tax (14%), environmental cleaning tax (4%), and advertisement tax (3%). Additionally, user charges and service fees, such as those for water, sewerage, and business licenses, contributed 11.3% to the revenue of subnational governments.

Local governments also depend on borrowing and external funding. They can obtain loans from domestic banks or issue municipal bonds, although these actions require approval from the central government. Moreover, they receive international funding from organisations like the World Bank and the European Union for various infrastructure projects (OECD & UCLG, 2022). Public-Private Partnerships (PPPs) enhance funding opportunities by facilitating private investment in local infrastructure and services.

In terms of expenditures, local government spending in 2015 was allocated as follows: 34% for investments, 17% for salaries, 42% for goods and services, 3% for grants and transfers, and 4% for other expenses (Council of Europe, 2017). During the same year, local government revenue accounted for 5% of Türkiye's GDP, in contrast to 33.2% for the central government (Council of Europe, 2017). These statistics illustrate the financial framework of Türkiye's local governments, emphasising their dependence on central funding while also highlighting their initiatives to raise revenue through taxation, fees, and external collaborations.

Key Differences

Aspect	Kenya	Türkiye
Governance Structure	Decentralised, 47 counties	Centralised, municipal governance under national oversight
Leadership	Elected governors with executive powers	Elected mayors but under national government control
Autonomy	High administrative and financial autonomy	Limited autonomy; central government controls key decisions

Table 5: Illustrates and Compares Differences in the Gov Structure, Leadership & Autonomy Kenya vs Türkiye.

Source: Created by the Author.

2.2. Functional Analysis

Kenya

Delivery of health services

The Constitution significantly transformed the delivery and accessibility of health services within the nation. It grants county governments the authority to offer essential health services, while the national government oversees national health referral facilities and formulates health policy (Masaba et al., 2020). Additionally, the Constitution acknowledges the fundamental right to health. Specifically, Article 43 (1) states that every individual is entitled to the highest attainable standard of health, encompassing the right to healthcare services, including those related to reproductive health. The decentralised government system necessitated significant reforms and reorganisation within the health sector.



Image 6: Kilifi Hospital, Constructed by The County Government

Source: <https://images.app.goo.gl/xbuUGAVhFbJHh38k8>

Prior to 2013, the Ministry of Health at the national level was primarily responsible for delivering health services, with only a few former local authorities offering limited health care. The current Constitution mandates that all 47 county governments deliver a variety of health and related services, while the national government retains responsibility for policy coordination and certain national health services. According to the Constitution, county governments are responsible for managing hospitals at both the county and sub-county levels, as well as rural health facilities and dispensaries, including their upkeep (Maarifa Centre, 2023). The scope of county health services encompasses county health pharmacies, ambulance services, and the advancement of primary healthcare. Additionally, county governments are tasked with regulating and licensing businesses that sell food to the public, managing solid waste disposal, and providing veterinary services.

Since 2013, county governments have consistently invested in health initiatives, allocating an average of 60 per cent of their budgets to health services, which typically represents the largest portion of their overall expenditures (Di Giorgio, Yoo & Maina, 2022). These funds have been directed towards enhancing healthcare infrastructure, recruiting additional healthcare professionals to deliver services, and fostering primary healthcare across the nation. The positive results of these investments are reflected in improved access to health services, as indicated by a rise in visits to healthcare facilities, an increase in the number of skilled birth attendants, and a decline in infant mortality rates, among other positive indicators. Reports and statistics in the health sector show

rapid growth of facilities in the health sector. Before the onset of devolution in 2013, there were a total of 3,127 dispensaries (Level 2 facilities) in the entire country.³⁷⁷ The number rose to 4,546 in 2018³⁷⁸ and to a total of 10,677 dispensaries as of August 2022.³⁷⁹ County referral hospitals (Level 5) were 17 in 2013, and this number has grown to 23 facilities across the country (Maarifa Centre, 2023).

Improving Access to Water and Sanitation Services

The right to water consists of four key elements: sufficiency, which the United Nations defines as 50 to 100 litres per person per day; acceptability, which pertains to the water's colour, odour, and other cultural considerations; physical accessibility, which requires that water be reachable within 1,000 meters; and affordability, which should not exceed 3 per cent of a household's income (Di Giorgio, Yoo & Maina, 2022). The responsibility for providing water and sanitation services lies with county governments, which share sectoral responsibilities with the national government. While the national government primarily handles legislative and policy-making duties, the actual delivery of water and sanitation services is managed by the county governments. Reforms in the water and sanitation sector commenced in 2002 with the enactment of the Water Act 2002. However, the introduction of the Constitution of Kenya in 2010 required a reorganisation of water and sanitation responsibilities to ensure compliance with the new constitutional framework (Akinyi & Odundo, 2018).

The regulation of water services is governed by the Water Act of 2016, which assigns county governments the duty of establishing Water Service Providers (WSPs). These WSPs are tasked with ensuring the provision of water and developing the necessary infrastructure to facilitate this supply (Akinyi & Odundo, 2018). Currently, there are approximately 142 WSPs operating nationwide, alongside an additional 4,562 informal water service providers, which include community-based water service providers (Maarifa Centre, 2023).

Transforming early childhood education in Kenya

The Constitution guarantees every child the right to free and compulsory basic education. Additionally, it mandates the state to implement measures, including affirmative action programs, to ensure that young people have access to appropriate education and training (Kenya, 2012). The Constitution further urges the state to establish affirmative action

initiatives aimed at providing special opportunities for minorities and marginalised groups in both educational and economic sectors.

The responsibility for ensuring the fulfilment of the right to education lies with both the national government and the county governments. In the realm of education, county governments oversee pre-primary education, village polytechnics, homecraft centres, and childcare facilities. The establishment of county governments in 2013 initiated substantial transformations within the education sector, particularly in early childhood development. These governments have prioritised Early Childhood Education (ECDE) by building dedicated facilities in primary schools nationwide. Additionally, they have recruited ECDE teachers, resulting in a consistent and significant increase since 2013 (COUNCIL, 2023). These initiatives have facilitated greater access to education, enabling children, especially in rural regions, to commence their schooling at an earlier age.

Furthermore, county governments have contributed to the development of upper primary classrooms and educational buildings, offered bursaries, and established village polytechnics along with other tertiary institutions, as mandated by the Constitution (COUNCIL, 2023). In regions impacted by famine and drought, county governments have implemented school feeding programs aimed at improving student retention and enhancing the health and nutrition of children by providing them with balanced meals.

Enhancing agricultural productivity in the counties

Agriculture plays a crucial role in the economic advancement of the country. As the second largest contributor to the national GDP, accounting for 22.43 percent in 2021, and the foremost employer among economic sectors, with 53.8 percent in 2020, this sector is vital for the nation's progress. The 2010 Constitution of Kenya transferred agricultural services to county governments while retaining policymaking authority at the national level (Maarifa Centre, 2023). According to the Constitution, county governments are responsible for various areas, including crop and animal husbandry, livestock markets, county abattoirs, disease control for plants and animals, and fisheries. Conversely, the national government oversees the Agriculture Policy and Veterinary Policy (Timamy, 2019). The specific responsibilities delegated to county governments within these sub-sectors encompass extension services, farmer advisory services, management of farm inputs, soil and water management at agricultural mechanisation stations, and the control of plant pests and diseases, among other duties (Timamy, 2019). In all these areas, county

governments are tasked with promoting agricultural development to ensure that the sector serves as a significant driver of economic activity.

Investment in roads and other infrastructure

In rural regions, county authorities have installed street lighting to improve safety and security for nighttime travel. The condition of the roads has hindered farmers from transporting their goods from farms to local markets or other regions of the country. The upkeep or development of roads demands significant financial investment, which only the government can effectively plan and execute (Adan, 2017). County governments are responsible for providing and maintaining urban services, including the construction and upkeep of urban roads under their jurisdiction, regulating urban development, establishing additional infrastructure in town areas, managing transportation and urban traffic, and overseeing waste collection, among other urban services. Counties are progressively enhancing urban centres nationwide, transforming them into liveable environments suitable for vibrant urban communities.

Environmental and natural resource management and protection

County governments are tasked with the responsibility of safeguarding the environment and promoting the sustainable utilisation of natural resources. To fulfil this mandate, they must implement specific national policies related to natural resource management and environmental conservation, which encompass soil and water preservation as well as forestry practices (Muigua, 2021). Counties that possess extensive forested regions collaborate with the national government and local communities to promote forest conservation, ensuring that sustainable methods are employed for the protection of both forests and the environment. In urban settings, the primary goal is to provide residents with a clean living environment, access to safe drinking water, adequate housing, and effective urban planning to alleviate congestion. County governments are also proactive in addressing the challenges posed by solid waste in urban areas, devising innovative strategies for waste management (Muigua, 2021).

Building of markets and business places in urban areas

Throughout the country, counties are establishing modern market facilities that facilitate traders in selling their products. Waste collection has seen significant improvements, and business operations are now conducted in a cleaner environment (Maarifa Centre, 2023). In Ruiru Market, located in Kiambu County, the newly constructed market is fully

operational, with traders occupying stalls to sell their goods. Prior to the development of the market sheds and complexes, fresh produce vendors in Kiambu struggled with adverse weather conditions, including rain and cold. This ongoing issue has been effectively addressed with the establishment of the new market sheds as part of the KUSP initiative.



Image 7: Ruiru Market complex in Kiambu County.

Source: Image taken by the Author.

Technology and innovation in service delivery and development

As the technological revolution progresses, individuals' lives and livelihoods are becoming increasingly intertwined with technology, particularly in relation to accessing fundamental services. These services encompass vital functions such as the registration of births and deaths, the application for identity cards and passports, as well as various government services. Consequently, information and communication technology (ICT) is emerging as an essential tool for accessing services, including employment opportunities and entrepreneurial ventures. County governments are actively promoting initiatives designed to enhance technological accessibility for the populace. Makueni County, for instance, has established an ICT Innovation Hub situated at the Makueni Green Park in Wote Town.



Image 8: Makueni County ICT Centres

Source: <https://maarifa.cog.go.ke/county-initiatives/promoting-youth-led-innovation-and-sustainable-development-role-makueni>

This centre offers a range of programs aimed at integrating ICT into everyday life. Among these initiatives is the "Tusome" computer literacy program, which trains youth across the county, selecting 120 participants from the 30 wards (four from each ward). Additionally, the centre hosts a children's boot camp focused on basic computer literacy, which recently benefited 102 children (Maarifa Centre, 2023). The county government has also formed partnerships with major technology companies such as Google and Facebook to facilitate income generation and impart essential tech knowledge. Currently, approximately 4,000 residents of Makueni are reaping the benefits on a monthly basis (Maarifa Centre, 2023).

Functions of Local Governments in Türkiye

Local governments in Türkiye play a crucial role in providing essential services to residents, maintaining infrastructure, and promoting regional development. They are categorised into municipalities, metropolitan municipalities, and metropolitan district municipalities, each with distinct responsibilities under legal frameworks such as Act No. 5393 and Act No. 5216.

Municipalities

Municipalities are responsible for a wide range of urban services that ensure the well-being of residents and the sustainability of cities. These include urban infrastructure development, such as water supply, sewage systems, and transportation networks (Act 5393, Art. 14). They also manage environmental health, waste collection, fire brigades, emergency aid, and city traffic. Additionally, municipalities oversee social services, including marriage registration, cultural activities, youth sports, and professional training.

Municipalities with a population exceeding 50,000 are mandated to establish shelters and welfare centres for women and children.

Furthermore, municipalities may engage in supplementary services such as opening preschool education centres, maintaining public school buildings, and supporting amateur sports clubs. They are also tasked with protecting cultural heritage, restoring historical sites, and promoting tourism. Another unique function includes food banking, which provides essential supplies to disadvantaged communities.

Metropolitan Municipalities

Metropolitan municipalities have broader and more strategic responsibilities due to their large-scale governance over multiple districts. They are tasked with preparing strategic and master zoning plans, licensing business establishments, and developing metropolitan transportation plans (Act No. 5216, Articles 7-9). Infrastructure projects such as constructing major roads, boulevards, and city squares fall under their jurisdiction.

Environmental protection is also a key responsibility, including afforestation, waste management, and safeguarding water basins. Metropolitan municipalities provide public transport services, clean water and sewerage, and oversee passenger and cargo terminals. They also develop social infrastructure such as libraries, museums, parks, zoos, and sports facilities to enhance the quality of urban life.

Additionally, these municipalities manage interment services by designating graveyard areas and overseeing burials. Economic responsibilities include constructing wholesale markets and slaughterhouses, developing housing projects, and facilitating urban transformation initiatives (Act 5393, Art. 73).

Metropolitan District Municipalities

Metropolitan district municipalities function within the framework of metropolitan governance but focus on more localised services. Unlike metropolitan municipalities, their duties are primarily confined to areas that are not under the direct jurisdiction of higher-tier authorities. Their responsibilities include waste collection and transfer, licensing and regulatory controls, and constructing local parks and recreational facilities (Act 5216, Art. 7).

Social and cultural services for vulnerable groups, including the elderly, disabled, women, and children, are also part of their mandate. They facilitate vocational training programs and provide support for agricultural and livestock activities. Moreover, they are

responsible for maintaining historical sites and ensuring the safe demolition of buildings that pose a risk to public safety.

2.3. Legal and Institutional Frameworks

Kenya

Kenya's local government framework is based on the principles of devolution, which were established by the Constitution of Kenya (2010). This system is designed to distribute power more evenly, improve service delivery, and foster equitable development throughout the nation. The legal foundation for local governance in Kenya is derived from constitutional provisions, legislative documents, policy guidelines, and proposed legislative reforms.

Constitutional Provisions

The Constitution of Kenya (2010) creates a devolved government structure that segments the nation into 47 county governments (Constitution of Kenya, 2010, Art. 6). This segmentation is intended to bring governance closer to citizens, enabling counties to manage their affairs and deliver essential services effectively. Chapter 11 of the Constitution (Articles 174-200) delineates the goals and principles of devolution. Article 174 highlights the importance of public participation, fair resource distribution, and self-governance, while Article 176 specifies that each county government comprises an executive branch (led by the governor) and a county assembly tasked with legislative and oversight responsibilities. Moreover, Article 184 allows for the establishment of urban areas and city boards within counties to manage urban governance. However, the Constitution does not explicitly safeguard sub-county governments. Instead, it requires counties to decentralise functions and services wherever feasible and efficient (Constitution of Kenya, 2010, Art. 176.2). Consequently, local authorities at the ward and village levels function under the jurisdiction of county governments rather than as autonomous bodies.

Main Legislative Texts

Several laws provide the legal framework for Kenya's devolved system. The principal legislation governing local government includes:

1. County Governments Act (2012): Establishes the structure, powers, and responsibilities of county governments. It also mandates public participation in governance.

2. Urban Areas and Cities Act (2011): Regulates the management of cities, municipalities, and towns, defining their governance structures and service delivery mandates.

Other relevant legislation that supports local governance includes:

- Coordination of National Government Act (2013): Defines how the national government interacts with the counties.
- Finance Act (No. 4 of 2012): Governs public finance management at both national and county levels.
- Intergovernmental Relations Act (2012): Establishes mechanisms for cooperation between national and county governments.
- Land Act (2012) & Land Registration Act (2012): Provide guidelines on land management and ownership, affecting county planning and development.
- Leadership and Integrity Act (2012): Sets ethical standards for public officials, including county leaders.
- National Land Commission Act (2012): Governs land administration, including how counties manage public land.
- Public Finance Management Act (2012): Guides budget planning, revenue collection, and expenditure at the county level.
- Public Service Commission Act (2012): Defines the roles of county public service boards in hiring and managing employees.
- Transition to Devolved Government Act (2012): Facilitated the shift from centralised governance to devolved governance.

These laws create a framework that ensures counties can function effectively while remaining accountable to both the national government and the public.

Legal Basis for Local Government in Türkiye

Article 123 of the 1982 Turkish Constitution affirms the unitary structure of the Turkish state and outlines the principles governing public administration. This article forms the basis for the operations of both central and local governments within Türkiye's administrative system. It establishes the legal framework for Türkiye's predominantly

centralised administrative model, where local governments function as extensions of the national government instead of as autonomous bodies. Although the article mentions decentralisation, local governance is effectively subject to stringent central oversight, which restricts the autonomy of municipalities.

Türkiye's local administration is governed by The Municipal Law No. 5216 (2004) and The Metropolitan Municipalities Law (1984, amended in 2012). These laws define the structure, functions, and oversight mechanisms of municipalities, particularly metropolitan municipalities like Istanbul, Ankara, and Izmir. Despite these legal frameworks, strong central government oversight remains a key feature of Türkiye's local governance system.

The Municipal Law No. 5216 (2004)

This law regulates the establishment, responsibilities, and operations of metropolitan municipalities and their subordinate district municipalities.

The administrative structure of a metropolitan municipality (Büyükşehir Belediyesi) extends over an entire province, overseeing multiple district municipalities. Each municipality is headed by an elected mayor (Belediye Başkanı) serving a five-year term. The municipal council (Belediye Meclisi) functions as the decision-making body, responsible for approving budgets and policies (Municipal Law No. 5216, 2004).

The functions and responsibilities of metropolitan municipalities include urban planning, zoning, and land use regulation. They are also tasked with infrastructure development, such as roads, transportation, and water supply, along with public services like waste management, parks, and emergency response (Municipal Law No. 5216, 2004).

Regarding financial regulations, municipalities generate revenue through local taxes, service fees, and central government transfers. However, their financial autonomy remains limited due to heavy reliance on central government funding from Ankara (Özdemir, 2020).

There is significant central government oversight in municipal operations. The Ministry of Interior has authority over municipal budgets and can dismiss elected officials under certain conditions, reinforcing the centralised nature of governance in Turkey (Çelenk, 2019).

The Metropolitan Municipalities Law (1984, Amended in 2012)

This law was initially enacted in 1984 but underwent major reforms in 2012, restructuring Turkey’s metropolitan governance system.

One key reform was the expansion of metropolitan boundaries. Before 2012, metropolitan municipalities only governed urban centres, but the amendments extended their jurisdiction to the entire provincial boundaries. This change significantly increased their administrative responsibilities (Metropolitan Municipalities Law, 2012).

The law also aimed at reducing the number of local units by abolishing small towns and village administrations. These smaller administrative units were merged into district municipalities under the control of metropolitan municipalities, centralising governance at the provincial level (Metropolitan Municipalities Law, 2012).

Additionally, the law strengthened metropolitan governance by giving metropolitan mayors greater authority over district-level services and infrastructure projects. The hierarchical structure of governance was reinforced, making district municipalities more dependent on metropolitan municipalities for decision-making and service delivery (Güler, 2018).

Key Differences

Aspect	Kenya	Türkiye
Legal Basis	2010 Constitution (Devolution)	Article 123 of the Constitution (Unitary State)
Financial Independence	Counties receive national revenue and raise local taxes	Municipalities rely on national funding, limiting autonomy
Government Oversight	Counties are self-governing	Municipalities operate under the Ministry of Interior

Table 6: Comparison of Legal Framework of Local Gov in Both Countries

Source: Created by the Author.

2.4. Impact on Service Delivery and Local Development

Devolution has had an extensively positive impact on service delivery and local development.

Healthcare

County governments have prioritised healthcare by constructing and upgrading health facilities, leading to better access to medical services (Muwonge et al., 2022). A majority of the county's budget is allocated to meet the healthcare needs, as seen in the graph below.

Since 2013, county governments have made significant investments in health services, leading to enhanced access to healthcare and improved health outcomes. Various indicators reflect this progress, including an increase in health facility visits, a decline in maternal and child mortality rates, higher immunisation rates for children, and a greater number of births attended by skilled professionals. In 2013, approximately 800,000 women received care from skilled attendants during childbirth, a figure that rose to 1.1 million by 2018 (Maarifa Centre, 2023). With county governments implementing strategies to retain more community health workers, these numbers are expected to continue increasing. The Kenya Demographic Health Survey of 2021 reports that the national rate of skilled birth deliveries have reached an impressive 89 per cent. Additionally, the incidence of maternal deaths in health facilities has decreased; in the first year of devolution, there were 116.4 deaths per 100,000 births, which has now fallen to below 100 deaths per 100,000 births. Furthermore, child mortality rates for those under five years of age have dropped from 47.78 per cent to 40.34 per cent per 100,000 births (Maarifa Centre, 2023).

Education

Counties have invested in early childhood development centres and vocational training institutes, enhancing foundational education and equipping youth with practical skills tailored to local economic needs.

Investment by county governments in Early Childhood Development Education (ECDE) facilities has significantly increased the number of ECDE centres across the nation since 2013. There has been a 14.5% rise in the number of ECDE centres and facilities, growing from 24,767 in 2013 to 28,383 in 2019 (Muwonge et al., 2022). Before the devolution process, ECDE struggled to develop due to insufficient funding for its full implementation. In contrast, the expansion of private ECDE centres, driven by direct investment from 2013 to 2019, was even more pronounced, with a growth rate of 17.5% (from 15,443 in 2013 to 18,147 in 2019). The Council of Governors (CoG) reports that

the number of pre-primary centres, encompassing both private and public institutions, rose from 46,671 in 2021 to 48,412 in 2022, with an estimated total of 39,244 classrooms.

Infrastructure

Devolved units have constructed and maintained county roads, improving connectivity and facilitating trade within and between counties. This has been particularly beneficial in rural areas previously underserved by infrastructure development. In Machakos County, under Governor Alfred Mutua's leadership, significant advancements were made in terms of road construction. Over 200 kilometres of new tarmac roads and more than 8,000 kilometres of graded roads were developed, enhancing accessibility across the county.

Agriculture and Trade

Counties have supported local farmers through extension services, provision of subsidised inputs, and facilitating access to markets. This has led to increased agricultural productivity and incomes. Additionally, the promotion of local trade and investment has stimulated economic growth.

Enhancing Farmers' Cooperatives and Market Access. County governments are transforming lives by promoting and supporting the establishment of cooperative and marketing societies tailored for different groups of farmers (Muwonge et al., 2022). When farmers are well-organised, they can negotiate more favourable terms for their products, present a unified voice regarding their needs to the county government, and combine resources for investments that benefit their farming activities. In fact, individual efforts by farmers can diminish their market opportunities and expose them to risks, such as exploitation by middlemen who purchase their produce at low prices. In Murang'a County, the Avocado Farmers' Cooperative Union plays a crucial role in securing better prices and ensuring a stable market for its members (Maarifa Centre, 2023). Established in 2018 by self-help groups across all eight sub-counties of Murang'a, the Union has successfully collaborated with the National Agricultural and Rural Inclusive Growth Project, in partnership with the World Bank, to facilitate access to recommended pest control products.

Water Provision

County governments have undertaken a variety of initiatives to improve water accessibility in both urban and rural regions. These efforts include drilling boreholes,

building water pans and small dams, installing domestic rainwater storage systems, and establishing piped water supply networks in urban areas. As of August 2022, the 47 county governments had successfully constructed 11,163 boreholes nationwide, with Siaya, Turkana, and Nairobi counties leading in the number of boreholes developed (Maarifa Centre, 2023). Additionally, a total of 1,661 small dams have been built to provide water access for rural communities facing scarcity and shortages. Small dams and water pans are frequently utilised to combat water shortages in arid and semi-arid regions, helping to alleviate the impacts of erratic rainfall and changing weather conditions. In total, county governments have constructed approximately 3,200 water pans. Notably, around 1,000 of these were built in Nyeri County, with additional contributions of 273 in Garissa, 290 in Mandera, and 215 in Isiolo counties, among others. Furthermore, the counties of Wajir, Laikipia, and Turkana have constructed 110, 183, and 56 small dams and water pans, respectively (Maarifa Centre, 2023).

Challenges to Service Delivery

Counties continue to encounter difficulties in providing high-quality health care. The situation is exacerbated by rising staff absenteeism within the health sector, resulting in persistently low standards of care. Compliance with clinical guidelines, particularly concerning maternal and neonatal cases, remains significantly below 50 per cent, and the availability of essential drugs and equipment is similarly stagnant at around 50 per cent (Muwonge et al., 2022). However, there have been notable advancements. For instance, the accuracy of diagnostics has seen a substantial rise, increasing from 45 per cent in 2012 to 68 per cent in 2018, and the availability of necessary infrastructure has improved dramatically, climbing from under 50 per cent to over 70 per cent (Muwonge et al., 2022). In the fields of Early Childhood Development and Education (ECDE), water management, agriculture, and urban development, there is a notable absence of quantitative data regarding quality. However, findings from the case study counties present a mixed picture. In the education sector, county governments have made strides in acquiring teaching guides, learner workbooks, and other educational materials. Nevertheless, the systems and resources for quality assurance remain underdeveloped and insufficient, particularly at the subcounty level. There is a lack of enforcement regarding learner assessment guidelines and the basic education curriculum, leading to the implementation of some inappropriate child development assessment practices

(Muwonge et al., 2022). In the water sector, there has been a decline in the proportion of the population with access to piped water systems, indicating a growing dependence on more basic water sources.

In agriculture, stakeholders have raised concerns about the ineffective demand-driven extension model and the inadequacy of disease control measures (Muwonge et al., 2022). Regarding urban development, the enforcement of development control standards is inconsistent. Additionally, unreliable operational budgets are likely to negatively impact solid waste management and the upkeep of urban infrastructure.

Türkiye

Improved Public Services

Healthcare Expansion

Local authorities have made significant strides in enhancing healthcare accessibility by building and renovating hospitals, clinics, and health centres, especially in rural regions. For example, the Istanbul Metropolitan Municipality (IMM) has broadened its mobile health services, offering complimentary medical check-ups to marginalised communities (Yılmaz & Bayraktar, 2021). Furthermore, municipalities in cities such as Bursa and Konya have set up specialised healthcare facilities dedicated to elderly care and rehabilitation.

Public Transport Development

Municipalities in prominent cities have allocated resources to improve public transportation infrastructure, aiming to alleviate congestion and enhance urban mobility. The Istanbul Metropolitan Municipality introduced the Metrobus system, a high-capacity bus rapid transit (BRT) network that has significantly shortened travel times for millions of residents (TÜİK, 2022). Likewise, Ankara has expanded its metro system, while Izmir has implemented a smart ticketing solution that integrates buses, ferries, and trams (Çetin, 2020).

Waste Management & Sanitation

Numerous municipalities have upgraded their waste collection and recycling systems to promote better sanitation and environmental sustainability. The Ankara Metropolitan Municipality initiated a comprehensive waste separation and recycling initiative, resulting in a 35% increase in the city's recycling rate (Demirci, 2019). Additionally,

Istanbul has adopted a smart waste collection system that optimises garbage collection routes, thereby minimising fuel consumption and reducing carbon emissions.

Regional Development and Economic Growth

Infrastructure Initiatives

Local authorities have made significant investments in infrastructure to enhance economic activities, especially in less developed areas. A notable example is the Southeastern Anatolia Project (GAP), which upgraded irrigation systems, thereby increasing agricultural output and creating jobs in the region (Öztürk, 2018). In a similar vein, local governments in the Black Sea area have constructed new highways and bridges, which have improved trade and tourism opportunities.

Support for Small Enterprises

Municipalities are actively fostering small businesses by providing incentives, tax breaks, and various business development resources. The Gaziantep Metropolitan Municipality has set up a business incubation centre that offers mentorship and financial support to entrepreneurs (Kaya, 2020). Furthermore, cities such as Konya and Kayseri have initiated microfinance programs aimed at assisting local artisans and family-run businesses.

Tourism Development

Local governments are essential in advancing tourism by investing in infrastructure and safeguarding cultural heritage. In Antalya, officials have restored historical landmarks and enhanced transportation connections to key tourist sites, resulting in a notable rise in visitor numbers (Erdoğan, 2019). Likewise, the local government in Cappadocia has enacted stringent conservation measures to protect its renowned cave dwellings and rock formations while encouraging sustainable tourism practices.

Disaster Management and Preparedness

Earthquake Preparedness

In light of Türkiye's susceptibility to earthquakes, local authorities have bolstered disaster preparedness by implementing more stringent building codes and enhancing emergency response systems. The Istanbul Metropolitan Municipality initiated the "Istanbul Seismic Risk Mitigation and Emergency Preparedness Project," which involves retrofitting thousands of structures to improve their earthquake resilience (AFAD, 2022).

Flood and Fire Response

Coastal municipalities have improved their flood protection measures and firefighting resources to address natural disasters more effectively. For example, Izmir has established an early warning system for floods, which has significantly decreased response times and reduced potential damage (Karaca, 2021). In the Mediterranean area, local governments have made investments in advanced firefighting equipment and aerial suppression technologies to better tackle wildfires.

Digital Transformation and Smart Cities

E-Government Services

Numerous municipalities have transitioned to digital administrative processes, leading to enhanced efficiency and improved accessibility. For example, Istanbul introduced the “e-Belediye” platform, which allows residents to apply for permits, pay taxes, and request municipal services online (TÜBİTAK, 2021). This initiative has streamlined bureaucratic procedures and fostered greater transparency in governance.

Smart City Initiatives

Several Turkish cities have embraced smart technologies to improve urban management. For instance, Izmir has implemented a smart traffic system that utilises artificial intelligence to monitor and manage congestion in real time, resulting in a 20% reduction in travel delays (Çakır, 2020). Likewise, the Konya Metropolitan Municipality has adopted a smart irrigation system for its public parks, which optimises water usage and minimises waste.

Social Services and Community Development

Affordable Housing Initiatives

In response to the pressing need for housing, local authorities have implemented affordable housing initiatives. The Ankara Metropolitan Municipality, in partnership with TOKİ (Housing Development Administration of Türkiye), has developed thousands of low-cost housing units aimed at assisting low-income families (Eren, 2021). These initiatives are designed to alleviate urban poverty and ensure stable housing for at-risk populations.

Empowerment of Women and Youth

Numerous municipalities have introduced programs to empower women and youth through vocational training, entrepreneurship support, and social services. The Eskişehir Municipality has established a Women’s Entrepreneurship Centre that provides business

training and financial resources for female entrepreneurs (Yıldız, 2019). Likewise, youth entrepreneurship initiatives in Istanbul offer mentorship and grants to young business owners, promoting innovation and creating job opportunities.

2.5. Case Studies

2.5.1. Nairobi County

Like many post-colonial African nations, Kenya adopted its local government framework from the colonial administration. The City of Nairobi was formally established by royal charter in 1950, and a local government ordinance was introduced in 1960 to oversee local governance. Throughout the colonial period, the primary objective of local government was to cater to the growing white settler community in Nairobi and other areas.

Currently, Nairobi City County is one of Kenya's 47 counties. Projected to have a population of approximately 5,454,000 by 2024, it ranks as the most densely populated county despite being the third smallest in land area (Nairobi City County, 2025). Additionally, it serves as the capital city of Kenya. Established by the Constitution of Kenya in 2010, Nairobi City County succeeded the former City Council of Nairobi. It functions under the framework of the Cities and Urban Areas Act, the Devolved Governments Act, and several other legislative acts. The Nairobi City County is responsible for delivering a wide range of services to its residents. These services encompass those previously managed by the defunct City Council, as well as those transferred from the national government. The former services include Physical Planning, Public Health, Social Services, Housing, Primary Education Infrastructure, Inspectorate Services, Public Works, and Environmental Management. The latter services consist of Agriculture, Livestock Development and Fisheries, Trade, Industrialisation, Corporate Development, Tourism and Wildlife, and Public Service Management.



Image 9: Nairobi County Offices

Source: https://en.m.wikipedia.org/wiki/Nairobi_City_County

County Structure

The Nairobi City County, in execution of responsibilities and functions bestowed upon it by the above Acts, has been divided into three arms as follows:

1. The Executive, led by the Governor
2. The Legislative Arm, or the County Assembly, is headed by the Speaker
3. County Public Service Board

The Executive

Led by The Governor and The Deputy Governor. The Executive arm of the County is charged with the responsibility of policy formulation. Within this arm is the County Public Service Board, the County Executive Committee, the City Inspectorate, County Investigations and Information Analysis departments, the Disaster Management and Coordination Sector and a host of agencies (Nairobi City County, 2025).

The County Public Service Board

The County Public Service Board is appointed by the Governor and is responsible for the determination of the county's Human Resource needs, recruitment and related Public Service functions (Nairobi City County, 2025). The board is under the charge of the chairman, supported by various committee members.

The County Executive Committee

The County Executive Committee, appointed by HE the governor, comprises ten members and is the highest policy-making organ of the county. Each County Executive Committee Member is responsible for a sector of County operations (Nairobi City County, 2025).

County Assembly

It is the legislative arm of the County responsible for the formulation of laws that are expected to regulate the conduct of activities in the county and to provide oversight. The legislature comprises 85 elected and 42 nominated members of the county assembly who sit in the various committees of the county assembly (Nairobi City County, 2025). Legislation is conducted through committees where bills are presented, culminating in the plenary assembly, where the bills are concluded before being signed into law by the Governor. The Speaker is the head of the legislature and is expected to conduct all sittings of the county assembly, save for standing committee meetings.

Challenges and Opportunities of Devolution

1. Corruption and Mismanagement

A major obstacle to effective devolution in Nairobi is corruption. The increased autonomy granted to county governments has resulted in greater control over financial resources, which has unfortunately led to widespread mismanagement and corruption (Cornell & D'Arcy, 2016). The phenomenon known as "everyone's turn to eat" has caused funds intended for public services to be misappropriated for personal benefit, thereby undermining the effectiveness of devolution.

2. Political Interference and Power Struggles

Although devolution aimed to empower county governments, ongoing political interference from the national government remains a significant hurdle (Nyandemo, 2022). Given its strategic significance, Nairobi has experienced frequent clashes between the county government and national authorities, which often result in governance inefficiencies (World Bank, 2012).

3. Inadequate Revenue and Financial Constraints

County governments are heavily dependent on financial allocations from the national government, which are frequently delayed, adversely impacting service delivery (Gathii

& Otieno, 2018). Furthermore, revenue collection at the county level is often ineffective, with a considerable amount of funds lost due to gaps in the taxation system (Cornell & D'Arcy, 2014).

4. Service Delivery Challenges

Despite the process of devolution, the delivery of services in critical areas such as healthcare, waste management, and infrastructure remain subpar in Nairobi. This inefficiency is primarily due to inadequate planning, a shortage of skilled personnel, and limited resources. The World Bank (2012) highlights that while devolution was designed to bring services closer to the populace, many residents of Nairobi continue to face bureaucratic delays and inefficiencies in accessing essential services.

Opportunities Presented by Devolution in Nairobi

1. Increased Public Engagement and Accountability

Devolution has enabled citizens to engage actively in decision-making at the county level, promoting greater accountability and transparency (Nyandemo, 2022). Public forums and budget discussions now provide residents with a platform to express their concerns and impact governance.

2. Economic Development and Local Advancement

Devolution has catalysed local economic progress through infrastructure initiatives and support for small enterprises (Gathii & Otieno, 2018). The creation of county-specific economic programs has generated job opportunities and enhanced the quality of life for residents.

3. Enhanced Service Delivery through Effective Implementation

Although there have been initial challenges, Nairobi has seen advancements in certain sectors as a result of devolution. For example, the decentralisation of healthcare management has led to improved efficiency in some county hospitals (Cornell & D'Arcy, 2016). With more effective financial planning and management, Nairobi has the potential to further improve service delivery under devolved governance.

Despite facing considerable challenges such as corruption, political interference, and financial limitations, devolution in Nairobi offers significant opportunities for better governance, economic development, and increased public engagement. Tackling governance issues and reinforcing institutional frameworks will be essential to fully realise the advantages of devolution.

2.5.2. Istanbul Municipality, Türkiye

Istanbul, the largest city in Türkiye and a key economic hub, functions under a centralised governance framework where municipal authorities manage local affairs. With a population surpassing 16 million, it stands as Türkiye's foremost centre for commerce and culture.

Governance Framework

The Istanbul Metropolitan Municipality (IMM) is led by a mayor, who is elected by the residents of Istanbul, alongside a Metropolitan Council that handles legislative responsibilities. The Turkish government exercises considerable oversight over local governance through the Ministry of Interior, which supervises municipal activities.

In contrast to Nairobi, Istanbul's governance remains predominantly centralised, which restricts local self-governance.



Image 10: Istanbul Metropolitan Municipality office) in Fatih, İstanbul, Türkiye

Source: https://en.m.wikipedia.org/wiki/Municipal_Council_of_Istanbul

Service Delivery and Local Development in Türkiye

Urban Planning and Infrastructure

Istanbul boasts a robust infrastructure, characterised by a comprehensive metro network, numerous bridges, and extensive highways. Nevertheless, the swift pace of urbanisation has resulted in a shortage of housing and increased traffic congestion (Gülay, 2020). The city has experienced significant transformation projects; however, challenges such as

insufficient green spaces and the presence of informal settlements remain unresolved (Aydin, 2021).

Healthcare and Education

The majority of healthcare and educational services are overseen by the central government, with municipalities providing support for local initiatives. Although Türkiye has achieved notable advancements in healthcare accessibility, regional inequalities continue to pose a challenge (OECD, 2019). The Ministry of National Education primarily dictates education policies, while local authorities contribute by developing infrastructure and community programs (Karaman & Oğuz, 2022).

Economic Development

As the financial centre of Türkiye, Istanbul plays a crucial role in driving the nation's economic growth. The Istanbul Metropolitan Municipality (IMM) fosters economic activities through various business incentives and initiatives aimed at promoting cultural tourism (Yilmaz & Çetinkaya, 2021). Ongoing investments in the trade, real estate, and technology sectors are propelling the city's expansion, establishing Istanbul as a vital economic hub in both Europe and Asia.

2.6. Challenges and Opportunities

Challenges

Limited Local Autonomy

Despite Türkiye's efforts towards decentralisation, local authorities, including the Istanbul Metropolitan Municipality (IMM), remain under stringent oversight from the central government, which restricts their decision-making capabilities. Although municipalities are tasked with responsibilities such as urban planning, transportation, and local services, the central government retains control over critical policy areas, financial resources, and administrative functions (CoR, n.d.). A significant limitation on Istanbul's local autonomy stems from its financial reliance on Ankara. The Turkish Ministry of Treasury and Finance oversees tax revenues, and municipalities obtain funding through centrally distributed grants, lacking full control over local taxation. Approximately 75% of municipal revenue is derived from transfers from the central government, which constrains the financial independence of local administrations (CoR, n.d.). For instance, in 2019, following the victory of the opposition Republican People's Party (CHP) in the

Istanbul mayoral election, the central government redirected essential financial resources away from the municipality, thereby diminishing its capacity to finance projects. This incident illustrates how political influence can impact the financial autonomy of local governments.

While municipalities are responsible for urban planning and transportation management, the central government maintains significant influence. For example, key infrastructure initiatives such as the Istanbul Canal Project, Istanbul Airport, and the third Bosphorus Bridge were launched and overseen by the central government, which restricts the city's capacity to shape large-scale urban development (Global Future Cities Programme, n.d.). The central government, through agencies like the Ministry of Environment and Urbanisation, frequently overrides municipal zoning decisions, prioritising national interests over local requirements. In Türkiye, municipalities, including Istanbul, lack full autonomy in appointing or managing local officials. The Ministry of the Interior holds the authority to remove elected mayors and appoint trustees (kayyum) if they are perceived to be acting against state interests. This situation has sparked considerable controversy, especially in municipalities led by opposition parties. Historically, mayors from these parties have encountered investigations, budget reductions, and bureaucratic obstacles, which have hindered their ability to pursue independent policies (Yakar, n.d.). For instance, after Ekrem İmamoğlu assumed the mayoralty of Istanbul in 2019, his administration faced numerous political and legal challenges, with the central government obstructing certain initiatives and attempting to limit municipal control over transportation and public services. The restricted local autonomy hampers governance efficiency, as municipalities are unable to fully manage their budgets, infrastructure planning, or administrative functions. This leads to delays in service provision, conflicting policy priorities between the city and the central government, and diminished responsiveness to local needs.

High Population Density

Istanbul's population has surpassed 16 million, positioning it as one of the most densely populated cities in Europe (Macrotrends, n.d.). This rapid urban expansion has led to a shortage of housing, escalating property prices, and the emergence of informal settlements (OECD, 2019). Many inhabitants, particularly those from low-income backgrounds, are compelled to reside in gecekondu (Slums or informal housing areas)

on the city's periphery, where infrastructure and public services are often lacking (Wikipedia, n.d.). The increasing demand for affordable housing has also triggered gentrification, displacing marginalised communities further from the city centre.

The transportation infrastructure is similarly overwhelmed due to heavy commuter traffic. Major routes, including the E-5 and TEM motorways, face significant congestion, particularly during peak periods (ResearchGate, n.d., a). Public transportation options, such as metro lines, metrobuses, and ferries, struggle to keep pace with demand, despite ongoing expansion initiatives (ResearchGate, n.d.,b). Research indicates that residents spend an average of 2.5 hours each day in traffic, adversely impacting both productivity and overall quality of life (Istanbul Metropolitan Municipality, 2023).

In response to these challenges, the government has committed to large-scale infrastructure projects, including the Marmaray Rail Tunnel, which links the European and Asian sides of the city beneath the Bosphorus (ResearchGate, n.d.,b). Additionally, the Istanbul Airport, one of the largest globally, is designed to handle the growing number of passengers (Wikipedia, n.d.). Another significant initiative is the Istanbul Canal Project, intended to alleviate congestion in the Bosphorus Strait, although it has sparked environmental concerns. Despite these advancements, the pace of rapid urbanisation continues to outstrip improvements in infrastructure, necessitating long-term strategic planning for sustainable development (OECD, 2019).

Environmental Concerns

Istanbul is grappling with significant pollution issues, challenges in waste management, and a shortage of green spaces. The city's air quality is heavily influenced by emissions from vehicles, industrial operations, and dust from construction activities (Ministry of Environment and Urbanisation, 2021). According to a 2021 report from Türkiye's Ministry of Environment, levels of particulate matter (PM2.5) in Istanbul frequently surpass the limits recommended by the World Health Organisation, contributing to respiratory illnesses such as asthma and bronchitis (Ministry of Environment and Urbanisation, 2021). Areas like Esenler and Bağcılar suffer the most from poor air quality due to their high traffic volumes and proximity to industrial zones.

In response to air pollution, Istanbul has implemented several measures, including the introduction of low-emission buses and electric taxis aimed at lowering carbon emissions (Canitez, 2025). Additionally, the city is expanding its metro and tram networks to

promote the use of public transportation over private vehicles (Canitez, 2025). Furthermore, stricter environmental regulations have been put in place to limit industrial pollution (Ministry of Environment and Urbanisation, 2021).

Waste Management

Istanbul generates approximately 17,000 tons of waste daily, with a significant portion being sent to landfills as a result of inadequate recycling efforts (Hürriyet Daily News, 2024). The issues of illegal dumping and improper waste management exacerbate pollution in local water bodies, including the Golden Horn and the Bosphorus. In response, the city has introduced waste-to-energy projects, such as the Kemerburgaz Biogas Facility, which transforms organic waste into electricity. Nevertheless, there is still a lack of awareness regarding recycling, highlighting the necessity for improved waste sorting policies.

Green Spaces and Water Pollution

Istanbul, despite its considerable size, offers limited green spaces, providing only 2.2 square meters per person, significantly lower than the World Health Organisation's recommended 9 square meters per capita (Habitat, 2018). The rapid pace of urban development has resulted in deforestation, especially in regions adjacent to the Belgrad Forest and Atatürk Arboretum. This loss of natural environments heightens the risk of flooding, as evidenced by the severe rainfall in 2021 that inundated roads in areas such as Üsküdar and Beyoğlu (Akkemik, 2014). Additionally, water pollution poses a significant challenge, particularly in the Marmara Sea, which experienced a marine mucilage crisis in 2021 due to untreated wastewater and elevated sea temperatures. In response, the government has implemented measures to treat industrial waste prior to its discharge into the sea; however, the enforcement of these regulations remains inconsistent.

Aspect	Nairobi County, Kenya	Istanbul Municipality, Türkiye
Governance Structure	Devolved county government with an elected Governor and County Assembly	Centralised metropolitan municipality with an elected Mayor under national oversight
Service Delivery	Struggles with infrastructure, healthcare, and waste management	More structured but faces congestion and environmental issues
Autonomy	Greater autonomy but affected by national government interventions	Limited autonomy with strict central government control
Economic Development	Major economic hub in East Africa with growing SMEs	Leading financial and cultural hub in Türkiye
Challenges	Political interference, corruption, urban congestion	Limited municipal power, overpopulation, environmental degradation

Table 7: Comparative Analysis of Nairobi and Istanbul Municipal Functions

Source: Created by the Author.

Political Constraints

Türkiye

One of the main challenges in Istanbul’s local administration is the heavy control exerted by the central government over municipalities. Despite being democratically elected, the mayor’s powers are often undermined by the Turkish presidency. The government has historically appointed trustees (kayyum) to replace elected opposition mayors in various municipalities, limiting the democratic autonomy of local governments (Wikipedia, 2024).

A prominent example is the political pressure faced by Istanbul’s Mayor Ekrem İmamoğlu. Since his election in 2019, he has encountered multiple legal battles, including a conviction that temporarily disqualified him from holding public office (Reuters, 2025). Many analysts view this as an attempt by the ruling AK Party to weaken political opposition ahead of national elections. The case of İmamoğlu illustrates how local

governance in Istanbul is often influenced by broader national political struggles, making it difficult for municipalities to operate independently.

Nairobi: Conflicts Between National and County Governments

In Kenya, the 2010 Constitution introduced devolution, granting more authority to county governments, including Nairobi. However, conflicts between county leaders and the national government continue to disrupt governance. A notable example is the tenure of former Nairobi Governor Mike Sonko, who was impeached in 2020 amid allegations of corruption and misuse of public funds. His removal led to the unprecedented transfer of key county functions—such as health, transport, and revenue collection—to the Nairobi Metropolitan Services (NMS), a national government-appointed agency (Mitullah, 2014). This takeover sparked debate over the limits of county autonomy. Critics argued that by bypassing elected county officials, the national government weakened the principles of devolution. Additionally, the appointment of national administrators to oversee city affairs has led to tensions over accountability and resource allocation, making it difficult for local leaders to execute long-term development plans (Raballa, 2025).

Financial and Administrative Challenges

Istanbul: Budgetary Constraints and Municipal Debt

Istanbul's financial challenges are partly due to its heavy dependence on funds allocated by the central government. Local administrations have limited power to generate revenue independently, making them vulnerable to funding restrictions imposed by national authorities. For example, in 2021, the Istanbul Metropolitan Municipality reported financial difficulties after the central government delayed the release of funds for key infrastructure projects, allegedly for political reasons (Yıldız & Saylam, 2025).

Additionally, Istanbul has accumulated significant municipal debt due to large-scale projects, such as the city's Metro expansion and urban renewal programs. Although these projects aim to improve urban mobility and housing, the reliance on loans and public-private partnerships has increased financial risks. For instance, the construction of the Istanbul Airport and Canal Istanbul project—both heavily promoted by the national government—has drawn criticism for diverting funds away from essential local services (Reuters, 2025).

Nairobi: Revenue Collection and Corruption

Nairobi's financial struggles stem from inefficiencies in revenue collection and high levels of corruption. Despite being Kenya's economic hub, the city generates insufficient local revenue to sustain essential services. Nairobi collects revenues from sources such as parking fees, business licenses, and property taxes, yet leakages due to corruption significantly reduce the funds available for public projects (Raballa, 2025).

For example, in 2019, an audit revealed that Nairobi City County could not account for KSh 10 billion (\$91 million) in collected revenues. This led to the dismissal of several county officials and further exposed the structural weaknesses in financial management (Mitullah, 2014). Additionally, delayed disbursements from the national treasury often result in stalled development projects, affecting road repairs, garbage collection, and health services.

A specific example of mismanagement is Nairobi's water supply system. Despite the city experiencing frequent water shortages, millions of shillings allocated for upgrading water infrastructure remain unaccounted for. This has forced many residents to rely on expensive private water vendors, increasing the cost of living for low-income populations (Raballa, 2025).

Administrative and Bureaucratic Inefficiencies

Istanbul: Overlapping Responsibilities and Bureaucracy

The governance structure in Istanbul is complex, with multiple agencies responsible for different aspects of city management. While the Istanbul Metropolitan Municipality (IMM) oversees most urban services, there are 39 district municipalities that also exercise administrative functions. This fragmentation often leads to inefficiencies and duplication of efforts (Wikipedia, 2024).

For example, during the 2020 floods in Istanbul, both municipal and national emergency services responded to the crisis, yet coordination issues led to delays in relief efforts. Residents complained about the slow response to infrastructure damage, with different agencies blaming each other for the failures. These bureaucratic inefficiencies hinder the city's ability to respond effectively to urban challenges (Yıldız & Saylam, 2025).

Additionally, delays in construction permits and zoning approvals create obstacles for businesses and investors. Reports indicate that real estate developers often face long waiting periods to obtain the necessary approvals, leading to project delays and increased

costs. Such inefficiencies affect Istanbul's overall economic competitiveness and investment climate (Reuters, 2025).

Nairobi: Poor Service Delivery and Inefficient Public Sector

Nairobi faces significant administrative inefficiencies, particularly in service delivery. Issues such as uncollected garbage, poor road maintenance, and inconsistent water supply have been persistent concerns among residents. One of the key challenges is the lack of accountability in public service management (Mitullah, 2014).

For example, the Nairobi Metropolitan Services (NMS), which took over city operations in 2020, initially made strides in improving road infrastructure and sanitation. However, its abrupt dissolution in 2022 left many projects incomplete, raising concerns about the sustainability of short-term administrative interventions (Raballa, 2025).

Similarly, the inefficiency of Nairobi's public transport system continues to affect urban mobility. The lack of proper regulation of the matatu (public minibus) sector has resulted in frequent traffic congestion and safety concerns. Although proposals for a Bus Rapid Transit (BRT) system have been made, implementation has been slow due to bureaucratic red tape and political interference (Mitullah, 2014).

Opportunities

Both Nairobi and Istanbul are actively pursuing reforms to enhance their local administration systems, focusing on transparency, citizen engagement, and efficient service delivery. This comparative analysis examines the opportunities each city is exploring to strengthen governance structures and improve public services.

Nairobi: Advancing Open Governance and Digital Transformation

Nairobi City County has initiated several reforms aimed at institutionalising open governance and leveraging digital technologies:

1. **Open Government Action Plan (2025–2027):** In March 2025, Nairobi launched its Open Government Action Plan, emphasising transparency, accountability, and citizen participation. The plan focuses on embedding open governance principles into county policies, expanding public participation through ward-level forums and digital platforms, and enhancing access to information via an Open Data Portal. These initiatives aim to build public trust and ensure policy continuity beyond political transitions (Open Government Partnership, 2025).

2. **Public Participation Act:** To strengthen citizen engagement, Nairobi enacted the Public Participation Act, ensuring structured public consultations in policymaking and budgeting. This legislation mandates the inclusion of citizen input in governance processes, promoting inclusivity and responsiveness (Open Government Partnership, 2025).

3. **Smart Nairobi Initiative:** The county has launched digital governance efforts to enhance service delivery, automate processes, and improve public access to county services. These initiatives aim to increase efficiency, reduce bureaucratic hurdles, and improve citizen satisfaction (Open Government Partnership, 2025).

Istanbul: Local Administration Reform and Digital Initiatives

Istanbul has embarked on several initiatives to reform its local administration and improve public services:

1. **Local Administration Reform Project (Phase III):** Turkey, with Istanbul as a focal point, has implemented the Local Administration Reform Project to ensure effective, inclusive, accountable, and participatory local governance. This project aims to strengthen administrative capacities, enhance service delivery, and promote democratic governance principles. Key areas include improving coordination between central and local governments, addressing rural area management challenges, and mobilising quality human resources (United Nations Development Programme [UNDP], n.d.).

2. **Digital Transformation Efforts:** Istanbul Metropolitan Municipality has prioritised digital initiatives to enhance service delivery. For instance, the municipality has developed mobile applications and online platforms to facilitate access to services such as transportation, bill payments, and public information. These efforts aim to increase efficiency, reduce bureaucratic hurdles, and improve citizen satisfaction.

Comparative Insights and Opportunities

Both cities recognise the importance of transparency, citizen engagement, and digital transformation in local governance. Nairobi's focus on open governance and partnerships with international organisations demonstrates a commitment to leveraging external expertise for internal improvements. Istanbul's emphasis on comprehensive administrative reforms and digital initiatives reflects an approach to modernising municipal services and enhancing efficiency.

Opportunities for both cities include:

- **Enhancing Public Participation:** Expanding platforms for citizen engagement ensures that governance processes are inclusive and reflective of public needs.
- **Leveraging Technology:** Investing in digital infrastructure can streamline service delivery, reduce corruption, and increase transparency.
- **Building Institutional Capacity:** Continuous training and development of municipal staff can improve efficiency and responsiveness in public service provision.

By focusing on these areas, Nairobi and Istanbul can strengthen their local administration systems, leading to improved service delivery and increased public trust.



CHAPTER 3: DISCUSSION & FINDINGS

3.1. Comparative Analysis

Kenya and Türkiye display significant contrasts in their governance frameworks, levels of decentralisation, and the effectiveness of service delivery. This section examines these differences and identifies best practices that each nation could learn from the other.

Differences in Governance Frameworks

Kenya implemented a devolved governance system with the introduction of the 2010 Constitution, which aims to foster democratic governance, improve service delivery, and ensure fair resource allocation throughout the country. This system established 47 county governments, each operating as a semi-autonomous administrative entity with its own executive and legislative branches. The executive branch is led by an elected Governor, while the legislative branch consists of the County Assembly, which includes elected Members of the County Assembly (MCAs) and appointed members representing specific interests. This arrangement empowers counties to oversee areas such as health services, agriculture, and infrastructure development, thereby promoting localised decision-making and public engagement (Constitution of Kenya, 2010).

In terms of finances, county governments receive funding from the national government based on a predetermined revenue-sharing formula, which ensures that resources are allocated according to factors such as population and developmental requirements. This financial independence allows counties to design and execute projects that are suited to their unique circumstances (Constitution of Kenya, 2010).

Türkiye's Unitary Governance System

Türkiye functions under a unitary governance model characterised by centralised administrative authority. The nation is segmented into 81 provinces, each managed by a Governor (Vali) appointed by the central government, who acts as its representative at the provincial level. These governors are tasked with coordinating and overseeing the execution of national policies and ensuring public order within their respective areas (Administrative divisions of Türkiye, n.d.).

Although local administrations, such as municipalities and special provincial administrations, do exist, their autonomy is quite restricted. Municipalities handle local services, including transportation, land use, and waste management; however, their

activities are monitored by the central government, and their funding primarily comes from allocations set by national authorities. While mayors and municipal councils are elected by local residents, their ability to make decisions is limited by the overarching control of the centrally appointed governors (Local government in Türkiye, n.d.).

The key difference between the governance frameworks of Kenya and Türkiye is the level of local autonomy. Kenya's devolved system provides significant decision-making authority to county governments, enabling them to create policies and initiatives that cater to local requirements (Constitution of Kenya, 2010). In contrast, Türkiye's unitary system centralises power, with local administrations functioning under the close oversight of appointed officials, leading to a more consistent application of national policies throughout the country.

Levels of Decentralisation

Kenya's devolution seeks to enhance governance by empowering county governments with authority over local policies, budgets, and public services. Although the national government allocates funding, it does not exert direct control over decisions made at the county level (Constitution of Kenya, 2010). Nonetheless, the reliance on central government funding and existing capacity challenges within counties impede their complete autonomy.

In contrast, Türkiye operates under a centralised governance framework that incorporates elements of partial decentralisation. Local governments are tasked with administrative duties; however, their financial and policy-making capabilities are restricted by the oversight of the central government. This limitation affects the ability of local governments to effectively customise services to meet the specific needs of their communities.

Effectiveness of Service Delivery

Since the introduction of devolution in 2013, Kenya has experienced significant advancements in service delivery, especially in areas like health, water, and infrastructure. The creation of 47 county governments, each equipped with its own executive and legislative bodies, has promoted more localised decision-making and resource distribution, thereby improving service accessibility for residents. For example, the World Bank's 2022 report indicates that devolution has allowed counties to customise

health services according to the unique needs of their communities, leading to improved health outcomes.

Nevertheless, challenges remain. Problems such as corruption, political interference, and unequal resource allocation have obstructed the complete realisation of devolution's advantages. The World Bank report points out that although devolution was intended to decentralise political authority and public finances, unclear function assignments and inadequate intergovernmental coordination have resulted in inefficiencies in service delivery. To overcome these challenges, it is essential to strengthen accountability mechanisms, improve transparency, and ensure fair resource distribution among the counties.

Istanbul's municipal government has made notable progress in delivering services, particularly in sectors such as transportation, waste management, and urban development. The city's strategic initiatives prioritise participatory democracy, transparency, and inclusivity. A study conducted by İkizer (2023) examined the strategic plans of the Istanbul Metropolitan Municipality and noted a transition towards a discourse of participatory democracy, emphasising the incorporation of concepts like participation, transparency, and accountability.

However, despite these improvements, political friction between local and national governments can hinder the execution of large-scale projects. The centralised structure of Türkiye's governance necessitates that local initiatives obtain approval from national authorities, which may result in delays and disputes, particularly when there are differing political affiliations. This situation highlights the necessity for enhanced intergovernmental relations and a clearer definition of powers to improve the efficiency of project implementation.

3.2. Policy Implications

The governance frameworks in Kenya and Türkiye have led to unique policy outcomes that influence their political, social, and economic environments.

3.2.1. Kenya: Devolution and Its Policy Outcomes

The devolution process in Kenya, initiated by the 2010 Constitution, aimed to distribute power and resources among 47 county governments, thereby fostering democratic

governance, equitable development, and improved service delivery (D'Arcy, 2018). This transformation has resulted in several significant policy outcomes:

1. Improved Local Governance and Accountability

Devolution has facilitated closer interaction between the government and citizens, thereby enhancing public involvement in decision-making. This increased proximity has the potential to improve accountability and transparency at the local level. Nonetheless, issues such as corruption and political interference persist, necessitating strong oversight mechanisms to ensure effective governance (D'Arcy, 2018).

2. Fair Resource Allocation

The direct allocation of resources to county governments through devolution seeks to rectify historical regional inequalities. Counties are now empowered to prioritise and execute development initiatives that cater to their specific needs. However, disparities in administrative capabilities and resource management have resulted in inconsistent development outcomes across different counties (Cheeseman et al., 2021).

3. Reforms in Policy and Legislation

The shift to a devolved governance system necessitated extensive policy, legal, and institutional reforms to facilitate effective implementation. Notable legislative frameworks include the Public Finance Management Act (2012) and the National Government Coordination Act (2012), which promote sound financial management and ensure coordinated governance between national and county authorities (Kenya Law Reform Commission, n.d.).

3.2.2. Türkiye: Unitary System and Its Policy Implications

Turkey functions under a unitary governance framework, where authority is predominantly held at the central level. The transition to a presidential system in 2017 has further enhanced executive power, leading to various policy consequences (Stockholm Centre for Freedom, 2020).

1. Concentration of Executive Power

The move to a presidential system has solidified authority within the executive branch, prompting worries regarding the diminishing effectiveness of checks and balances. This centralisation has undermined parliamentary oversight and judicial independence,

attracting criticism for potential democratic regression (Stockholm Centre for Freedom, 2020).

2. Impact on Local Governance

Although local administrations exist, the central government's dominance restricts the autonomy of these local entities. While major municipalities such as Istanbul enjoy some financial and administrative independence, regional governors are appointed by the President, which diminishes local decision-making authority (Güvenç & Öktem, 2020). This arrangement can impede the efficiency of local service delivery and responsiveness to the specific needs of communities.

3. Policy Formulation and Implementation

The centralised governance model facilitates consistent policy application throughout Türkiye. However, this may also suppress regional innovation, as local governments possess limited capacity to tailor policies to address their distinct challenges. For instance, urban planning in Istanbul frequently experiences delay due to conflicts between local and national authorities (İkizer, 2023).

The governance frameworks in Kenya and Türkiye have led to divergent policy environments. Kenya's devolved system fosters local autonomy and participatory governance, albeit with challenges related to capacity and accountability. Conversely, Türkiye's unitary system guarantees centralised policy coherence, yet it raises issues concerning democratic checks and balances and the effectiveness of local governance. Recognising these policy implications is essential for guiding future governance reforms and enhancing effectiveness and inclusive development in both countries.

CONCLUSION

Summary of Findings

The research examined the local governance and administrative frameworks of Kenya and Türkiye, emphasising notable similarities and differences in decentralisation, service provision, and organisational structures. The results reveal that:

- **Kenya's Devolution Framework:** The 2010 constitutional reforms in Kenya established a devolved governance system that provides considerable autonomy to county governments. This framework is designed to improve local decision-making and service delivery; however, it continues to face challenges such as financial limitations, political interference, and administrative inefficiencies.
- **Türkiye's Centralised Governance:** Although Türkiye has local governments, it functions within a predominantly centralised administrative framework. The national government maintains substantial authority over local entities, affecting decision-making processes and resource distribution. Nevertheless, Türkiye possesses a well-organised local government system that facilitates effective service delivery.
- **Shared Governance Issues:** Both nations encounter governance-related challenges, including corruption, bureaucratic inefficiencies, and disparities in resource allocation. However, Türkiye enjoys a more established administrative structure, whereas Kenya's system is still in the process of development.
- **Citizen Engagement:** Kenya's governance approach prioritises public involvement in decision-making, in contrast to Türkiye's more hierarchical model, which offers limited opportunities for direct citizen participation in local governance.

In summary, the study illustrates that while Kenya's devolved governance system holds promise for enhancing localised governance and development, its effectiveness hinges on successful policy execution, sound financial management, and the strengthening of institutional capacities.

Recommendations for Policy and Practice

Based on the research findings, the following policy and practical recommendations are suggested:

1. Strengthening Financial Management in Kenya. The Kenyan government ought to enforce more rigorous financial accountability standards at the county level to reduce corruption and inefficiencies.
2. Enhancing Local Government Autonomy in Türkiye. Türkiye could gain from granting increased decision-making autonomy to local governments while still ensuring central oversight.
3. Capacity-Building for Local Administrators. Both countries should prioritise investment in training initiatives for local government officials to improve their administrative and leadership skills.
4. Citizen Engagement Mechanisms. Kenya should enhance its public participation approaches to foster more meaningful engagement, while Türkiye might consider methods to integrate greater citizen input into local governance.
5. Policy Exchange and Learning. Both nations could benefit from engaging in policy discussions to share insights from each other's governance frameworks, potentially adopting best practices to enhance efficiency and service delivery.

Directions for Future Research

To further expand on this study, future research could focus on:

1. **Longitudinal Analysis of Kenya's Devolution.** Conduct a longitudinal Analysis of Kenya's Devolution. A longitudinal study on Kenya's devolution system would provide deeper insights into how the shift from a centralised to a devolved government structure has impacted governance, service delivery, and socioeconomic development over time.
2. **Citizen Perceptions of Local Governance** – Conducting surveys to understand public satisfaction and engagement in local government processes. Understanding public perceptions is crucial in evaluating the effectiveness and legitimacy of local governance structures. Future research could use surveys, interviews, and focus groups to assess citizen satisfaction with local government performance.

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CURRICULUM VITAE

Full Name: Abdisalan Mahamed IBRAHIM	
Education Information (Undergraduate)	
University	UNISO
Faculty	Faculty of Social Science and Humanities
Department	Public Administration
Articles and Papers	
1. Ibrahim, A. M. (2024). The Evolution of Local Administration in Kenya. Global Scientific Journal, 12(6). ISSN 2320-9186. https://www.globalscientificjournal.com .	