



A just world for all women and girls

Not just online:
**Addressing sexual
exploitation and
abuse across
digital and
physical realities
in Kenya**

Policy brief - October 2025

About Equality Now

Equality Now is a worldwide human rights organisation dedicated to securing the legal and systemic change needed to end discrimination against all women and girls, everywhere in the world. Since its inception in 1992, it has played a role in reforming 130 discriminatory laws globally, positively impacting the lives of hundreds of millions of women and girls, their communities and nations, both now and for generations to come.

Working with partners at national, regional and global levels, Equality Now draws on deep legal expertise and a diverse range of social, political and cultural perspectives to continue to lead the way in steering, shaping and driving the change needed to achieve enduring gender equality, to the benefit of all.

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Executive summary

Sexual exploitation and abuse, which disproportionately affects women and girls, occurs across digital and physical spaces, driven by entrenched gender inequality, systemic discrimination and societal norms that normalise abuse. Kenya has made significant legislative and policy strides to address sexual exploitation and abuse. However, persistent gaps in these laws and policies and in their implementation continue to leave many survivors vulnerable and without adequate redress, protection and access to justice.

This policy brief draws on evidence from Equality Now's legal and advocacy campaigns implemented in collaboration with local civil society groups, as well as insights from a recent convening of Kenyan state and non-state actors held in Nairobi in August 2025, titled "*Not just online: Confronting sexual exploitation and abuse across digital and physical realities*". The convening brought together survivors and actors from civil society, government departments, law enforcement, the judiciary and the media to examine the continuum of sexual exploitation and abuse across online and offline spaces, identify systemic gaps, co-create a typology of harm, and develop actionable, survivor-centred recommendations.

Key findings

- ▶ **Continuum of harm:** Sexual exploitation and abuse (OSEA) is interconnected across online and offline spaces. Technology amplifies existing gender-based vulnerabilities, enabling traffickers, coercers and exploiters to reach women and girls through social media, messaging apps, and online recruitment agencies and platforms. Survivors experience lifelong consequences, including physical and mental health challenges, social isolation, educational disruption and ongoing trauma resulting from the continued circulation of sexual abuse material.
- ▶ **Legal and policy gaps:** Existing laws inadequately address OSEA. Provisions concerning online coercion and extortion, image-based sexual abuse, livestreaming and algorithmic exploitation remain limited, leaving survivors without adequate legal protection. The proposed and ongoing reforms to the Sexual Offences Act and the Counter-Trafficking in Persons Act present an opportunity to integrate OSEA-specific safeguards and protections, harmonise definitions, address impunity and ensure timely access to justice.

- ▶ **Institutional barriers:** Judicial and law enforcement systems face capacity gaps, do not fully apply trauma-informed approaches and have limited expertise in handling digital evidence. Fragmented responses, inadequate infrastructure, and siloed inter-agency coordination deter survivors from reporting and pursuing justice. Notable successes, such as multi-agency rescues of trafficking victims and the operation of the Court Users Committees at the county level, demonstrate the potential of coordinated, survivor-centred approaches.
- ▶ **Societal and cultural challenges:** Survivors face entrenched societal and cultural barriers that obstruct justice and reinforce impunity. Family and community pressures often silence survivors, especially when perpetrators are relatives, while religious and cultural norms encourage forgiveness or reconciliation instead of accountability. Stigma and victim-blaming remain widespread, leading many survivors not to report their experiences for fear of ostracism and reputational harm. Corruption further deepens mistrust in the justice process, as survivors perceive investigations to be compromised and that perpetrators can evade punishment through bribery.
- ▶ **Regional and cross-border cooperation:** Regional and subregional frameworks provide mechanisms to combat sexual exploitation and abuse. However, there are gaps when addressing technology-enabled trafficking where protection is inconsistent. Non-state actors, including the private sector, can also be critical in victim identification. Kenya's review of the Counter-Trafficking in Persons Act offers an opportunity to strengthen protection and cooperation with other states.

Recommendations

To address these challenges, this policy brief presents actionable recommendations across seven priority areas:

- ▶ **Legal and policy reforms:** Policy makers should explicitly integrate OSEA into law, harmonise definitions across laws and policies, adopt survivor-centred and trauma-informed processes and procedures across the justice system, including the admissibility and use of pre-recorded testimony in court proceedings. Emerging technologies, including AI, should be regulated to prevent abuse, while ensuring that enforcement mechanisms are practical, consistent and aligned with existing legal frameworks such as the Children Act, the Computer Misuse and Cybercrimes Act and the Sexual Offences Act.

- ▶ **Strengthening coordination and multi-stakeholder engagement:** The government should institutionalise joint referral protocols, scale up PoliCare One-Stop Centres and Child-Advocacy Centres, and integrate survivor-led movements into policymaking. Additionally, technology companies should be mandated to collaborate transparently on reporting, escalation and content moderation mechanisms to ensure timely and effective responses to gender-based violence.
- ▶ **Capacity-building and institutional strengthening:** The government should provide law enforcement, prosecutors, and judicial officers with trauma-informed and digital evidence training, strengthen digital forensics, and ensure that civil society has the capacity to support survivors. It should also integrate OSEA and related rights into academic curricula to build long-term awareness and expertise.
- ▶ **Survivor-centred and trauma-informed responses:** The government should prioritise holistic care for survivors, encompassing medical, psychosocial, legal and socioeconomic support, while embedding trauma-informed practices throughout justice processes. It should also promote peer support and mentorship to strengthen survivor resilience and recovery.
- ▶ **Strengthening accountability:** The government should establish internal monitoring frameworks within the National Police Service and the ODPP, supported by annual multistakeholder reviews, independent audits and public reporting. It should also enforce anti-corruption mechanisms and leverage development partner support to strengthen monitoring and evaluation.
- ▶ **Enhancing regional and cross-border cooperation:** Policymakers should prioritise ratifying and domesticating regional frameworks, strengthen cross-border cooperation with East Africa Community (EAC) member states, and ensure national laws explicitly address technology-enabled trafficking. Governments should also formalise partnerships with non-state actors to identify victims early, facilitate reporting, and provide survivor-centred protection and support.
- ▶ **Prevention and awareness:** The government should implement nationwide, survivor-informed awareness campaigns and integrate digital safety and consent education into schools and communities. It should also promote safe, accessible national reporting tools and ensure platform accountability.

Call to action

Addressing sexual exploitation and abuse requires integrated, survivor-centred approaches that bridge online and offline realities. Legal reform, institutional strengthening and coordinated multistakeholder engagement are critical. Survivors must be at the heart of all reforms as rights holders and leaders in framing solutions. By adopting these measures, Kenya can advance justice, prevent exploitation and ensure meaningful protection for women and girls.

Introduction

Sexual exploitation and abuse of women and girls takes place across digital and physical spaces. Rooted in gender inequality, systemic discrimination and the persistent devaluation of women's lives, these harms are amplified by technology and societal norms that normalise abuse. Kenya has taken progressive steps to address sexual exploitation and abuse across physical and digital spaces through the enactment of various laws and policies.

However, significant gaps persist in addressing the interconnected nature of sexual exploitation and abuse online and offline. Survivors, especially those facing compounded vulnerabilities including but not limited to poverty, disability, displacement and age, encounter systemic barriers to justice and protection due to weak enforcement of existing laws and inadequate survivor-centred services.

This policy brief provides evidence of the challenges in effectively addressing sexual exploitation and abuse online as part of the continuum of gender based violence, and the connections with sexual exploitation and abuse in the physical space. This evidence is drawn from Equality Now and our partners' legal and advocacy campaigns in Kenya over the years. More recently, in August 2025, Equality Now convened a multi-stakeholder convening in Nairobi titled *"Not just online: Confronting sexual exploitation and abuse across digital and physical realities."* The forum brought together survivors, frontline organisations, government agencies, the judiciary, regional bodies and the media to discuss and explore solutions for the continuum of sexual abuse of women and girls online and offline.

The convening mapped the continuum of harm, illustrating how online and offline abuses intersect and reinforce one another. Participants identified systemic gaps in laws, policies and institutional responses that limit protection and access to justice for survivors. A typology of harm was co-created, capturing direct, systemic and indirect forms of abuse, providing a structured framework to guide future interventions. Finally, the convening generated actionable, cross-cutting recommendations and established a follow-up mechanism to ensure sustained, coordinated efforts to prevent sexual exploitation and abuse and to support survivors effectively.

Combining the cross-cutting recommendations from the convening and years of Equality Now's advocacy campaigns, experiences from stakeholders, and the lived experiences of survivors and frontline organisations, this policy brief provides recommendations to the government of Kenya and other stakeholders under seven areas of focus, namely:

- ▶ Legal and policy reforms
- ▶ Strengthening coordination and multistakeholder engagement
- ▶ Capacity building and institutional strengthening
- ▶ Survivor-centred and trauma-informed responses
- ▶ Strengthening accountability
- ▶ Regional and cross-border cooperation
- ▶ Prevention and awareness

Understanding the continuum of harm

Sexual exploitation and abuse remain among the most pervasive and most devastating forms of gender-based violence globally, with devastating consequences for women and girls, who are disproportionately impacted. Rooted in systemic gender inequality, patriarchal norms and the persistent devaluation of women's and girls' lives, sexual exploitation and abuse manifest in diverse forms, including trafficking for sexual exploitation, sexual harassment, image-based sexual abuse (IBSA), sexual coercion and extortion, and child sexual abuse material (CSAM). Online sexual exploitation and abuse, across both digital and physical spaces, thrives in contexts where social norms, legal frameworks and institutional responses are weak, discriminatory, or underresourced.

Historically, sexual exploitation and abuse have been framed primarily in relation to physical spaces, such as homes, schools, workplaces and within communities. However, the rapid expansion of digital technologies has fundamentally reshaped the landscape of abuse. Increased access to mobile phones, social media platforms and internet connectivity has opened up new opportunities for connection and avenues for exploitation. This has been the case in Kenya, which has witnessed rapid internet penetration in the last decade. Although still experiencing a digital divide, nationally, internet penetration in Kenya is at 35%, with internet penetration in urban areas (56.5%) significantly higher compared to rural areas (25%).¹ The increase in internet and technology use, but with safeguards lagging, renders more people at risk of abuse and harm across the digital and physical environments.

Online and offline abuses are not separate; they are profoundly interconnected and mutually reinforcing, with technology often amplifying existing patterns of gender-based violence. Limited digital literacy, combined with factors such as displacement due to changing climatic conditions and persistent poverty, creates fertile ground for sexual exploitation. Technology has enabled perpetrators to exploit these vulnerabilities, targeting women and girls in both rural and urban settings with false promises of better livelihoods.

Participants in the convening highlighted that poverty frequently coerces women and girls into exploitative situations in exchange for a livelihood. Many contact recruitment agencies on social media platforms such as Facebook and Telegram for employment. These agencies are often fraudulent, acting as fronts for trafficking rings; the women are deceived into paying for the service through mobile payment systems like M-PESA and are subsequently trafficked abroad, mainly on visitor visas rather than work visas. Once the women and girls arrive abroad, in countries like the United Arab Emirates, Saudi Arabia or Thailand, they are given the contact details of men pretending to be their bosses.

These men exploit them by coercing them into prostitution and other forms of sexual slavery under false promises of helping them to secure work visas. Others threaten to report them to law enforcement and confiscate their passports to maintain control.

The use of technology platforms by traffickers is not confined only to Kenya. In Uganda's Karamoja region, Equality Now's partners and other CSOs reported incidents where parents and relatives sold girls to be trafficked to Nairobi,² and as highlighted in the convening, in some cases for as little as USD 5. The traffickers communicate with the parents and relatives via social media platforms like Facebook, WhatsApp and Telegram, and often use online payment platforms such as M-PESA. Once transported and trafficked to Nairobi, the girls usually become domestic servants, endure sexual exploitation and live in deplorable conditions in slums.³ Despite well-documented reports and cases, participants at the convening highlighted that there has been no lasting solution between Kenya and Uganda to address the problem.

Another illustration of the continuum of harm between online and offline spaces can be seen in the context of child marriages, where girls are married off to wealthy foreign men as a perceived pathway to survival or economic stability. During the convening, participants shared a striking case involving a 15-year-old girl whose parents arranged her marriage to a Turkish man, using falsified documents indicating she was 21 years old. The man groomed the girl and her parents by sending money and gifts and promising a better life as an escape from their dire circumstances.

Participants also recognised that technology has enabled new forms of exploitation, reporting that some parents are being recruited and coerced online to record CSAM of their own children via webcams or to share such materials with the exploiters in exchange for money. The CSAM is subsequently shared on online platforms.

The consequences of sexual exploitation and abuse online and offline are lifelong. A 2025 research by Equality Now, KICTANet, HAART Kenya, Trace Kenya and LifeBloom Services International, which examined the experiences of women and girls affected by OSEA, found that survivors in Kenya suffer severe physical and mental health risks, including HIV, unwanted pregnancies, PTSD, depression and suicidal ideation.⁴ They also experience social isolation, loss of educational opportunities and diminished livelihood prospects. For survivors whose abuse is recorded and shared online, the trauma is compounded by the persistent threat of re-victimisation. Unless the material is taken down across all platforms, the perpetual nature of the dissemination of sexual exploitation material online amplifies and prolongs harm, sustaining the impact of abuse long after the physical exploitation has ended and creating enduring and often never-ending trauma for survivors.

Systemic gaps in laws and institutions

Kenya has made significant strides in addressing sexual exploitation and abuse. The country's legal framework has several relevant legal instruments, such as the Sexual Offences Act (2006), Counter-Trafficking in Persons Act (2010), Computer Misuse and Cybercrimes Act (2018)⁵, the Data Protection Act (2019), the Children Act (2022), and the Penal Code, among others. Policies such as the National Policy on Prevention and Response to GBV (2014), the National ICT Policy (2019), the National Plan of Action to Tackle Online Child Sexual Exploitation and Abuse (2022 – 2026), and the National Care Reform Strategy for Children in Kenya (2022 – 2032) have also been adopted to support the government's efforts to address OSEA. The National Policy on Prevention and Response to GBV (2014) was adopted to accelerate efforts towards eliminating all forms of GBV in Kenya, and there are ongoing discussions on how it can be leveraged to address tech-facilitated GBV.⁶ Additionally, some counties have adopted SGBV policies that include leveraging digital innovation. For example, Homa Bay County launched a GBV policy and a Digital and Innovation Hub to use digital tools in prevention, reporting and coordination.⁷

However, significant gaps persist in effectively addressing the continuum of sexual exploitation and abuse across both physical and digital realities. The convening identified legal, institutional and societal challenges that obstruct access to justice and allow impunity to thrive.

Gaps in legal frameworks

Participants in the convening highlighted that existing laws prohibit sexual violence but do not contain explicit provisions to address violations in digital spaces. For example, while the Sexual Offences Act criminalises rape and other forms of sexual abuse, it does not extend its scope to cover these offences when they have a digital dimension, nor does it address other emerging forms of sexual exploitation and abuse committed online, such as sexual coercion and extortion, livestreaming of sexual abuse and image-based sexual abuse. This narrow framing leaves survivors of OSEA without adequate legal protection. It is worth noting that in its different forms, OSEA is currently being considered for inclusion in the Sexual Offences Act, which is under review. Representatives from the National Council on the Administration of Justice (NCAJ), which is leading the review process, urged participants to provide recommendations.

Another gap in law is its failure to keep pace with technological changes. Emerging technologies such as artificial intelligence (AI) and algorithmic recommendation systems are increasingly weaponised to target women and girls, exposing them to unsolicited content, harassment and abuse.⁸ Yet, the law has not developed the nuance required to regulate these technologies and their harms, nor does it hold technology companies accountable. Participants stressed that unless legislation is adapted to reflect the realities of digital abuse, survivors will continue to fall through the cracks.

At the same time, a consistent concern raised was the failure of courts and prosecutors to interpret existing laws expansively enough to encompass OSEA, reinforcing the artificial divide between offline and online sexual exploitation and abuse.

Restitution as a remedy has been prioritised by survivors of online and offline sexual exploitation and abuse, but the justice system does not consider it as such. While compensation to a victim is legally recognised as an element of justice, it is rarely included in the prosecutor's pleadings, and therefore seldom granted in practice. Judges and Magistrates at the convening urged prosecutors to include a claim for compensation and civil society to advocate for compensation for survivors when they engage with the justice system as amici or in engagements with prosecutors handling cases for survivors they are supporting. Without a compensation award, survivors pursuing justice are left without the restitution that could help their recovery and healing.

Institutional barriers to justice

The convening also highlighted deep-seated institutional barriers that compound the challenges survivors face when accessing justice. Kenya's legal system is mainly adversarial and inadvertently has inherent risks of re-traumatising survivors, who are subjected to aggressive questioning and compelled to recount their experiences in court repeatedly. Many are forced to face their abusers in the courtroom, reliving their trauma under conditions that prioritise evidentiary procedure over survivor wellbeing. These practices deter many survivors from reporting or following through with cases.

Capacity gaps within the judiciary and law enforcement were another critical concern. Many judicial officers lack training in trauma-informed approaches and are ill-prepared to prosecute OSEA cases. As a result, prosecutions are often weak and cases collapse before justice can be delivered. Infrastructure within the courts is also inadequate. Across many courts, witness protection boxes and child-friendly courtrooms are scarce or non-existent, leaving survivors exposed and vulnerable. Participants proposed solutions such as the use of pre-recorded testimonies or trained intermediaries. They also highlighted how insightful the Court Users Committees⁹ (CUCs) have been helping justice actors understand the importance of trauma-informed response and survivor-centred processes within the justice system. More of these initiatives to raise capacity and awareness of CUCs need to be rolled out, and more information on the online-offline continuum of harm needs to be shared and understood by frontline actors and responders.

The police also face similar challenges. Officers are often untrained in handling digital evidence or in trauma-informed support and care, thus failing to respond sensitively to survivors. This results in poor evidence collection, delayed investigations and interactions that leave survivors feeling dismissed or re-traumatised. When coupled with the judiciary's shortcomings, these gaps create an environment where justice is both inaccessible and harmful to survivors who attempt to seek it.

The participants highlighted that fragmented, siloed responses undermine justice. Participants stressed the need for joint operations, shared referral pathways and survivor-centred coordination between agencies such as the Office of the Director of Public Prosecutions (ODPP), Directorate of Criminal Investigations (DCI), National Cohesion and Integration Commission (NCIC), Judiciary, and CSOs. Successful examples of multi-agency collaborations can be seen in institutions such as PoliCare One-Stop Centres¹⁰ and Child-Advocacy Centres, although they are not operational across all counties. CSOs like Trace Kenya have also been supported by other CSOs in rescuing trafficking victims,¹¹ demonstrating that collaboration works when built on trust, mutual respect and survivor-centred principles.

Regional and cross-border cooperation

At the regional level, progress to address GBV has been made through instruments such as the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol) and the African Charter on the Rights and Welfare of the Child, which place obligations on member states to address GBV impacting women, girls and children. More recently, the African Union also adopted the Convention on Ending Violence Against Women and Girls (2025)¹². This new Convention is yet to be ratified by member states.

At the subregional level, the East African Community (EAC) has developed frameworks to strengthen cooperation in combating human trafficking. The EAC Anti-Trafficking in Persons Bill (2016) seeks to harmonise partner states' laws, promote joint investigations and enhance cross-border victim protection and assistance. In practice, EAC partner states cooperate through joint border task forces, information-sharing platforms and coordinated operations under the EAC Peace and Security Strategy. Together, these initiatives aim to ensure that trafficking cases are addressed collaboratively, reflecting the transnational nature of the crime and the shared responsibility of states to protect survivors and hold traffickers accountable.

Related to the digital environment, the African Union notably adopted the Convention on Cyber Security and Personal Data Protection¹³ (Malabo Convention) in 2014. The Convention establishes a continental framework for promoting cybersecurity, protecting personal data and combating cybercrime, including online exploitation and abuse. Under the Convention, member states must adopt national laws addressing digital security, electronic transactions and online criminal activity.

Despite these regional instruments, several challenges impact their effectiveness at both national and regional levels. Convening participants noted that the domestication of regional instruments is limited. For example, member states, including Kenya, have yet to fully operationalise the commitments under both the African Charter on the Rights and Welfare of the Child and the Maputo Protocol to respond to the contemporary realities, such as OSEA. At the same time, only 15 of the 55 African countries have ratified the Malabo Convention, resulting in weak implementation of the regional instrument across Africa. Kenya has not ratified this Convention.

Regional and international cooperation among states is key to addressing cross-border trafficking. Such cooperation is especially critical in addressing technology-enabled trafficking for sexual exploitation, which often transcends national boundaries. Further, the intertwined online and offline dimensions are evident in trafficked survivors' lived experiences. Many are groomed and recruited online, while traffickers often use digital and mobile money transfer systems to facilitate payments.¹⁴ Survivors are then transported across countries by air or road through criminal networks, exploited in person, and their sexual exploitation and abuse can be recorded, sold and distributed online.

Cooperation at the regional and international levels is essential for identifying survivors and investigating and prosecuting cases that span multiple jurisdictions. However, the lack of harmonised protections across countries often leaves survivors without adequate support or justice. For example, survivors trafficked from Kenya to countries such as Thailand, the United Arab Emirates and others in the Middle East are frequently subjected to sexual exploitation yet remain unprotected. Due to barriers around mutual legal assistance and extradition agreements between Kenya and destination countries, perpetrators based there fall outside of Kenya's legal system and therefore may go unpunished. This dual failure by states leaves survivors without remedies and emboldens traffickers to continue their operations with impunity.

In these multi-jurisdictional matters, the cooperation of non-state actors is also critical. For example, at the convening, representatives from Kenya Airways highlighted significant strides that the airline had made in identifying trafficking victims before they leave Kenya. The airline then reports these instances to law enforcement, working collaboratively to protect the survivors before they leave Kenya.

The ongoing review of Kenya's Counter-Trafficking in Persons Act, led by the Counter-Trafficking in Persons Secretariat, presents an important opportunity to strengthen the law's provisions to address technology-enabled trafficking. It also offers a chance to enhance mechanisms for cooperation with other states, as part of a broader strategy to address sex trafficking across both physical and digital environments effectively.

Societal and cultural barriers

Beyond the law, survivors face deeply entrenched cultural barriers that obstruct justice. In cases where family members perpetrate sexual exploitation, survivors are often silenced by families unwilling to send a relative to prison. Religion also reinforces silence, with survivors encouraged to forgive or endure abuse rather than seek redress. Some religious practices legitimise harmful norms, such as child marriage to the perpetrator when the perpetrator has raped a child.

Stigma and victim-blaming are pervasive. Survivors are frequently held responsible for the violence committed against them, leaving them isolated and unwilling to report. Survivors of trafficking rarely disclose their experiences due to fear of ostracism and reputational harm. Participants emphasised that this culture of silence not only denies survivors justice but also perpetuates impunity for perpetrators.

Corruption and lack of trust

Corruption emerged as a crosscutting obstacle. Participants described widespread mistrust in law enforcement and the judiciary, fuelled by corruption at every stage of the justice chain. Survivors and communities are reluctant to report sexual exploitation and abuse cases because they fear that investigations will be compromised or that perpetrators will buy their way out of accountability. This erosion of trust further entrenches underreporting and ensures that justice remains out of reach for many survivors.

Recommendations

Participants developed actionable recommendations under seven priority areas:

Legal and policy reforms

A just and safe digital future for women and girls requires robust, survivor-centred legal frameworks that keep pace with technological change. Laws must close protection gaps, ensure accountability and reflect the realities of sexual exploitation and abuse across physical and digital spaces.

- ▶ **Policymakers** must explicitly provide for OSEA in law. Kenya's legislative framework should harmonise definitions across sexual exploitation and abuse and gender-based violence laws to eliminate inconsistencies that undermine enforcement and survivor protection.
- ▶ Policymakers should provide for legal reform that allows for pre-recorded testimony, video evidence and alternative means of giving statements to minimise secondary trauma and uphold the dignity of survivors.
- ▶ AI and emerging technologies are reshaping how harm manifests online. Policymakers should ensure that laws safeguard against algorithmic bias, exploitation and misuse that exacerbate gendered inequalities and violence.
- ▶ Policymakers should provide clear statutory duties and penalties for tech companies for detecting, reporting and removing harmful content.
- ▶ **The ODPP and judiciary** should ensure that sexual exploitation and abuse cases are completed within 90 days, accompanied by compensation mechanisms and survivor-centred procedures that prioritise redress and accountability.

Strengthening coordination and multi-stakeholder engagement

Participants call for a coordinated, society-wide approach to tackling sexual exploitation and abuse both online and offline. Fragmented responses have left survivors navigating complex systems with little support or accountability. Coordination between justice, health and technology actors must be institutionalised rather than ad hoc.

- ▶ Government institutions like the **judiciary, national police service, DCI and the ODPP** should establish joint referral protocols, one-stop centres and child Advocacy Centres to improve survivor case management. Survivors should not have to repeat their experiences across multiple agencies; integrated models must guarantee safety, privacy, and efficiency and avoid retraumatising survivors.
- ▶ **The Counter Trafficking in Persons Secretariat and NCAJ** should ensure embedded inter-agency collaboration in the ongoing reviews of the Sexual Offences Act and the Counter Trafficking in Persons Act to align legal, social and digital frameworks. A harmonised approach will strengthen implementation and bridge the gaps between law, policy and lived realities.
- ▶ **Survivor-led movements** are essential to accountability. Building civil society's capacity to engage in technology regulation, advocacy, and justice processes will ensure that reforms are grounded in lived experiences and responsive to evolving digital harms.
- ▶ As primary enablers of the digital environment, **technology companies** must partner transparently with the government and civil society to create effective reporting, escalation and referral pathways for OSEA cases. Platform responsibility cannot be optional.

Capacity-building and institutional strengthening

Addressing sexual exploitation and abuse both online and offline requires a justice system equipped with the knowledge, resources and tools to respond effectively. Institutions must evolve to handle complex digital harms while upholding survivors' rights and dignity.

- ▶ **The National Police Services** should invest in specialised training for judicial officers, prosecutors, and law enforcement on digital harms, trauma-informed practice, and evidence handling. A justice system that understands technology and trauma can deliver absolute protection.
- ▶ **The DCI, ODPP, and related authorities** should strengthen digital forensics and evidence management systems to ensure that OSEA cases are investigated with precision, integrity and sensitivity.
- ▶ **Civil society** plays a critical role in bridging justice gaps. Sustained funding from **development partners** and capacity-building for organisations supporting survivors, including training in digital harms and institutional sustainability, are vital to ensure long-term impact.
- ▶ **Academic institutions** should integrate OSEA and digital rights modules into law, ICT and criminology curricula.

Survivor-centred and trauma-informed responses

The survivor must be at the heart of every reform. The participants emphasised that justice systems must shift from punitive, procedure-heavy approaches to survivor-centred, trauma-informed models that restore agency and dignity.

- ▶ **The NCAJ and the judiciary** should institutionalise survivor representation in advisory boards, CUCs and justice reform platforms.
- ▶ **The Ministry of Health and the State Department for Gender and Affirmative Action** should adopt a holistic model of survivor support that includes medical care, psychosocial services, legal aid and socioeconomic reintegration.
- ▶ **The National Police Service, ODPP and judiciary** should embed trauma-informed practices into investigations, hearings and testimony-taking to reduce retraumatisation and ensure survivors feel safe and respected throughout the justice process.
- ▶ **Civil society** should build peer-support and mentorship initiatives that empower survivors to lead, advocate and support one another, transforming trauma into collective resilience and reform.

Strengthening accountability

- ▶ **The Ethics and Anti-Corruption Commission (EACC) and the Judiciary** can enforce anti-corruption mechanisms to eliminate bribery, case interference and survivor intimidation for sexual exploitation and abuse cases.
- ▶ **The National Police Services and ODPP** should establish internal accountability frameworks to monitor case management and ensure all sexual exploitation and abuse cases are investigated and resolved within 21 days of complaint.
- ▶ **The NCAJ** should proactively convene multi-stakeholder review forums at least annually to assess progress, share data and agree on corrective actions.
- ▶ **Parliament and the NCAJ** should mandate regular independent audits for the handling of sexual exploitation and abuse cases and integrate integrity benchmarks into institutional performance reviews.

- ▶ **Civil society** should continue to monitor justice sector performance, document delays and corruption risks and publicly share progress towards accountability commitments.
- ▶ **Development partners** should support integrity and monitoring initiatives through funding, technical assistance, and independent evaluation mechanisms.
- ▶ Accountability should also extend to **technology companies**, with the government enacting and implementing laws and policies to ensure that they are held accountable for preventing and ensuring women and girls' safety on their platforms.

Regional and cross-border cooperation

Effective prevention and response to cross-border trafficking and technology-enabled sexual exploitation requires coordinated regional and international action.

- ▶ **Policymakers should accelerate the ratification and domestication** of regional frameworks, including the AU Convention on Ending Violence Against Women and Girls (2025) and the Malabo Convention, to strengthen harmonised legal obligations across jurisdictions.
- ▶ **The Kenyan government can continue collaborating with other EAC member states** to strengthen cross-border cooperation through joint investigations, shared intelligence, and coordinated operations under the EAC Peace and Security Strategy, ensuring consistent protections and accountability for traffickers across countries.
- ▶ **National laws and protocols should explicitly address technology-enabled trafficking**, including online recruitment, mobile payments and the distribution of sexual exploitation material, with mechanisms to hold perpetrators accountable across borders.
- ▶ **The government should formalise partnerships with non-state actors**, including airlines, transport providers, tech companies and civil society organisations, to identify victims early, report cases promptly, and ensure survivor-centred support and protection.

Prevention and awareness

Prevention is the most sustainable form of protection. The participants call for proactive, inclusive, and rights-based strategies to prevent sexual exploitation and abuse rooted in awareness, education, and community engagement.

- ▶ **The government** should launch nationwide public awareness campaigns that demystify sexual exploitation and abuse and digital safety. These campaigns must be survivor-informed and accessible to rural and marginalised communities.
- ▶ **The Department of Education and civil society** should integrate digital citizenship and online safety education into school curricula and community outreach. Early education on consent, privacy and digital ethics can shift norms and prevent future harm.
- ▶ **The Communication Authority of Kenya, tech companies** and others should promote national digital reporting tools such as www.cirt.go.ke and incidents@ke.cirt.go.ke. Social media platforms must invest in user trust and transparency to ensure survivors can safely report harm without fear of reprisal.

Conclusion

Addressing sexual exploitation and abuse of women and girls across digital and physical spaces requires a comprehensive, coordinated and survivor-centred approach. The insights from the Not Just Online convening underscore that online and offline harms are deeply interconnected and must be tackled as part of a single continuum of gender-based violence. Kenya's legal and policy frameworks provide a strong foundation, but gaps in enforcement, coordination and survivor protection continue to undermine progress.

Closing these gaps demands harmonised laws, stronger institutional capacity, sustained regional and international cooperation, and accountability from both state and non-state actors, including technology companies. Only through integrated, inclusive and trauma-informed action can Kenya and the wider region make meaningful progress toward eliminating sexual exploitation and abuse in all its forms.

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Experiencing online sexual exploitation and abuse in Kenya: **Survivor narratives and legal responses**



Endnotes

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