



*Approved
SAJA
28/5/26*

REPUBLIC OF KENYA
THE NATIONAL ASSEMBLY

THIRTEENTH PARLIAMENT – FIFTH SESSION – 2026

PUBLIC PETITIONS COMMITTEE



REPORT ON-

CONSIDERATION OF P/NO.15 BY REV.JOSIAH NJIRU WAJOSHUAH, CHAIRMAN
OF THE ASSOCIATION OF PENTECOSTAL VOCATIONAL TRAINING
INSTITUTIONS REGARDING THE ENACTMENT OF LEGISLATION TO
REGULATE THEOLOGICAL COLLEGES IN THE COUNTRY

Directorate of Audit Appropriations &
General Purpose Committees
Clerk's Chambers
Main Parliament Buildings
NAIROBI

THE NATIONAL ASSEMBLY PAPERS LAID	
DATE: 28 MAY 2026	DAY: Thursday
TABLED BY:	Hon. Maizon Marwa, MP Member, Public Petitions Committee
CLERK-AT THE-TABLE:	Irene Nduku MAY, 2026

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CHAIRPERSON'S FOREWORD

On behalf of the Public Petitions Committee and pursuant to the provisions of Standing Order 227, it is my pleasant privilege and honor to present to this House the Report of the Committee on Public Petition No. 3 of 2025 regarding the enactment of a legislation to regulate the proliferation of theological colleges in the country.

The petition was presented to the House pursuant to Standing Order No. 225 (2) (a) by the Honorable Speaker on behalf of the Petitioner.

The Committee considered the Petition and observed that the petitioner wants a regulatory framework for theological training and the establishment of occupational standards for practicing ministers.

The Committee undertook this inquiry by listening to the stakeholders and receiving written submissions from the Petitioners, concerned citizens who made submission and the Ministry of Education

The committee notes that Kenya National Qualifications Framework (KNQF) Act, Cap. 214 and TVET Act Cap. 210A currently regulates the training space. The Committee recommends that the Ministry of Education maps out all theological training schools and ensures compliance with prevailing laws, within ninety (90) days of tabling of this report. The Committee further recommends that the ministry convenes an inter-faith forum to identify gaps identified in regulation of faith training.

The Committee appreciates the Offices of the Speaker and Clerk of the National Assembly for providing guidance and necessary technical support, without which its work would not have been possible. The Chairperson expresses gratitude to the Committee Members for their devotion and commitment to duty during the consideration of the Petition.

On behalf of the Committee and pursuant to the provisions of Standing Order 199, I now wish to lay the Report on the Table of the House.

HON. MUCHANGI KAREMBA, CBS, M.P.

CHAIRPERSON, PUBLIC PETITIONS COMMITTEE

PART ONE

1 PREFACE

1.1 Establishment and Mandate of the Committee

The Public Petitions Committee is established under the provisions of Standing Order 208A with the following terms of reference:

- i) considering all public petitions tabled in the House;
- ii) making such recommendations as may be appropriate with respect to the prayers sought in the petitions;
- iii) recommending whether the findings arising from consideration of a petition should be debated; and
- iv) advising the House and reporting on all public petitions committed to it.

1.2 Committee Membership

1. The Public Petitions Committee was first constituted in October 2022 and reconstituted in March 2025 and comprises the following Members:

Chairperson

Hon. Muchangi Karemba, CBS, M.P.
Runyenjes Constituency
United Democratic Alliance (UDA)

Vice Chairperson

Hon. Janet Jepkemboi Sitienei, M.P.
Turbo Constituency
United Democratic Alliance (UDA)

Hon. Patrick Makau King'ola, M.P.
Mavoko Constituency
Wiper Democratic Movement-Kenya (WDM-K)

Hon. Edith Vethi Nyenze, M.P.
Kitui West Constituency
Wiper Democratic Movement-Kenya (WDM-K)

Hon. Joshua Chepyegon Kandie, M.P.
Baringo Central Constituency
United Democratic Alliance (UDA)

Hon. Beatrice Kadeveresia Elachi, CBS, M.P.
Dagoretti North Constituency
Orange Democratic Movement (ODM)

Hon. Maisori Marwa Kitayama, M.P.
Kuria East Constituency
United Democratic Alliance (UDA)

Hon. Paul Biego Kibichiy, M.P.
Chesumei Constituency
United Democratic Alliance (UDA)

Hon. Bernard Muriuki Nebart, M.P.
Mbeere South Constituency
Independent

Hon. Patrick Munene, CBS, M.P.
Chuka Igambang'ombe Constituency
United Democratic Alliance (UDA)

Hon. John Bwire Okano, M.P.
Taveta Constituency
Wiper Democratic Movement-Kenya (WDM-K)

Hon. Peter Mbogho Shake, M.P.
Mwatate Constituency
Jubilee Party (JP)

Hon. Suzanne Ndunge Kiamba, M.P.
Makueni Constituency
Wiper Democratic Movement-Kenya (WDM-K)

Hon. Peter Irungu Kihungi, M.P.
Kangema Constituency
United Democratic Alliance (UDA)

Hon. Sloya Clement Logova, M.P.
Sabatia Constituency
United Democratic Alliance (UDA)

1.3 Committee Secretariat

2. The secretariat comprises the following:

Lead Clerk

Mr. Victor Weke

Principal Clerk Assistant II

Ms. Miriam Modo

Clerk Assistant I

Ms. Kafuyai Wamae

Clerk Assistant III

Mr. Bernard Kipchumba

Clerk Assistant III

Mr. Clinton Sindiga

Legal Counsel II

Mr. Arkan Mumin

Research Officer III

Ms. Felister Muiya

**Public Communication
Officer**

Ms. Nancy Ouma

Research Officer III

Ms. Fridah Ngari

Media Relations Officer III

Ms. Roselyne Njuki

Principal Serjeant-at-Arms

Mr. Paul Shana

Serjeant-at-Arms

Mr. Collins Mahamba

Audio Officer

Mr. Pascal Valerian

Hansard Officer III

PART TWO

2 BACKGROUND OF THE PETITION

2.1 Introduction

3. The petition was presented to the House pursuant to Standing Order No. 225 (2) (a) by the Honorable Speaker on behalf of the Petitioner.
4. The Petitioner is the Chairman of the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK), an association registered under the Societies Act, and with over two hundred (200) Bible colleges across Kenya.
5. In recent years there has been a proliferation of theological colleges, Bible schools, and online ministry training platforms, especially those affiliated to Pentecostal, Charismatic and Indigenous movements, many of which operate without an episcopal order.
6. While this growth has enhanced access to theological education, it has also led to challenges, inter alia, absence of a standardized curriculum; questionable accreditation of some institutions; emergence of “diploma mills” and unverified “degrees”; doctrinal confusion and pastoral unpreparedness; and disparities in ministerial competence across denominations.
7. The Petitioner is concerned that the lack of a recognized regulatory framework tailored to theological education has implications for credibility, quality assurance, and the integrity of ministry within the church community. Existing statutes such as the TVET Act, Universities Act and the Kenya National Qualifications Framework Act primarily address secular education and do not cater for the unique character of sacred and spiritual training.
8. The issues in respect of which this Petition is raised are not pending before any Court of law or any constitutional or legal body.

2.2 Prayers

9. The Petitioner prayed that the National Assembly, through the Public Petitions Committee considers enacting a law to allow the Pentecostal and Evangelical religious sector to establish a self-regulatory authority to manage theological education. Such an authority will accredit theological institutions and programmes, recognize prior learning (RPL), protecting those already serving in ministry and preserving doctrinal integrity among its following.

10. The Petitioner prayed that the National Assembly, through the Public Petitions Committee considers enacting a legislation expressly providing for regulation of theological training and education within the Pentecostal, Charismatic and Indigenous church community, standardization of curricula; accreditation of Spirit-filled, biblically faithful and academically sound institutions; accountability and integrity in ministerial training; facilitation of contextual theological research; regional and global networking for academic and ministerial excellence.

PART THREE

3 STAKEHOLDERS' SUBMISSIONS

3.1 The Petitioners

The Rev. Josiah Njiiru Wajoshuah, Chairperson, Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK) appeared before the Committee on Thursday 5th March, 2026 and he submitted as follows -

11. For over a century, theological education in Kenya has largely operated outside the formal national education system. As a result, thousands of pastors have faithfully served their communities for decades; however, their training and experience remain largely unrecognized within the national qualifications framework.
12. Existing regulatory bodies, such as the Kenya National Qualifications Authority, the Technical and Vocational Education and Training Authority, and the Commission for University Education, regulate academic and technical training. However, these institutions were not designed to assess theological education, spiritual formation, or ministerial ethics, thereby creating a significant policy gap.
13. Churches are registered under the Societies Act; however, the quality and standards of ministerial training remain largely unregulated.
14. They also cited the national reform context following the Shakahola tragedy, after which the Presidential Taskforce on Religious Organizations recommended stronger oversight and certification of religious leaders. The Shakahola tragedy exposed the loss of life from manipulation by untrained, unaccountable spiritual leaders. Theological education must uphold public safety, religious freedom must be safeguarded and the state must support structures that prevent extremism.
15. The petition by Association of Pastors and Visionary Overseers of Theological Institutions in Kenya (APVOTIK) therefore proposes the establishment of a faith-led Theological Education Council within the national qualifications framework. The proposed council would recognize ministerial training, certify experienced pastors through Recognition of Prior Learning (RPL), and establish ethical and educational standards for theological education.
16. The proposal does not interfere with doctrine or worship and fully respects Article 32 of the Constitution of Kenya on freedom of religion.

17. Finally, the petitioners seek the establishment of a legal framework that recognizes the service of ministers, protects the public, and ensures quality theological education in Kenya.

3.2 Ministry of Education

The Principal Secretary, Ministry of Education, Dr. Esther Thaara Muoria appeared before the Committee on Thursday, 12th September, 2024, and submitted as follows—

18. On the issues of questionable accreditation of some religious institutions, the existence of self-regulating professional organizations enables training that is linked to the respective sector needs. Self-regulating organizations set occupational standards, monitor competence and maintain ethical practice among their members. They also establish occupational standards that are critical in setting up training curricula as well as licensing their members to practice. Governments on the other hand usually oversee the regulatory bodies through laws to ensure that self-regulating bodies serve the public and not just the relevant professions. The absence of a central self-regulating theological body is the likely reason why there is training fragmentation in the sector.
19. Accreditation is executed in strict compliance with existing Policies Laws and Regulations and is immune to secular or non-secular orientations of the institutions being accredited.
20. 34 Christian Sponsored Institutions are accredited by TVETA to offer Christian Chaplaincy and Christian Ministry Curricula. Consequently, any institution offering training outside the realm of the TVET Act or any other lawful authority is operating unlawfully.
21. On the issue of absence of standardized religious education curricula, the TVET Curriculum Development, Assessment and Certification Council (TVET-CDACC) is the body corporate responsible for Curriculum Development, the development of occupational standards and competency-based curricula for all sectors, including religious and theological vocations. It also conducts assessment and issues certificates to candidates who have successfully demonstrated the required competency standards.
22. All curricula developed by the Council are informed by Sector Skills Advisory Committees (SSACs), which comprise industry experts and practitioners who advise on the occupational standards expected of a worker in each field, and the skills required to be imparted through training. This ensures that every qualification offered is grounded in real-world occupational demands and labor market needs.

23. The Council has to date developed three (3) religious curricula under the TVET qualifications framework.
24. On the issue of lack of a regulatory framework for theological education, it should be noted that the Kenya National Qualifications Framework (KNQF) Act, Cap. 214 has sufficient legal provisions to regulate both theological and non-theological education in Kenya. Section 5(1) of the Act bestows the Kenya National Qualifications Authority (KNQA) with a statutory mandate to recognize and register qualifications conferred by accredited institutions. This ensures harmony, comparability, alignment, and standardization of qualifications granted both nationally and internationally.
25. The National Qualifications landscape in Kenya is structured into five sub-frameworks or sectors, namely: Basic Education, Technical and Vocational Education and Training (TVET), University Education, Industrial Training, and Professional Education and Training. Each of these sub-frameworks is governed and regulated by a designated regulatory and quality assurance body established through an Act of Parliament.
26. Through the framework, KNQA coordinates, harmonizes, and integrates the standards and regulatory mechanisms applied across these five sub-frameworks. This ensures comparability of qualifications, facilitates progression pathways for learners, and promotes national and international recognition of Kenyan qualifications.
27. The KNQF Act also facilitates the regulation of practitioners and professionals in specialized sectors through the registration and recognition of professional examination bodies.
28. These institutions operate within the KNQF Act by developing and administering professional qualifications that are aligned with nationally recognized competency standards.
29. In view of the foregoing, it is observed that the absence of a tailor-made regulatory framework for theological education does not necessarily imply a regulatory vacuum within the national qualifications system. Rather, theological education institutions are required to situate their academic and professional qualifications within the existing regulatory framework.
30. To ensure that theological qualifications meet nationally recognized standards, facilitate academic progression, and enhance transparency and public confidence in theological training institutions should institutionalize the KNQF Act.

31. This approach would enable the theological education sector to maintain doctrinal autonomy while ensuring that its qualifications are integrated within the national education and training system.
32. Theological practitioners who may possess the requisite skills that have not been recognized can be accorded recognition in the Recognition of Prior Learning (RPL) framework.
33. RPL provides a structured and harmonized mechanism through which individuals can have their knowledge, skills, and competencies acquired through informal, non-formal, or experiential learning assessed and formally recognized.
34. The State Department for Technical Vocational Education and Training (SDTVET) views that the TVET Act Cap. 210A and the KNQF Act Cap. 214 provide substantive legal and regulatory frameworks to govern accreditation, recognition and registration of theological education curricula. The laws provide a mechanism of co-creating and reviewing curricula as well as pathways to registered duly registered theological education institutions and Qualifications Awarding Bodies. TVET-CDACC has collaboratively developed two (2) based curricula and one (1) Muslim-oriented curriculum. It has also cumulatively assessed 810 candidates register to pursue theological training.
35. Whereas SDTVET acknowledges the proliferation of theological colleges and the legitimate desire to regulate them, the State Department remains committed to collaborative engagement with all stakeholders within the Education and Training Sector, including those in theology to build public confidence in the accreditation of institutions, recognizing and registering the qualifications and collaboratively developing the training curricula. It is genuinely believed that such an approach will not only ensure effective and efficient service delivery in the sector but will also create an environment where all stakeholders are protected and benefit from legislations arising thereof.
36. There is no central regulatory body for religious education. She emphasized on the need to engage theological professionals so as to get the occupational standards that are to be used. Curricula are developed from professional bodies who give the occupational standards that are used in curricula development.
37. The Religious Organization Bill, 2024 seeks to create a framework for all religious organizations.

3.3 Submission by Mr. Muriuki Mutuma

Mr. Muriuki Mutuma, a concerned citizen submitted written submissions dated 24th November, 2025 to the clerk of the National Assembly. He submitted as follows -

38. The petition presented by APVOTIK is unconstitutional, inherently impractical and substantially flawed and it should be dismissed.
39. Theological training is part of the 'teaching' right provided for under Article 32(2) of the Constitution. Thus, by attempting to incorporate targeted regulation of theological colleges, APVOTIK contravenes this constitutional provision because the Association wants all Christian denominations to manifest a teaching that is fashioned in APVOTIK'S image and likeness.
40. The proliferation of a thing does not necessarily mean that there is regression. It simply denotes growth. It would thus appear that APVOTIK is uncomfortable with the exponential growth of the Gospel through theology.
41. Standardization of spiritual matters is a runaway horse that can't be practically attained. it is impractical to settle on a singular theological curriculum that conforms to all Christian groups and their respective doctrines and beliefs.
42. It is possible that the petitioners may have been misled by incidents like the Shakahola incident.
43. Every individual religion and religious group has an inherent right to determine its own curriculum, both in structure and in content.

PART FOUR

4 COMMITTEE OBSERVATIONS

Upon reviewing and considering the submissions by the petitioners and other stakeholders, the Committee observed that—

44. The petitioners want a regulatory framework for theological training and have suggested a Theological Education Bill.
45. Currently, existing regulatory bodies, such as the Technical and Vocational Education and Training Authority (TVETA), the Commission for University Education (CUE), and the Kenya National Qualifications Authority (KNQA), regulate technical and academic education.
46. Currently, there is no faith-led regulatory council mandated to assess ministerial competence, theological training, ethics, and institutional standards within a faith-based context. The Committee observed the difficulty in regulating the practice of faith, especially the charismatic kind as there was no central authority on personal beliefs.
47. Existing mechanisms such as Recognition of Prior Learning (RPL) within the national qualifications framework are primarily designed for secular professions and may not adequately evaluate spiritual calling, pastoral experience, and theological formation.
48. Kenya National Qualifications Framework (KNQF) Act, Cap. 214 and TVET Act Cap. 210A regulate both theological and non-theological education in Kenya. Section 5(1) of the Act bestows the Kenya National Qualifications Authority (KNQA) with a statutory mandate to recognize and register qualifications conferred by accredited institutions.
49. The Committee notes the difficulty in harmonizing and regulating standards for faith training across denominations, especially in recognition of prior learning and other informally acquired faith competencies.

PART FIVE

5 COMMITTEE RECOMMENDATIONS

Pursuant to the provisions of Standing Order 227, the Committee responds to the Petition as follows—

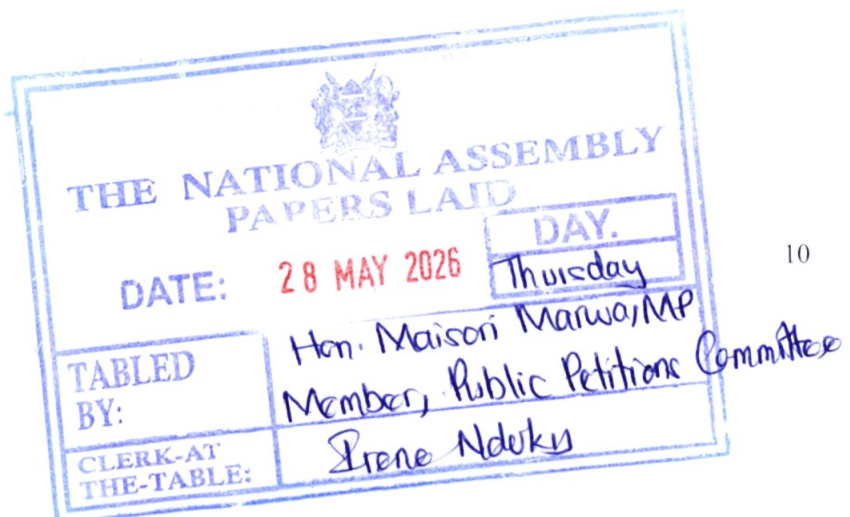
50. On the prayers that the National Assembly considers enacting a legislation expressly providing for regulation of theological training and education within the Pentecostal, Charismatic and Indigenous church community, standardization of curricula; accreditation of Spirit filled, biblically faithful and academically sound institutions; accountability and integrity in ministerial training; facilitation of contextual theological research; regional and global networking for academic and ministerial excellence; **The Committee recommends that within ninety (90) days upon tabling of this report, the Ministry of Education should establish/map out all theological training institutions countrywide and enforce compliance within the prevailing laws;**

The Committee further recommends that within ninety (90) days of tabling of this report, the Ministry of Education should convene a multi-faith forum to address gaps identified in the practice of faith-based training and consideration of the draft bill presented by the petitioners for purposes of public participation.

Signed: _____ Date: 28/05/26.

HON. MUCHANGI KAREMBA, CBS, M.P.

CHAIRPERSON, PUBLIC PETITIONS COMMITTEE



ANNEXURES

Annexure 1:	Adoption List
Annexure 2:	Public Petition No.15 of 2025 regarding enactment of a legislation to regulate proliferation of theological colleges in the country.
Annexure 3:	Minutes of Proceedings

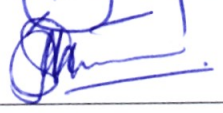
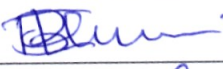
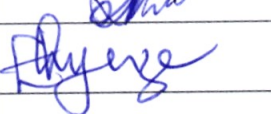
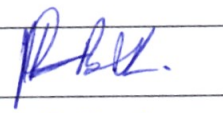
PUBLIC PETITIONS COMMITTEE

ADOPTION LIST

- (i) Consideration and adoption of the P/No.15 of 2025 enactment of legislation to regulate Theological Colleges in the country by Rev. Josiah Njiru Wajoshuah, Chairman of the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK).

We, the undersigned, hereby affix our signatures to this Report to affirm our approval:

DATE: 7/5/2026

	HON. MEMBER	SIGNATURE
1.	Hon. Muchangi Karemba, CBS, M.P.(Chairperson)	
2.	Hon. Janet Jepkemboi Sitienei, CBS, M.P.(Vice Chairperson)	
3.	Hon. Patrick Makau King'ola, M.P.	
4.	Hon. Beatrice Kadeveresia Elachi, CBS, M.P.	
5.	Hon. Joshua Chepyegon Kandie, M.P.	
6.	Hon. Maisori Marwa Kitayama, M.P.	
7.	Hon. Edith Vethi Nyenze, M.P.	
8.	Hon. Patrick Ntwiga Munene, M.P.	
9.	Hon. Paul Biego Kibichy, M.P.	
10.	Hon. (Eng.) Bernard Muriuki Nebart, M.P.	
11.	Hon. Peter Mbogho Shake, M.P.	
12.	Hon. Suzanne Ndunge Kiamba, M.P.	
13.	Hon. John Bwire Okano, M.P.	
14.	Hon. Sloya Clement Logova, M.P.	
15.	Hon. Peter Irungu Kihungi, M.P.	



**THE NATIONAL ASSEMBLY
THIRTEENTH PARLIAMENT (FOURTH SESSION)**

**CONVEYANCE OF PUBLIC PETITION
(No. 15 of 2025)**

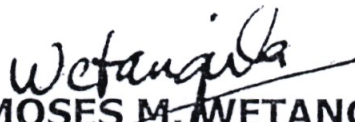
**REGARDING ENACTMENT OF A LEGISLATION TO REGULATE
PROLIFERATION OF THEOLOGICAL COLLEGES IN THE COUNTRY**

- 1. Honourable Members,** Article 119 of the Constitution accords any person the right to petition Parliament to consider any matter within its authority. Further, Standing Order 225(2)(b) requires the Speaker to report to the House any Petition other than those presented by a Member.
- 2. Honourable Members,** in this regard, I wish to report to the House that my Office has received a Petition from *Rev. Josiah Njiru Wajoshuah*, Chairman of the *Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK)*, an association registered under the Societies Act, and with over two hundred (200) Bible colleges across Kenya.
- 3.** The Petitioner acknowledges that although Article 8 of the Constitution provides that there shall be no State religion in Kenya, meaning Kenya is a secular state, Article 32 guarantees the freedom of conscience, religion, thought, belief and opinion.
- 4.** The Petitioner notes that in recent years there has been a proliferation of theological colleges, Bible schools, and online ministry training platforms, especially those affiliated to Pentecostal, Charismatic and Indigenous movements, many of which operate without an episcopal order.

5. While this growth has enhanced access to theological education, it has also led to challenges, *inter alia*, absence of a standardized curriculum; questionable accreditation of some institutions; emergence of "diploma mills" and unverified "degrees"; doctrinal confusion and pastoral unpreparedness; and disparities in ministerial competence across denominations.
6. **Honourable Members**, the Petitioner is concerned that the lack of a recognized regulatory framework tailored to theological education has implications for credibility, quality assurance, and the integrity of ministry within the church community. Existing statutes such as the TVET Act, Universities Act and the Kenya National Qualifications Framework Act primarily address secular education and do not cater for the unique character of sacred and spiritual training.
7. The Petitioner prays that the House considers enacting a law to allow the Pentecostal and Evangelical religious sector to establish a self-regulatory authority to manage theological education. Such an authority will accredit theological institutions and programmes, recognize prior learning (RPL), protecting those already serving in ministry and preserving doctrinal integrity among its following.
8. **Honourable Members**, the Petitioner, therefore, prays that the National Assembly considers enacting a legislation expressly providing for regulation of theological training and education within the Pentecostal, Charismatic and Indigenous church community, standardization of curricula; accreditation of Spirit-filled, biblically faithful and academically sound institutions; accountability and integrity in ministerial training; facilitation of contextual theological research; regional and global networking for academic and ministerial excellence.

- 9. Honorable Members,** having established that the matter raised in the Petition is well within the authority of this House; and further, that the matters raised in this Petition are not pending before any court of law, constitutional or legal body, I hereby commit the Petition to the Public Petitions Committee for consideration pursuant to Standing Order 208A.
- 10.** The Committee is required to consider the Petition and report its findings to the House and to the Petitioner in accordance with Standing Order 227(2).

I thank you.


THE RT. HON. (DR.) MOSES M. WETANG'ULA, EGH, MP
SPEAKER OF THE NATIONAL ASSEMBLY

Wednesday, 1st October 2025

MINUTES OF THE 35TH SITTING OF THE PUBLIC PETITIONS COMMITTEE HELD ON THURSDAY, 7TH MAY, 2026 IN BAOBAB CONFERENCE ROOM, SERENA HOTEL, MOMBASA COUNTY AT 9:00 A.M.

PRESENT

- | | | |
|--|---|-------------------------|
| 1. Hon. Eric Muchangi Karemba, CBS M.P. | - | Chairperson |
| 2. Hon. Janet Jepkemboi Sitienei, CBS, M.P. | - | Vice-Chairperson |
| 3. Hon. Beatrice Kadeveresia Elachi, CBS, M.P. | | |
| 4. Hon. Joshua Chepyegon Kandie, M.P. | | |
| 5. Hon. Maisori Marwa Kitayama, M.P. | | |
| 6. Hon. (Eng.) Bernard Nebart Muriuki, M.P. | | |
| 7. Hon. Edith Vethi Nyenze, M.P. | | |
| 8. Hon. Paul Biego Kibichiy, M.P. | | |

APOLOGIES

1. Hon. Patrick Makau King'ola, M.P.
2. Hon. Suzanne Ndunge Kiamba, M.P.
3. Hon. Peter Irungu Kihungi, M.P.
4. Hon. Peter Mbogho Shake, M.P.
5. Hon. Sloya Clement Logova, M.P.
6. Hon. Patrick Ntwiga Munene, CBS, M.P.
7. Hon. John Bwire Okano, M.P.

IN-ATTENDANCE

SECRETARIAT

- | | | |
|--------------------------|---|-------------------------------|
| 1. Mr. Victor Weke | - | Principal Clerk Assistant II |
| 2. Ms. Miriam Modo | - | Clerk Assistant I |
| 3. Mr. Bernard Toroitich | - | Clerk Assistant III |
| 4. Ms. Kafuyai Wamae | - | Clerk Assistant III |
| 5. Mr. Clinton Sindiga | - | Legal Counsel II |
| 6. Ms. Nancy Akinyi | - | Research Officer III |
| 7. Mr. Arkan Mumin | - | Research Officer III |
| 8. Mr. Collins Mahamba | - | Audio Officer |
| 9. Ms. Felistas Muiya | - | Public Communications Officer |
| 10. Mr. Rose Njuki | - | Serjeant-at-Arms |

MIN./PPC/2026/181:

PRELIMINARIES

The Chairperson called the meeting to order at 9:00 am and Hon. Beatrice Elachi said the opening prayer.

MIN./PPC/2026/182:

ADOPTION OF AGENDA

The proposed agenda was adopted having been proposed by Hon. Joshua Kandie, M.P and seconded by, Hon. Maisori Kitayama, M.P.

AGENDA

1. Prayer and Preliminaries
2. Adoption of the Agenda
3. Confirmation of previous Minutes
4. Matters Arising
5. **Consideration and Adoption of the following Reports on: -**
 - (i) **Public Petition No. 18 of 2025 by Hon. John Machua Waithaka regarding road reserve boundaries and protection of ancestral land by residents of Gitei Village, Kiambu County;**
 - (ii) **Public Petition No. 19 of 2024 by Hon. Brighton Yegon, M.P regarding Hydropower Generation by Kenya Tea Development Authority;**
 - (iii) **Public Petition No. 18 of 2025 by Hon. Sarah Korere, M.P regarding the revocation of the gazettement of Mukogodo Forest Reserve as a public forest; and**
 - (iv) **Public Petition No. 15 of 2025 regarding the enactment of legislation to regulate theological colleges in the country, by Rev. Josiah Njiru Wajoshuah Chairman of the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK).**
6. Any Other Business
7. Adjournment and Date of the Next Meeting

MIN./PPC/2026/183: CONFIRMATION OF MINUTES

This agenda item was deferred.

MIN./PPC/2026/184: CONSIDERATION AND ADOPTION OF REEPORTS ON VARIOUS PUBLIC PETITIONS

- a) **Public Petition No. 18 of 2025 by Hon. John Machua Waithaka, M.P regarding road reserve boundaries and protection of ancestral land by residents of Gitei Village, Kiambu County**

The adoption of the Draft Report was deferred pending receipt of a written response from the National Land Commission concerning the title deeds and land ownership documents allegedly held by the villagers.

- b) **Public Petition No. 19 of 2024 by Hon. Brighton Yegon, M.P regarding hydropower generation by Kenya Tea Development Authority**

The Committee considered and adopted the Draft Report unanimously with amendments to recommendation (1) having been proposed by the Hon. Joshua Kandie, MP and seconded by the Hon. Nerbert Muriuki, MP as follows –

- i) On the prayer that the Committee engages the Ministry of Agriculture and Livestock, Ministry of Energy and Petroleum; and, other relevant authorities with a view of investigating the alleged financial mismanagement in regard to generating power by KTDA on behalf of small holder tea farmers in Bomet County and other surrounding

counties in the West of Rift; **The Committee recommends that within thirty (30) days upon tabling of this report, the KTDA should convene a multi-sectoral public engagement and participation exercise, including local political leadership, farmers and those persons whose land are affected by the Kipsonoi project with a view of resolving all outstanding issues.**

ii) On the prayer that the Committee makes recommendation compelling KTDA to provide a detailed report within 30 days on the status of the hydro- power projects, including how the funds were invested and the reasons for the inordinate delay of the project; **The Committee confirms that Kenya Tea Development Agency (KTDA) and Tea Board of Kenya furnished the Committee with the report. The Committee recommends that the KTDA must ensure completion of the Chemosit power plant and submit a commissioning report by 31st October 2026;**

iii) On the prayer that the Committee recommends the due compensation of all small holder tea farmers in the affected region where more than Kshs 3 billion have been deducted since 2014; **The Committee reiterates its recommendations (i) and (ii) above.**

iv) Make any other necessary recommendation the Committee deems fit to address the issues raised in this Petition; **The Committee recommends that within ninety (90) days upon tabling of this report the Ministry of Energy and Petroleum in liaison with KTDA should negotiate favourable rates similar to those of other Independent Power Producers.**

c) **Public Petition No. 18 of 2025 by the Hon. Sarah Korere, M.P regarding the revocation of the gazettement of Mukogodo Forest Reserve as a public forest**

The Committee unanimously considered and adopted the Draft Report with the following recommendations having been proposed by the Hon. Janet Sitienei, MP and seconded by the Hon. Marwa Kitayama, MP –

(i) **On the Prayer that the Committee recommends revocation of Gazette Notice No. 174 of 1964 and subsequent gazettement of 20,189 hectares of Mukogodo Forest as a community forest;** the Committee rejects this prayer for revocation and reclassification. The Committee however recommends that the Ministry of Environment, Climate Change and Forestry strengthens and fully implements the existing joint management framework with the Ilmamusi-Mukogodo Community Forest Association (CFA) under the Forest Conservation and Management Act, 2016. The Ministry should enhance community decision-making authority within the current legal structure, expand benefit-sharing mechanisms already provided in the Participatory Forest Management Plan 2023-2027, and ensure the community's existing user rights for eco-tourism, beekeeping, grazing, water abstraction, seed collection, and educational activities are fully realized and monitored. A report on the same should be submitted to the National Assembly within six (6) months of tabling of this report.

(ii) **On the Prayer that the Committee recommends allocation of the remaining 10,000 hectares of Mukogodo Forest for the resettlement of the Il Ngwesi and Yaaku**

communities; the Committee rejects the prayer for allocation of forest land for resettlement. The Committee however recommends that the National Land Commission, in collaboration with the Ministry of Lands, Public Works, Housing and Urban Development and the County Government of Laikipia, investigates any outstanding historical land claims outside the forest reserve through proper legal channels. The Committee further recommends that the Ministry of Environment, Climate Change and Forestry expedites regularization of schools and social amenities through Special Use Licences to secure community access, within three (3) months of tabling of this report.

d) Public Petition No. 15 of 2025 regarding the enactment of legislation to regulate theological colleges in the country by Rev. Josiah Njiru Wajoshuah, Chairman of the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK).

The Committee considered and adopted the Draft Report unanimously with the following recommendation having been proposed by the Hon. Edith Nyenze and seconded by the Hon. Beatrice Elachi, MP -

1. On the prayers that the National Assembly considers enacting a legislation expressly providing for regulation of theological training and education within the Pentecostal, Charismatic and Indigenous church community, standardization of curricula; accreditation of Spirit filled, biblically faithful and academically sound institutions; accountability and integrity in ministerial training; facilitation of contextual theological research; regional and global networking for academic and ministerial excellence; **The Committee recommends that within ninety (90) days upon tabling of this report, the Ministry of Education should establish/map out all theological training institutions countrywide and enforce compliance within the prevailing laws;**

The Committee further recommends that within ninety (90) days of tabling of this report, the Ministry of Education should convene a multi-faith forum to address gaps identified in the practice of faith-based training and consideration of the draft bill presented by the petitioners for purposes of public participation.

MIN./PPC/2026/185:

ADJOURNMENT AND DATE OF THE NEXT MEETING

There being no other business, the meeting was adjourned at 4:30 p.m.

Sign:

Date 28/05/26

HON. MUCHANGI KAREMBA, CBS, M.P.

CHAIRPERSON, PUBLIC PETITIONS COMMITTEE

**MINUTES OF THE 26TH SITTING OF THE PUBLIC PETITIONS COMMITTEE
HELD ON TUESDAY, 8TH APRIL, 2026 IN COMMITTEE ROOM 20, 3RD FLOOR,
BUNGE TOWER AT 11:40 A.M.**

PRESENT

- | | | |
|---|---|-------------------------|
| 1. Hon. Muchangi Karemba, CBS M.P. | - | Chairperson |
| 2. Hon. Janet Jepkemboi Sitienei, CBS, M.P. | - | Vice-Chairperson |
| 3. Hon. Joshua Chepyegon Kandie, M.P. | | |
| 4. Hon. (Eng.) Bernard Nebart Muriuki, M.P. | | |
| 5. Hon. Maisori Marwa Kitayama, M.P. | | |
| 6. Hon. Edith Vethi Nyenze, M.P. | | |

APOLOGIES

1. Hon. Patrick Makau King'ola, M.P.
2. Hon. Beatrice Kadeveresia Elachi, CBS, M.P.
3. Hon. Suzanne Ndunge Kiamba, M.P.
4. Hon. Paul Biego Kibichiy, M.P.
5. Hon. Peter Irungu Kihungi, M.P.
6. Hon. Peter Mbogho Shake, M.P.
7. Hon. Sloya Clement Logova, M.P.
8. Hon. Patrick Ntwiga Munene, CBS, M.P.
9. Hon. John Bwire Okano, M.P.

IN-ATTENDANCE

SECRETARIAT

- | | | |
|--------------------------|---|-------------------------------|
| 1. Mr. Victor Weke | - | Principal Clerk Assistant II |
| 2. Ms. Miriam Modo | - | Clerk Assistant I |
| 3. Mr. Bernard Toroitich | - | Clerk Assistant III |
| 4. Ms. Kafuyai Wamae | - | Clerk Assistant III |
| 5. Mr. Clinton Sindiga | - | Legal Counsel II |
| 6. Ms. Nancy Akinyi | - | Research Officer III |
| 7. Mr. Arkan Mumin | - | Research Officer III |
| 8. Mr. Collins Mahamba | - | Audio Officer |
| 9. Ms. Felistas Muiya | - | Public Communications Officer |
| 10. Ms. Fridah Ngari | - | Media Relations Officer |

MINISTRY OF EDUCATION

- | | | |
|-----------------------------|---|--|
| 1. Dr. Esther Thaara Muoria | - | PS, State Department for TVET |
| 2. Mr. Joseph Njau | - | Administrative Secretary |
| 3. Prof. Kisilu Kitainge | - | CEO/Council Secretary, TVETA |
| 4. Mr. Timothy Nyongesa | - | DG, TVETA |
| 5. Dr. Joseph Kandi | - | Director, TVETA |
| 6. Mr. Stanley Maindi | - | Director, RPL |
| 7. Dr. Victor Nzomo | - | Corporation Secretary/Director Legal, KNQA |

MIN./PPC/2026/135: PRELIMINARIES

The Chairperson called the meeting to order at 11:40 a.m. and the Hon. Janet Jepkemboi Sitienei, M.P said a word of prayer.

MIN./PPC/2026/136: ADOPTION OF AGENDA

The Agenda of the meeting was adopted having been proposed by Hon. Joshua Chepyegon Kandie, M.P and seconded by Hon. Edith Vethi Nyenze, M.P.

AGENDA

1. Prayer & Preliminaries;
2. Adoption of the Agenda;
3. Confirmation of the Previous Minutes;
4. Matters Arising;
5. **Meeting with the Principal Secretary, Ministry of Education, on a Public Petition No. 15 of 2025 by Rev. Josiah Njiru Wajoshuah regarding the enactment of a legislation to regulate theological colleges in the Country.**
6. Any other Business; and
7. Adjournment.

MIN./PPC/2026/137: CONFIRMATION OF MINUTES

This agenda item was deferred to the next sitting.

MIN./PPC/2026/138: MEETING WITH THE PRINCIPAL SECRETARY, STATE DEPARTMENT FOR TVET, MINISTRY OF EDUCATION ON PUBLIC PETITION NO. 15 OF 2025 BY REV. JOSIAH NJIRU WAJOSHUAH REGARDING THE ENACTMENT OF LEGISLATION TO REGULATE THEOLOGICAL COLLEGES IN THE COUNTRY

The Principal Secretary, State Department for TVET, Ministry of Education, appeared before the Committee and submitted as follows: -

- a) The State Department's view is that the TVET Act (Cap. 210A) and the Kenya National Qualifications Framework (KNQF) Act (Cap. 214) provide a comprehensive legal and regulatory framework governing the accreditation, recognition, and registration of theological education curricula.
- b) The existing framework facilitates the co-creation and periodic review of curricula, as well as pathways for the registration of theological institutions and qualification-awarding bodies.
- c) The TVET Curriculum Development, Assessment and Certification Council (TVET-CDACC) has developed two Christian-based curricula and one Muslim-oriented curriculum.
- d) To date, 810 candidates have been assessed and registered to undertake theological training.
- e) The State Department acknowledged the proliferation of theological colleges and the legitimate need for regulation. It reiterated its commitment to continued stakeholder

engagement across the education and training sector, including theological institutions, with a view to:

- Enhancing public confidence in accreditation systems;
 - Strengthening recognition and registration of qualifications; and
 - Promoting collaborative curriculum development.
- f) The Department expressed the view that such an approach would foster effective service delivery while ensuring that all stakeholders are protected and benefit from any legislative framework established.

Committee Observations

- a) The Committee observed that the submissions by the State Department lacked specific and actionable recommendations directly addressing the petitioner's concerns.
- b) The Committee noted that both the State Department and the petitioner were in agreement on the need to establish a professional body to regulate theological colleges and to professionalise the religious sector.
- c) The Committee further observed that the **Religious Organizations Bill, 2024**, currently before the Senate, seeks to establish a regulatory framework for religious organisations.

Committee Resolution

The State Department for TVET to prepare a comprehensive paper on professional religious bodies, including clear recommendations on the establishment of a regulatory professional body for theological institutions, and submit the same to the Committee for consideration.

MIN./PPC/2026/139: ADJOURNMENT

There being no other business, the meeting was adjourned at 1:45 p.m. The next meeting will be held on Thursday 9th April at a venue to be communicated.

Sign:

HON. MUCHANGI KAREMBA, CBS, M.P.

CHAIRPERSON, PUBLIC PETITIONS COMMITTEE

Date 06/05/24

**MINUTES OF THE 11TH SITTING OF THE PUBLIC PETITIONS COMMITTEE
HELD ON THURSDAY, 5TH MARCH, 2026 IN COMMITTEE ROOM 24 5TH
FLOOR, BUNGE TOWER, PARLIAMENT BUILDINGS AT 11.00 A.M.**

PRESENT

- | | | |
|--|---|-------------------------|
| 1. Hon. Eric Muchangi Karemba, CBS M.P. | - | Chairperson |
| 2. Hon. Janet Jepkemboi Sitienei, CBS, M.P. | - | Vice-Chairperson |
| 3. Hon. Beatrice Kadeveresia Elachi, CBS, M.P. | | |
| 4. Hon. (Eng.) Bernard Nebart Muriuki, M.P. | | |
| 5. Hon. Joshua Chepyegon Kandie, M.P. | | |
| 6. Hon. Edith Vethi Nyenze, M.P. | | |
| 7. Hon. Peter Irungu Kihungi, M.P. | | |
| 8. Hon. Paul Biego Kibichiy, M.P. | | |

APOLOGIES

1. Hon. Patrick Makau King'ola, M.P.
2. Hon. Patrick Ntwiga Munene, CBS, M.P.
3. Hon. Suzanne Ndunge Kiamba, M.P.
4. Hon. Peter Mbogho Shake, M.P.
5. Hon. John Bwire Okano, M.P.
6. Hon. Maisori Marwa Kitayama, M.P.
7. Hon. Sloya Clement Logova, M.P.

IN-ATTENDANCE

SECRETARIAT

- | | | |
|--------------------------|---|------------------------------|
| 1. Mr. Victor Weke | - | Principal Clerk Assistant II |
| 2. Ms. Miriam Modo | - | Clerk Assistant I |
| 3. Mr. Bernard Toroitich | - | Clerk Assistant III |
| 4. Ms. Kafuyai Wamae | - | Clerk Assistant III |
| 5. Mr. Clinton Sindiga | - | Legal Counsel II |
| 6. Mr. Arkan Mumin | - | Research Officer III |
| 7. Mr. Collins Mahamba | - | Audio Officer |
| 8. Mr. Calvin Karungo | | Media Relations Officer III |

PETITIONERS

- | | | |
|----------------------------|---|----------------------------------|
| 1. Rev. Njiru Wajoshuah | - | Chairman, APVOTIC |
| 2. Mr. Bernard Namusasi | - | Patron, APVOTIC |
| 3. Mr. Eurry S.Mabonga | - | Advocate, APVOTIC |
| 4. Bishop Joel Chok | - | Matheny College officer, APVOTIC |
| 5. Dr. Agnes Masika | - | APVOTIC |
| 6. Mr. Maurice Omulubi | - | APVOTIC |
| 7. Dr. Joan Mwende Ngunzi | - | APVOTIC |
| 8. Bishop Dr. Phineas Mwit | - | APVOTIC- Director, RPL |
| 9. Rev. Joshua Omolo | - | APVOTIC-Training officer |
| 10. Bishop Jacob Ongala | - | APVOTIC-Research officer |
| 11. Ms. Christine Njiru | - | APVOTIC-Education Officer |

MIN./PPC/2026/055: PRELIMINARIES

The Chairperson called the meeting to order at 11:50 am, an invited Hon. Edith Vethi Nyenze, M.P to Pray.

MIN./PPC/2026/056: ADOPTION OF AGENDA

The proposed agenda was adopted having been proposed by Hon. (Eng.) Bernard Nebart Muriuki, M.P and seconded by, Hon. Beatrice Kadeveresia Elachi, CBS, M.P

AGENDA

1. Prayer and Preliminaries
2. Adoption of the Agenda
3. Confirmation of previous Minutes
4. Matters Arising;
5. **Meeting with the Rev. Josiah Njiiru Wajoshuah on a Public Petition regarding the enactment of legislation to regulate Theological Colleges in Kenya.**
6. Any Other Business
7. Adjournment and date for the next Sitting

MIN./PPC/2026/057: CONFIRMATION OF MINUTES

This agenda item was deferred to the next sitting.

MIN./PPC/2026/058: MEETING WITH THE REV. JOSIAH NJIIRU WAJOSHUAH, REGARDING THE ENACTMENT OF LEGISLATION TO REGULATE THEOLOGICAL COLLEGES IN KENYA

The Rev. Josiah Njiiru Wajoshuah, Chairperson, Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK) submitted as follows -

1. Constitution of Kenya Article 8 provides that there shall be no State religion in Kenya, affirming that the country is a secular state. Further, Article 32 guarantees the freedom of conscience, religion, thought, belief, and opinion.
2. In recent years, there has been a proliferation of theological colleges, Bible schools, and online ministry training platforms, particularly those affiliated with Pentecostal, Charismatic, and Indigenous Christian movements, many of which operate without an episcopal order or centralized ecclesiastical oversight.
3. While this growth has expanded access to theological education, it has also given rise to several challenges, including: the absence of a standardized curriculum; questionable accreditation of some institutions; the emergence of “diploma mills” and unverified degrees; doctrinal inconsistencies and pastoral unpreparedness; and disparities in ministerial competence across denominations.

4. The lack of a recognized regulatory framework tailored specifically to theological education has implications for credibility, quality assurance, and the integrity of ministerial training within church communities. Existing statutes such as the Technical and Vocational Education and Training Act, the Universities Act, and the Kenya National Qualifications Framework Act primarily regulate secular education and training and do not adequately address the unique character and requirements of sacred and spiritual training.

Petitioners Prayers

The Petitioner, prayed that the National Assembly considers enacting a legislation expressly providing for regulation of theological training and education within the Pentecostal, Charismatic and Indigenous church community, standardization of curricula; accreditation of Spirit-filled, biblically faithful and academically sound institutions; accountability and integrity in ministerial training; facilitation of contextual theological research; regional and global networking for academic and ministerial excellence.

Further Clarification by the Petitioners

The petitioners informed the Committee that -

1. For over a century, theological education in Kenya has largely operated outside the formal national education system. As a result, thousands of pastors have faithfully served their communities for decades; however, their training and experience remain largely unrecognized within the national qualifications framework.
2. Existing regulatory bodies, such as the Kenya National Qualifications Authority, the Technical and Vocational Education and Training Authority, and the Commission for University Education, regulate academic and technical training. However, these institutions were not designed to assess theological education, spiritual formation, or ministerial ethics, thereby creating a significant policy gap.
3. Churches are registered under the Societies Act; however, the quality and standards of ministerial training remain largely unregulated.
4. They also cited the national reform context following the Shakahola tragedy, after which the Presidential Taskforce on Religious Organizations recommended stronger oversight and certification of religious leaders.
5. The petition by Association of Pastors and Visionary Overseers of Theological Institutions in Kenya (APVOTIK) therefore proposes the establishment of a faith-led Theological Education Council within the national qualifications framework. The proposed council would recognize ministerial training, certify experienced pastors through Recognition of Prior Learning (RPL), and establish ethical and educational standards for theological education.
6. The proposal does not interfere with doctrine or worship and fully respects Article 32 of the Constitution of Kenya on freedom of religion.
7. Finally, the petitioners seek the establishment of a legal framework that recognizes the service of ministers, protects the public, and ensures quality theological education in Kenya.

Committee Concerns

1. The Committee inquired whether the petitioners had engaged other religious organizations in the matter, and the petitioner responded that the petition was only touching on the theological training and education within the Pentecostal, Charismatic and Indigenous church community.
2. Members were concerned whether the petitioner had sought redress from the regulatory bodies such as the Technical and Vocational Education and Training Authority (TVETA) since TVETA have academic accreditation and specialized certification and that churches are well accommodated and the petitioner responded that they had engagements with TVET on the same matter TVET but averred that TVET was regulating training institutions and not theological colleges.
3. Asked whether they want to be a regulator, the petitioner responded that they were not going to be a regulator but a Quality Assurance Institution just like TVET.

Committee Observations

The Committee observed as follows: -

THAT-

1. The petition may be discriminatory, as it does not incorporate the views of other religious organizations. There is therefore a need to bring on board representatives from other faiths and religious bodies to ensure inclusivity and broader stakeholder participation.
2. The existing regulatory bodies, such as the Technical and Vocational Education and Training Authority (TVETA), the Commission for University Education (CUE), and the Kenya National Qualifications Authority (KNQA), regulate technical and academic education. However, these institutions are not equipped to assess doctrinal soundness, spiritual formation, or ministerial ethics, which are integral to theological education.
3. It was further observed that the existing legal and institutional framework does not adequately regulate or recognize theological training institutions and ministerial preparation. The petitioner therefore seeks recognition as a regulatory award body, while proposing that government institutions continue to issue formal qualification awards.
4. Currently, there is no faith-led regulatory council mandated to assess ministerial competence, theological training, ethics, and institutional standards within a faith-based context.
5. The petitioner clarified that the proposal seeks the establishment of occupational standards for practicing ministers, and not the standardization of religious doctrine.

6. Existing mechanisms such as Recognition of Prior Learning (RPL) within the national qualifications framework are primarily designed for secular professions and may not adequately evaluate spiritual calling, pastoral experience, and theological formation.
7. Consequently, there is no comprehensive legislative framework that recognizes and regulates theological education while simultaneously preserving the autonomy of religious institutions.

Committee Resolution

The Committee resolved that --

- a) The Inter-Religious Council of Kenya (IRCK) to apprise the Committee on the prayers sought by the petitioner; and
- b) The Committee to engage the Attorney General and the National council of Churches of Kenya.

MIN./PPC/2026/059:

ADJOURNMENT AND DATE OF NEXT MEETING

There being no other business, the meeting was adjourned at 2:00 p.m. Next meeting will be held on Tuesday, Proliferation 10th March, 2026 at the same venue to be communicated.

Sign:.....



HON. MUCHANGI KAREMBA, CBS, M.P.

CHAIRPERSON, PUBLIC PETITIONS COMMITTEE

Date

01/04/2026

(11) ESTHER
Please deep
AA 27/11/25

Submission -Response to Petition on Theological Colleges

G. Muriuki Mutuma

P.O. Box 103348

Code 00101

NAIROBI

Tel. +254722687468

Email: getpriority@gmail.com

24th November, 2025

(11) OLAS
26/11/25

The Chairperson

Public Petitions Committee

Thru'

The Clerk of the National Assembly

The National Assembly

Parliament of Kenya

P.O. Box 41842

Code 00100

NAIROBI

(11) V. weke
This is for
your attention
H.M
11/2/26

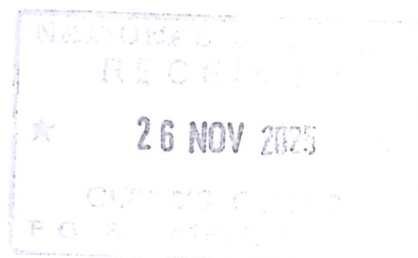
Dear Sir,

**SUBMISSION ON PETITION REGARDING PROPOSED REGULATION OF
THEOLOGICAL COLLEGES**

Greetings.

I wish to make my submissions regarding Petition committed to the Public Petitions Committee of the National Assembly on 1st October 2025 on regulation and management of theological colleges. The Petition, submitted by Rev. Josiah Njiru Wajoshuah under the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK), is definitively unconstitutional, inherently impractical, and substantially flawed. The Petition should thus be declared inadmissible and subsequently dismissed forthwith based on the following reasons:

27 NOV 2025



1. At the very onset, the Petition **contradicts** its own mission by making reference to Article 8 of the Constitution which provides that:

There shall be no State religion.

Since APVOTIK is aware that **there is no State religion** in Kenya, why do they presume to canvas and parade Christianity before a State organ as though Christianity is the State religion of Kenya?

2. Again by their own admission, APVOTIK is aware that the Republic of Kenya is a secular state, and as such, it is ironic and a classic case of logical, empirical and self-referential contradiction for them to attempt to bring before a secular institution **matters of spirituality** and religion.
3. APVOTIK further commits a **self-referential contradiction** by quoting Article 32 of the Constitution without stating whether it has any shortcoming. Why quote a provision of the Constitution that technically annuls your position, and then act as though that provision is in actual sense supporting your case? There is dishonesty and attempted trickery in such a manoeuvre.
4. **Article 32(1)** of the Constitution provides as follows:

Every person has the right to freedom of conscience, religion, thought, belief and opinion.

Freedom of religion and belief protects a person's religious beliefs from being overridden by another person who assume that their religion is superior. In this case, APVOTIK seems convinced that they are the Prefects of All Theological Colleges. They have presumed to be the gold standard of theological training. They presume to represent all Christians in this Republic. Who appointed them to be Christians' representatives? Why are they propagating the idea that they are the Custodians of Religion? We didn't even know that they existed before October this year, yet they wish to spring up out of the woodworks, seemingly take upon themselves the role of Vicar of Christ, counter every theological college that has not yet agreed to join them, and attempt to push a divisionary, sectarian, illegal and unconstitutional propaganda down Parliament's collective throat. They must not be allowed to trample on clear provisions of the law.

5. **Article 32(2)** of the Constitution provides as follows:

*Every person has the right, either individually or in community with others, in public or in private, to manifest any religion or belief through worship, practice, **teaching** or observance, including observance of a day of worship.*

Theological training is part of the 'teaching' right provided for under Article 32(2) of the Constitution. Thus, by attempting to incorporate targeted regulation of theological colleges, APVOTIK contravenes this constitutional provision because the Association wants all Christian denominations to manifest a teaching that is fashioned in APVOTIK's image and likeness. They want to be the gods of religious teaching. It is either their way or the highway.

6. Article 32(4) of the Constitution provides as follows:

*A person shall **not be compelled to act**, or engage in any act, that is **contrary to the person's belief or religion**.*

Through their Petition, APVOTIK seek to compel all believers countrywide to act and engage contrary to their respective beliefs and religious persuasions. This is because APVOTIK is advocating for a system of religious teachings that they alone are happy with. They will thus be attempting to push their religious agenda down the throats of those who do not currently subscribe to their Association.

7. Further, in their Petition, APVOTIK seem to imply that *proliferation*, by and of itself, is a bad thing. They deliberately ignore the fact that proliferation of something doesn't mean it is necessarily regressive. It simply denotes exponential growth. It would thus appear that APVOTIK is uncomfortable with the exponential growth of the Gospel through Theology. Do they prefer stagnation? Are they are opposed to the theological proliferation because they prefer religious paralysis and regression?
8. The Petitioners call for what they term as a '*standardized curriculum*' for theological colleges, yet one cannot claim to standardize matters of faith that are dependent upon a religious group's own spiritual persuasions. For instance, how do you standardize the topic of the Holy Spirit, or miracles, or fasting, which are viewed very differently by different religious groups?
9. The Petitioners also claim that there is '*questionable accreditation of some institutions*.' Well, if this is the case, then the Petitioners should have raised their matter with the Commission for University Education (CUE) or the Technical and Vocational Education and Training Authority (TVETA), which are the public agencies responsible for registration, accreditation and auditing of training institutions including theological colleges.
10. In particular, **the TVET Act (CAP 210A)** empowers TVETA to:
 - a) inspect, license, **register and accredit** training institutions

- b) **regulate** and coordinate training under TVET Act,
- c) accredit and **inspect** programmes and courses;
- d) advice and make recommendations to the Cabinet Secretary on all matters related to training;
- e) determine the national technical and vocational training objectives;
- f) promote access and relevance of training programmes within the framework of the overall national socio-economic development plans and policies;
- g) prescribe the **minimum criteria** for admission to training institutions and programmes in order to promote access, equity and gender parity.
- h) **recognize and equate** qualifications awarded by local or foreign technical and vocational education institutions in accordance with the standards and guidelines set out by the authority from time to time;
- i) collect, **examine** and publish information relating to training;
- j) **assure quality** and relevance in programmes of training;
- k) liaise with the national and- county governments and with the public and the private sector on matters relating to training;
- l) undertake, or cause to be undertaken, **regular monitoring, evaluation and inspection of training and institutions** to ensure compliance with set standards and guidelines;
- m) mobilize resources for development of training;
- n) ensure the **maintenance of standards**, quality and relevance in all aspects of training, including training by or through open, distance and electronic learning;
- o) approve the process of introduction of new training programmes and **review existing programmes** in technical and vocational education and training board institutions; etc.

11. In consideration of the above roles of TVETA and CUE, there is no vacuum or lacuna in the accreditation and inspection of theological colleges in the country, and as such, APVOTIK's decision to rush to Parliament to seek the regulation of **an area that is already regulated on** is an enormous error and a case of ignorance of the law. With the foregoing in mind, the Petition should be dismissed forthwith on the basis of material and procedural error.

12. The TVET Act, Universities Act and the Kenya National Qualifications

Framework Act exist to regulate post-secondary training of all forms, and thus there is no legislative vacuum. APVOTIK's claim that these legal frameworks *do not cater for the unique character of sacred and spiritual training* is a very fluid and subjective argument because all training is unique. There is no training that is more important than the other. Let APVOTIK approach TVETA or CUE and ask them to be more vigilant in their regulatory work, but not attempt to use Parliament as a short-cut for interfering with the work of recognized and legal public entities.

13. Further, APVOTIK talk of what they term as *á church community*' as though Kenya has only one uniform/ homogenous Christian movement. There is no such body in Kenya. Kenya is composed of Roman Catholics, Anglicans, Eastern Orthodox, Presbyterians, Baptists, Seventh Day Adventists (SDAs), Methodists, Akorinõ, Lutherans, and the thousands of Pentecostal denominations such as Gospel Outreach, Full Gospel, Deliverance, Assemblies of God, Winners Chapel, Nairobi Chapel, CITAM, PEFA, KAG, Redeemed Gospel, Jesus Winners, etc. Which church community are APVOTIK referring to since all these aforementioned groups have different believes and convictions, and some even treat the others as heretical? For instance, SDAs will tell you that Catholics are pagans and Pentecostals are heretics, while Pentecostals will tell you that SDAs are modern-day Pharisees lost in legalism and spiritually blinded by the Law of Moses. APVOTIK cannot thus claim to represent any church community in their two-page Petition.

14. The Petitioners seek Parliament's intervention in *allowing the Pentecostal and Evangelical religious sector to establish a self-regulatory authority to manage theological education*. Why should such an Authority be formed when we already have two public agencies (TVETA and CUE) mandated by law to regulate training in the country including theological training? This prayer, if granted, can only lead to wastage of tax payers' money through creating of an Authority that will lead to duplication of work already being undertaken by other existing State agencies.

15. Finally, the Petitioners want Parliament to enact a legislation that shall provide for *'accreditation of Spirit-filled and biblically-faithful institutions.'* How can Parliament determine that a college is Holy Spirit-filled? Some Christian groups such as Jehovah Witnesses refer to the Spirit as 'it', while others refer to the Holy Spirit as 'he'. At the same time, some Christian groups don't believe in the Holy Spirit at all. So how does one standardize the Holy Spirit experience? Which organ of Government is able to determine which people are Holy Ghost-filled and who are not? Will MPs go and ask students of theology to speak in tongues so as to determine who among them is

Holy Spirit-filled? Further, Parliament is composed of Muslim MPs, Hindu MPs, etc. Can a Muslim MP determine which college is biblically faithful? This Petition should never have seen the light of day. It was dead on arrival, and should never have been forwarded to an honourable institution such as Parliament. The Petition is practically and legally inadmissible. The Public Petitions Committee ought to declare the Petition as inadmissible.

16.Through this Petition there is the **possibility of discrimination** -Only Christianity has theological colleges. Buddhists, Sikhs, Muslims, Shintoists, etc have no theological colleges. Hence the Petition is unfairly focused on Christianity, and therefore discriminatory in both form and essence. Why should Christianity be subjected to stand-alone regulation by the Government at the exclusion of Muslims, Hindus and Buddhist, yet Kenya is a secular State with no State religion? This is blatant discrimination. The Petition is thus unconstitutional and void.

17.**Practicality constraint** -Standardization of spiritual matters is a runaway horse that can't be practically attained. It is impractical to settle on a singular theological curriculum that conforms to all Christian groups and their respective beliefs/doctrine. As it is, the Petitioner, Rev. Josiah Njiru, might be pursuing the establishment of theological curriculum that conforms to his Association's worldview. In other words, APVOTIK presume, erroneously so, that their curriculum is the global standard for Christian doctrine.

18.It is possible that the Petitioners may have been misled by isolated incidents such as the Shakahola incident. Without doubt, the incident was indeed unfortunate. However, attempting to regulate the entire theological arena on that account is a disproportionate knee-jerk reaction. The Penal Code and other laws are there to bring to justice perpetrators of crime, including immoral preachers (which is why Paul Nthenge Mackenzie is still in custody). Mackenzie was arrested under the Penal Code and other existing laws of Kenya. There was no debate regarding which law to charge him under. Laws are there to be followed. We don't need any new laws or regulations -we simply need to implement the existing ones. Individual actions should not hamstring entire institutions.

19.Every individual religion or religious group has inherent right to determine its own curriculum, both in frame/ structure and in content. If for instance a certain theological college is convinced on the need to train as pastors only men who are below 40 years for a period of one year, that is their choice. No outsider should come and tell them that they must include men over 40 years and train them for six months instead. A church/ religious ministry is not run in the same manner as a secular institution such as school. Article 32(4) provides that "A person shall not be

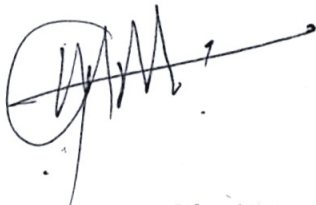
compelled to act, or engage in any act, that is contrary to the person's belief or religion." Compelling a theological institution to train certain people in certain ways for certain periods of time using a certain structure within certain secular frameworks is compelling it to go against its belief and religion -and this makes the Petition unconstitutional

20. The Principle of Separation of Church and State has been observed and honoured globally for good reasons. The Public Petitions Committee should not breach this pillar of social stability just because APVOTIK have presumed to be the gold standard of Christian education.
21. APVOTIK is attempting to hoodwink Parliament to midwife a ridiculous and unconstitutional religious arrangement.
22. Israel vs Gaza/Palestine is a prime and sad example of what can happen when a State gets involved in religious turf wars.
23. APVOTIK is attempting to use an entire arm of Government to fight its religious turf wars with other Christian groups. APVOTIK seeks to ward off competition from other bible colleges which it has failed to convince to join it. APVOTIK is attempting to use an honourable institution to commit a dishonorable error.
24. Let each church, ministry or religious group determine its own curriculum both in terms of structure and content, with TVETA and CUE ensuring quality standards as per the law. Religious teaching has never and will never be uniform. Not every aspect of life can be standardized, and religion is part of this exception.
25. Seemingly, APVOTIK wants every Christian group to bow at their altar. They seek to be the demigods of theology, the gatekeepers of religious engagements, the earthly deities of religious discourse, the unchallenged interpreters of the Bible. Parliament should not be hoodwinked into factional and sectarian disagreements.
26. In my view APVOTIK are really not seeking good order. They are seeking control. A fluid fraternity hardly known by anyone now seeks to wrap all believers under its control. They ought to be aware that the framers of Article 32 foresaw such schemes such as this one clothed in a Petitions outfit. They ought to be reminded that Freedom is not on Clearance Sale. Freedom is not up for grabs.
27. The Petition should be **rejected** due to its blatant breach of clear provisions of the Constitution, its attempt to create an Authority to duplicate the work of existing State agencies, its empirical impracticality, its attempt to blur the State and religion mutual exclusivity, its ignorance of existing legal framework, its inherent discrimination, its misrepresentation and non-representation of Christians in the

country, its attempt to circumvent current legal provisions on training, and for forwarding to a secular arm of Government untenable prayers in which the Petitioners seems to expect MPs to read the entire Bible so as to determine which colleges are Biblically-faithful, and, further, makes additional preposterous prayers asking MPs to determine which people and colleges are filled and led by the Holy Spirit of God (the Holy Ghost).

28. My prayer is that the Public Petitions Committee declares the Petition by Rev. Josiah Njiru as INADMISSIBLE, DISMISSES THE PETITION, REJECTS the Petition's prayers as impractical or REJECTS the Petition outright based on the fact that the Petition's prayers are already being undertaken by existing government agencies (TVETA and CUE).

Yours Faithfully,



G. Muriuki Mutuma

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NAIROBI

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24th November, 2025



MINISTRY OF EDUCATION

State Department For Technical, Vocational

Education and Training

SUBMISSION OF BRIEF ON ENACTMENT OF LEGISLATION TO REGULATE THE PROLIFERATION OF THEOLOGICAL COLLEGES IN THE COUNTRY

Introduction

Hon Chair,

- i) The Public Petitions Committee vide a letter Ref: NA/DAA&GPC/PPC/2026/026 dated 24th February 2026 invited the Cabinet Secretary, Ministry of Education to appear before it and make submissions regarding *'P/No. 15/2025 Rev. Josiah Njiru Wajoshuah regarding enactment of a legislation to regulate Theological Colleges in the Country'*.
- ii) After scrutiny of the petition, the State Department for Technical Vocational Education and Training (SDTVET) identified the following issues that are relevant to its mandate and makes submissions on the same hereunder.

Issues

1. Questionable accreditation of some religious institutions
2. Absence of standardized religious education curriculum
3. Lack of regulatory framework for theological education.

Issue 1:

TVETA

Questionable accreditation of some religious training institutions

Response

Hon. Chair,

- ① →
- i) The existence of self-regulating professional organizations enables training that is linked to the respective sector needs. Self-regulating organizations set occupational standards, monitor competence and maintain ethical practice among their members. They also establish occupational standards that are critical in setting up training curricula as well as licensing their members to practice. Governments on the other hand usually oversee the regulatory bodies through laws to ensure that self-regulating bodies serve the public and not just the relevant professions. The absence of a central self-regulating theological body is the likely reason why there is training fragmentation in the sector.
 - ii) The mandate for accrediting training institutions in Kenya is legally vested in the Technical and Vocational Education and Training Authority (TVETA) under the TVET Act, Cap. 210A. Accreditation is executed in strict compliance with existing Policies Laws and Regulations and is immune to secular or non-secular orientations of the institutions being accredited.
 - iii) Some of the functions of the Authority include but are not limited to, courses and programs accreditation and inspection, recognizing and equating qualifications by local and foreign institutions, inspecting, licensing, registering and accrediting training institutions.
 - iv) The Authority also inspects, monitors and evaluates training institutions to ensure that they maintain high standards and offer quality and relevant programs. Further, the Authority approves the process of Technical and Vocational Education and Training Boards to introduce new training programmes and review existing programmes.
 - v) The TVET Act provides the legal framework for institutional accreditation, regulation and monitoring. It also provides for coordination, assessment, certification and assurance of standards.

quality and relevance in training in TVET. Provisions of the Act apply to institutions that offer **religious and non-religious education**.

- vi) Section 17 of the Act bars individuals or institutions from offering training in Kenya unless they have been accredited, licensed and registered. Consequently, qualification issued by any institution not yet accredited, registered and licensed in accordance with the Act shall not be recognized in Kenya.
- vii) It is noteworthy that 34 Christian Sponsored Institutions (Annex 1) are accredited by TVETA to offer Christian Chaplaincy and Christian Ministry Curricula. Consequently, any institution offering training outside the realm of the TVET Act or any other lawful authority is operating unlawfully.

Issue 2:

Absence of standardized religious education curricula *Kitenge*

Hon. Chair,

- i) The TVET Curriculum Development, Assessment and Certification Council (TVET-CDACC) is the body corporate responsible for Curriculum Development, the development of occupational standards and competency-based curricula for all sectors, including religious and theological vocations. It also conducts assessment and issues certificates to candidates who have successfully demonstrated the required competency standards.
- ii) All curricula developed by the Council are informed by Sector Skills Advisory Committees (SSACs), which comprise industry experts and practitioners who advise on the occupational standards expected of a worker in each field, and the skills required to be imparted through training. This ensures that every qualification offered is grounded in real-world occupational demands and labour market needs.
- iii) The Council has to date developed three (3) religious curricula under the TVET qualifications framework, as outlined below.

a) Christian Ministry (Levels 4, 5 and 6)

- The Christian Ministry curriculum was developed in accordance with the occupational standards for a Christian Minister serving in a church and community setting. It prepares learners for work in religious environments, equipping them with the competencies required to provide spiritual leadership, pastoral care, and community engagement. The curriculum further prepares candidates for the conduct of religious ceremonies, including marriages, burials, and counselling, amongst others.

b) Christian Chaplaincy (Levels 4, 5 and 6)

- The Christian Chaplaincy curriculum is designed to prepare learners for institutional chaplaincy roles, providing religious guidance and pastoral support to congregants within institutional settings. These include, but are not limited to, schools, military establishments, and police camps. As with Christian Ministry, the curriculum encompasses the conduct of religious ceremonies.

c) Islamic Studies (Levels 3, 4, 5 and 6)

- The Islamic Studies curriculum has been developed with the objective of producing qualified Imams who are equipped to lead mosque congregations and provide religious guidance, care, and support to congregants. The curriculum similarly covers the conduct of religious ceremonies. Development of this curriculum has been completed, and it is currently awaiting formal approval by the TVET CDAC Council, following which it will be transmitted to TVETA for approval before training may commence.

Hon. Chair,

- iv) Since the introduction of the religious curricula, TVET-CDACC has assessed 545 candidates in the Christian Ministry Curriculum and 256 candidates under the Christian Chaplaincy Curriculum.
- v) All candidates, regardless of the programme of study, are held to the same assessment and certification standards and guidelines applicable across all TVET qualifications. This ensures that no unqualified or

unskilled individual enters the labour market under the guise of a TVET qualification, thereby safeguarding both the integrity of the qualifications' framework and the welfare of the communities these graduates serve.

- vi) No institution is permitted to undertake TVET CDACC curricula or assessments unless it has first been accredited by TVETA and approved to offer the relevant course or courses within the bands prescribed.
- vii) The Council registers institutions as Assessment Centers only upon confirmation of such TVETA accreditation. This two-tier quality assurance mechanism ensures that only institutions meeting the requisite standards are authorized to deliver theological and religious vocational training under the TVET framework.

Issue 3:

Lack of regulatory framework for theological education *Kando*

Response:

Hon. Chair,

- i) SDTVET notes the concerns raised by the petitioner regarding the proliferation of un-regulated theological colleges, bible schools and online ministry training platforms.
- ii) It should be noted that the Kenya National Qualifications (KNQF) Act, Cap. 214 has sufficient legal provisions to regulate both theological and non-theological education in Kenya.
- iii) Section 5 (1) (a) of the Act bestows The Kenya National Qualifications Authority (KNQA) with a statutory mandate to recognize and register qualifications conferred by accredited institutions. This ensures harmony, comparability, alignment, and standardization of qualifications granted both nationally and internationally.
- iv) For operational excellence, the Authority maintains a national database of quality assured and credible Qualification Awarding Bodies, National Qualifications and graduates records.
- v) The Act established a Kenya National Qualifications Framework which is a comprehensive system designed to organize, classify, and ensure the quality of all qualifications awarded in Kenya. The Framework

applies to all Qualification Awarding Institutions irrespective of their philosophical foundation, public or private status, provided such authority is derived from a statutory instrument.

- vi) A total of 184 Qualifications Awarding Bodies (QABs) are operational, of which 65 have attained registration with the KNQA. Out of this number, Universities constitute 10 registered (including both public and private Universities); 33 National Polytechnics, 7 foreign institutions (including private ones), and 3 Professional Examination Boards are duly registered. Additionally, 10 Specialized Institutions are registered.
- vii) In accordance with the Act, only accredited and recognized institutions are included in the Database. Consequently, public institutions without the function to confer awards are not recognized as credible awarding bodies.
- viii) While the institutions referred to in vi) above may provide training, they are not mandated to independently confer qualifications unless such awarding is provided by statute. Thus, assessment and certification are conducted on their behalf by bodies authorized to confer awards.
- ix) The National Qualifications landscape in Kenya is structured into five sub-frameworks or sectors, namely: Basic Education, Technical and Vocational Education and Training (TVET), University Education, Industrial Training, and Professional Education and Training. Each of these sub-frameworks is governed and regulated by a designated regulatory and quality assurance body established through an Act of Parliament.
- x) Through the KNQF framework, KNQA coordinates, harmonizes, and integrates the standards and regulatory mechanisms applied across these five sub-frameworks. This ensures comparability of qualifications, facilitates progression pathways for learners, and promotes national and international recognition of Kenyan qualifications.
- xi) KNQF also facilitates the regulation of practitioners and professionals in specialized sectors through the registration and recognition of professional examination bodies. Examples of such bodies include:
 - a) Kenya Accountants and Secretaries National Examinations Board (KASNEB)
 - b) Kenya Institute of Supplies Examination Board (KISEB)

c) Human Resource Management Professionals Examinations Board (HRMPEB)

xii) These institutions operate within the KNQF by developing and administering professional qualifications that are aligned with nationally recognized competency standards.

② xiii) In view of the foregoing, it is observed that the absence of a tailor-made regulatory framework for theological education does not necessarily imply a regulatory vacuum within the national qualifications system. Rather, theological education institutions are required to situate their academic and professional qualifications within the existing regulatory framework.

xiv) To ensure that theological qualifications meet nationally recognized standards, facilitate academic progression, and enhance transparency and public confidence in theological training institutions should institutionalize the KNQF

xv) This approach would enable the theological education sector to maintain doctrinal autonomy while ensuring that its qualifications are integrated within the national education and training system.

③ xvi) Theological practitioners who may possess the requisite skills that have not been recognized can be accorded recognition in the Recognition of Prior Learning (RPL) framework.

xvii) RPL provides a structured and harmonized mechanism through which individuals can have their knowledge, skills, and competencies acquired through informal, non-formal, or experiential learning assessed and formally recognized.

xviii) It is therefore, recommended that the Petitioner may collaborate with the various regulatory bodies recognized as such under KNQF (General) Regulations, 2025 who are mandated to regulate and enforce several legislative provisions in the education and training sector to weed out unlicensed and unaccredited theological colleges, bible schools and online ministry training platforms in Kenya.

→ Rediged & Signed 11/20/24

Hon. Chair,

In conclusion:

In view of the foregoing, it is SDTVET considered view that the TVET Act Cap. 210A and the KNQF Act Cap. 214 provide substantive legal and regulatory frameworks to govern accreditation, recognition and registration of theological education curricula. The laws provide a mechanism of co-creating and reviewing curricula as well as pathways to registered duly registered theological education institutions and Qualifications Awarding Bodies. As demonstrated above, TVET-CDACC has collaboratively developed two (2) based curricula and one (1) Muslim-oriented curriculum. It has also cumulatively assessed 810 candidates register to pursue theological training.

Whereas SDTVET acknowledges the proliferation of theological colleges and the legitimate desire to regulate them, the State Department remains committed to collaborative engagement with all stakeholders within the Education and Training Sector, including those in theology to build public confidence in the accreditation of institutions, recognizing and registering the qualifications and collaboratively developing the training curricula. It is genuinely believed that such an approach will not only ensure effective and efficient service delivery in the sector but will also create an environment where all stakeholders are protected and benefit from legislations arising thereof.



Dr. Esther Thaara Muoria, PhD, CBS
Principal Secretary

ANNEX 1

LIST OF ACCREDITED CHURCH BASED TVET INSTITUTIONS

No	Institution	Registration number	Category	Type	County
1.	Africa Theological Seminary	TVETA/PRIVATE/TVC/O 165/2016	TVC	Private	Trans Nzoia
2.	Apostolic Faith Church Bible College	TVETA/PRIVATE/TVC/O 001/2023	TVC	Private	Nakuru
3.	Jubilee Harvest College	TVETA/PRIVATE/TVC/O 284/2016	TVC	Private	Kakamega
4.	Crossroads Bible Institute	TVETA/PRIVATE/TVC/O 015/2022	TVC	Private	Kilifi
5.	Higher Ground Vocational Training Institute	TVETA/PRIVATE/TVC/O 083/2023	TVC	Private	Kiambu
6	Uhai Christian College (UCC)	TVETA/PRIVATE/TVC/O 101/2023	TVC	Private	Kiambu
7.	Wesleyan United Methodist Training College	TVETA/PRIVATE/TVC/O 063/2021	TVC	Private	Nairobi
8.	St Paul's University TVET Centre	TVETA/PRIVATE/TVC/O 086/2024	TVC	Private	Nairobi
9.	Kabarak University TVET Institute	TVETA/PRIVATE/TVC/O 016/2021	TVC	Private	Nakuru
10.	Kings Bible College	TVETA/PRIVATE/TVC/O 004/2021	TVC	Private	Nairobi
11.	Manna College	TVETA/PRIVATE/TVC/O 033/2021	TVC	Private	Kajiado
12.	Libu Training Institute	TVETA/PRIVATE/TVC/O 011/2022	TVC	Private	Kiambu
13.	Breakthrough International Training College	TVETA/PRIVATE/TVC/O 054/2022	TVC	Private	Nairobi
14.	Capacity And Training Institute	TVETA/PRIVATE/TVC/O 002/2020.	TVC	Private	Kakamega
15	Word Of Faith Community College	TVETA/PRIVATE/TVC/O 079/2016	TVC	Private	Kiambu
16.	Word Of Truth Technical and Vocational Centre	TVETA/PRIVATE/TVC/O 080/2023	TVC	Private	Nakuru
17.	Gihon Leadership Training Institute	TVETA/PRIVATE/TVC/O 098/2024	TVC	Private	Uasin Gishu
18.	Kingdom Transformers Training Institute	TVETA/PRIVATE/TVC/O 075/2024	TVC	Private	Nakuru
19.	Impact Training and Counselling Centre	TVETA/PRIVATE/TVC/O 018/2024	TVC	Private	Mombasa
20.	Goebay Training Institute	TVETA/PRIVATE/TVC/O 123/2024	TVC	Private	Kakamega
21.	Serein Education Centre	TVETA/PRIVATE/TVC/O 061/2016	TVC	Private	Nakuru
22.	North Rift Christian College	TVETA/PRIVATE/TVC/O 036/2024	TVC	Private	Trans Nzoia
23.	Nairobi Pentecostal Bible College	TVETA/PRIVATE/TVC/O 048/2019	TVC	Private	Nairobi

ANNEX 1

24.	Mwembeni Technical Training Institute	TVETA/PRIVATE/TVC/O 036/2022	TVC	Private	Kilifi
25.	Fem Leadership College -Kambu Campus	TVETA/PRIVATE/TVC/O 013/2024	TVC	Private	Makueni
26.	St. Paul's University TVET Institute-Limuru Campus	TVETA/PRIVATE/TVC/O 182/2024	TVC	Private	Kiambu
27.	Ruach Chayah Bible & Vocational Training Center	TVETA/PRIVATE/TVC/O 177/2024	TVC	Private	Uasin Gishu
28.	Nairobi Great Commission Training College	TVETA/PRIVATE/TVC/O 171/2024	TVC	Private	Nairobi
29.	J.C.C School of Ministry	TVETA/PRIVATE/TVC/O 069/2024	TVC	Private	Mombasa
30.	Leonard Fox Theology Training College	TVETA/PRIVATE/TVC/002 7/2025	TVC	Private	Kiambu
31.	Full Gospel Theology Training Institute	TVETA/PRIVATE/TVC/O 021/2025	TVC	Private	Nairobi
32.	King David Leadership Institute	TVETA/PRIVATE/TVC/O 025/2025	TVC	Private	Nairobi
33.	Harvest Missionaries College	TVETA/PRIVATE/TVC/007 1/2025	TVC	Private	Narok
34.	Angaza Bible And Training Institute	TVETA/PRIVATE/TVC/O 064/2023	TVC	Private	Bungoma



ASSOCIATION OF PENTECOSTAL

VOCATIONAL TRAINING INSTITUTIONS OF KENYA

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(ii) MACHIRI
Please deal

18th November, 2025

for
19/11/25

To:
The Clerk of the National Assembly
Parliament of the Republic of Kenya
Parliament Buildings
Nairobi

DLS
i) D/AAGPC
Please deal.
18/11/25

Dear Sir,

RE: SUBMISSION OF ADDENDUM TO PUBLIC PETITION NO. 15 OF 2025 AND THE THEOLOGICAL EDUCATION BILL 2025

Pursuant to the provisions of **Article 119 of the Constitution, Standing Orders 225(2)(b) and 208A**, and further to the Conveyance of Public Petition No. 15 of 2025 by the Rt. Hon. Speaker on 1st October 2025, the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK) hereby submits an official **Addendum** to the earlier Petition and the accompanying draft *Theological Education Bill 2025*.

This Addendum provides additional clarity, updated justification, and further legislative insights arising from ongoing national discussions, stakeholder consultations, and public concerns. It reinforces the imperative for a coherent, faith-led regulatory framework for theological education, one that balances constitutional religious freedom with public safety, quality assurance, and institutional accountability.

We respectfully request that your esteemed office **receives, acknowledges, and conveys this Addendum** to the **Public Petitions Committee** for its consideration in accordance with **Standing Order 227(2)**. APVOTIK stands ready to provide any further documentation, technical submissions, or oral presentations that the Committee may require during its deliberations.

We reaffirm our commitment to supporting Parliament in this critical reform process and in ensuring that theological education in Kenya advances in a manner that is responsible, inclusive, constitutionally aligned, and nationally beneficial.

Kindly accept, Sir, the assurances of our highest consideration.

Yours faithfully,

Rev. Josiah Njiru Wajoshua

Chairperson

Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK)

Cc:

- The Rt. Hon. Speaker, National Assembly
- Chairperson, Public Petitions Committee

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REPUBLIC OF KENYA



**THE THEOLOGICAL EDUCATION BILL
2025 AND APVOTIK PUBLIC PETITION
NO. 15 OF 2025**

*A National Reform Blueprint for Responsible, Accountable, and Inclusive
Theological Education in Kenya
Strengthening Faith · Protecting Freedom · Ensuring Quality*

Comprehensive Progress Review Report and Policy Manuscript

Submitted to:

**THE NATIONAL ASSEMBLY OF THE REPUBLIC OF KENYA
Public Petitions Committee
Parliament Buildings, Nairobi
*Pursuant to Article 119 of the Constitution of Kenya, 2010 and
Standing Order 225(2)(b)***

**Principal Submitting Institution
*Association of Pentecostal Vocational Training Institutions of
Kenya (APVOTIK)***

Chairperson:
Rev. Josiah Njiru Wajoshua

Collaborating Entities
Partner Theological Colleges
Ecclesiastical Institutions and Faith-Based Organizations

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Submitted for consideration and adoption by the Parliament of Kenya as part of the implementation framework for the Theological Education Bill 2025.

EXECUTIVE SUMMARY

1. Introduction

Kenya stands at a pivotal moment in shaping its moral and educational future. The call for reform in theological education is not sudden. It is the culmination of decades of unregulated growth, deep devotion, and silent suffering within the faith community. Thousands of Christian institutions have trained leaders who serve tirelessly in churches, schools, relief missions, prisons, and local communities. Yet, they do so within a system that lacks national standards of accountability, academic legitimacy, and constitutional safeguards.

Public Petition No. 15 of 2025, presented to the National Assembly by the Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK), seeks urgent remedy. The proposal centers on the formal introduction of the Theological Education Bill 2025, a legislative step designed to establish quality, protect citizens, and affirm religious freedom.

The reform addresses multiple systemic concerns:

- the vulnerability of congregations to doctrinal abuse,
- the marginalization of pastors without formal certification,
- the risk of harmful, cult-like movements escaping oversight,
- the exclusion of faith education from national development structures,
- and the absence of an official platform for faith stakeholders in policymaking.

The petition argues that Kenya must regulate theological education not to restrict belief, but to protect belief from exploitation.

2. Why Reform Is Urgent

The urgency intensified following the Shakahola tragedy, which exposed the loss of life resulting from manipulation by untrained, unaccountable

spiritual leaders. Kenya realized, painfully, that when religious instruction is detached from ethical formation, faith can be turned into a weapon of harm.

Members of Parliament across party lines acknowledged this truth. They highlighted three points:

1. theological education must uphold public safety,
2. religious freedom must be safeguarded,
3. and the State must support structures that prevent extremism.

Significantly, supportive MPs saw this Bill not as a burden to the church, but as a shield for genuine faith and a filter against distortion.

Cautious MPs also contributed constructively. They emphasized respect for Article 32 of the Constitution — freedom of conscience, religion, thought, belief, and opinion. Their input refined the Bill to ensure clarity in scope, limited state intrusion, and guaranteed denominational diversity.

Through these exchanges, Parliament reaffirmed something profound: spiritual responsibility is a matter of national interest.

4. What the Bill Proposes

The Theological Education Bill 2025 introduces several key institutional and regulatory mechanisms including:

- establishment of a Theological Education Council (TEC) as an independent, faith-led regulatory body
- accreditation and recognition of theological colleges and seminaries
- mandatory ethical standards to protect congregants and learners
- Recognition of Prior Learning (RPL) to certify experienced ministers
- proportional representation of denominations to ensure inclusivity
- transparent communication and monitoring
- mechanisms that prevent financial and doctrinal exploitation
- and guaranteed protection of religious freedom

The TEC would partner with existing government agencies such as KNQA, TVETA, and CUE to ensure synergy with national education structures, while maintaining theological autonomy.

5. Grounded in Research and Consultation

This manuscript lays a solid foundation for the Bill across ten comprehensive chapters. These chapters together demonstrate intellectual rigor, legal coherence, policy alignment, and spiritual relevance.

The structure of the manuscript provides:

- Global context — showing that theological regulation is standard in many countries (Chapter 2)
- Constitutional grounding — illustrating legal and human rights imperatives (Chapter 3)
- Institutional validation — proving APVOTIK's readiness and experience (Chapter 4)
- Parliamentary evidence — using Hansard analysis to showcase legislative support (Chapter 5)
- Strategic guidance — detailing a roadmap for stakeholder unity (Chapter 6)
- Legal precision — refining technical clauses and definitions (Chapter 7)
- Financial feasibility — presenting a realistic funding and implementation blueprint (Chapter 8)
- Projected national benefits — through measurable social, ethical, and security outcomes (Chapter 9)
- Implementation strategy — ensuring sustainability and phased progression (Chapter 10)

Each chapter builds upon the previous one to form a total policy framework capable of delivering long-term transformation.



6. Expected Outcomes

The reform's biggest impacts will be long-term — reshaping Kenya's religious, social, and ethical environment. Anticipated improvements include:

- Stronger theological institutions supported by legal recognition
- Professional ministry standards for training and ethical leadership
- Greater safety for congregations through prevention of manipulation and abuse
- Reduced extremism and improved national cohesion
- Increased trust between the church, the state, and the public
- Academic mobility for theology graduates in national systems
- Formal pathways for grassroots ministers through RPL, ending historical inequality
- Enhanced interdenominational cooperation built on mutual respect
- A well-regulated faith sector that upholds public interest

In effect, theology becomes part of the nation's development pipeline, contributing to values-based governance, peacebuilding, and community resilience.

7. Core Values Shaping the Reform

This reform rests on three philosophical pillars:

i. Faith Freedom

Worship remains free. Doctrine remains independent. Government does not dictate belief.

ii. Accountable Stewardship

Authority in ministry must protect human dignity. Leadership requires learning.

iii. Collaborative Governance

Church and State engage respectfully. Cooperation replaces tension.

These values mirror Kenya's constitutional spirit and affirm shared guardianship over national ethics and wellbeing.

8. A National Legacy in the Making

The Executive Summary demonstrates that the Theological Education Bill 2025 is both a constitutional necessity and a spiritual responsibility. It is evidence-informed, prayer-supported, and publicly endorsed.

Its passage will:

- align theology with national goals in Vision 2030,
- professionalize faith leadership,
- elevate the church's role in peace and development,
- equip citizens with trusted religious guidance,
- and protect vulnerable populations from manipulation.

Ultimately, the reform safeguards Kenya's spiritual DNA. It ensures that future generations inherit churches led with integrity, grounded in truth, and accountable to both God and community.

As such, this Bill is not merely legislative — it is legacy-building. It binds guidance with governance, devotion with diligence, and revelation with responsibility.

If Parliament adopts this reform, Kenya will take a visionary step toward a society where:

faith transforms, leadership protects, and theology serves the nation's good.

This moment invites our highest duty and our deepest faith — to shape a future where knowledge guards belief, and belief inspires justice.



NatureKenya

THE EAST AFRICA NATURAL HISTORY SOCIETY

Museum of Kenya, Museum Hill
P.O. Box 44486, 00100 GPO Nairobi
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Cell: +254 (0)771 343138, (0)780 149200
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www.naturekenya.org

Clerk of the National Assembly
P.O. Box 41842 - 00100
Nairobi, Kenya

D/DC
(17) / AA GPC
Please bring to attention of the 2 committees handling related petitions.
19/11/25

(17) MAEWA
Please check
19/11/25

17th November 2025

Dear Sir,

RE: Objection regarding de-gazettement of public forest land (Public Petition No. 20 of 2025).

Nature Kenya – the East Africa Natural History Society – acknowledges the request by the Cabinet Secretary for Environment, Climate Change and Forestry. However, we express concern over Public Petition No. 20 of 2025 regarding regularization of various claims to public forest land.

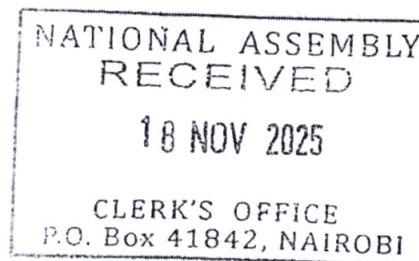
We **STRONGLY OBJECT** to the petition on the following grounds:

1. The petition violates section 34 (2b) of the Forest Conservation and Management Act (Cap 385) as it poses a significant threat to water catchment areas and biodiversity conservation.
2. The forest excisions will set the wrong precedent. It is wrong to allow people to illegally invade forest land and later regularize the illegality. Instead, the Government should find alternative land from existing Government land that does not fit the description of forest. For example, the Government still has a lot of land under the Agricultural Development Corporation (ADC) that is aimed at food production. The forest squatters can be settled on those lands to also help the Government to produce food.
3. Kenya's forest cover is below that recommended by the Food and Agriculture Organization. Kenya needs to restore every part of degraded forest land in order to meet the Afri100 and Bonn Challenge restoration target of 5.1 million hectares. The Presidential 15 billion tree growing initiative will not be achieved through excisions of 7008.66 Ha of forest land that denies Kenya the opportunity to restore 11 million trees.

Nature Kenya believes that safeguarding biodiversity is securing our future. We actively advocate for the conservation of biodiversity – plants, animals, microorganisms, the genes they contain and the ecosystems of which they are part - for generations to come.

Yours sincerely,

Dr. Paul Matiku,
Executive director, Nature Kenya



Partner in Kenya

Background information about Nature Kenya

Nature Kenya—the East Africa Natural History Society (EANHS)—is Africa's oldest environmental Society, established in 1909 to promote the study and conservation of nature in eastern Africa. We remain a non-political and not for profit membership Society. Our mission is connecting nature and people. Our work is firmly based on partnership, science and action. We use the best available science to inspire positive action for biodiversity by and for partners—Government, local communities and the private sector.

Nature Kenya takes practical action. We work with and for people – to improve their quality of life alongside, and as a result of, nature conservation. We collaborate with others wherever possible, at local, national, regional or global levels, linking with community groups, governments, businesses, universities and civil society groups to increase the impacts of our efforts.

Some of our achievements include:

- Founded the National Museums of Kenya, now a world-renowned institution for research and education.
- Published, since 1910, the *Journal of East African Natural History*, a respected scientific journal now jointly produced with the National Museums.
- Established and maintained, with the National Museums of Kenya, a comprehensive natural history library.
- Engaged our members in the study, enjoyment and conservation of nature in Eastern Africa, through field trips, lectures, publications, and opportunities to take part in research activities since 1909.
- Identified and designated Important Bird Areas (IBAs) for Kenya, in collaboration with the National Museums. More recently, documented the plants, animals and other biodiversity of Eastern Africa as a contribution to expanding the taxonomic scope of priority setting from IBAs to Key Biodiversity Areas (KBAs). Since IBAs are KBAs based on birds, they are also referred to as Important Bird and Biodiversity Areas.
- Encouraged and supported community-based organizations to become Site Support Groups (SSGs) promoting conservation and alternative livelihoods at Important Bird Areas, especially those without official protection status.
- Developed partnerships among Government and non-government organizations for sustainable conservation action at IBAs, now KBAs, through the Important Bird Areas National Liaison Committee (IBA-NLC) – now the Key Biodiversity Areas National Liaison Committee (KBA-NLC). We work with others in the development of policies, legislation and institutional frameworks that safeguard the ecological sustainability of KBAs in Kenya
- Mobilized resources to connect nature and people to take action for biodiversity conservation through development and implementation of donor funded projects at priority KBAs in Kenya.
- Work globally through the BirdLife International Partnership and its network of like-minded organizations in Eastern Africa and beyond in 117 countries and territories.

For more information visit our website at www.naturekenya.org.



ASSOCIATION OF PENTECOSTAL
VOCATIONAL TRAINING INSTITUTIONS OF
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STATEMENT BEFORE THE PARLIAMENTARY PUBLIC PETITIONS COMMITTEE KENYA
PARLIAMENT

By Rev. Josiah Njiru Wajoshuah, Chairman, Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK)

On Public Petition No. 15 of 2025 and the Theological Education Bill 2025

Honourable Chairperson of the Public Petitions Committee,
Honourable Members of Parliament present here,
Distinguished Support Staff of this Honourable Committee,
Fellow Faith Leaders, Educators, and Citizens of the Republic of Kenya.

I am Rev. Josiah Njiru Wajoshuah, Chairperson of the Association of Pentecostal Vocational Training Institutions of Kenya, known as APVOTIK. Our offices are located at Madaraka Estate, in Nairobi. You can reach us through our postal address at P.O Box 52267-00100, Nairobi, Kenya, by telephone at +254 721565355 or +254 728 760 208, or through our website at www.apvotik.com. We are a legally registered association under the Societies Act, registration number 54540, with a national governance structure covering all regions of Kenya. In essence, APVOTIK represents a large minority of the Christians in Kenya. According to the Kenya National Bureau of Statistics Survey (2019) there are 9.6 Million evangelicals in Kenya, including Pentecostals and charismatic. This is the constituency for which APVOTIK speaks.

We have individual and corporate members in 38 counties across 13 regions namely :



1. South Coast
2. North Coast
3. Lower Eastern
4. Upper Eastern
5. Lower Central
6. Upper Central
7. North Rift
8. South Rift
9. South Western
10. North Western
11. Nyanza Central
12. Nyanza West
13. Nyanza South

The regions are represented by regional chairpersons supported by two other members, thus a secretary and

a treasurer. The structure will be cascaded to county and subcounty levels.

Honourable Members, I now invite you to meet my colleagues who will provide details on specific aspects of our petition.

Bsp Dr. Benard Namusasi Chinungo, our CEO and Patron is the founding visionary of this movement, having guided APVOTIK from a small network of concerned theological educators to a national association with over two hundred members. These members represent specific church congregations thus the current membership can be extrapolated to over 100,000. Dr. Chinungo will address our governance structures and institutional readiness, demonstrating that APVOTIK possesses the capacity, the systems, and the experience to implement the framework we propose. He will walk you through our organizational structure, our financial management protocols, and our partnerships with national and international bodies.

Bishop Jacob Ongala Owiti, the principal drafter of our Comprehensive Progress Review Report and Addendum. He will give the landscape of our areas of coverage and influence in the republic of Kenya. In our endeavours, The APVOTIK leadership has experienced the struggles, documented wisdom, and translated the Pastors' hopes into the policy documents now before you. He will provide a scope of the petition in terms of legalities and the alignment with the current regulatory authorities namely the Societies Act, the KNQF Act, the TVET Act, and the Universities Act. These regulatory authorities serve the constitutional mandate we have identified without creating conflict or duplication. Section 5 of the KNQF Act has space for and meaning of "**Specialized Qualifications Awarding Institution**".

Bsp Dr Phineas Murega Mwiti, Chairperson of the Recognition of Prior Learning Committee has spearheaded the training of three hundred RPL assessors and trainers who form the human resource for RPL assessment. These assessors have been drawn from across all the regions of Kenya. The training has been undertaken in collaboration with the State Department of TVET Delivery Unit and partnership with the University of Nairobi..

Our Legal advisor, **Senior Council Idris Omondi**, represented by **Council Eurry Mabonga** will address the legal matters in connection with every statute related to the theological education. Together with his team they have mapped the jurisdictions of the regulatory authorities namely KNQA, TVETA, CUE, and the Societies Act. He will also address the Petition compliance with existing laws and frameworks and the jurisdictional overlaps.

Bsp Prof. Maurice Omulubi, will demonstrate and address issues related to the challenges of standardization of curricula and the ripple effect thereof. He leads a theological college in Kenya that trains students from marginalized communities.

Honourable Members, we come as one body.

Each presenter is the voice of reason in APVOTIK with a constituency under his jurisdictions.

Together, we demonstrate the unity and readiness of which we speak. We are not here as individuals seeking personal recognition. But as servants of the people. Our agenda is borne of conviction, shaped by consultations, and now placed before you for legislative consideration.

Honourable Members, we have brought before you three key documents.

The first is **Public Petition No. 15 of 2025** itself, which initiated this process and invokes your constitutional mandate under Article 119 of the Constitution.

The second is our **Comprehensive Progress Review Report**, a document of over one hundred fifty pages that chronicles our journey, our research, our consultations, our findings and our proposed solutions. This report contains the evidence base for every claim we make today. It documents our historical analysis beginning on page 24, our examination of global and regional models on page 39, our understanding and response to the Shakahola tragedy on page 34, and our detailed implementation framework beginning on page 108. We respectfully request that this report be formally incorporated into the record of these proceedings.

The third document is our **Addendum**, submitted to address emerging issues and to provide further clarity on matters that have arisen since the initial tabling. This *Addendum*, dated March 2025, responds directly to parliamentary observations and public submissions. It reinforces our fundamental intent and addresses the five emerging issues we have identified:

- i) the proliferation of low quality unregistered theological schools,
- ii) public vulnerability to doctrinal manipulation,
- iii) regional inconsistencies in accreditation,
- iv) growing demand for Recognition of Prior Learning, and
- v) institutional fragmentation in the delivery of Christian Ministry training.

We ask that this Addendum also be admitted as part of our formal submission.

Honourable Members, let me now place this petition in its proper historical context.

As documented on page 23 of our Comprehensive Progress Review Report, theological education in Kenya began with the missionary movement in the late nineteenth century. Missionaries from Europe and America established the first formal training institutions to prepare local evangelists and catechists. These early Bible schools followed the curricula of their mother churches abroad. They focused on scripture reading, basic doctrine, and church planting. Graduates returned to their communities as spiritual leaders, often with deep devotion but limited formal education beyond the Bible.

After independence in 1963, theological education expanded rapidly. African Independent Churches emerged, establishing their own training centers separate from mission structures. Pentecostal and charismatic movements grew exponentially from the 1970s onward. They prioritized spiritual gifts and practical ministry over academic qualification. Thousands of Bible colleges sprang up across the country—some well-resourced, most operating humbly under trees, in church buildings, or rented halls. This expansion was a testament to Kenya's spiritual vitality. But as our report notes on page 23, it also created fragmentation, uneven standards, and a growing disconnect between ministerial training and the people's aspirations on spirituality..

Honourable Members, this historical context explains the gap we now seek to serve.

For over a century, theological education has existed parallel to Kenya's formal education structures. Missionaries trained workers for the church, not for the nation. Independent churches trained leaders for their congregations, not for recognition by the state. The result, as stated on page 24 of our petition, is a vibrant but invisible sector—thousands of pastors with decades of experience but no certificates recognized beyond their denominations. This is not failure; it is history. But history must now be rewritten. Honourable Members, let me be clear about why existing structures cannot address our need.

We acknowledge with respect the institutions Parliament has already established. The Kenya National Qualifications Authority, KNQA, established under the KNQA Act of 2014, provides the national framework for all qualifications. The Technical and Vocational Education and Training Authority, TVETA, established under the TVET Act of 2013, regulates skills-based training. The Commission for University Education, CUE, established under the Universities Act of 2012, oversees university education. We honor these bodies. We work with them. We seek their partnerships.

But Honourable Members, here is the gap. As explained on page 46 of our report, TVETA registers Bible schools as vocational institutions, focusing on skills training and trade standards. **It cannot evaluate whether teaching is doctrinally sound or ethically responsible because faith content falls outside its secular mandate.** Our need is different. We seek a faith-led council that assesses **ministerial competence, spiritual formation, and ethical conduct**—matters TVETA was never designed to oversee.

CUE accredits university theology programs, focusing on academic degrees in chartered institutions. Our need is different. We represent **informal, sacred training** where pastors learn through **practice, mentorship, apprenticeship and spiritual formation**. These institutions need a framework that validates experience, not just academic qualifications, while honoring their faith context and community service.

The Societies Act registers churches as **organizations but cannot evaluate the quality of their delivery**. As our report concludes on page 47, there is a policy vacuum where theology should be. This Petition serves that gap without duplicating any existing function.

Let me address the concerns about the alleged duplications.

The Theological Education Council that APVOTIK Petition proposes will not replace KNQA, TVETA, or CUE. It will work alongside these regulatory Frameworks as a **Specialized Qualifications Awarding Institution (SQAI)** under the Kenya National Qualifications Framework. This is exactly what the KNQF Act contemplates in Section 5—*specialized bodies awarding qualifications within the national system*. As detailed on page 103 of our report, we propose a dual-track strategy where the Council focuses on **theological content, ministerial ethics, and institutional governance in faith-based training**. National bodies will continue handling general quality assurance matters, data management, and international benchmarking. **We complement; we do not compete.**

In our Addendum, paragraph 3, reiterates this point clearly: "What is sought is not interference in doctrine, ecclesiology, internal worship patterns, or denominational distinctives. The proposed framework establishes a **self-regulating authority, constituted and governed by faith-based stakeholders**, with the State playing oversight recognition and policy-alignment role, consistent with the practice in other specialized sectors."

Honourable Members, we are not alone in this journey.

We recognize the continental Pentecostal Bodies that have guided us. As noted on page 40 of our report, the Accrediting Council for Theological Education in Africa, (ACTEA), has accredited theological institutions across Africa since 1976. In addition APVOTIK is a member of the Association of Pentecostal Theological Education in Africa. (APTEA). See the membership receipt attached 2025. Many of our member institutions hold APTEA accreditations. We have learned from their standards and their wisdom.

Globally, we partner with the World Evangelical Alliance and similar bodies that connect us to best Pentecostal practices worldwide. Page 41 of our report references the Latin American and Asian experiences that have informed our thinking. These partnerships ensure that Kenya's theological education meets international benchmarks while serving local needs.

But Honourable Members, these bodies cannot give Kenyan church ministers legal recognition. They cannot make a church minister's certificate valid for employment in a formal set up. They cannot connect our ministers to national development goals. Only the Kenyan law can do that through this Parliament.

Honourable Members, we have already begun the work.

In partnership with the TVET Curriculum Development, Assessment and Certification Council, (TVET CDACC), we have started a national rollout of Recognition of Prior Learning for church Ministers at levels four to six in Christian ministry and chaplaincy. We have already trained three hundred Christian Ministry RPL Level Two Assessors through the TVET RPL Delivery Unit, in collaboration with the University of Nairobi. Many of our members have successfully undergone this training process and have been awarded formal certification. We are grateful for these partnerships and the progress they represent. They have given us a foundation upon which to build. Currently we are in the process of concluding an MoU with St Paul's University on RPL for higher qualifications.

But Honourable Members, here is the painful truth that brings us before you today.

The TVET RPL Delivery Unit training Manual is designed for secular occupations. It follows a framework developed for plumbers, electricians, mechanics, and hairdressers among others. It cannot capture the sacred, informal, and spiritual setting in which our church Ministers operate. Their training happens in prayer rooms, under trees, through mentorship, apprenticeship, individual encounters with God and in the fires of ministerial experience and divine revelation. The Manual has no categories for these realities. It measures tasks, **not calling**. It assesses skills, not **divine engagement**.

The CDACC Christian ministry and chaplaincy occupation standards, while well-intentioned, are limiting to our membership and their needs. These standards were developed without adequate input from the diverse **theological traditions we represent**. They focus on competencies that can be measured in **secular terms but miss the spiritual formation, doctrinal grounding, and pastoral wisdom** that define true Christian minister's preparation. They tell us what a minister does, **but not who a minister is**.

Most fundamentally, Honourable Members, these bodies have no place to assess theological Training. They cannot evaluate whether a Christian Minister's teaching is biblically sound. They cannot **judge whether a minister's ethics reflect the values they preach**. They cannot **assess spiritual formation, divine calling, or spiritual soundness**. These are secular institutions with secular mandates, and they perform those

mandates well. But they were never designed to **judge the sacred**. You cannot measure the work of the Spirit with the tools of the workshop.

Our Addendum, at paragraph 4, identifies this as an emerging issue requiring parliamentary attention: "Public vulnerability resulting from doctrinal manipulation, aggravated by the lack of occupational standards and the absence of standardized ministerial preparation." This is not theoretical. This is happening now.

For every Christian Minister we certify through RPL under this limited framework, hundreds more remain unrecognized. "Our motto is every God given gift counts and from calling to certification"

For every institution we assist toward accreditation, dozens more operate in the shadows. The demand far exceeds our capacity. The framework itself is a constraint. We are trying to fit a spiritual reality into a secular box, and the box is too small.

We have the will. We have the partnerships. We have trained the human resource. We have tested the process. We have proven that recognition is possible. But we **lack the legislative framework to create a system designed for sound Christian Ministry training** that captures the entire spectrum—not just academics. One that clearly distinguishes the divine from the secular.

We need a faith-led council that understands what we assess, why it matters, and how to honor both God and the law in the process. We need a body that can look at a pastor's life and ministry and say with authority: this service is valid, this experience is learning, this calling is certified. **This petition provides that framework.**

It does not replace the excellent work of CDACC, TVETA, or our university partners. It complements it. It creates a home for sacred education within Kenya's qualifications framework—a home designed for the sacred, built by the faithful, and accountable to the Christian faithfuls and the nation. It allows CDACC to continue its secular work while we do the sacred work, side by side, each respecting the other's mandate, each serving the same Kenyan people.

We are not asking to be excused from national standards. We are asking for **standards that fit who we are**. We are not asking to be exempt from accountability. We are asking for **accountability that understands what we do**. We are not asking for special treatment. We are asking for equal treatment—recognition that sacred education is as valid as technical education, and that forming a pastor's soul is as important as training a plumber's hands.

Honourable Members, the pastors we represent have joined your constituents, your brothers and sisters and your children in holy matrimony. They have counseled your families in times of crisis, visited the bereaved and even intervened in conflict. They have served without certificates, without recognition, without complaint. Now they ask only for what is just: that their service be seen, their experience validated, and their calling honored under the law.

Honourable Members, the Presidential Taskforce on Religious Organizations confirmed this gap in 2024.

After the Shakahola tragedy, His Excellency President William Ruto received a comprehensive report from the taskforce chaired by the respected Hon. Rev. Mutava Musyimi. That taskforce examined the very issues we address today.

Their findings were clear. As summarized on page 37 of our report, they documented significant gaps in governance and oversight of religious institutions across Kenya. They noted that existing bodies—CUE for universities and TVETA for vocational training—**cannot evaluate doctrinal soundness or ministerial ethics**. These are secular bodies with secular mandates. They were never designed to **assess spiritual formation or pastoral competence**.

The taskforce therefore made specific recommendations. They proposed minimum qualifications and standards for religious leaders. They called for certification processes that validate both knowledge and character. Most importantly, they recommended that umbrella bodies be empowered to certify religious leaders and organizations through self-regulation.

Honourable Members, **APVOTIK** is that professional body stepping forward to take care of this gap. We represent over two hundred Pentecostal theological institutions(**formal, non formal, and informal**) and individual Pentecostal ministers across this nation. We have spent years developing frameworks for Recognition of Prior Learning, accreditation standards, and ethical guidelines. We have partnered with KNQA, TVETA, **CDACC**, The University of Nairobi, and the ongoing MoU with St Paul's University. We have tested what works. Now we need the law to make it work for all.

We are not creating a new idea. We are implementing a national recommendation born from tragedy and refined through consultation. The taskforce spoke. The nation listened. APVOTIK understood. Now we ask Parliament to act.

This Petition does not invent problems—it solves them. It does not create conflicts, APVOTIK creates consensus. The taskforce gave us the roadmap. We bring it to you **for legislative consideration**.

Now let me address the potential areas of conflict that some have raised.(Justification)

First, conflict with religious freedom. Some worry this Petition gives government power over the pulpit. Honorable Members, as affirmed on page 78 of our report, the Council has **no authority over doctrine, worship, or internal church governance**. Its role is limited to **sacred educational standards, professional ethics, and institutional transparency**. The content of faith remains with the church. The quality of education becomes a shared responsibility. This is not control; it is partnership.

Our Addendum, at paragraph 3, states this even more clearly: "The Petition proposes sacred education, ethical, and ministerial safeguards, while fully respecting Article 32 of the Constitution on freedom of religion and belief."

Second, conflict with existing laws. We have examined the Societies Act, the KNQF Act, the TVET Act, and the Universities Act. This Petition does not contradict any of them. **It fills the gaps**. The Societies Act registers organizations but cannot evaluate training. The TVET Act governs **skills but not theology**. This Bill completes the **architecture without disturbing existing foundations**.

In addition the current regulatory authority TVETA and CUE have the following shortfalls in matters Sacred education and training

1. Mandate Mismatch with Theological Training:

TVETA is primarily designed to regulate technical and vocational skills (e.g., plumbing, engineering), focusing on competency-based curriculum and occupational standards. Bible colleges focus on spiritual formation, theology, and pastoral ministry, which are not purely technical skills. Similarly, CUE regulates formal secular university education and may not recognize the specific, specialized accreditation bodies

commonly used within the theological education sector, such as the Accrediting Council for Theological Education in Africa (ACTEA) and Association of Pentecostal Theological Education in Africa (APTEA)

2. Rigid Accreditation Requirements:

Both CUE and TVETA have stringent, often bureaucratic, and costly accreditation processes. Many Bible colleges operate on limited funding and are small-scale, meaning they often cannot afford to comply with the heavy financial, infrastructural, and human resource requirements demanded by CUE or TVETA.

3. Theological vs. Academic Focus:

CUE requires academic staff to hold specific secular academic qualifications (e.g., Ph.D. in Theology from a recognized university). Bible colleges may value spiritual maturity, ministerial experience, or qualifications from other accredited Bible schools, which may not fit the conventional academic criteria, leading to a shortage of "qualified" trainers in the eyes of the regulator.

4. Unrecognized Qualifications (The "Fake Degree" Stigma):

CUE has flagged numerous Bible colleges (e.g., Eldoret Bible College, Grace Life Bible College, Breakthrough Bible College) for operating without proper accreditation. This creates a conflict where the regulator views Bible training as "illegal" or "substandard" while the institutions provide necessary spiritual training that does not neatly fit into the secular education framework.

6. Lack of Flexibility in Curriculum Development:

TVETA focuses heavily on standardized, modular curricula. Bible colleges require flexibility to adapt to changing church needs, denomination-specific doctrines, and missional training, which rigid national curricula do not allow.

6. Regulatory Overlap and Conflict:

Many private colleges, including those with religious backing, face confusion due to overlapping roles among regulators (TVETA, CUE, and professional bodies), which often results in bureaucratic delays and discourages institutions from seeking formal registration.

Honourable Members, the debate in this House showed both support and caution.

As recorded in Chapter Five of our report, beginning on page 63, we heard some members of parliament note that historically, the religious community has resisted regulation. They were right. But times have changed. **The church now understands that self-regulation is the highest form of freedom.** Some legislators asked whether our Bill creates monopoly. The answer is no. **Any institution meeting minimum standards can seek accreditation.** Questions raised on uniform teaching across denominations were not the concern. The APVOTIK does not demand uniformity—it **demand accountability. Doctrinal matters remain diverse. Ethics remain universal.**

Honourable Members this Petition that seeks powers for APVOTIK to be a Qualification Awarding Institution(QAI) will serve the Pentecostal, Charismatic and Indigenous church communities in specific ways.

APVOTIK will also implement the Recognition of **Prior Learning** at scale. As explained on page 114, thousands of church Ministers have served for decades without certificates. Their experience, their sermons, their counseling, their community service—all of this will be assessed and certified. This is not a favor. It is justice.

Honourable Members, I now make our prayers to this Committee.

First, we pray that you receive this petition with the same seriousness you have shown thus far.

Second, we pray that as you deliberate, you remember the faces behind this petition. Remember the pastor who has served forty years without a certificate. Remember the rural Bible school training leaders with

sacrifice but without recognition. Remember the young church Minister whose only qualification is the voice he heard from God saying “Go now and rescue my people from perishing”. This Petition is for them.

Third, we pray that you protect the constitutional balance between freedom and accountability. Let the Petition remain clear that the state does not define doctrine. Let it affirm that the church remains autonomous in matters of faith and doctrine. But let it also declare that all institutions serving the public must meet minimum standards of integrity and competence.

Fourth, we pray that you provide guidance on implementation. If full legislation takes time, we ask for your support in pursuing an **interim Legal Notice**. This allows preparatory work to begin while Parliament completes its process. It does not bypass you; **it prepares the ground for smoother implementation once the Act is passed.**

Fifth, we pray that you take note of the emerging issues outlined in our Addendum. **The proliferation of low quality unregistered theological schools, the vulnerability of the public to doctrinal manipulation, the regional inconsistencies, the growing demand for RPL, and the deepening institutional fragmentation**—all of these require your urgent attention.

Sixth, we pray that you affirm APVOTIK as the **faith-led Qualifications Awarding Institution (QAI)**. This is not a request for privilege. It is a request for a structure that works—tested by experience, supported by evidence, and aligned with both the Constitution and the Kenya National Qualifications Framework.

Seventh, we pray for God's wisdom upon each one of you. Legislating on matters of faith requires discernment beyond human reason. We pray that the Holy Spirit guides your deliberations, focuses your hearts to the cry of the people, and strengthens your resolve to do what is just.

Honourable Members, I conclude with this.

The APVOTIK Petition No 15 is not a political project. Neither is it a denominational agenda. **It is a national moral imperative.** It seeks to protect the faith of millions. It seeks to dignify the service of thousands. It seeks to ensure that Kenya's spiritual foundations remain intact, strong for generations to come.

We have done our part. We have consulted widely. We have documented thoroughly. We have listened humbly. We have brought you our petition, our comprehensive report, and our addendum. Now we place these documents in your hands, trusting that you will handle them with solomonic wisdom.

May God bless your deliberations.

May God protect the Republic of Kenya.

May God grant us all the courage to build a nation where faith is free, education is excellent, and leadership is accountable.

Thank you for listening. I now invite my colleagues to join me in responding to any specific concerns of our petition from the Petitions Committee. Accompanying Apvotik leadership representatives.

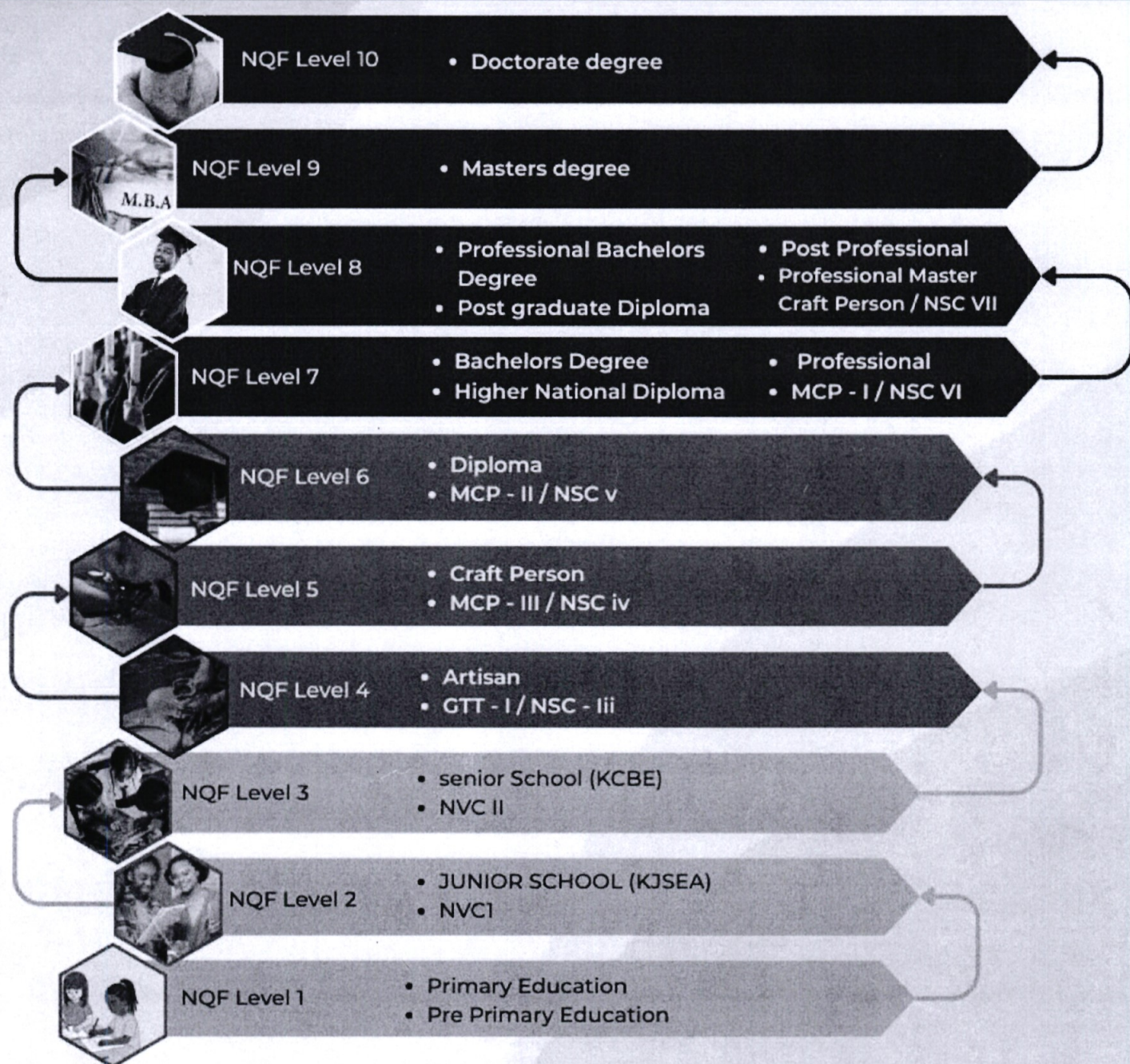
1. **Pst. Dr. Joan Mwende- Education and Training**
2. **Mrs Christine Njiru - Education and Training**
3. **Rev Joshua Omollo- Education and Training**

4. Bsp Joel Chola- Partnerships
5. Dr. Agnes Masika- Finance
6. Bsp. Dr. Ezekiel Muendo -Association Secretary



Rev . Josiah Njiru Wajoshuah .
APVOTIK Chairman

UNDERSTANDING THE KENYA NATIONAL QUALIFICATIONS FRAMEWORK



The Kenya National Qualifications Framework (KNQF) provides a unified system for recognising and comparing qualifications across Kenya's education and training sectors, enhancing quality, transparency, and trust.

By linking Basic Education, TVET, University Education and Industry Training, the KNQF supports mobility and portability of qualifications, allowing learners to move seamlessly between academic, vocational, and workplace pathways through recognition of prior learning and credit transfer.



TVET CURRICULUM DEVELOPMENT, ASSESSMENT AND CERTIFICATION COUNCIL (TVET CDACC)

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Ref. No.: CDACC/CBA 7/64 Vol.2 (264)

Date: 31st October 2025

The Secretary
Association of Pentecostal Vocational Training Institutions of Kenya (APVOTIK)
P.O Box 52267-00100
NAIROBI
Email: apvotikkenya2022@gmail.com

Atten: Dr Ezekiel Muendo

**RE: COLLABORATION ON RECOGNITION OF PRIOR LEARNING (RPL)
ASSESSMENT FOR CHRISTIAN MINISTRY**

Following our consultation on the above subject matter, TVET CDACC will collaborate with you in conducting the Recognition of Prior Learning (RPL) assessment for Christian Ministry.

In view of your extensive network and experience in this field, we request your support in undertaking the following activities:

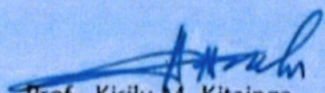
1. **Awareness creation** on the RPL process for prospective candidates.
2. **Candidate counselling and facilitation** throughout the RPL process.
3. **Evaluation of Portfolios of Evidence (PoE)** in close collaboration with registered assessment centres that offer formal training in Christian Ministry.

Subsequently, TVET CDACC will provide the approved assessment tools to the registered assessment centres to conduct the final assessments. The Council will then award certificates to candidates who have been declared competent for a **Full Qualification, Part Qualification, or Skill of Attainment**, as applicable.

Please note that the assessments will be conducted by **RPL Practitioners** who have successfully completed **RPL Practitioners Training Level 2**.

We plan to carry out this assessment during the months of **November and December 2025**, with subsequent assessments scheduled thereafter.

We look forward to your positive response and continued collaboration in promoting skills recognition and quality assurance within the Christian Ministry sector.


Prof. Kisilu M. Kitainge
CEO/COUNCIL SECRETARY

PARLIAMENTARY GROUP PRESENTATION DOCUMENT
THE THEOLOGICAL EDUCATION BILL, 2025
Strategy | Constitutional Depth | Statutory Anchoring | Clause Analysis | Policy
Justification

Honourable Chair and Members,

Thank you for granting us this opportunity. Allow me to begin with clarity, calm, and constitutional precision.

The discussion before us must begin by removing several misconceptions that naturally arise whenever the State legislates in an area that touches on religion.

This is **not a theological debate**.

This is **not an attempt by the State to define doctrine**.

This is **not a contest between Parliament and the Church**.

What we are dealing with today is a **constitutional governance question**. At its core, the question before Parliament is a narrow but important one:

Can the State establish minimum standards for institutions issuing theological qualifications without regulating religion itself?

Our answer must be guided by constitutional principle, not fear. And the constitutional answer is clear:

Yes. Constitutionally. Proportionately. And necessarily.

The Constitution protects **belief, worship, and conscience**. But Parliament remains responsible for **institutional integrity and public protection**.

Where institutions issue qualifications that affect public trust, leadership authority, and societal influence, Parliament cannot abdicate its constitutional responsibility simply because those institutions operate within the religious sphere.

This Bill therefore establishes a careful constitutional boundary:

Faith remains free.

Institutions that issue formal qualifications become accountable.

The Bill seeks to regulate **institutions issuing credentials**.
It does **not regulate belief systems**.

It regulates **training structures**, not **spiritual authority**.

That distinction is not rhetorical. It is the **entire constitutional foundation upon which this Bill stands**.

WHAT THIS BILL IS NOT

Before we proceed into the substance of the Bill, it is important to remove the fears that often arise when legislation touches on religion.

This Bill **does not seek**:

- a. regulate churches
- b. regulate sermons
- c. regulate worship practices
- d. regulate doctrinal teachings
- e. regulate ordination or clergy appointment
- f. establish a State religion

If this Bill attempted any of those things, it would be unconstitutional under **Article 8 of the Constitution**, which clearly provides that there shall be **no State religion in Kenya**.

In fact, if such provisions existed in the Bill, many of us would be the first to oppose it.

However, this Bill does something fundamentally different.

It regulates **institutions that issue professional theological qualifications**. That distinction is crucial.

There is an important difference between:

- a. regulating **belief** and
- b. regulating **institutional credential issuance**

The Constitution protects the former absolutely.

The State has legitimate authority over the latter.

Therefore, throughout this debate, Members must remain anchored to this central principle: **Institutional accreditation is not doctrinal control**.

CONSTITUTIONAL FOUNDATION

The constitutional validity of this Bill rests upon the **harmonious interpretation of several constitutional provisions**.

The Constitution must always be read as a coherent whole rather than isolated provisions competing against each other. Several articles are particularly relevant.

a. Article 8 – Secular Character of the State

Article 8 establishes that Kenya shall not have a State religion. This provision protects religious pluralism and ensures that the State does not favour one faith tradition over another.

However, Article 8 does **not prohibit the State from regulating institutions operating within religious sectors**, provided such regulation does not interfere with doctrine or belief.

The courts have consistently recognised that **secular governance does not require regulatory abstinence in areas touching religion**, provided the State remains neutral and non-doctrinal.

The Bill fully respects this principle.

It regulates **institutional standards**, not **religious teachings**.

b. Article 32 – Freedom of Religion and Belief

Article 32 protects:

- a. freedom of conscience
- b. freedom of belief
- c. freedom of religion
- d. freedom of worship; and
- e. freedom to manifest religion in practice and teaching

This right is fundamental in a pluralistic democracy. However, freedom of religion does not create an automatic exemption from **institutional regulation where public interests are implicated**.

The courts have consistently drawn a distinction between:

- a. **Core religious practice**, which enjoys the highest protection.
- b. **Institutional activities with public implications**, which may be subject to reasonable regulation.

This Bill operates strictly within the second category. It does not interfere with belief. It regulates **institutions that present themselves as issuing structured qualifications**.

c. Article 94 – Legislative Authority of Parliament

Article 94 vests legislative authority in Parliament to enact laws for the **peace, order, and good governance of the Republic**.

Education governance and qualification integrity fall squarely within this mandate.

Where a regulatory vacuum exists, Parliament has both the authority and the duty to legislate. Failure to regulate can itself produce social harm.

d. Article 10 – National Values and Principles of Governance

Article 10 requires all public institutions to uphold:

- a. Integrity;
- b. Accountability;
- c. Transparency; and
- d. good governance

These values apply across all sectors of national life, including the education sector.

Where institutions issue qualifications that shape leadership, influence communities, and affect social structures, those institutions must operate within a framework of integrity and accountability.

This Bill advances these constitutional values.

THE REGULATORY VACUUM

Kenya possesses a robust legal architecture for regulating education. The country regulates:

- a. Universities
- b. Technical institutions
- c. Professional training bodies; and
- d. National qualifications frameworks

However, theological training institutions occupy a unique position that falls outside the effective reach of these frameworks. Existing statutes governing education include:

- a. **The Universities Act**
- b. **The Technical and Vocational Education and Training Act**
- c. **The Kenya National Qualifications Framework Act**
- d. **The Societies Act among others.**

Each of these statutes regulates a specific aspect of institutional activity. However, none of them adequately addresses **the distinctive structure of theological training institutions**.

As a result, a large number of theological institutions operate **outside any coherent national accreditation framework**.

The consequences of this regulatory vacuum are significant.

- a. First, there is **fragmentation of qualifications**. Graduates from different institutions may possess credentials that are difficult to compare or evaluate.
- b. Second, there is **limited recognition of theological qualifications** within the broader national education system.

- c. Third, there is **no clear mechanism for Recognition of Prior Learning**, meaning individuals with extensive ministerial experience may lack pathways to formal qualification recognition
- d. Fourth, the absence of regulation creates **opportunities for credential fraud**, where institutions issue qualifications without adequate standards, and
- e. Finally, the absence of a regulatory framework produces **public confusion regarding the legitimacy of theological qualifications**.

The absence of regulation should not be mistaken for neutrality. In reality, it represents **structural neglect**.

This Bill seeks to address that gap.

STRUCTURAL INCOMPATIBILITY WITH EXISTING REGULATORS

Institution	Core Mandate	Structural Regulatory Model	Structural Limitation for Theological Education
Commission for University Education (CUE)	The Commission for University Education is established under the Universities Act, 2012 to regulate university education in Kenya. Its mandate includes ensuring quality assurance in degree-granting institutions, approving academic programmes, supervising institutional governance structures, and maintaining academic standards in higher education.	CUE operates within a research-driven university model. Universities are expected to maintain significant academic infrastructure including doctoral-level faculty, research programmes, peer-reviewed scholarship, libraries, laboratories, and structured academic governance systems. Accreditation standards assume institutions whose primary mission is academic research and scholarly knowledge production.	Most theological colleges do not operate as research universities. Their primary objective is ministerial formation, pastoral leadership development, theological interpretation, and spiritual formation. Many instructors are experienced clergy or ministry practitioners rather than research academics with doctoral qualifications. As a result, theological institutions cannot realistically satisfy the research-intensive accreditation model designed for universities. Applying the university regulatory framework would either force theological colleges into an unsuitable academic structure or exclude them entirely from accreditation, thereby leaving them outside formal regulatory oversight.
Technical and Vocational Education and Training Authority (TVETA)	TVETA is established under the Technical and Vocational Education and Training Act to regulate technical training institutions that prepare students for employment in skilled occupations. Its mandate includes licensing technical institutions, supervising training standards, and ensuring alignment	TVETA regulates institutions through a Competency-Based Education and Training (CBET) framework. This model is designed for occupations that require measurable practical competencies such as engineering, mechanics, construction, information technology, hospitality, and other industrial or	Theological education does not fit within a competency-based industrial training model. Training for ministry focuses on spiritual formation, ethical leadership, pastoral care, biblical interpretation, religious scholarship, and community guidance. These areas involve intellectual, spiritual, and moral development rather than measurable industrial skills. The CBET model assumes training outcomes that can be objectively tested in a technical

	between vocational training and labour market needs.	technical trades. Training programmes are structured around clearly defined occupational competencies and standardized technical assessments.	environment, whereas theological formation involves values, reflection, pastoral sensitivity, and religious scholarship, which cannot be adequately captured through industrial competency standards.
Kenya National Qualifications Authority (KNQA)	KNQA is established under the Kenya National Qualifications Framework Act to coordinate and harmonize qualifications across the national education and training system. Its mandate is to ensure comparability, recognition, and standardization of qualifications across different sectors of education.	KNQA operates primarily as a framework coordination body rather than a direct institutional regulator. Its role is to align qualification levels and ensure compatibility across sectors, but it depends on sector-specific regulators such as CUE and TVETA to supervise institutions and enforce accreditation standards.	KNQA cannot regulate theological institutions directly because it does not possess institutional licensing authority. Where institutions fall outside the regulatory jurisdiction of both CUE and TVETA, KNQA lacks an operational mechanism for enforcing qualification standards. As a result, theological institutions often remain disconnected from the national qualifications framework, limiting the recognition and portability of their credentials.
Societies Act (Registrar of Societies)	The Societies Act governs the registration and administration of societies, including religious organizations, community groups, and voluntary associations. Its primary objective is to regulate organizational registration and compliance with statutory reporting requirements.	The regulatory model under the Societies Act focuses exclusively on organizational registration and governance compliance, such as maintaining membership records, submitting annual returns, and ensuring lawful organizational operation. It does not regulate educational programmes	Many theological institutions currently operate under registration as societies or religious organizations. While this allows them to function legally as institutions, the Societies Act does not provide any mechanism for academic accreditation, curriculum oversight, quality assurance, or credential verification. Consequently, institutions may issue educational qualifications without any structured academic standards or national oversight.

		or professional qualifications.	
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Structural Conclusion

The analysis above demonstrates that Kenya's current regulatory architecture for education is structured around three primary categories:

- a. **University academic education**, regulated by the Commission for University Education.
- b. **Technical and vocational training**, regulated by the Technical and Vocational Education and Training Authority.
- c. **Qualification alignment across sectors**, coordinated by the Kenya National Qualifications Authority.

However, **theological education does not fit comfortably within any of these categories.**

Theological institutions are:

- a. not universities in the research-driven academic sense;
- b. not technical training institutions preparing students for industrial trades; and
- c. not directly regulated by the national qualifications framework authority.

As a result, theological training institutions exist within a **structural regulatory gap.**

The **Theological Education Bill, 2025** seeks to address this gap by establishing a **specialized regulatory framework specifically designed for theological education**, ensuring institutional accountability while respecting the constitutional protections of religious freedom.

CONSTITUTIONAL COMPLIANCE MATRIX

Article	Constitutional Principle	Potential Constitutional Concern	Constitutional Safeguard in the Bill	Explanation of Compliance
Art 8	Kenya is constitutionally a secular State, meaning the State must remain neutral in matters of religion and cannot establish or favour any religious tradition.	Critics may argue that by regulating theological education the State is indirectly entering the religious sphere and therefore violating the constitutional principle that there shall be no State religion.	The Bill expressly limits the role of the regulatory authority to institutional accreditation and qualification oversight , and does not empower the State to regulate doctrine, belief, worship practices, clerical appointments, or internal church governance.	Article 8 prohibits the establishment of a State religion but does not prohibit the State from regulating institutional activities that intersect with public interests such as education standards and credential integrity. By limiting regulatory authority strictly to institutional accreditation and excluding doctrinal matters, the Bill preserves the neutrality required by Article 8 while allowing Parliament to perform its governance function.
Art 32	Every person has the right to freedom of religion, belief, opinion, and the freedom to manifest religion through practice, teaching, and worship.	Opponents may argue that regulating theological training institutions interferes with how religious communities train clergy and therefore violates the constitutional guarantee of religious freedom.	The Bill includes a non-interference clause explicitly stating that the regulatory authority cannot regulate doctrine, worship, ecclesiastical authority, or religious teachings	Constitutional jurisprudence distinguishes between core religious practice , which must remain free from State interference, and institutional activities with public implications , which may be subject to reasonable regulation. The Bill regulates only institutions that issue formal qualifications and does not intrude into matters of belief or worship. Religious communities remain entirely free to teach and practice their faith traditions.
Art 27	The Constitution guarantees equality	Religious communities may	The Bill requires multi-denominational	Multi-denominational representation prevents regulatory capture by a single

	before the law and prohibits discrimination on grounds including religion.	fear that a regulatory council could be dominated by one denomination or religious tradition, resulting in unequal treatment of other theological institutions.	representation within the regulatory council , ensuring plural participation across faith traditions involved in theological education.	religious tradition and ensures that accreditation standards are applied equally across theological institutions. This institutional design ensures compliance with Article 27 by safeguarding equality and preventing discrimination among religious communities.
Art 47	All administrative decisions by public authorities must be lawful, reasonable, and procedurally fair.	Institutions may fear that accreditation decisions could be arbitrary, biased, or influenced by political or religious considerations.	The Bill establishes clear accreditation procedures, transparent regulatory criteria, and an independent Appeals Tribunal , whose decisions remain subject to judicial review by the High Court.	The existence of an appeals tribunal ensures that institutions regulated under the Act have access to an independent review mechanism if they believe a regulatory decision is unfair. Judicial oversight by the High Court further guarantees that regulatory actions comply with constitutional standards of fairness, thereby fulfilling the requirements of Article 47.
Art 94	Parliament has the authority to enact legislation necessary for the peace, order, and good governance of the Republic.	Critics may argue that Parliament lacks authority to legislate in areas connected to religion and that theological education should remain entirely within the domain of religious institutions.	The Bill regulates institutional training structures and credential issuance , which fall within the broader domain of education governance and public policy oversight.	Parliament has clear constitutional authority to regulate sectors of national life where public interests are implicated. Institutions issuing qualifications influence professional credibility, leadership authority, and public trust. Regulating institutional standards for such training therefore falls squarely within Parliament's legislative mandate under Article 94.

Art 24	Constitutional rights may only be limited where the limitation is reasonable, justifiable, and proportionate in an open and democratic society.	Critics may argue that any State regulation touching theological education constitutes a limitation of freedom of religion under Article 32 , particularly where religious institutions train clergy and religious leaders.	The Bill includes an express statutory safeguard clause stating that the regulatory authority shall not regulate religious doctrine, worship practices, ecclesiastical authority, or internal governance of religious institutions. Regulation is limited strictly to institutional accreditation and issuance of formal theological qualifications .	Under the constitutional proportionality test, a law must pursue a legitimate objective, be rationally connected to that objective, impair rights as minimally as possible, and maintain a fair balance between public interest and individual rights. The Bill satisfies this test because it protects qualification integrity while leaving religious belief and worship entirely untouched.
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The matrix demonstrates that the **Theological Education Bill, 2025** has been carefully structured to maintain the constitutional balance between:

Religious Freedom (Protected Absolutely)

- a. belief
 - b. worship
 - c. doctrine
 - d. ecclesiastical governance
- and

Institutional Accountability (Regulated)

- a. accreditation
- b. licensing

- c. qualification issuance
- d. institutional training standards

The Bill therefore preserves the constitutional principle that:

**Faith must remain free,
but institutions issuing qualifications must remain accountable.**

This Bill introduces a **sector-specific regulator capable of bridging this gap while respecting religious autonomy.**

REGULATORY VACUUM JUSTIFICATION MATRIX

Regulatory Domain	Existing Legal Framework	Institutional Regulator	Structural Limitation	Consequence of the Gap	Justification for the Bill
University Education	Universities Act, 2012	Commission for University Education (CUE)	The CUE framework is designed for research-based universities with large academic faculties, doctoral programmes, research output, and complex academic governance structures. Most theological colleges operate as ministerial training institutions focused on pastoral formation and community leadership rather than research-intensive academic institutions.	Many theological institutions cannot meet the infrastructural and academic requirements of university accreditation, resulting in their exclusion from the university regulatory system.	The Bill creates a specialised accreditation system suited to theological institutions , ensuring quality standards without forcing them into a research university model.
Technical and Vocational Training	Technical and Vocational Education and Training Act	TVET Authority (TVETA)	TVETA regulates institutions through Competency-Based Education and Training (CBET) designed for industrial and technical occupations such as engineering, mechanics, and hospitality. Theological education involves spiritual formation, ethics, religious scholarship, and pastoral leadership , which cannot be reduced to technical	Theological institutions cannot meaningfully align their programmes with technical competency frameworks designed for industrial trades.	The Bill establishes context-appropriate accreditation standards for ministerial and theological training , acknowledging the unique educational structure of theological formation.

			occupational competencies.		
National Qualifications Framework	Kenya National Qualifications Framework Act	Kenya National Qualifications Authority (KNQA)	KNQA functions primarily as a coordination and alignment body , ensuring comparability of qualifications across sectors. However, it does not directly regulate institutions. It relies on sector regulators such as CUE or TVETA to enforce qualification standards.	Where institutions fall outside both CUE and TVETA, KNQA lacks the institutional mechanism to ensure qualification quality or recognition.	The Bill introduces a sector regulator capable of integrating theological qualifications into the national framework , enabling proper alignment and recognition.
Religious Organization Registration	Societies Act	Registrar of Societies	The Societies Act regulates organizational registration and governance , not academic programmes or educational standards. It provides no mechanisms for accreditation, curriculum oversight, or qualification quality assurance.	Many theological institutions operate legally as societies but issue qualifications without structured academic oversight or quality assurance mechanisms.	The Bill introduces institutional accreditation and training standards , ensuring that qualifications issued by theological institutions meet national credibility benchmarks.
Theological Education Sector (Current Status)	No dedicated statute	No specialised regulator	The theological education sector currently exists between existing regulatory frameworks , meaning no authority is specifically responsible for ensuring institutional standards in theological training.	This regulatory vacuum leads to fragmented qualifications, inconsistent training standards, limited recognition of credentials, and increased risk of fraudulent	The Bill fills this regulatory vacuum by establishing a dedicated council responsible for accreditation, quality assurance, and institutional oversight of theological training institutions .

				theological qualifications.	
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Structural Insight from the Matrix

The matrix demonstrates a clear systemic issue. Existing education regulators in Kenya were designed for **three specific educational domains**:

- a. **Academic universities** (CUE)
- b. **Technical vocational training** (TVETA)
- c. **Qualification alignment across sectors** (KNQA)

However, **theological education does not fall squarely within any of these categories**. Instead, theological institutions exist within a **structural regulatory gap** where:

- a. They are **not universities**,
- b. They are **not technical training institutions**, and
- c. They are **not directly regulated under the national qualifications framework**.

The result is a **policy vacuum in the governance of theological education**.

Legislative Necessity

The Theological Education Bill, 2025 therefore performs a **gap-filling function within the national education regulatory system**.

The Bill:

- a. introduces a **sector-specific accreditation authority**
- b. ensures **quality assurance in theological training institutions**
- c. integrates theological qualifications into the **national qualifications framework**
- d. protects **religious autonomy while ensuring institutional accountability**

In constitutional terms, the Bill does not expand State control over religion. Rather, it addresses a **governance vacuum within the education sector** while respecting the constitutional guarantees of **religious freedom and State neutrality**.

SOCIAL AND PHILOSOPHICAL FOUNDATION

Kenya is constitutionally a **secular State**, but it is also a **deeply spiritual society**. Faith institutions play critical roles in:

- a. community leadership
- b. conflict resolution
- c. moral education; and social welfare

Because of this influence, theological training carries significant social implications.

Where influence exists without standards, the potential for abuse increases. This Bill therefore seeks to strengthen **public confidence in theological education without compromising religious liberty**.

INTERNATIONAL LEGITIMACY

Many democratic countries regulate theological education through specialised accreditation systems.

Examples include:

- a. United States – **Association of Theological Schools**
- b. United Kingdom – **Quality Assurance Agency**
- c. South Africa – **Council on Higher Education**

These systems demonstrate that regulating theological accreditation is **compatible with democratic constitutional systems**.

LITIGATION DEFENCE STRATEGY

If challenged in court, the central legal argument will remain simple:

The Bill regulates institutional accreditation, not religious belief.

Courts generally uphold regulation where:

- a. a legitimate public interest exists;
- b. the regulation is proportionate; and
- c. core constitutional rights remain protected

This Bill satisfies all three requirements.

FINAL CLOSE

Honourable Chair and Members,

The Constitution protects belief. But it also entrusts Parliament with governance.

Faith must remain free. But institutions issuing qualifications must be accountable.

This Bill protects both. Faith remains free and Institutions remain accountable.

I thank you.

DDLPS
Please deal.
21/10/25

② Head of
Tadard
Director, AASCP
for the attending
the PPC.
Anaphine
22/10

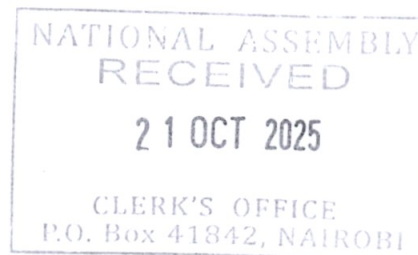
REPUBLIC OF KENYA
NATIONAL ASSEMBLY

MEMORANDUM OF OBJECTION

BY SAUTI YA KANISA KENYA (SKK)
IN RESPONSE TO A PETITION SEEKING STATE REGULATION OF
THEOLOGICAL COLLEGES IN KENYA

Reference No: SKK/NAT/REL/2025/001
Date: October 10, 2025

To:
The Clerk of the National Assembly
Parliament Buildings
Parliament Road
Nairobi, Kenya



③ M. A. A. A.
Please deal
HA
22/10/25

1. Introduction

Sauti Ya Kanisa Kenya (SKK), a duly registered national umbrella movement representing over 15,000 independent churches and ministries, respectfully submits this **Memorandum of Objection** in response to a petition before the National Assembly seeking the establishment of a legal framework to regulate theological colleges and Bible schools in Kenya.

While SKK appreciates the ongoing national conversation on the credibility and quality of theological education, and recognizes the petitioner's concern for accountability and academic integrity within Bible schools and theological colleges, we note with concern that the proposed establishment of a government-led or centralized legal framework to regulate theological training poses serious theological, legal, and constitutional implications that could undermine religious freedom and long-established ecclesiastical autonomy.

2. Context

A petition has been lodged in the National Assembly calling for the establishment of a legal framework to regulate theological colleges in Kenya. The petitioner, Rev. Josiah Njiru, argues that Parliament should set standards for curricula, accreditation, and pastoral training, citing tragedies such as the Shakahola massacre as justification.



While SKK acknowledges the importance of quality control, we hold that self-regulation within umbrella religious bodies remains the most appropriate, constitutional, and theologically sound approach.

3. Theological and Contextual Implications

Theological education forms the spiritual foundation of the Church's mission. Each denomination, movement, and tradition has developed unique theological emphases, liturgical practices, and ministerial standards that express its faith identity.

State-imposed theological curricula or accreditation would erode doctrinal diversity, compromise spiritual integrity, and threaten ecclesiastical independence.

Kenya's religious landscape, rich with Pentecostal, Charismatic, Evangelical, African Indigenous, and Mainline Christian traditions, requires a model that safeguards theological plurality while maintaining integrity and accountability in ministerial formation.

This principle of ecclesiastical autonomy is protected under Article 32 of the Constitution of Kenya, which guarantees freedom of religion, belief, and practice. Theological formation, being a sacred mandate, cannot be subjected to uniform state control without compromising spiritual liberty and doctrinal diversity.

4. Legal and Constitutional Implications

Article 32 of the Constitution of Kenya (2010) guarantees freedom of conscience, religion, belief, and opinion, including the right to teach and manifest one's faith.

State-led regulation of theological institutions would amount to unconstitutional interference in the internal governance of religious communities. The role of Parliament, therefore, should be to protect religious freedom and promote self-regulation, not to centralize doctrinal control.

While the State retains a legitimate interest in ensuring public safety, transparency, and the prevention of fraud, theological training and accreditation must remain under the custodianship of recognized faith bodies.

5. Observed Disparities

SKK acknowledges existing disparities in theological education, including:

- a. Inconsistent curricula and accreditation systems
- b. Emergence of unverified "diploma mills"
- c. Doctrinal confusion and inadequate pastoral formation
- d. Variations in ministerial competence across denominations.

These disparities warrant faith-led reform, not state takeover. The most sustainable solution is the creation of structured, autonomous self-regulatory authorities within each religious umbrella body.



6. Legal Disparities

The petitioner's proposal, if adopted without modification, would create several legal and administrative disparities that threaten both the constitutional rights of religious communities and the established governance structures of umbrella bodies.

6.1 Violation of Religious Freedom

Centralizing control of theological accreditation under one association risks infringing Article 32 of the Constitution, which guarantees freedom of religion, belief, and practice. Such an approach would subject faith-based training to external interference and restrict the diversity of doctrine and worship expression that defines Kenya's spiritual landscape.

6.2 Conflict of Jurisdiction

Theological colleges and ministry training institutions operate under the oversight of distinct umbrella bodies, each guided by its own doctrinal and faith-based standards. A law that empowers a single entity to regulate all would blur jurisdictional boundaries and create interdenominational tension, undermining the delicate balance of autonomy and accountability currently maintained by umbrella bodies.

6.3 Undermining Ecclesiastical Authority

Granting the petitioner authority to regulate theological colleges would usurp the internal powers and autonomy of existing umbrella organizations that are custodians of multiple churches and denominations. Such interference would erode their spiritual and institutional authority, established through decades of ministerial service, theological formation, and denominational governance.

6.4 Danger of Overreach by the Petitioner

Allowing one association to control accreditation or standards across all faiths risks creating a monopolistic religious regulator. Such a move would contradict Kenya's plural religious heritage and endanger interfaith harmony by imposing one group's theological orientation upon others. It would also set a dangerous precedent where one private body could override the spiritual mandates and internal systems of other umbrella religious organizations.

7. Comparative and International Models of Faith-Based Self-Regulation

Globally, self-regulation by umbrella bodies has proven both effective and sustainable when legally recognized but not controlled by the state.

7.1 United States – Association of Theological Schools (ATS)



A self-regulating body that accredits seminaries across denominations, recognized by the U.S. Department of Education. The government acknowledges but does not direct its theological standards.

7.2 Nigeria – Christian Association of Nigeria (CAN) & Denominational Councils

CAN and other denominational bodies, such as the Nigerian Baptist Convention, manage their own ministerial boards, maintaining doctrinal integrity while coordinating with national authorities through memoranda of understanding, not government control.

7.3 Ghana – Ghana Pentecostal and Charismatic Council (GPCC)

Oversees internal regulation of Pentecostal and Charismatic ministries, establishing curriculum benchmarks and ministerial ethics while respecting church independence.

7.4 United Kingdom – Denominational Oversight

Each major denomination regulates its own theological institutions. The state recognizes academic outcomes but does not interfere with ministerial formation processes.

These models affirm that effective accountability in religious education is best achieved through faith-based self-regulation, with the state acting only as a recognizing authority, not a controlling one.

8. Proposed Amendments and Way Forward

8.1 Faith-Based Self-Regulatory Authorities

Each umbrella religious organization, including Pentecostal, Evangelical, Charismatic, African Indigenous, Catholic, Anglican, and Mainline Protestant, should establish its own self-regulatory authority responsible for theological and ministerial training standards within its constituency. This approach mirrors existing practice among mainstream churches, which already operate under structured and recognized theological curricula and ecclesiastical oversight mechanisms.

8.2 Legal Recognition by Parliament

Parliament may enact an enabling clause recognizing such self-regulatory authorities as legally competent accrediting bodies, provided they operate transparently and uphold educational integrity as earlier proposed in the Presidential Task Force on Church Regulation 2024.

8.3 National Forum of Religious Education Regulators

A National Forum of Religious Education Regulators may be formed, comprising representatives from all umbrella bodies, to coordinate best practices and promote interfaith accountability. However, this Forum should not operate as an independent regulatory body, since umbrella bodies are custodians of several churches under their spiritual and administrative care.



8.4 Transitional Period

A 3–5-year transitional window should be provided for existing theological institutions to align with their respective umbrella body's self-regulatory frameworks. This ensures continuity in ongoing programs while promoting orderly reform.

9. Conclusion

Sauti Ya Kanisa Kenya (SKK) reaffirms its commitment to promoting credible, accountable, and theologically sound ministerial education. However, SKK firmly holds that such regulation must originate within the Church, not through state intervention.

We therefore urge the National Assembly to:

- a. **Reject** any proposal granting the State authority over theological curricula and pastoral accreditation; and
- b. **Adopt** the self-regulatory model anchored in each umbrella religious organization as the constitutionally compliant and theologically appropriate solution for Kenya's faith sector.

Submitted by:

SAUTI YA KANISA KENYA (SKK)

A National Umbrella Movement Representing Over 15,000 Churches and Ministries

Executive Director:

Prof. Obed Bett Chelogoi

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Signature: _____



Date: _____

13/10/2025

