

Linguistic Equity for Sustainable Development: A Critical Analysis of Augmentative and Alternative Communication, Language Policy and Sustainable Development Goals in Kenya

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Abstract

This paper employs a qualitative documentary research methodology to conduct a critical analysis of the intersection between language policy, Augmentative and Alternative Communication (AAC), and the implementation of the Sustainable Development Goals (SDGs) in Kenya. It argues that the systematic marginalization of persons with speech, language, and communication needs (SLCN) arises from a profound policy-practice dissonance embedded within Kenya's development architecture. Using a systematic review and critical discourse analysis of national policy documents (2010–2024), international frameworks, and academic and grey literature, the study identifies a recurring pattern of omission, implicit bias, and strategic ambiguity surrounding issues of communication accessibility. The findings indicate that, while Kenya's 2010 Constitution and its international obligations—including the UN Convention on the Rights of Persons with Disabilities and the 2030 Agenda for Sustainable Development—provide a strong normative framework for inclusion, sector-specific policies in education, disability, and health do not explicitly mandate, finance, or operationalize AAC provision. This persistent policy silence has produced an unfunded mandate, resulting in fragmented service delivery, limited professional capacity, and minimal institutional coordination across government sectors. Consequently, Kenya's SDG localization strategies, particularly for Goal 4 (Quality Education), Goal 10 (Reduced Inequalities), and Goal 16 (Peaceful and Inclusive Societies), remain linguistically exclusive and ill-equipped to address the communication rights of persons with SLCN. This exclusion not only reinforces inequality but also undermines the national commitment to “leave no one behind.” The paper concludes that linguistic and communication equity must be recognized as a core pillar of sustainable development. It recommends urgent policy reform, the development of communication-inclusive SDG indicators, dedicated budgetary allocations, and the formulation of a cross-sectoral national AAC strategy to ensure that every Kenyan can participate meaningfully in social, educational, and civic life.

Keywords: Documentary Research, Language Policy, Augmentative and Alternative Communication (AAC), Sustainable Development Goals (SDGs), Kenya

1.0 Introduction and Background

Language constitutes the fundamental conduit for accessing human rights, education, healthcare, economic participation, and civic engagement. It is the medium through which identity is formed, knowledge is transmitted, and citizenship is enacted. For an estimated segment of the population with speech, language, and communication needs (SLCN)—including those with autism, cerebral palsy, intellectual disabilities, and aphasia—this essential

conduit is often obstructed or entirely absent, rendering them among the most marginalized populations in societies striving for sustainable development (Bunning, 2016). The United Nations Sustainable Development Goals (SDGs), underpinned by the central, transformative pledge to “leave no one behind,” present a global framework for inclusive progress (United Nations, 2015). However, for non-verbal and communicatively disabled individuals, this principle remains a distant aspiration in contexts where language policy and practical implementation fail to intersect meaningfully. This gap is acutely evident in multilingual and developing nations like Kenya, where linguistic diversity, socio-economic disparity, and disability create a complex, overlapping web of exclusionary practices that policy often fails to untangle.

The challenge of communication accessibility is frequently addressed through Augmentative and Alternative Communication (AAC), a broad field encompassing all forms of communication that supplement or replace speech or writing. This includes unaided systems like gestures and sign language, and aided systems ranging from low-tech picture boards and communication books to high-tech speech-generating devices and specialized software (Beukelman & Light, 2020). The effective integration of AAC into national systems is not merely a technical or therapeutic issue but a profound matter of human rights, social justice, and equitable development policy.

This study, therefore, employs a comprehensive documentary research methodology to provide a macro-level, critical analysis of the Kenyan policy landscape. It moves beyond individual case studies to interrogate the laws, policies, and strategic documents that constitute the official framework for disability inclusion and SDG implementation. The central argument is that the exclusion of persons with communication difficulties is not merely an implementation failure but is, in fact, facilitated by systemic omissions and ambiguities within Kenya's key policy documents. By systematically analyzing the discourse and content of these documents, this research aims to uncover the structural barriers that perpetuate communicative marginalization and to provide an evidence base for transformative policy reform.

The purpose of this study is to conduct a critical policy analysis through documentary research to evaluate the adequacy of Kenya's legal and policy frameworks in securing communication inclusion for persons with SLCN within the context of SDG implementation.

It is guided by three research questions:

1. How do Kenya's national policy frameworks explicitly address and provide for the communication needs of persons requiring AAC?

2. What gaps and contradictions exist between Kenya's international commitments and its domestic policy documents regarding communication inclusion?
3. What does existing literature document as the primary systemic barriers to implementing communication-inclusive practices in Kenya?

2.0 Statement of the Problem

The pervasive and systemic exclusion of persons with speech, language, and communication needs (SLCN) from Kenya's development agenda represents a critical and unaddressed flaw in the nation's pursuit of the Sustainable Development Goals (SDGs). While Kenya has made laudable strides in establishing a progressive constitutional framework and policies promoting inclusive education and disability rights, a chasm exists between these high-level commitments and the tangible realization of communication accessibility for all. The core problem this research addresses is the systemic omission and strategic ambiguity regarding Augmentative and Alternative Communication (AAC) within Kenya's national policy architecture, which actively undermines the country's ability to fulfill its "leave no one behind" pledge.

The manifestation of this problem is twofold. First, at the conceptual level, there is a critical failure to recognize communication as a foundational human capability without which other rights and capabilities—to learn, to access healthcare, to participate in justice, and to engage in community life—cannot be actualized. National policies, including the Special Needs Education Policy Framework (2018) and the Basic Education Act (2013), overwhelmingly conceptualize accessibility in physical and sensory terms (ramps, Braille, sign language), thereby rendering invisible the needs of non-verbal individuals or those with complex communication disabilities. This constitutes a form of institutional ableism where the system is designed for a narrow spectrum of abilities, automatically excluding those who fall outside it.

Second, at the operational level, this conceptual erasure translates into a cascade of implementation failures. The absence of explicit mandates for AAC in policy documents results in a lack of dedicated budgetary allocations, a critical shortage of trained professionals (speech-language therapists, AAC-literate teachers), and a complete absence of accountability mechanisms to ensure compliance. Consequently, the provision of AAC support is relegated to ad-hoc, donor-dependent projects, creating a precarious and unsustainable patchwork of interventions that fail to provide universal, equitable access. This operational void ensures that individuals with SLCN remain perpetually on the margins, unable to benefit from Kenya's developmental gains.

This problem is exacerbated by a significant gap in scholarly and policy analysis. Existing research has effectively documented the symptoms of this crisis at the micro-level—highlighting untrained teachers, lacking resources, and poor outcomes in specific schools or regions (Obat, 2021; Njuguna, 2022). However, there is a scarcity of macro-level, critical research that diagnoses the root cause of these symptoms within the nation's policy documents themselves. The "why" behind the implementation failure remains largely unexplored. Without interrogating the foundational texts that guide national development, efforts to promote inclusion will continue to treat the symptoms while the disease—the policy silence—remains unaddressed.

Therefore, this study seeks to fill this critical gap. It posits that the marginalization of persons with SLCN is not an accidental byproduct of development but a predictable outcome of a policy design that silently sanctions their exclusion. By critically analyzing the content and discourse of Kenya's key policy documents, this research aims to expose this structural problem and provide the evidence necessary to advocate for a more linguistically equitable and truly inclusive development pathway for Kenya.

3.0 Study Context: Global, Regional, and National Landscapes

To fully understand Kenya's position, it is essential to situate its policies within the broader global, sub-Saharan African, and national contexts. Each level presents a distinct set of norms, challenges, and opportunities that shape the domestic policy environment.

3.1 The Global Context

Globally, the rights of persons with disabilities have been significantly advanced by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which Kenya ratified in 2008. The UNCRPD represents a paradigm shift from a medical model of disability to a social and human rights model. Article 9 on accessibility, Article 21 on freedom of expression and opinion (which explicitly mandates states to facilitate AAC), and Article 24 on inclusive education form a powerful trifecta obligating states to ensure communication access (United Nations, 2006). Furthermore, the 2030 Agenda for Sustainable Development and its core principle of "leaving no one behind" provide a complementary framework, implicitly requiring the inclusion of persons with disabilities in all goals, particularly SDG 4 (Quality Education) (United Nations, 2015). In high-income countries, this global consensus has led to robust national AAC policies, state-funded assistive technology programs, and the integration of AAC into mainstream education and healthcare systems, setting a high standard for rights-based implementation (Light & McNaughton, 2015; von Tetzchner, 2018).

3.2 The Sub-Saharan African Context

The situation in sub-Saharan Africa is markedly different, characterized by a pervasive resource-practice gap. While many countries, including Kenya, have ratified the UNCRPD, domestic implementation is hindered by competing developmental priorities, widespread poverty, and legacies of underinvestment in health and education systems (Mpofu & Oakland, 2010). A critical regional challenge is the complex linguistic ecology. Colonial legacies often privilege European languages (e.g., English, French, Portuguese) in formal education and governance, while a vast diversity of indigenous languages dominate home and community life (Bamgbose, 2011). This multilingualism creates an additional layer of complexity for AAC, as tools and resources are rarely available in local indigenous languages, forcing users to navigate a world of symbols and devices based on a foreign linguistic structure (Wickenden & Kembhavi-Tam, 2014). Despite these challenges, progressive examples exist. South Africa's White Paper 6 on Inclusive Education mandates communication support in schools, and Uganda's Persons with Disabilities Act (2020) incorporates specific provisions for AAC, demonstrating that political will can lead to advanced legislation even in resource-constrained settings (Mugerwa, 2021; AAP, 2021).

3.3 The Kenyan Context

Kenya exists at the intersection of these global commitments and regional challenges. Its 2010 Constitution is hailed as one of the most progressive in the world, with Article 54 enshrining the rights of persons with disabilities and Article 7(3) recognizing Kenyan Sign Language, Braille, and "other communication formats." This provides a stronger foundational right than many of its regional peers. Kenya has also been proactive in localizing the SDGs through its Vision 2030 development blueprint and its Competency-Based Curriculum (CBC), which promotes inclusivity and learner-centered education. However, Kenya faces acute systemic barriers: a critical shortage of speech-language therapists (numbering in the dozens for a population of over 50 million), limited manufacturing capacity for assistive technology, and significant disparities in resource distribution between urban and rural areas (Njuguna, 2022; Obat, 2021). Furthermore, deep-rooted sociocultural beliefs and stigma surrounding disability often lead to the isolation of individuals with SLCN, creating an environment where their communication rights are not demanded nor prioritized by communities (Mbugua, 2019). It is within this context of progressive ambition constrained by practical and attitudinal barriers that Kenya's policy documents must be analyzed.

4.0 Theoretical Framework

Theoretical Underpinnings

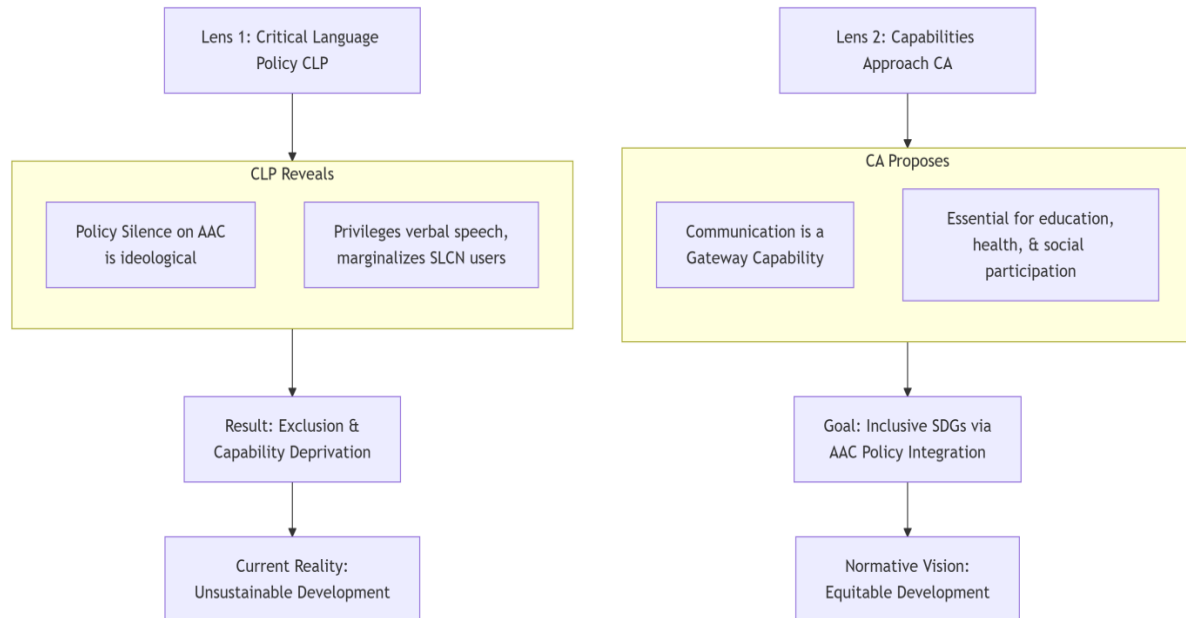
This analysis is grounded in two complementary theoretical frameworks that provide the lenses through which the documentary evidence is interpreted. Together, they allow for both a critique of existing power structures and a normative vision for an inclusive society.

The first is Critical Language Policy (CLP). Emerging from critical sociolinguistics, CLP theory posits that language policies are never neutral technical instruments but are inherently ideological, reflecting and reproducing existing power dynamics and social hierarchies (Tollefson, 1991; Ricento, 2006). Policies that appear benign, such as the designation of official languages or the choice of medium of instruction, often serve to maintain the advantage of dominant social groups while marginalizing minorities, including linguistic minorities and people with communication disabilities. This lens is crucial for interrogating why certain modes of communication (e.g., verbal speech in English or Kiswahili) are privileged and normalized within Kenyan policy, while other modes (e.g., AAC, non-verbal communication) are systematically rendered invisible or peripheral. This process of omission is not accidental; it is a form of symbolic violence that reinforces the hegemony of verbal speech and reinforces the marginalization of persons with SLCN by failing to recognize their linguistic human rights as valid within the nation's development agenda. CLP helps us see policy silence not as a gap, but as a deliberate, if unconscious, strategy of exclusion.

The second framework is the Capabilities Approach, developed by economist Amartya Sen (1999) and philosopher Martha Nussbaum (2011). This human development approach evaluates well-being and development not merely by economic growth (GDP) or resource distribution (income), but by the substantive freedoms and opportunities ("capabilities") that individuals have to lead lives they value. A capability is the effective ability to achieve various valuable functionings, such as being educated, being healthy, participating in community life, and having self-respect. The approach shifts the focus from a person's impairment to the societal and policy barriers that limit their capabilities. From this perspective, the inability to communicate effectively is not an innate personal deficit but a capability deprivation caused by a failure of social and political organization. AAC provision is, therefore, not a charitable act but a fundamental capability that serves as a gateway to other central capabilities. Without the capability to communicate, the capabilities to be educated, to form social relationships, to participate politically, and to seek justice are severely diminished or completely nullified. The Capabilities Approach provides a powerful normative basis for arguing that communication

access is a fundamental right that enables all others, and its absence in policy constitutes a direct failure of Kenya's development model to create real freedoms for all its citizens.

Diagrammatic Presentation of Theoretical Framework



Explanation:

- **The Two Lenses:** The analysis uses two theories.
- **The Critique (CLP):** Shows that current policy silence is not accidental, but a form of exclusion that creates barriers for people with communication disabilities.
- **The Vision (CA):** Argues that communication is a fundamental right that unlocks all other rights and capabilities needed for a good life.
- **The Outcomes:** The current reality leads to exclusion, undermining the Sustainable Development Goals (SDGs). The goal is to integrate AAC into policy to achieve truly equitable development.

5.0 Methodology: A Documentary Research Design

This study utilized a rigorous qualitative documentary research design. This methodology involves the systematic identification, critical evaluation, and synthesis of existing

documentary evidence to generate new knowledge and answer specific research questions (Bowen, 2009). It is exceptionally well-suited for policy-oriented studies as it allows for a comprehensive analysis of the stated intentions, strategic omissions, discursive patterns, and inherent contradictions within authoritative texts that constitute a nation's official stance on an issue (Bailey, 2017). Unlike methodologies that generate new primary data through interviews or surveys, documentary research provides a bird's-eye view of the policy landscape, revealing the overarching structures that shape everyday realities. It allows the researcher to ask not only "what is happening?" but also "what is the system that allows this to happen?" by examining the blueprint of that system—its policies.

Data Sources and Selection Criteria

A purposive sampling strategy was employed to select a corpus of documents most relevant to the research objectives. The goal was to build a comprehensive dataset that represented the full spectrum of Kenya's official commitment to inclusion, from its highest laws to its most specific implementation plans. The data was drawn from four distinct streams:

1. **Primary National Policy and Legal Documents:** This formed the core of the analysis and included Kenya's supreme law, key Acts of Parliament, and pivotal policy frameworks:
 - *The Constitution of Kenya (2010)*: Analyzed for its foundational rights and principles.
 - *The Basic Education Act (2013)*: Scrutinized for its operationalization of inclusive education.
 - *The Persons with Disabilities Act (2003) & The Persons with Disabilities Bill (2022)*: Compared to assess evolution in recognizing communication rights.
 - *The Sessional Paper No. 1 of 2019 on Reforming Education and Training for Sustainable Development*: Reviewed for its overarching philosophy on inclusion.
 - *The National Special Needs Education Policy Framework (2018)*: Subjected to detailed analysis as the primary policy guiding SNE.
 - *The Competency-Based Curriculum (CBC) Framework*: Examined for its integration of inclusive communication principles.
 - **Kenya Vision 2030 Third Medium Term Plan (2018-2022)**: Analyzed for its alignment of national development with inclusive goals.
2. **International Frameworks and Commitments:** Key international instruments ratified by Kenya were analyzed to establish the global standards against which national policy is measured and to identify commitments that Kenya has pledged to uphold.

- *The UN Convention on the Rights of Persons with Disabilities (UNCRPD)*, particularly Article 9 (Accessibility), Article 21 (Freedom of expression and opinion), and Article 24 (Education).
 - *The 2030 Agenda for Sustainable Development (SDGs)*, with a focus on Goals 4, 10, and 16.
 - *Kenya's Sustainable Development Goals Voluntary National Reviews (VNRs) (2017, 2021)*: Critically analyzed for their reporting on disability and inclusion.
3. **Academic Literature:** A systematic review of peer-reviewed journal articles, books, and conference papers focusing on language policy, inclusive education, AAC, and disability studies in Kenya was conducted. Databases such as JSTOR, Google Scholar, African Journals Online, and ProQuest were utilized using search terms like "AAC Kenya," "inclusive education Kenya," "communication disability policy," and "SDGs Kenya disability."
 4. **Grey Literature:** Reports from government agencies (e.g., Kenya National Bureau of Statistics), international NGOs (e.g., UNICEF, Humanity & Inclusion), and Kenyan institutions (e.g., Kenya Institute of Special Education - KISE, National Council for Persons with Disabilities - NCPWD) were included to provide context on the documented realities of implementation, needs assessments, and progress reports that are not found in academic journals.

The **inclusion criteria** mandated that documents were published between 2010 (post-promulgation of the new constitution) and 2024, were directly relevant to the Kenyan context, and addressed core themes of language, disability, education, AAC, or SDG implementation.

Data Analysis Procedure

The data analysis was a two-stage iterative process, moving from a broad overview to a deep, critical reading:

1. **Thematic Content Analysis:** Using NVivo software, the policy documents and literature were systematically coded. This involved both deductive coding for pre-determined themes derived from the research questions and theoretical framework (e.g., "AAC mention," "funding mechanism," "teacher training," "SDG 4," "implementation strategy," "rights-based language," "capability deprivation") and inductive coding for emergent themes that became apparent during close reading (e.g., "strategic ambiguity," "omission," "privileging of verbal speech," "siloed approach"). This process allowed for the organization of large amounts of qualitative data into coherent themes and for the quantification of certain phenomena (e.g., frequency of key terms like "AAC" versus "wheelchair").

2. **Critical Discourse Analysis (CDA):** Drawing on the work of Fairclough (1995) and supported by the CLP lens, the language within the policies was subjected to a deeper critical analysis. This involved examining:
- **Framing:** How are problems framed? Is communication access constructed as a rights issue or a charitable, medicalized welfare issue?
 - **Agency:** Who is assigned agency and responsibility? Is the onus on the state to provide systems or on the individual/family to adapt?
 - **Solutions:** What solutions are proposed? Are they systemic (training, funding) or temporary (project-based initiatives)?
 - **Omission and Assumption:** What is omitted or taken for granted? The most powerful finding often lies in what is not said—the assumption that all citizens are verbal communicators is a profound silence that speaks volumes.

This CDA lens helped uncover the underlying power structures, ideologies, and worldviews that sustain the status quo and make the exclusion of certain groups seem natural or inevitable.

Ethical Considerations and Limitations

As this study exclusively utilized publicly available documents, ethical concerns related to human participants were minimized. The research adhered to principles of scholarly integrity by ensuring accurate representation of sources, avoiding misquotation or decontextualization, providing rigorous and proper attribution to avoid plagiarism, and maintaining a stance of critical respect in the analysis of government policies—critiquing the text without impugning the motives of individuals.

The primary limitations of this methodology are acknowledged:

- **Restricted Scope:** The analysis is restricted to *documented* policy and cannot capture the nuanced, lived experience of implementation on the ground. It can show that a policy is absent but cannot richly describe the daily impact of that absence on a child in a classroom.
- **Dependency on Availability:** The findings are dependent on the availability, transparency, and comprehensiveness of published documents; internal government reports, memos, or circulars that might provide further context or indicate internal advocacy were not accessible.
- **Diagnostic vs. Experiential:** While the methodology can effectively identify the *what* and *why* of policy gaps (the diagnosis), it cannot empirically document the *how* of

their everyday impact on individuals (the lived experience), which would require complementary ethnographic or interview-based research.

6.0 Findings and Analysis

The Constitutional-Policy Dissonance

The analysis reveals a profound and telling dissonance between Kenya's progressive, world-class constitutional commitments and the operational vagueness of its subsequent sectoral policies. The Constitution of Kenya (2010) provides a robust, rights-based foundation for inclusion that is consistent with the Capabilities Approach. Article 54, dedicated to the rights of persons with disabilities, explicitly mandates that they be treated with dignity and have access to educational institutions, public transport, and information. Furthermore, Article 7(3) promotes the development and use of indigenous languages, Kenyan sign language, Braille, and "other communication formats and technologies accessible to persons with disabilities." This clause is particularly significant as it implicitly endorses linguistic diversity beyond verbal speech and opens the door for the recognition of AAC.

However, a critical discourse analysis of the key implementation documents that flow from the Constitution reveals a pattern of strategic ambiguity and erasure. The Basic Education Act (2013), which should operationalize the constitutional right to education for all, mentions "inclusion" and "learners with disabilities" but fails to define these terms in any way that includes communication needs. The term "Augmentative and Alternative Communication" is entirely absent. The Act creates a framework for access but defines access primarily in physical terms.

This dissonance is most starkly exemplified in the National Special Needs Education Policy Framework (2018), a pivotal document that should provide the master plan for inclusive education. While it nominally identifies "communication barriers" as a concern, its operational strategies and entire discursive focus are overwhelmingly geared towards physical access (ramps, toilets) and sensory impairments (Braille, sign language). The needs of non-verbal learners with intellectual, developmental, or multiple disabilities are rendered invisible through a consistent pattern of omission. The policy frequently employs generalized, non-committal language about providing "appropriate support" without specifying what that support is, who should provide it, how it will be funded, or how its effectiveness will be measured. This creates

what policy scholars call an "unfunded mandate"—a lofty goal without any attached resources or accountability mechanisms, making it impossible to implement or enforce. The CLP lens interprets this not as an oversight but as an ideological choice that privileges certain types of disabilities over others, reinforcing the hegemony of verbal communication.

The Omission of Communication in SDG Localization

Kenya's commitment to the SDGs is outlined in its Voluntary National Reviews (VNRs) (2017, 2021) and aligned with its national development blueprint, Kenya Vision 2030. A thematic content analysis of these documents for key terms related to communication access yields stark and disappointing results. While "disability" is mentioned, its framing is generic, often limited to physical accessibility and statistical representation. There is no tangible linkage made between achieving SDG 4 (quality inclusive education) and the necessity of providing AAC tools and trained personnel. The goal to reduce inequalities (SDG 10) is discussed in terms of gender, region, and income, but lacks any specific measures to break down the profound communication barriers that create some of the most extreme inequalities. The pursuit of peaceful and inclusive societies with access to justice for all (SDG 16) is discussed without any reference to ensuring that non-verbal citizens can report crimes, give testimony, or participate in legal processes.

This represents a critical failure in policy alignment and a contravention of the principle of policy coherence for sustainable development. Kenya reports on disability-inclusive development in its VNRs but operates with a definition of disability in its domestic sectoral strategies that is silent on communication access. This directly contravenes both the spirit and the letter of Article 21 of the UNCRPD ("Freedom of expression and opinion, and access to information"), which explicitly mandates states to "accept and facilitate the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions." The SDG localization process, therefore, replicates and reinforces the exclusion present in domestic policy, thereby systematically violating the "leave no one behind" principle for a specific population. Their absence from the metrics and strategies means they are, by design, left behind.

Synthesized Systemic Barriers from the Literature

The systematic review of academic and grey literature consistently identifies a set of interconnected barriers that stem directly from the policy gaps identified above. These are not isolated challenges but symptoms of a systemic failure originating in the policy architecture.

- **Policy-Practice Decoupling:** Scholars like Obat (2021) and Mose (2021) consistently note that the lack of explicit policy leads to ad-hoc, donor-dependent implementation of AAC in schools. Support, if it exists, is fragmented and reliant on the initiative of individual headteachers or the temporary presence of NGOs, not on a systemic, state-driven mandate. This creates a precarious and unsustainable patchwork of interventions that collapses when project funding ends or a committed teacher transfer.
- **Funding Absence:** The policy documents analyzed universally lack specific line items for AAC devices, software localization, or the training of speech-language therapists. As Njuguna (2022) documents, this results in a complete lack of sustainable financing. The cost of AAC devices, often imported, is prohibitively high, placing the financial burden on already-strained families and schools. This effectively denies access to all but the most affluent, exacerbating inequality within the disability community itself.
- **Professional Capacity Gap:** The absence of AAC from the national teacher training curricula (as reflected in the policy documents for the Teachers Service Commission and curriculum developers) results in a workforce profoundly unprepared to identify or support learners with SLCN (Obat, 2021). This finding is corroborated by reports from KISE, which highlight the extreme shortage of speech-language therapists in the country—a number estimated to be in the dozens for a population of over 50 million. A policy that does not mandate training ensures that the capacity gap will persist.
- **Fragmentation:** The documentary analysis clearly shows that education, health, and social development policies operate in silos. There is no cross-sectoral strategy articulated in any document for providing coherent, lifelong AAC support. A child might access early intervention through a health clinic (if available), but that support is not transitioned to their school. An adult who acquires a communication disability through injury has no clear pathway to access AAC through the social protection or health system. This fragmentation ensures that individuals fall through the cracks at every transition point in their lives, a direct result of the lack of an overarching, coordinating policy directive.

7.0 Discussion

The findings from this documentary analysis demonstrate convincingly that the exclusion of persons with communication difficulties from Kenya's development agenda is not merely a downstream implementation failure but is, critically, encoded within the policy architecture itself. The use of Critical Language Policy as a lens reveals how policy documents, through strategic omission and ambiguous language, systematically privilege verbal communicators and sideline those requiring AAC. This constitutes a form of institutional ableism, where the system is designed by and for those who communicate in a specific, dominant mode, making the exclusion of others a predictable outcome of the design rather than a flaw in its execution. The consistent erasure of AAC from key texts is a powerful discursive act that renders an entire population invisible to the policymakers and planners who rely on these documents.

The Capabilities Approach frames this not as a simple oversight, but as a catastrophic failure to nurture a fundamental human capability—the capability to communicate. Sen (1999) argues that development is about expanding capabilities. By this measure, the current policy landscape is actively under-developing a segment of the population. Without this core capability, other capabilities central to the SDGs, such as the capability to be educated (SDG 4), to participate in community life and decision-making (SDG 16), to form social relationships, and to seek justice, are severely diminished or completely nullified. Kenya's SDG localization efforts, as evidenced in its VNRs and sector plans, are thus built on an incomplete and flawed foundation; they measure inclusion by metrics of physical access and gender representation but remain blind to communicative access. They track the number of ramps built but not the number of children who remain locked inside their own minds for want of a communication board. This is a fundamental mis-measurement of progress.

The dissonance between the inclusive, capabilities-oriented spirit of the Constitution and the vague, non-committal language of sectoral policies suggests that well-intentioned commitments are neutered by a lack of political will to enact specific, binding, and funded mandates. The silence on AAC in the SNE Policy Framework and the Basic Education Act means that inclusive education remains a theoretical concept rather than a practical reality for non-verbal learners. Their exclusion is, therefore, a predictable outcome of the policy design, not an unforeseen consequence. The CLP lens would argue that this silence reflects the lower political priority given to this marginalized group compared to others, and the Capabilities

Approach would judge the entire development project as failing this group by this specific measure.

8.0 Conclusion and Recommendations

Conclusion

This study concludes that Kenya's language and development policy landscape is characterized by a significant and disabling communication inclusion gap. Despite a progressive constitution and ratifications of powerful international instruments like the UNCPRD, national implementation policies fail to explicitly address, mandate, or fund the communication needs of persons requiring AAC. This gap actively undermines the country's ability to achieve core SDGs and constitutes a continuous violation of the communicative rights of a significant portion of its population. The marginalization of persons with SLCN is, therefore, not an accidental byproduct of development but a consequence of deliberate policy silence and strategic ambiguity. The analysis proves that the problem begins at the source, in the documents that are supposed to guide the nation towards inclusive development. Until these documents are radically revised, the lived experience of exclusion documented by other researchers will persist.

Recommendations

Based on the evidence derived from the documentary analysis, the following recommendations are proposed to bridge the identified policy gaps and align Kenya's development pathway with its constitutional and international obligations:

1. **Immediate Policy Revision and Strengthening:** The Ministry of Education, in mandatory consultation with the NCPWD, organizations of persons with disabilities (OPDs), and AAC experts, should issue a binding supplementary directive to the National Special Needs Education Policy Framework. This directive must explicitly define "inclusive communication," mandate the provision of AAC as a fundamental right, and outline clear, measurable minimum standards for its implementation in all public schools. The forthcoming Persons with Disabilities Bill (2022) must be urgently passed and must incorporate strong, unambiguous clauses on the right to AAC across all life domains—education, health, justice, and civic participation.
2. **Mainstream AAC in SDG Monitoring and Evaluation:** Kenya's SDG coordination unit (Kenya National Bureau of Statistics), in partnership with the NCPWD, should develop and

integrate new, specific indicators for SDGs 4, 10, and 16. These should track metrics such as: the percentage of schools with a basic AAC toolkit; the pupil-to-trained-teacher ratio for communication support; the number of public health facilities with AAC resources; and the participation rates of persons with communication disabilities in community decision-making. This would make the invisible visible in national reporting and create accountability.

3. **Dedicated Fiscal Commitment:** The National Treasury and county governments must create dedicated, protected budget lines within the education, health, and social development votes for: (a) procuring, maintaining, and insuring AAC devices for public institutions; (b) funding the pre-service and in-service training of teachers, health workers, and justice officials on AAC; and (c) supporting the development and production of local, low-tech AAC materials in Kenyan languages.
4. **Develop a National Cross-Sectoral AAC Strategy:** The government, through the State Department for Social Protection, should formulate and launch a National AAC Strategy. This strategy must be developed through an inter-ministerial taskforce (Education, Health, ICT, Labour, Justice) and outline a coherent, lifelong pathway for AAC provision, from early childhood intervention in health centers to education, vocational training, and adult life, ensuring seamless transitions between sectors.
5. **Invest in Localization and Innovation:** The government, through the Ministry of ICT, Innovation and Youth Affairs, should establish innovation grants and partnerships with tech hubs, universities, and disability organizations. The goal should be to fund the research and development of open-source, low-cost AAC technologies and applications tailored to Kenyan languages, cultures, and socio-economic contexts, moving away from reliance on expensive imported solutions.

This documentary analysis provides the necessary evidence base to argue that linguistic equity for all Kenyans, including those who do not use verbal speech, is not a peripheral welfare issue but a central and non-negotiable tenet of sustainable development. Addressing this gap is a legal obligation under the Constitution and UNCRPD, a moral imperative for a just society, and a practical necessity for achieving the SDGs. For Kenya to truly commit to leaving no one behind, it must first ensure everyone has a voice.

References

- African Union. (2021). *African Disability Protocol*. Addis Ababa: AU Press.
- Bailey, C. A. (2017). *A guide to qualitative field research* (3rd ed.). Sage Publications.

- Beukelman, D. R., & Light, J. C. (2020). *Augmentative and alternative communication: Supporting children and adults with complex communication needs* (5th ed.). Brookes Publishing.
- Bowen, G. A. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal*, 9(2), 27–40. <https://doi.org/10.3316/QRJ0902027>
- Bunning, K. (2016). Speech, language and communication needs and mental health: The challenge for mental health services. *Advances in Mental Health and Intellectual Disabilities*, 10(3), 155–164. <https://doi.org/10.1108/AMHID-02-2016-0003>
- Fairclough, N. (1995). *Critical discourse analysis: The critical study of language*. Longman.
- Government of Kenya. (2010). *The Constitution of Kenya*. National Council for Law Reporting.
- Government of Kenya. (2013). *The Basic Education Act*. Government Printer.
- Government of Kenya. (2018). *The National Special Needs Education Policy Framework*. Ministry of Education.
- Government of Kenya. (2021). *Kenya Voluntary National Review 2021 on the Implementation of the Sustainable Development Goals*. Ministry of Devolution and ASALs.
- Light, J., & McNaughton, D. (2015). Designing AAC research and intervention to improve outcomes for individuals with complex communication needs. *Augmentative and Alternative Communication*, 31(2), 85–96. <https://doi.org/10.3109/07434618.2015.1036458>
- Mose, M. (2021). Language policy and disability rights in Kenya: An analysis of educational inclusivity. *East African Journal of Education and Social Sciences*, 2(3), 54–63.
- Njuguna, A. (2022). Barriers to inclusive education for children with speech and language difficulties in Kenya. *Journal of Special Needs Education*, 8(1), 33–45.
- Nussbaum, M. C. (2011). *Creating capabilities: The human development approach*. Harvard University Press.
- Obat, J. (2021). Teacher preparedness in supporting augmentative communication strategies in inclusive schools. *Kenya Journal of Educational Studies*, 3(2), 23–37.
- Ricento, T. (2006). *An introduction to language policy: Theory and method*. Blackwell Publishing.
- Royal College of Speech and Language Therapists. (2023). *Inclusive communication: Principles and practices*. <https://www.rcslt.org>
- Sen, A. (1999). *Development as freedom*. Oxford University Press.
- Tollefson, J. W. (1991). *Planning language, planning inequality: Language policy in the community*. Longman.
- United Nations. (2006). *Convention on the Rights of Persons with Disabilities (CRPD)*. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>
- United Nations. (2015). *Transforming our world: The 2030 Agenda for Sustainable Development*. <https://sdgs.un.org/2030agenda>
- von Tetzchner, S. (2018). *Introduction to augmentative and alternative communication*. Whurr Publishers.