This study investigated the learning and target needs of Business English learners at diploma level in Kenya under two syllabi: the KNEC Business Communications syllabus and the Pitman syllabus for Business Communications. The main objective was to examine the responsiveness of the syllabi to the needs of Business English learners. The study adopted the skill theory by Levlet (1978) and Johnson (1996) which characterizes language as a skill and language learning as skill learning; and the theory of communicative competence (Hymes, 1972) whose main tenet is that language should be assessed in terms of the level of communicative competence acquired rather than the amount of linguistic knowledge gained. Hutchinson and Waters (1987)'s theoretical framework for conducting a needs analysis and Munby (1978)'s communication needs processor framework guided the needs analysis and data collection as well as research instrument construction. The study used both qualitative and quantitative approaches in its research design. Interviews were conducted with ten Business English tutors, representing educators; and ten workers, representing the employers; while self-designed questionnaires were administered to 121 students, representing the learners; and 24 secretaries who are former students of the two syllabi and now in the target situation. The 121 students came from four colleges which were purposively sampled because they offered both the Pitman and the KNEC syllabi. The data reveals that course developers do not adequately involve all stakeholders in the needs analysis process. As a result, the courses are not fully responsive to the needs of Business English learners. The courses, also, do not satisfy the learners' occupational needs although the findings indicate that stakeholders consider occupational needs to be very important. Instead, teaching focuses more on learning needs at the expense of occupational needs. The stakeholders, thus, express dissatisfaction with the courses. Speaking, writing, grammar and business correspondence are the most often used linguistic skills in the learning and the target situation indicating that these skills are the most needed and, consequently, should be emphasized in teaching. Practically, the study sought to influence the future design of Business English courses based on the information gathered from the needs analysis. The thesis is divided into five chapters; one gives the preliminary information of the study. Chapter two focuses on a brief overview of the historical development of ESP and Business English as well as the theoretical orientation of the study. Chapter three outlines the research methodology while chapter four presents and analyses data. Chapter five outlines the summary of findings, recommendations and gives a general conclusion of the study.