DECADE OF CHANGE

A Stocktake of the Technology-Facilitated Child Sexual Exploitation and Abuse Ecosystem in Kenya

2026



Safe Online

Evident

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Acronyms

AHTCPU	Anti-Human Trafficking and Child Protection Unit
CA	Communications Authority of Kenya
CEOP	Child Exploitation and Online Protection Command
CPIMS	Child Protection Information Management System
CSAM	Child Sexual Abuse Material
CSEA	Child Sexual Exploitation and Abuse
CSO	Civil Society Organisation
CUCs	Court User Committees
DCI	Directorate of Criminal Investigations
DCS	State Department for Children's Services
IJM	International Justice Mission
ITU	International Telecommunication Union
IWF	Internet Watch Foundation
MNR	Model National Response
NCAJ	National Council on the Administration of Justice
NCMEC	National Center for Missing & Exploited Children
NGO	Non-Governmental Organisation
OCSEA	Online Child Sexual Exploitation and Abuse
ODPP	Office of the Director of Public Prosecutions
SO	Safe Online
SOP	Standard Operating Procedures
TDH	Terre des Hommes
TF-CSEA	Technology-Facilitated Child Sexual Exploitation and Abuse
TWG	Technical Working Group on Child Online Protection
UNODC	United Nations Office on Drugs and Crime

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I: WHY MEASURING SYSTEMS CHANGE MATTERS

Introduction & Purpose

Technology-facilitated child sexual exploitation and abuse (TF-CSEA)[1] continues to evolve rapidly in scale, complexity and reach. As digital environments expand and diversify, so too do the risks faced by children, requiring coordinated and adaptive responses across sectors, institutions and national contexts.

Since its inception in 2016, Safe Online has supported global efforts to address TF-CSEA through investments in evidence-building, innovative solutions, cutting-edge technologies and cross-sectoral programs. Through its decade of investments in more than 180 projects in over 100 countries, Safe Online helps to build the global evidence base and facilitates advocacy and collective action for the rights and safety of children in the digital world.

Despite growing investment and activity in this field, there remains limited structured evidence on how change occurs at the national level, particularly in Global South contexts, where resource constraints, institutional capacity and rapidly evolving digital ecosystems shape distinct challenges and opportunities. While project-based monitoring and evaluation provides important insights into specific interventions, it often does not capture how different actors, policies and initiatives interact to produce broader systemic outcomes. As a result, there is a need for deeper understanding of the conditions and pathways through which effective and sustained change occurs.

To address this gap, Safe Online undertook two national case studies in the Global South to examine how change unfolds within different country contexts. These case studies aim to identify key drivers of progress, as well as persistent challenges and constraints, by analysing how a range of stakeholders and interventions collectively contribute to national responses. By focusing on diverse contexts, the studies seek to generate comparative insights into how systemic change is enabled under different conditions.

Kenya was selected as one of the case study countries given the presence of diverse stakeholders across government, civil society and industry engaged in responding to TF-CSEA within the last decade.

The Kenya case study explores how national and local actors have responded to TF-CSEA and how their combined and interacting efforts have shaped the country's evolving response. By examining this experience, the report seeks to contribute to a more nuanced understanding of what enables effective action in complex and rapidly changing environments.

This report is intended for donors, policymakers and advocates working to strengthen child protection in digital spaces. It provides insights to inform investment strategies, policy development, advocacy and programming with the aim of enhancing the effectiveness and coherence of efforts to address TF-CSEA globally.

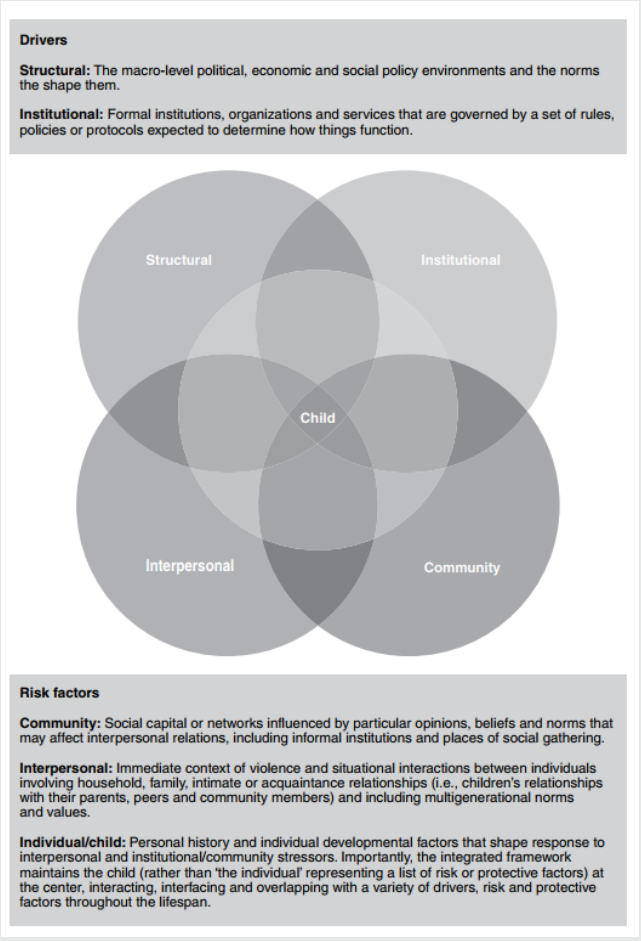
[1] Increasingly, the term 'online child sexual exploitation and abuse' or OCSEA is being replaced with 'technology-facilitated chid sexual exploitation and abuse or 'TF-CSEA' to better account for the reality that abuse and exploitation rarely exists discretely online or offline but has aspects of being facilitated by technology.

Methodology

Analytic Framework

This case study adopts a systems-informed analytical approach to examine how change occurs within national responses to TF-CSEA. Systems analysis enables a more comprehensive understanding of complex social challenges by identifying the roles and inputs of different actors, mapping interactions between system components, and examining how combinations of interventions contribute to observed outcomes. It also supports the identification of key catalysts and constraints within the ecosystem. By analysing how these dynamics operate in practice, systems approaches can inform more effective and targeted investment and intervention strategies.

The analytical framework for this study draws on Bronfenbrenner's socio-ecological systems model,[2] which is widely used to understand the multiple, interacting layers that shape individual experiences and social outcomes. Building on this, Kardefelt-Winter & Maternowska[3] adapted the model (pictured) to incorporate digital environments, developing an integrated child-centred framework that reflects how online and offline factors interact within systems affecting child safety. Their framework highlights how a child's experience of violence is shaped by interactions across individual, interpersonal, community and societal domains.



To operationalise this systems perspective for the purposes of data collection and analysis, the study applies the WeProtect Global Alliance Model National Response (MNR)[4] as a structural framework. The MNR defines key domains of a national ecosystem responding to TF-CSEA and provides a shared, internationally recognised basis for analysis and cross-country comparison. The study examines the following MNR domains:

1. Policy, legislation and governance
2. Law enforcement and justice
3. Social services and survivor support
4. Industry engagement
5. Public awareness and education
6. Research, data and evidence

In consultation with Safe Online, a seventh domain was added to strengthen the analysis of resource flows and sustainability:

7. Funding models and ecosystem financing

[2] Bronfenbrenner, U. (1979). The ecology of human development: Experiments by nature and design. Cambridge, MA: Harvard University Press.

[3] Kardefelt-Winther & Maternowska, C. (2019). Addressing violence against children online and offline. Nature Human Behavior, 4. 227-230.

[4] WeProtect Global Alliance. (2023). Preventing and Tackling Child Sexual Exploitation and Abuse: A Model National Response: Maturity Model.

Data Collection

To generate the Kenya case study, a qualitative multi-method approach was employed. A comprehensive document review was conducted to establish the contextual and institutional landscape of the national response to TF-CSEA. This was followed by nineteen in-person, semi-structured interviews with critical stakeholders from national and local government, civil society, and industry conducted in Nairobi during February 2026. Stakeholders were selected based on their roles and involvement across the different domains of the ecosystem. An ethical decision was taken not to collect new primary data from children for reasons set out in the limitations section below.

The WeProtect Global Alliance MNR self-assessment tool[5] informed the initial development of the overarching research questions (see Annex A), which were further refined through consultation between the research team and Safe Online. Question guides were then developed for both the document review and interviews to identify observed changes in policy, coordination, and practice, as well as pathways of change, enabling factors, constraints, and interactions across the system.

Data Analysis and Triangulation

Data analysis was guided by an adapted outcome harvesting approach,[6] which identifies observable changes in behaviours, relationships, actions or policies and works retrospectively to determine how these changes occurred and the contributions of different actors. This approach is particularly suited to complex systems where causality is non-linear and distributed.

The analysis followed six iterative steps:

1. Design of the outcome harvest
2. Review of documentation and development of draft outcome descriptions
3. Engagement with stakeholders to identify observable changes
4. Substantiation of outcomes through multiple sources
5. Analysis of contribution and significance
6. Synthesis of findings into lessons and insights

Triangulation was achieved through the integration of document review, interview data and stakeholder engagement. Stakeholders from government, civil society, service providers and industry were included to capture diverse perspectives and strengthen the credibility of findings. Special attention was taken to explore both intended and unintended consequences of inputs across the seven domains.

Validation, Lived Experience Analysis and Contribution

Preliminary findings were synthesised into a draft case study report and shared in advance of a national multi-stakeholder roundtable held on 2nd June, 2026 in Nairobi. The roundtable meeting included presentation of the findings and structured discussion to test interpretations, challenge assumptions and refine analysis. The roundtable was designed to inform the analysis rather than to establish consensus and was attended by 12 of the 19 interview participants representing 12 organisations.

Throughout the process, the research team applied critical scrutiny to stakeholder inputs, recognising potential biases and incentives for positive self-reporting. Triangulation across sources, combined

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[5] WeProtect Global Alliance. (2023). Preventing and Tackling Child Sexual Exploitation and Abuse: A Model National Response: Self-Assessment Tool.

[6] Wilson-Grua, R. & Britt, H. (2012). Outcome Harvesting. Ford Foundation: Cairo, Egypt.

with the research team's contextual expertise, was used to validate findings and challenge dominant narratives. However, it is worth noting that the primary interviewee pool of government, civil society, and industry actors shares a degree of institutional interest in describing the ecosystem's progress favourably, and triangulation predominantly among these groups may reinforce as much as counteract that shared incentive.

The clearest independent check within the methodology was therefore a separately held consultation with survivor-advocates. This was conducted with five participants who were part of the Brave Movement Survivor Network in Kenya on 3rd June, 2026 in a closed setting to ensure a safe and independent space for reflection. This enabled the integration of lived experience perspectives without institutional influence. Insights were incorporated with careful attention to ethical considerations, including safeguarding and the avoidance of tokenistic representation (see Annex B). It is noted that this group was small (n=5) and the consultation was used primarily to validate and contextualise draft findings. Future iterations of this research could strengthen the corrective function of triangulation with a more structured 'dissenting voice' review step that profiles actors without a direct stake in the ecosystem's institutional narrative.

The analysis also explored the extent to which Safe Online funded interventions plausibly contributed to observed outcomes within the broader ecosystem. However, given the systems-level scope of the study, outcomes reflect the combined influence of multiple actors and investments. The analysis therefore focuses on contribution and interaction rather than direct attribution as is usual in project evaluations.

Presentation of Findings

Findings are presented through a series of thematic narratives that highlight key elements of system change including catalysts, enabling factors, barriers, and interactions between system components. Rather than imposing a single, unified theory of change, this approach reflects the complexity of the ecosystem and allows for the presentation of multiple, interrelated pathways of change.

This approach preserves analytical rigor while maintaining readability and accessibility.

Ethical Review and Safeguarding

The project design, methodology and tools underwent independent ethical review. Safeguarding measures were implemented throughout, including the presence of psychosocial expertise during the survivor-advocate consultation. Further details are provided in Annex B.

Limitations

The systems-wide analytical approach limits the ability to directly attribute observed changes to specific interventions, including those funded by Safe Online. Instead, the study focuses on understanding how multiple actors and factors interact to produce outcomes in a more general sense. This direct attribution limitation is accepted in the trade-off for telling the bigger picture story.

Much of the evidence presented in the report reflects systemic and structural changes as reported by stakeholders. While these changes are likely to contribute to outcomes at community and individual levels, direct impacts have generally not been directly substantiated with empirical data at those levels.

An ethical decision was taken not to directly consult children for the study. This reflected guidance from the study's independent ethical review (see Annex B): Given the study's system-level focus on institutional and policy change, the potential value of direct child participation was judged not to outweigh the risks and safeguarding resourcing required to engage children safely on such a sensitive topic, children's perspectives were represented in existing research such as careful child-led research

on TF-CESA led by Mtoto News, and participation would have had limited personal benefit to the participating children themselves.. Adult survivor-advocates were given prominent influence through the separate consultation event to critique and validate the findings, though their inputs were illustrative rather than representative and should not be interpreted as reflecting the experiences of all TF-CSEA survivors in Kenya These factors occasionally limit the conclusions that can be drawn. For example, determining the accessibility and effectiveness of prevention and response actions from children's perspectives.

II: BASELINE CONTEXT AND DYNAMICS

Prior to 2015, while trafficking and child sexual exploitation and abuse (CSEA) had some visibility in Kenya, there was very little awareness and understanding of the 'online' or technology facilitated forms of such abuse. In 2018, UNICEF Kenya estimated that children and young people accounted for more than 50% of all internet users in the country.[7] Yet, despite this, child online protection was barely on the national agenda. At that time, Kenya's key problems regarding child online protection were assessed as; low public awareness of risks, limited coordination of relevant government and other bodies, and the absence of online issues within the priorities of existing child protection mechanisms.[8]

Low Awareness of Online Harms to Children

A decade ago, TF-CSEA remained poorly understood in Kenya, despite awareness of CSEA in offline contexts. While child protection mechanisms and institutions existed, most actors, and the communities they served, understood physical forms of sexual abuse but had not grasped the ways that digital technologies could both enable this abuse, and bring new forms of non-contact abuse.

Interviewees described that TF-CSEA at this time was perceived by stakeholders at all levels (community and bureaucracy) as a 'new' and unfamiliar, siloed phenomenon.

> *"In 2015, 2016, 2017, we were grappling with the issue…because even the definitions were not clear for us. But also translating back to the communities that we were working with…people were struggling with first understanding of what this was."* (Interview 3, Civil Society Officer)

At the community level, parents and children had limited awareness of online risks and how to mitigate them. If abuse didn't include physical contact, parents did not recognise harmful online interactions as a potential kind of abuse.

> *"[Parents] could not see that [online abuse] was an exploitation or abuse because there was no contact."* (Interview 9, Civil Society Officer)

As a result, parents and child protection actors at the community level rarely escalated incidents of TF-CSEA to the police, resulting in underreporting.

> *"There were [online abuse cases], but…we were not aware…if this is child abuse or not. We took it as a normal thing…Because the gap we had was that we did not know that online child abuse can be reported to the police and that the perpetrator could be brought to book."* (Interview 17, Civil Society Officer)

Participants in the survivor-advocate's side event further emphasised that underreporting was driven not only by limited awareness and understanding of TF-CSEA, but also by persistent victim-blaming attitudes. These social norms created an environment in which survivors and their families feared judgment, criticism, or negative treatment from service providers, particularly law enforcement officers, thereby discouraging disclosure and help-seeking.

Nonetheless, the starting point was not zero, with awareness of offline CSEA and mechanisms for redress representing important entry points from where efforts to build understanding of TF-CSEA

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[7] Communications Authority of Kenya (2017). As cited in UNICEF Kenya (2018). Proposal submitted to Safe Online.
[8] UNICEF Kenya (2018). Development and Implementation of a National Plan of Action to Prevent and Respond to Online Child Abuse and Exploitation. Proposal submitted to Safe Online.

were anchored. The decade began to see existing child protection mechanisms adapted to encompass emerging digital risks.

Treatment of TF-CSEA in Law Enforcement and Justice

Prior to 2015, Kenya did have a legal and policy framework that addressed offline CSEA. This included key statutes, such as the Children Act of 2001[9] and the Sexual Offences Act of 2006[10] which criminalised the offence of 'defilement' – defined as an act which causes penetration with a child – and defined a child as anyone under the age of 18.

While these statutes provided a foundational legal framework, they did not specifically encapsulate emerging technology-facilitated dimensions of CSEA and remained primarily oriented toward offline, contact forms of abuse. These laws did not include provisions that addressed and clearly criminalised solicitation via technology, grooming, or creating and sharing CSAM.

Interviewees reported that at the formal level, police and justice professionals were generally unfamiliar with TF-CSEA:

> *"...most of the police stations do not even understand what is online, child safety, exploitation, and abuse."* (Interview 6, Law Enforcement)

Participants in the survivor side-event similarly noted that at that time police officers not only lacked understanding of TF-CSEA, but also had limited awareness of the impacts experienced by child survivors and the range of supports needed following disclosure.

Consequently, there were extremely few examples of TF-CSEA being addressed by police and justice systems at this time – and where they were, justice interviewees said that crimes were, and still somewhat today, were typically prosecuted for the physical or offline aspects. The online elements of the crime – like solicitation or dissemination of filmed illegal content – were rarely part of the prosecution.

> *"A lot of times the cases are prosecuted as defilement and hardly ever as tech facilitated [CSEA]... that is an area that could improve."* (Interview 14, Civil Society Officer)

There were growing calls for legal reforms that would recognise the breadth of TF-CSEA crimes. Yet, progress has been slow and moves to reform the law are still ongoing in 2026. This gap in the legal framework – coupled with the limited technical capacity of professionals to address TF-CSEA – resulted in an almost non-existent legal response and a denial of access to justice for survivors of TF-CSEA in Kenya prior to 2015.

> *"Grooming used not to be an offense. So, people could only stand back or request for pull down. But we tried to rely on existing laws that were trying to really deal with those kinds of cases, like in the Sexual Offenses Act."* (Interview 7, Law Enforcement)

This situation has progressively improved with the existence of the offline legal framework creating a pathway for subsequent reforms that incorporated technology-facilitated harms. Rather than requiring an entirely new legal framework, policymakers were able to build on established definitions of the child, recognised forms of harm, and existing offences to weave in emerging digital harms. The Children Act (2001) in particular, was targeted by advocates as an established foundation that could

[9] Republic of Kenya, (2001). The Children Act (repealed for new Act in 2022).
[10] Republic of Kenya, (2006). The Sexual Offences Act CAP 63A.

be expanded to incorporate emerging digital risks. This made reform more feasible, as new offences related to TF-CSEA could be integrated into already recognised categories of harm.

> *"In fact, I think [before] the Children's Act didn't have anything online completely. So, what happened is we looked at the Cybercrimes Act, and when we were reviewing the Children's Act that was enacted in 2022, you'll find that there are some of the terminologies that were brought in and addressed in the Children's Act."* (Interview 6, Law Enforcement)

Roundtable participants also noted that the existing Information and Communications Act of 1998[11] provided part of the regulatory foundation for Kenya's information and communications sector also.

Low Government Prioritisation of TF-CSEA

Prior to 2015, institutional capacity to respond to TF-CSEA was very limited. Within the Directorate of Criminal Investigations (DCI) was the cybercrime unit, which had a mandate to investigate all cyber-crimes, but online crimes related to children were often overshadowed by seemingly 'weightier' crimes such as financial fraud. Within the Office of the Director of Public Prosecutions (ODPP) and the Department of Children's Services (DCS), there were no specialised officers or units to address this issue.

Globally the evidence was building of the rapid rise of TF-CSEA, along with calls for government agencies to give it attention. At a pan-African level, the African Union attempted to catalyse African governments on this issue. The African Union Commission convened the first Continental Consultation on Combatting Online Child Sexual Exploitation from 6–8 March 2019 in Addis Ababa, Ethiopia[12] where this three-day meeting marked an important step in recognising technology-facilitated CSEA as an emerging form of cybercrime in Africa. The Government of Kenya participated in the consultation. Following this meeting, the African Union Commission developed the African Union Strategy and Plan of Action Against Online Child Sexual Exploitation and Abuse (2020–2025).[13] The African Committee of Experts on the Rights and Welfare of the Child had also contributed through its normative and convening roles. In 2019, it held its first Day of General Discussion on TF-CSEA which raised awareness among African Union Member States and identified emerging risks and response priorities. Since then, the Committee of Experts has increasingly integrated technology-facilitated CSEA into its State accountability processes, particularly through the review of State Party reports and the issuance of recommendations. This has helped embed digital child protection within broader child rights monitoring and implementation frameworks across the continent.

Yet still, interviewees remarked that despite the emerging political pressure, at that time there was no context-specific data for Kenya that could push the government to take serious action on this issue.

While confirming this situation, roundtable participants also reflected on the changes that have occurred over the subsequent decade. They noted that Kenya has transitioned from a context in which TF-CSEA received limited attention to one in which it is increasingly recognised as both a child protection and criminal justice concern. Yet, at the same time, participants cautioned that increased recognition has not always translated into action. Some noted that government commitment has, at

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[11] Republic of Kenya, (1998). The Information and Communications Act CAP 411A

[12] African Union (March 2019). African Union Continental Consultation on Combatting Online Child Sexual Exploitation: Press release.

[13] African Union Commission (2020) Strengthening Regional and National Capacity and Action Against OCSEA in Africa: Strategy and Plan of Action 2022-2025.

times, remained more rhetorical than operational, with persistent gaps in implementation, resourcing, coordination, and institutional capacity.

Emerging Public Awareness Campaigns

The Communications Authority of Kenya (CA), as part of the International Telecommunications Union (ITU) child online protection initiative, had made a head start in raising awareness of TF-CSEA by convening a child online safety conference in 2011 in Nairobi and also later launching the "Be the Cop" child online protection campaign in 2015.[14] These awareness initiatives were undertaken by the Consumer Protection Department of the CA and are commended, but it is telling that they occurred at a time where there were no staff assigned to carry out child online protection activities as part of their official duties.

While these awareness-raising efforts marked important early steps, they were not embedded within a coordinated national response linked to broader supports or institutional response mechanisms, thereby limiting their effectiveness. The CA was, however, cognisant of the need for more actors to come on board for a broader systems approach.

> *"We came up with a program which we launched in 2015. We had campaigns that…focusing more on parents, guardians…with that we were also hoping to trigger industry and stakeholders to addressing online safety issues, which I believe we achieved."* (Interview 1, Government Officer)

These early initiatives can therefore be understood as important agenda-setting efforts, even though at the individual level they were not able to connect victimised young people to accessing specialised supports (as these were simply not yet available in the ecosystem).

Beyond the CA, within the child protection ecosystem in 2015, early efforts on child online safety had begun to emerge from civil society. For example, the Watoto Watch Network initiated the annual marking of the 'Safer Internet Day' in Kenya in 2014.[15] While these initiatives primarily focused on awareness raising and promoting online safety, they played a role in drawing attention to the risks children face in the digital environment, including TF-CSEA, and in attempting to mobilise government, other ecosystem actors and the public to pay attention to this issue.

More programs specifically targeting TF-CSEA began to take shape from 2016 and 2017. But it must be noted that interview participants expressed that – at this time – even child protection actors were still really grappling to understand the nature of the issue in the Kenyan context. There was certainly no standardised terminology used across agencies and few places that staff could access useful and trustworthy guidance. In part responding to these needs, groundbreaking (for Kenya) early interventions by civil society organisations such as Terre des Hommes Netherlands and Childline Kenya around this time focused largely on awareness creation, primarily equipping partner organisations with the knowledge and content to then target children and parents in urban settings for preventative and risk-awareness communications.

Yet even with this groundbreaking work, there were no localised Kenya-specific education materials for awareness creation and no research or data about the trends and scale of TF-CSEA in Kenya. Agencies therefore had to learn from, and adopt resources from, other countries. They also relied on global studies on the emerging manifestations as observed in those jurisdictions. Broader systems

[14] Communications Authority of Kenya (2015). Press Release: CA Launches the 'Be the Cop' to protect children online.
[15] Watoto Watch Network, (2014). Marking 2014 Safer Internet Day in Kenya.

strengthening efforts – such as legal reforms, policy development, and institutional strengthening – were just not on the Kenyan agenda in 2015.

Coordination and Funding

TF-CSEA programming expanded from 2016 onwards as more and more agencies came on board, and the need for government-led coordination to align approaches, set standards, and bring efforts together became clear.

These coordination challenges were closely linked to how the response was funded. The initial response relied almost entirely on external donor funding, with international organisations shaping both the focus and direction of interventions. For example, funding via Terre des Hommes supported pilot initiatives with Childline Kenya to adapt resource materials about TF-CSEA in 2016-17. Apart from the Communications Authority of Kenya, which supported limited child online protection activities, there was almost no dedicated domestic public funding for TF-CSEA. This lack of government investment reflected the low institutional prioritisation of the issue at the time.

The first big significant donor commitment to address TF-CSEA in Kenya was Safe Online's 2016 grant of US$1 million in funding to UNICEF Kenya. This funding was catalytic, not only because of its size, but because it supported coordination across actors, and helped define TF-CSEA as a distinct sub-area of child protection policy and programming. By building shared knowledge platforms and standardised TF-CSEA training modules, this funded project helped reduce fragmentation and enabled more strategic and coordinated action.

International organisations – such as IJM and ChildFund – also committed their own funds to work on TF-CSEA programming, as well as beginning to seek further specific grants. This external donor investment has continued, for example, the Safe Online grant to ChildFund in 2022 for the Safe CLICS project[16] included ChildFund co-funding of 30% of project costs.

External donor support, especially large-scale investment from Safe Online, has led to progress in strengthening the child protection system in Kenya to address TF-CSEA. Meaningful levels of domestic funding are not yet forthcoming and a continued reliance on external donor funding represents big risks to sustainability and scale. National ownership and coordination of the response to TF-CSEA is critical for progress to continue.

Bolstering the Building Blocks in the Kenya Ecosystem

Although TF-CSEA-specific systems were weak prior to 2015, Kenya possessed a range of existing child protection, justice, and coordination structures that were targeted to incorporate TF-CSEA responses. Rather than building siloed or parallel systems, the response in the country has shown efficiency in this way by taking advantage of these established mechanisms and adapting them to respond to emerging digital risks in Kenya.

For coordination of criminal justice matters prior to 2015, mechanisms such as the National Council for the Administration of Justice (NCAJ) – particularly its Standing Committee on the Administration of Justice for Children – provided a high-level platform for oversight and monitoring of reforms regarding children's justice. At the local level, Court User Committees (CUCs) brought together police, investigators, prosecutors, and other actors to collaboratively review and manage cases. Safe Online-supported initiatives leveraged these justice coordination platforms to integrate TF-CSEA into

[16] ChildFund Kenya (2022). The Safe Community Linkages for Internet Child Safety (Safe CLICS) Project. Proposal submitted to Safe Online.

ongoing justice sector reforms, to strengthen inter-agency collaboration, and to improve coordinated case handling. The goal was always to utilise existing structures rather than to establish new ones.[17]

In relation to child welfare coordination, the County Children Advisory Committees (formerly called Area Advisory Committees) offered a multi-sectoral platform for stakeholder engagement specifically in addressing emerging issues affecting children. These committees in every county created an opportunity to facilitate cross-sector collaboration and information-sharing on any child protection risks, including the emerging risks of TF-CSEA. However, participants of the survivor's side event observed that these local coordination structures are frequently constrained by limited trust between members, inconsistent information sharing, competition for influence and funding, and weak collaboration outside formal meetings. Participants noted that while coordination forums may convene regularly, case support, referral follow-up, and ongoing information exchange between members are not always sustained.

At the community level, *Nyumba Kumi* structures – anchored in community policing – and existing grassroots community networks, some of which were already trained on child protection, provided an entry point to existing mechanisms usable for localised prevention, awareness, and monitoring efforts. These structures had potential to bridge the gap between formal systems and community-level responses to TF-CSEA and were identified as points of focus for programming. This is particularly evident in ChildFund's Safe CLICS project, which leveraged existing community and county-level coordination structures to strengthen referral pathways, enhance local detection and reporting, and connect community responses to formal child protection and justice systems.[18]

From a legal and policy perspective, the ongoing review of the Children Act 2001 towards the end of the last decade presented a strategic opportunity to incorporate provisions addressing TF-CSEA – rather than seeking for a siloed piece of legislation. This allowed alignment of emerging forms of online harm with the evolving legal framework, even before the issue was fully recognised at scale. Reform of this legislation was a critical focus for UNICEF Kenya, and their first Safe Online grant enabled advocacy on this to continue – especially via the ongoing role of the Child Protection Specialist with child online protection within her portfolio of responsibilities. In addition, the large scale Safe Online investment in evidence generation with the multi-country Disrupting Harm study[19] filled an important gap by gathering robust evidence regarding TF-CSEA in Kenya.

Finally, amongst Kenyan institutions, existing mechanisms – such as the Children's Officers deployed across counties by DCS, gender desks within police stations, and Children's Courts under the judiciary – constituted good foundations that could be improved for service delivery and case management regarding TF-CSEA. While these mechanisms were noted by interviewees to be highly constrained by limited human and financial resources, their systematic national presence nonetheless represented opportunities that could be harnessed and strengthened to respond to TF-CSEA. Interventions that strengthened the capacity of frontline actors were prioritised for funding by Safe Online, and this report highlights successes and challenges particularly in that work.[20]

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[17] UNICEF Kenya (2022). Strengthening capacity, networks and systems to make the internet safe for children in Kenya. Proposal submitted to Safe Online.

[18] ChildFund Kenya (2022). The Safe Community Linkages for Internet Child Safety (Safe CLICS) Project. Proposal submitted to Safe Online.

[19] ECPAT, INTERPOL and UNICEF. (2021). Disrupting Harm in Kenya: Evidence on Online Child Sexual Exploitation and Abuse. Global Partnership to End Violence against Children.

[20] UNICEF Kenya (2023). Strengthening capacity, networks and systems to make the internet safe for children in Kenya: Year 1 Progress Report.

III: CATALYSTS AND CONSTRAINTS

Catalyst 1: Legislative Reforms

Over the past decade, legislative reform has been a central driver of progress in addressing TF-CSEA in Kenya. This is not simply because the law improved, but because legal reforms concretely enabled the broader system to function. In the Kenyan context government action is closely tied to statutory authority and legislation defines what constitutes a crime, establishes institutional mandates, and legitimises state intervention. Because of this, without a clear legal framework that defined and responded to TF-CSEA, work to address the issue was unlikely to bear fruit. Law enforcement agencies, prosecutors, and child protection actors could only address CSEA that involved physical contact under the 2006 Sexual Offences Act[21] or occasionally using the lens of human trafficking under the 2010 Counter Trafficking in Persons Act.[22] The established practice in law of a fundamental reliance on physical evidence needed to be updated for the new challenges posed by digital crimes.

> *"Our laws envision physical evidence. Even in this space of sexual violence you expect to know a person who's complaining, and you expect that person to be accompanied by physical evidence."* (Interview 11, Civil Society Officer)

While there were efforts to investigate and prosecute cases, these remained relatively rare, and justice actors lacked a clear legal basis to pursue the online elements of abuse until reforms in 2018 and 2022.

> *"There were efforts from the government to fight, but the challenge was that we did not have a law that can be used to prosecute these forms of [online] violence"* (Interview 9, Civil Society Officer)

In this context, legislative reform became a necessary first step. While advocacy and programming efforts were beginning to emerge in the middle of the last decade, they could not translate into sustained institutional action without legal definition of the problem. Legal reform therefore acted as a bridge between growing awareness and system response, transforming TF-CSEA from an ambiguous abstraction into defined and actionable offences.

An early achievement of relevant legislative reform was the explicit criminalisation of online-specific offences in the 2018 Computer Misuse and Cybercrimes Act.[23] The enactment of this law significantly strengthened the legal framework for TF-CSEA, particularly as it defined previously unaddressed forms of harm that can occur digitally. It quite comprehensively defined CSAM and explicitly criminalised acts associated with it as well as criminalising mere attempts to commit these acts.[24] Numerous interviewees concurred that the Act played an important role in formalising and legitimising national discourse on online child safety by introducing explicit legal recognitions. On the other hand, participants in the survivor's side event also flagged public concern had been raised with elements of the law, with it reportedly being used to pursue activists who had criticised public authorities online. These perceptions highlight the importance of ensuring that legislation designed to address cybercrime and online harms is implemented in a manner that remains proportionate, transparent, and consistent with fundamental rights and freedoms.

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[21] Republic of Kenya, (2006). The Sexual Offences Act CAP 63A.
[22] Republic of Kenya, (2010). The Counter Trafficking in Persons Act CAP 61.
[23] Republic of Kenya, (2018). The Computer Misuse and Cybercrimes Act CAP 79C.
[24] ECPAT, INTERPOL and UNICEF. (2021). Disrupting Harm in Kenya: Evidence on online child sexual exploitation and abuse. Global Partnership to End Violence against Children. p. 21.

The 2022 Children Act[25] further defined forms of online abuse to include cyberbullying, grooming and solicitation, cyber-enticement, cyber-harassment and cyber-stalking. These offences are punishable with up to five years imprisonment. This law made slow progress over many years and advocates took advantage of the slow pace to push for TF-CSEA aspects to be additionally added to the reviews that were taking place. Expert roundtable participants emphasised that the Children Act 2022 should be understood as a comprehensive legislative overhaul rather than simply an amendment to the 2001 Act. Participants further described the new Act as a genuinely child-centred piece of legislation that strengthened protection measures and made implementation more practical for professionals working directly with children.

The third law to have impact for TF-CSEA is the Sexual Offences Act[26] and moves are underway to update, revise and align this law to cater to technology-facilitated aspects of these crimes – including regarding TF-CSEA.

Finally, roundtable participants noted that the Data Protection Act[27] also influenced responses to TF-CSEA. While the Act has strengthened protection of children's privacy, including safeguards around the collection, use and sharing of children's images by schools and organisations, participants noted that it has sometimes created operational challenges during investigations. Internet service providers and financial institutions have at times cited data protection obligations when declining to share information with investigators. However, participants emphasised that industry actors are generally cooperative when appropriate legal procedures, including court orders and established evidence-sharing mechanisms, are followed.

Together, these legal reforms performed three critical functions. First, they defined the problem by establishing standardised terminology, creating a shared understanding across sectors thus bringing coherence for government, law enforcement, all stakeholders and even setting the direction of public discourse.

> *"[The law has] played a critical role in terms of harmonising terminology."* (Interview 14, Civil Society Officer)

Second, they enabled action by providing law enforcement and justice actors with the authority and mandate to investigate and prosecute cases. This shift is reflected in practice, as police officers now have clear mandates and legal backing when handling cases in ways that were preventing action before.

> *"[The laws] give us authority when we are carrying out our investigation."* (Interview 6, Law Enforcement)

This is further reinforced by the variety and nuance that the laws now enable investigations to be based upon, rather than the prior necessity for physical evidence of abuse to have occurred.

Third, they improved system coordination by aligning legal frameworks and reducing fragmentation, with the Children Act and the Computer Misuse and Cybercrimes Act viewed as complementary and mutually reinforcing.

Through these functions, legislative reform did more than strengthen the law – it activated the wider ecosystem by enabling existing institutions to respond, aligning stakeholders around a common framework, and translating emerging awareness into enforceable action. In this way, legal reform

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[25] Republic of Kenya, (2022). The Children Act CAP 141.
[26] Republic of Kenya, (2006). The Sexual Offences Act CAP 63A.
[27] Republic of Kenya. (2022). The Data Protection Act CAP 411C.

served as a catalyst that unlocked broader system change, beyond providing a legal foundation for pursuing investigations and prosecution of TF-CSEA. Yet, despite these positive changes, stakeholders still emphasised the need for continued legislative evolution to keep pace with technological change. Technology-facilitated abuse is dynamic and often develops faster than legislative cycles, meaning that new risks can emerge before existing laws are fully implemented or updated. In particular, emerging threats – particularly those associated with artificial intelligence-generated content and new and evolving digital platforms – remain insufficiently addressed.

> *"I would specifically talk about the generated images, AI generated imageries. So, you'll find that this is not addressed in law."* (Interview 6, Law Enforcement)

This highlights the need for 'future-proofing' when legislation is developed. Laws need to allow room to be adaptive and applicable to threats that may have not yet even emerged rather than relying solely on periodic legislative reform cycles.

Roundtable participants strongly supported the concept of future-proof legislation and argued that future legislative approaches should be sufficiently flexible and technology-neutral to remain relevant as digital platforms, technologies, and forms of abuse continue to evolve. However, participants emphasised that the primary challenge facing Kenya is no longer the absence of laws and policies. While legislative and policy advances have significantly strengthened the national response to TF-CSEA, substantial gaps needing attention were in implementation, coordination, and nationwide operationalisation. Stakeholders agreed that ensuring existing legal and policy frameworks are effectively implemented and consistently applied across the country should now be the priority.

Roundtable participants cautioned against viewing legislative reform as an end in itself. While legal reform has played a critical role in advancing responses to TF-CSEA, stakeholders observed that government agencies often respond to emerging issues by developing new laws, regulations, or guidelines, even where implementation of existing frameworks remains incomplete. Experts therefore emphasised that any future legislative developments should be strategic, evidence-informed, and well-coordinated to avoid duplication, regulatory overlap, and fragmentation of the broader policy landscape. This would help ensure that legal reforms complement, rather than distract from, efforts to strengthen implementation and institutional effectiveness.

Increased Confidence to Pursue Justice

Beyond establishing legal clarity and moving the public discourse forward, legal reforms have significantly strengthened confidence among civil society organisations – especially community-based actors – in their efforts to support survivors to obtain justice. Prior to the introduction of explicit provisions on technology-facilitated offences, cases were frequently not pursued due to lack of legal grounding. This had the effect of weakening trust in formal systems to handle such cases. Following the reforms, a shift is clear:

> *"Nowadays they don't disturb me. I just give them the Act... when they know I know the law, now they fear."* (Interview 17, Civil Society Officer)

These shifts reflect the ripple effects in the Kenyan ecosystem that emerged from good, clear legislative reforms to define the emerging problem of TF-CSEA. Beyond the important impact of giving police and prosecutors clear grounds to act, these changes have also engendered a broader empowerment of civil society actors to support victims and pursue increased accountability from the justice system. It's seen an impact on other system elements to act and report and has compelled private industry to more actively cooperate with investigations.

Catalyst 2: Policy and Strategic Frameworks Show Potential for Impact

The 2022-26 National Plan of Action to tackle OCSEA (NPA)[28] was collaboratively developed between the Directorate of Children's Services, UNICEF and Terre des Hommes through support from a Safe Online grant.[29] The NPA sets forth the strategic direction for Kenya's response to TF-CSEA and attempts to align national efforts under a shared vision and framework for action.

> *"The National Plan of Action... set a tone for the whole country on how to handle [TF-CSEA] issues...it justified also why Kenya is making those efforts"* (Interview 2, Civil Society Officer)

The NPA set out a roadmap across five strategic pillars: Prevention, Protection/Support, Prosecution, Partnerships, and National Capacity/Institutional Strengthening. However, its implementation was severely constrained by an absence of domestic financing and uneven local capacity. Although the plan was carefully costed (through support from Safe Online supported programming), limited domestic funding allocations hindered its operationalisation, particularly at the county level. In many areas, frontline officers responsible for implementation of NPA activities lacked any of the necessary information, resources, and institutional support to act.

> *"Because now the NPA has been rolled out to only the counties where we have had programming around OCSEA. It should actually be rolled out to the whole country, because Children's Officers exist all over the country. And they handle those issues, but they are not equipped or skilled, or they haven't been targeted with the kind of information for them to be able to handle those issues."* (Interview 3, Civil Society Officer)

This reflects a broader structural challenge: National policy frameworks cannot be effectively implemented without sustained financing and investment in frontline capacity. In Kenya's devolved governance system, effective implementation depends on county-level institutions and actors, yet their capacity remains uneven and under-resourced. As a result, progress has been concentrated in counties with existing NGO programs rather than being consistently embedded nationwide. Strengthening the link between national strategy, domestic financing, and county-level systems is therefore critical for achieving long-term and system-wide impact.

Roundtable participants broadly agreed with these findings, noting that information, guidance materials, and implementation support for TF-CSEA often do not reach practitioners beyond Nairobi and a small number of donor-supported counties. Child protection officers at community and county levels are frequently unaware of the National Plan of Action and related implementation tools.

Interviewees highlighted the important role of community-based organisations and civil society actors, which often have direct access to children and families, understand local contexts, and help build trust and encourage reporting. They therefore recommended prioritising the strengthening and resourcing of existing community-based protection mechanisms.

Participants also emphasised that sustainable progress requires integrating online child protection into routine government systems. Goals such as those set out in the NPA can't stand alone in such a document. Goals have to be embedded within annual work plans, performance management

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[28] Directorate of Children's Services, UNICEF & Terre des Hommes, (2022). National Plan of Action to Tackle Online Child Sexual Exploitation and Abuse in Kenya, 2022–2026.

[29] UNICEF Kenya (2022). Strengthening capacity, networks and systems to make the internet safe for children in Kenya. Proposal submitted to Safe Online.

systems, and key performance indicators (KPIs) for relevant government agencies for implementation, long-term sustainability and accountability.

SOPs for Emerging Harmonisation of Responses

UNICEF coordinated with partners, including ChildFund Kenya, to develop Standard Operating Procedures (SOPs) on TF-CSEA useful for law enforcement, justice, judicial and social services actors in their Safe Online supported project.[30] These SOPs were repeatedly named by interviewees as a key contribution to the Kenya ecosystem because they represented a resource that concretely translates policy into practice for those at the frontline. While laws and national plans of action define what should be done, the SOPs provide practical guidance on *how* it should be done. They clarify roles and responsibilities, establish referral pathways, and outline procedures for identifying, reporting, and responding and supporting victims of TF-CSEA in the justice and child protection sectors. The SOPs have helped harmonise responses by creating a shared operational framework. They reduce ambiguity, strengthen coordination between agencies, and deconflict cases and promote consistent handling.

UNICEF also expanded these SOPs into broader guidelines addressing all forms of violence against children and supported some (although with quite limited reach) workforce training aligned with these procedures.

> *"We have the national referral mechanism guidelines... because we've got to implement this document, we are having standardised operations...and harmonisation of what we're supposed to do"* (Interview 6, Law Enforcement)

However, because domestic funding has not been forthcoming, the impact of the SOPs has been constrained. Awareness, dissemination and use of the SOPs remain low, especially at county and community levels where frontline responses occur. Dissemination has been limited to counties with donor-supported programs. In many areas, frontline actors have not received adequate training, resources, or institutional support to apply the SOPs. Logistical challenges – including limited funding for training, high staff turnover, and competing priorities – have further limited uptake. As a result, implementation varies widely across counties, and the intended standardisation has not been achieved. In some cases, unclear roles and responsibilities lead to duplication or gaps in service delivery.

> *"Not many people understand that these policy documents exist...it's still a gap...you'll still find...someone carrying out a task that is supposed to be carried out by another entity."* (Interview 6, Law Enforcement)

Participants in both the expert roundtable and survivor side-event reinforced concerns about the limited dissemination of policies, guidelines, and procedures related to TF CSEA. They noted that these resources are often discussed within professional forums and national-level workshops but do not consistently reach frontline practitioners and local communities. Participants also observed that policy updates are commonly communicated through formal channels, such as the Government Gasette, which are not easily accessible to community-level stakeholders. In addition, some national guidelines and frameworks become difficult to access after their launch – even being removed from online download links within short timeframes.

[30] UNICEF Kenya (2022). Strengthening capacity, networks and systems to make the internet safe for children in Kenya. Proposal submitted to Safe Online.

To address these gaps, participants recommended expanding dissemination efforts through online learning platforms and digital knowledge-sharing tools. Participants also recommended developing accredited and mandatory training modules linked to staff performance and compensation systems to strengthen accountability, institutionalisation, and consistent application.

This highlights a key lesson: developing SOPs is only the first step in operationalising policy; their effectiveness depends on sustained investment in dissemination, training, and county-level system support. Strengthening awareness and closing capacity gaps among frontline actors responsible for implementation represents a critical opportunity to ensure that SOPs effectively bridge the gap between policy and practice and enable a coordinated response to technology-facilitated CSEA.

Catalyst 3: Evidence and Research

The last decade in Kenya saw the generation of context-specific data about TF-CSEA. The strategic use of this data then evolved a previously low-visibility and poorly understood issue into a publicly recognised national issue. The foundational Disrupting Harm[31] study supported by Safe Online, alongside clever and strategic use of Childline Kenya's program data related to TF-CSEA were showcased examples that enhanced understanding on the issue.

Data on Magnitude and Trends of Technology-Facilitated CSEA

Interviewees consistently named that the most useful impact of research has been to establish the magnitude, scope, and evolving trends of TF-CSEA *specifically for Kenya*. Prior attempts to advocate using data from other countries or based on anecdotal observation simply don't hold water with policy makers and duty-bearers. It is too easy to dismiss a topic that is uncounted and not specifically described for Kenya itself.

> *"When you don't have the data and you don't understand exactly what you're dealing with, then you don't know how to respond to it."* (Interview 2, Civil Society Officer)

Starting from around 2017, evidence on TF-CSEA began to be gathered in Kenya. Interviewees credited early data presented by Childline Kenya from their program activities as well as a Terre des Hommes funded scoping study for Kenya in 2018: "The Dark Side of the Internet."[32] The increasing strategic use of this data in advocacy disallowed the topic from being brushed aside as it painted a direct picture of the problem for Kenya's children.

Acknowledging such impacts from strategic use of robust data, Safe Online supported the multi-country Disrupting Harm study between 2019 and 2022. In Kenya the research project included ongoing engagement with government, civil society and other actors from the design, through gathering data and validating findings before the release of the report in October 2021. This ongoing government engagement was explicitly planned to ensure buy-in at the release stage of the research.

The Kenyan Disrupting Harm study marked a turning point as the first comprehensive, nationally representative data picture of TF-CSEA in the country. Partly because of the involvement of Kenya's Technical Working Group on Child Online Protection (See chapter III for more) throughout the research, and in-person validation of the draft report before release, the Disrupting Harm findings were widely accepted and co-owned by government and other stakeholders in the ecosystem, contributing to a shared trust and use of this evidence:

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[31] ECPAT, INTERPOL and UNICEF. (2021). Disrupting Harm in Kenya: Evidence on online child sexual exploitation and abuse. Global Partnership to End Violence against Children.
[32] Terre des Hommes (2018). The Dark Side of the Internet for Children: Online Child Sexual Exploitation in Kenya – a Rapid Assessment Report.

> *"[it] was very well accepted by the government... [it] gave a lot of information to all the sectors...the Disrupting Harm report has been so critical...even the government consistently references it."* (Interview 2, Civil Society Officer)

Roundtable participants reinforced the importance of context-specific evidence, noting that research on children's digital experiences across Africa remains limited. They observed that in the absence of context specific data, decision-making often relies on evidence generated in the Global North despite significant cultural, social, and technological differences. Yet the evidence base for Kenya is primarily reliant on two specific studies – the 2018 Terre des Hommes study and Disrupting Harm. While some further small projects and program and administrative data complement this credible research, there is grounds to expand the Kenya-specific evidence base (see Annex C). Participants emphasised the need for locally grounded evidence, including concepts, indicators, and definitions of harm that reflect Kenyan and African realities.

Interviewees noted that the way global technology platforms define and assess harm can affect both evidence generation and understanding of the scale of technology-facilitated CSEA because platform's own 'community standards' tend to define what content is identified, removed, and recorded in transparency reporting systems. As such, Global North standards which don't always reflect local contexts may result in some forms of harm being under-recognised or excluded from the data used to define the issue.

Roundtable participants highlighted the need for greater transparency and full compliance of tech companies in providing required data regarding child safety. Since 2024, the Communications Authority of Kenya has required technology platforms to submit quarterly transparency reports on the removal of child sexual abuse-related content. However, stakeholders noted that access to Kenya-specific data remains limited and it was shared that only one of the major platforms currently provides Kenya-specific data.

Participants also highlighted the need for care in interpreting and using administrative and incident-reporting data. For example, a representative from the Communications Authority explained that the Kenya Computer Incident Response Team Coordination Centre receives between 800 million and 1 billion cybersecurity incident reports each quarter, most of which relate to routine issues such as password resets or account recovery. During the reporting period ending in December 2025, only eight incidents categorised as child-related abuse were reported directly to the response team. Data must be digested carefully and used appropriately for advocacy and to inform policy responses.

Influencing Legal and Policy Reform

Research evidence has played a direct and instrumental role in shaping Kenya's legal and policy framework on TF-CSEA. During the review of the Children Act prior to 2022, research evidence created a critical opportunity to integrate provisions addressing online safety:

> *"Kenya was reviewing its Children Act of 2001... because it hadn't been enacted, we grabbed the opportunity to make sure it also covers some detail about online safety... we used our [program] data to establish what the trends looked like...so there was evidence to consider."* (Interview 3, Civil Society Officer)

Evidence has also informed the development of policy and concretising operational frameworks, including the National Plan of Action to tackle technology-facilitated CSEA, SOPs, and training materials for frontline actors.

The Disrupting Harm study was particularly influential in this regard in Kenya. Its findings depicted both the scale of children affected by TF-CSEA in Kenya, and its analysis of the police investigations,

response pathways and available (or unavailable) supports to victims. This data not only provided a concrete picture that could justify concrete advocacy, but it also directly informed national planning processes that intended to respond to the issue:

> *"After the Disrupting Harm report, the government developed a National Plan of Action...it was based on the Disrupting Harm report."* (Interview 2, Civil Society Officer)

Identifying Institutional Gaps and Capacity Development

Research has also been instrumental in identifying critical institutional gaps, particularly within the justice sector. Again, Disrupting Harm qualitative data identified key strengths and vulnerabilities in the response and support systems that formed the bedrock of this work.

> *"The justice sector had [no] information on exactly what the gap was...Disrupting Harm really pronounced the issues...and the gaps that we had."* (Interview 2, Civil Society Officer)

Importantly, the clear identification of gaps enabled more targeted and strategic interventions. It meant that advocacy could be pointed and specific rather than generalised calls to 'improve the system.' The Disrupting Harm data provided detailed insights into systemic challenges, including pinpointing where limited technical capacity, gaps in coordination, and constraints in legal and procedural frameworks existed. The Disrupting Harm data was also accepted within the country thanks to careful ownership-building engagement throughout the project. The cost and effort involved paid dividends as it clearly became a foundational reference for all Kenyan TF-CSEA programming following its launch.

> *"[Disrupting Harm formed] the foundation of a lot of the work that has been done on prevention and response to online child sexual exploitation and abuse in Kenya."* (Interview 2, Civil Society Officer)

Safe Online provided grants following the release of Disrupting Harm reports that supported the strategic use of evidence across multiple parts of the response ecosystem. In Kenya, some of these investments strengthened justice sector responses through training, legal guidance, and institutional systems for investigation and prosecution. Other funding was used for prevention and early responses through schools, communities, and referral systems. Additional initiatives expanded child participation in evidence generation and policy dialogue, while some addressed the specific experiences and risks faced by vulnerable groups, including children with intellectual disabilities. Together, these interventions demonstrate how robust evidence can inform policy and provide concreteness for responses in prevention, protection, participation, and inclusion corners of the ecosystem. Examples of specific Safe Online supported projects that used evidence for further outputs include:

UNICEF Kenya

Produced a range of justice-sector tools and institutional resources to strengthen investigation and prosecution of TF-CSEA. Key outputs included the Training Handbook on Investigation and Prosecution of TF-CSEA, training curricula for judges, prosecutors, and police officers, a case digest, and a concept note for the Guidance Note on Interviewing Children. The project also supported the NCAJ to establish a technical committee to guide the development of a digital evidence management system.

Strategically, this work helped strengthen justice sector capacity and institutionalise more specialised responses to TF-CSEA.[33] [34]

ChildFund Kenya

Developed community- and school-based prevention and response tools through the 'Safe CLICS' project.[35] Key outputs included the Whole-School Digital Awareness Model, tools for social workers, community-level implementation guidance, and systems for Community Digital Champions, alongside strengthened referral linkages between schools, communities, DCS and Childline. Strategically, the project helped translate national policy and evidence into community-level prevention and early response mechanisms.

Mtoto News Africa

Generated child-led research and participatory evidence through the 'It's a FACT' project,[36] resulting in research reports and the Afrocentric Digital Literacy Framework for Children. Findings were also disseminated to inform policy discussions with the African Union. Strategically, this project strengthened child participation in evidence generation and contributed a context-specific framework for digital literacy and online safety.

Zana Africa:

Produced evidence on the experiences and risks faced by children with intellectual disabilities through the project 'Understanding Online Sexual Exploitation and Abuse of Children with Intellectual Disabilities in Kenya'.[37] Key outputs included research findings and policy-relevant insights on vulnerability and protection gaps for children with intellectual disabilities. Strategically, this work helped further expand the evidence base to better address inclusion and the specific protection needs of vulnerable groups within TF-CSEA responses.

The Disrupting Harm study stimulated significant interest amongst other ecosystem actors beyond government duty bearers. In particular, civil society organisations began to prioritise online safety programming using their pre-existing funding or used Disrupting Harm data as a basis to apply for grants or advocate for new funding for relevant preventative and response programming.

At the same time, respondents noted that while external donor funding – particularly significant investments from Safe Online – has supported this work, government investment in TF-CSEA remains low to non-existent – even in terms of supporting policy commitments set out in the government-owned NPA. It was noted that while work funded by organisations that aligned with the NPA gets acknowledged, evidence was not uncovered of the government *driving* the plan or finding ways to fund other stated actions in the NPA.

Roundtable participants observed that the heavy reliance on external donor funding for research – the availability of which is markedly in decline – will undermine the sustainability of context specific TF-CSEA evidence for Kenya. They recommended strengthening partnerships with Kenyan academic

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[33] UNICEF Kenya. (2018–2022). UNICEF Kenya Donor Report: The Fund to End Violence Against Children

[34] UNICEF Kenya. (2024). Annual Progress Narrative Report: Strengthening capacity, networks, and systems to make the internet safe for children in Kenya.

[35] ChildFund Kenya. (2024). Annual Progress Narrative Report: The Safe Community Linkages for Internet Child Safety Project.

[36] Mtoto News Africa. (2024). Annual Progress Narrative Report: It's fact: Internet and Technology – For Africa's Children Today.

[37] Zana Africa. (2024). Annual Progress Narrative Report: Understanding OCSEA With Intellectual Disabilities.

institutions and exploring domestic funding mechanisms – that could include corporate social responsibility inputs from industry – to support ongoing research.

Children's Voices in Research

A further contribution to Kenya's evidence ecosystem has been the growing inclusion of children as active participants in research on TF- CSEA, particularly through Safe Online-supported work led by Mtoto News Africa. Interviewees described this as a strategic way to strengthen the quality, relevance, and credibility of evidence.

> *"We had children who are principal investigators...they went to all counties...to be able to collect data."* (Interview 12, Private Sector Representative)

Interviewees noted that peer-led research created greater openness and trust, allowing children to share experiences and perspectives that may not emerge in adult-led research. This improved the quality of evidence, particularly on sensitive issues related to online experiences and risks.

> *"The kids...they will have conversations like the findings we are getting from the kids report is things that we did not hear as adults."* (Interview 12, Private Sector Representative)

Child-led evidence therefore strengthened the evidence in the ecosystem by generating insights that adults might miss and ensuring that prevention and policy responses were informed by children's own lived experiences. This made evidence not only richer, but also more relevant for programming and decision-making.

It was also noted that genuinely engaging children requires substantial and unexpected resources due to safeguarding requirements. Educating donors of this situation to ensure the work can be done at a quality level takes advocacy – particularly in the current climate where stretched donors are pushing for efficiency and impact while funding shrinks.

> *"Child participation is expensive. Okay...because you have to put all these safeguards around them. So, it's expensive to be able to engage children."* (Interview 12, Private Sector Representative)

This highlights an important lesson for the broader evidence ecosystem: child-led and child-centred research can generate more in-depth and policy-relevant evidence on TF-CSEA, but sustaining this approach requires commensurate resourcing and institutional commitment.

Roundtable participants strongly validated these findings, re-emphasising that adults cannot assume to fully understand children's online experiences from a child's perspective. Participants shared experiences whereby child-led research processes generated insights and recommendations that adults had not identified. Building on this, participants proposed establishing more permanent mechanisms for child participation, such as child advisory groups or child committees, to ensure that children's perspectives consistently inform research, policy development, programme design, and strategic decision-making on online safety issues.

Catalyst 4: Global and External Influence

Global and external actors have had quite influential and catalysing impacts in accelerating Kenya's response to TF-CSEA. Over the past decade, these influences have operated in a range of ways, including international normative frameworks, financial resources, technical expertise, transnational partnerships, and examples of policy and programmatic progress in other jurisdictions for adaptation to the Kenyan context. The political and institutional functions they served within a context where TF-CSEA initially lacked domestic visibility, conceptual clarity, and policy traction are important to acknowledge. In this sense, external pressures were able to be used by actors in the Kenya ecosystem

to help construct legitimacy, urgency, and institutional space for TF-CSEA to emerge as a policy issue deserving attention in the national agenda.

The lesson that may be taken is that global influence can function not only as a technical source of support, but as a structural catalyst in agenda-setting. International attention helped reduce the perception of TF-CSEA as a marginal or niche issue by framing it within globally recognised child protection and cyber safety concerns, thereby making it easier for Kenyan actors to introduce the issue into domestic institutional and policy spaces.

International Telecommunication Union Guidelines

The adoption of the ITU guidelines by the Communications Authority of Kenya in 2015 provided a foundational framework to spur the early development of child online protection advocacy (and to a lesser extent, action).

> *"We subscribe to the ITU guidelines…we picked that up and came up with a child online protection program, which we launched in 2015…focusing more on parents, guardians…and we were also hoping to trigger industry and stakeholders to address online safety issues…we were able to see a lot more actors come into play."* (Interview 1, Government Officer)

At a time when TF-CSEA was not yet widely recognised as an important policy issue in Kenya, the guidelines gave Kenyan actors a credible way to introduce and discuss the issue. They provided clear language, standards, and internationally recognised guidance that helped define what child online protection meant and how government and non-government actors could respond.

The guidelines also helped give the issue political legitimacy. Instead of TF-CSEA being seen as a new or externally imposed concern, the ITU framework placed it within broader global discussions on child protection, digital safety, and telecommunications governance. This helped reduce resistance, created space for institutions to engage, and made it easier for Kenyan actors to present action on TF-CSEA as part of accepted international best practice rather than as a minor or optional issue.

In this way, international frameworks helped give TF-CSEA credibility at a time when it had little domestic political attention. They supported early policy discussions and signalled that this was a serious and recognised issue within global child protection and regulatory debates.

WeProtect Global Alliance Country Membership

Interviewees mentioned that Kenya's 2019 membership into the WeProtect Global Alliance – which focuses on child online safety – helped catalyse mobilisation of more civil society organisations in Kenya to address TF-CSEA. The country self-assessment tool[38] created and disseminated by WeProtect was promoted by UNICEF to the Kenyan government (under the Safe Online grant) to help assess Kenya's position and to inform the things they should prioritise within the NPA.

> *"There has been a global interest on this matter…I would attribute it to the WeProtect Global Alliance…that's when a lot of actors then came on board…especially child agencies who had not taken this as a focus area earlier."* (Interview 1, Government Officer)

Kenya's WeProtect membership helped legitimise TF-CSEA at home because it was an internationally recognised issue. Subtle pressure through benchmarking against other countries was

[38] WeProtect Global Alliance (2023). Preventing and Tackling Child Sexual Exploitation and Abuse: A Model National Response: Self-Assessment Tool.

also possible through the membership bringing peer comparison and reputational incentives to advocacy attempts.

WeProtect membership increased visibility around Kenya's level of preparedness and highlighted institutional gaps. This created a form of soft accountability, where Kenya's progress could be measured against international standards and compared with peer countries. Such benchmarking can influence national priorities by encouraging governments to demonstrate responsiveness and progress, particularly in areas linked to international child protection commitments. Alliance membership therefore served as both support and pressure: Support by providing tools, knowledge, and networks, and pressure by signalling expectations for action within a visible international policy community.

In Kenya's case, this appears to have helped elevate TF-CSEA from a relatively under-recognised issue to one receiving greater institutional and civil society attention. This shows that global alliances can shape domestic policy agendas not only through technical support, but also through visibility, policy signalling, and accountability pressures that make inaction increasingly difficult to justify.

Roundtable participants reinforced these findings, noting that advocacy efforts to secure Kenya's participation in the WeProtect Global Alliance played an important role in raising awareness among government actors regarding online harms against children and strengthening commitment to the issue at the international level. Participants further highlighted that the WeProtect Model National Response framework subsequently served as an important foundation for government-led development of the National Action Plan. This suggests that the alliance's influence extended beyond agenda-setting and awareness raising to directly informing national planning processes and helping structure Kenya's emerging response to TF-CSEA.

However, participants also highlighted some limitations in how global alliances operate in practice. While the WeProtect Global Alliance provided important tools, frameworks, and opportunities for engagement during the early stages of Kenya's response, civil society representatives observed that engagement with WeProtect and its associated mechanisms appeared to diminish after the initial period surrounding Kenya's membership and the development of the NPA. Participants further noted that WeProtect's separate engagement structures for governments, technology companies, and civil society organisations limited visibility between these stakeholder groups.

Knowledge Transfer and National Adaptation from Other Contexts

Knowledge transfer from other parts of the world has been a key driver in shaping Kenya's understanding of TF-CSEA and informing contextually relevant responses.

> *"Tapping into information and knowledge...from countries that are ahead...sharing that information helps to paint a picture of how big a problem it is and could be even in Africa... and then investing in skilling the different actors."* (Interview 14, Civil Society Officer)

Terre des Hommes played a significant role in early facilitation of external to domestic knowledge transfer by leveraging prior research and program experience prior to and during the early COVID period.

> *"TDH had done another study in Asia...that informed the programming [in Kenya]."* (Interview 14, Civil Society Officer)

Knowledge transfer appears to have been particularly important in a context where local evidence and institutional familiarity with TF-CSEA were initially limited. Lessons from countries that had already begun addressing online child sexual exploitation helped Kenyan actors conceptualise the

scale, risks, and possible response pathways for an issue that was still poorly understood domestically.

However, knowledge transfer is not a neutral process. While it can accelerate learning and reduce the costs of policy experimentation, it also raises questions about adaptation, contextual fit, and the risk of importing frameworks or interventions developed in different technological, institutional, or socio-cultural contexts. Effective transfer therefore depends not only on borrowing ideas, but on translating and adapting them to national realities.

Roundtable participants emphasised that international approaches should be viewed as reference points rather than models for direct replication. While evidence and experiences from other regions can help identify emerging risks, trends, and threats that may also affect children in Kenya, interventions intended for implementation – including awareness materials, educational resources, safeguarding approaches, and policy frameworks – generally require adaptation to the local context and some concepts developed in Global North contexts may have limited relevance in African settings if applied without modification. For example, participants observed that privacy is often understood differently in African contexts where safety is commonly viewed not as the complete elimination of risk but from more of a resilience lens – equipping children with the knowledge and skills needed to navigate risks themselves.

Roundtable participants also provided examples of the challenges associated with replicating institutional models developed elsewhere. Participants noted that the DCI Child Protection Unit was partly inspired by the UK's CEOP model, which sought to bring law enforcement, industry, and civil society actors together within a shared working environment. However, implementation challenges emerged within the Kenyan context. Participants highlighted that funding arrangements did not adequately support sustained civil society participation and that some NGO personnel found it psychologically challenging to work continuously within a criminal justice environment. These experiences illustrate that even where institutional models are considered successful internationally, practical, organisational, financial, and psychosocial factors may affect their feasibility and effectiveness in different contexts.

Stakeholders further stressed that contextual learning should involve not only adapting external approaches but also drawing on local cultural practices and knowledge systems to generate approaches. Some participants suggested that traditional African rites of passage and gradual transitions to adulthood offer useful models that could be applied to digital safety initiatives. Rather than relying on restriction-based approaches that limit children's access to digital platforms, participants proposed approaches that progressively prepare children for online participation by increasing access and responsibility according to age, maturity, and readiness.

These observations highlight the importance of assessing both the originating and receiving contexts before adopting international models. Determining what can be transferred, what requires adaptation, and what may be built out from within the local culture is critical.

Capacity Building and Skills Development by Global Actors

Capacity building has been one of the most tangible and impactful outcomes of global engagement regarding TF-CSEA. A wide range of international actors – including development partners, law enforcement, private sector entities, and specialised organisations – have supported training initiatives targeting law enforcement, prosecutors, educators, and civil society actors. These efforts have significantly enhanced technical skills, awareness, and institutional capacity. For example:

> *"Microsoft...came up with a program...training teachers...and they were getting certifications on child online safety...that drastically improved [awareness]."* (Interview 13, Civil Society Officer)

Similarly, international partnerships have strengthened the capacity of law enforcement and justice sector actors. It was noted in interviews that development partners and other agencies like the US National Centre for Missing and Exploited Children (NCMEC) and UK's Internet Watch Foundation (IWF) supported capacity development by filling knowledge and skills gaps in areas where domestic institutions had limited experience. This hence accelerated capacity development and strengthened the response to a technologically complex crime that requires specialised expertise.

However, it is also noted that care and consideration in this work is vital. Interviewees disclosed there was little domestic coordination or prioritisation of the capacity development needs within Kenya. These trainings, while beneficial and appreciated, tended to still be somewhat opportunistic and directed by partner agendas rather than strategic for Kenya itself. Furthermore, framing of the training and how it occurs is worth considering:

> *"Partnering with the Directorate of Children's Services to provide that training, government-to-government was much more appreciated as opposed to CSOs leading that initiative and...law enforcement officers thinking that CSO people are just imposing things on us...that made it easier to facilitate sensitisation on tech facilitated abuse of children with government entities."* (Interview 14, Civil Society Officer)

This suggests that while capacity-building interventions are valuable, their effectiveness depends on how they are institutionally framed and domestically embedded. Technical support delivered through legitimate government structures appears to generate greater acceptance than initiatives perceived as externally imposed or NGO-driven.

Peer learning between countries has further enriched these efforts. While conducting interviews for this project, the research team directly encountered law enforcement officers from another country collaborating with Kenyan police on a major investigation.

> *"The concept of the DCI Child Protection Unit came from CEOP from the UK...including law enforcement, awareness structures, and helplines."* (Interview 13, Civil Society Officer)

This demonstrates how international practices can positively inform and strengthen the design and establishment of Kenyan national structures, and that bilateral partnerships can be enabled to collaborate, coach and support. Sometimes the costs for such engagements are low as mutual benefit is gained by all involved – particularly with joint law enforcement actions. Yet, some costs to enable the partnerships are necessary to be supported. At the same time, the borrowing of institutional models underscores the need for careful adaptation. Imported structures may provide useful templates for Kenya, but their effectiveness depends on domestic adaptation and institutional ownership, and resourcing, rather than replication alone.

In addition, global engagement has, at times, influenced national policy development by empowering Kenyan officers working with multi-lateral organisations to gain knowledge and access resources that facilitate them to advocate clearly and usefully for ecosystem improvements in the country:

> *"Development partners...are able to put pressure on the government to develop laws that deal with this type of crime...if you want support, then you need to focus on coming up with a legal system that addresses this crime type."* (Interview 2, Civil Society Officer)

This shows that regional centres of excellence that create institutionalised platforms for continuous learning, peer exchange, and professionalisation may offer a more sustainable model of capacity development than one-off training events. However, their long-term effectiveness still depends on sustained domestic uptake, sustained domestic financing, and integration into national systems.

> *"(AFRALTI) it's an ITU Centre of Excellence...we leverage it for capacity building...with facilitators from ICMEC, Internet Watch Foundation, Meta, Google, Kenya Law Reform Commission...we've been able to really train a lot of people."* (Interview 1, Government Officer)

Such initiatives have expanded access to high-quality training, strengthened technical competencies, and supported the professionalisation of actors involved in responding to TF-CSEA.

Catalyst 5: COVID-19

Increased Online Exposure Due to Remote Learning and Device Access

The rapid transition of schools in Kenya to remote learning during COVID-19 significantly increased children's use of digital devices and online platforms. With schools closed and education systems rapidly adapting to virtual modalities, children were required to engage with technology on an unprecedented scale. This shift resulted in a rapid expansion of children's digital presence, sometimes in environments that lacked adequate supervision or safeguarding measures as they had been hastily constructed with limited guidance for the teachers and others using them.

Importantly, the speed of digital expansion far exceeded the readiness of safeguarding and child protection systems to respond. As children moved online in large numbers, key organic and formal protective structures — including parental supervision, teacher preparedness, platform safety awareness, reporting pathways, and children's own digital literacy — did not scale at the same pace, creating significant systemic protection gaps alongside increased connectivity.

> *"When COVID happened...there was this escalation of children having...phones... internet became very accessible."* (Interview 16, Private Sector Representative)

In Kenyan households, devices were often previously restricted or monitored by parents – who would share devices with children. However, access to their own devices dramatically increased for young Kenyans in this period, either through deliberate provision by schools and the government[39] for educational purposes or through increased household access given parents and children were both online working and learning at the same time – requiring own devices. The rapid normalisation of independent device ownership and internet access fundamentally altered children's exposure to online environments, yet this transition occurred without a corresponding expansion in guidance, supervision, or child online safety capacity within homes and schools.

> *"As a result of the lockdown, education transitioned to the online space...children could interact with gadgets...and more children now had an opportunity to go into the online space."* (Interview 9, Civil Society Officer)

This increased access was sometimes accompanied by lacking supervision thus increasing risk to abuse.

> *"Some parents could leave their children...all they had were smart TVs, phones, and tablets."* (Interview 9, Civil Society Officer)

[39] Soto News (2020). Learners To Get Phones And Airtime to Enhance Homeschooling: Press release.

This lack of oversight created opportunities for offenders to engage with children through digital platforms without detection. The rapid expansion of children's online presence therefore created an enabling environment for TF-CSEA risks to intensify, particularly as many caregivers, schools, and institutions lacked the knowledge, tools, and preparedness to identify or respond to online harm. As reflected in the NPA rationale, school closures and increased unsupervised internet use during COVID-19 were themselves recognised as key drivers heightening children's exposure to TF-CSEA risks in Kenya.[40]

> *"When COVID happened…there was a huge increase of OCSEA…there was a huge surge…parental panic, teacher panic."* (Interview 16, Private Sector Representative)

There was a surge in cases of online grooming for sexual purposes reporting in mainstream media which brought the issue into sharper focus for families, educators, and policymakers, and further highlighting the immediacy of the risks and the need for urgent action.

System Unpreparedness and Exposure of Institutional Gaps

While the pandemic accelerated digital engagement, it also exposed significant gaps in preparedness across child protection systems.

> *"We were not ready…to guide them on some of the safety features of these platforms… everybody was caught off guard…we were forced to learn as we went through the COVID season."* (Interview 3, Civil Society Officer)

This lack of preparedness highlighted deficiencies in digital literacy, technical capacity, and system-level coordination within the ecosystem. While organisations and the government scrambled to get advice and guidance out, those who were generating the advice were also learning as they went. COVID-19 exposed the fact that the child protection system had been largely designed around offline risks and was insufficiently equipped for rapidly evolving digital environments, forcing institutions to respond reactively rather than proactively, often without established protocols, specialised expertise, or coordinated mechanisms for prevention and response in online spaces. Usefully, INGOs and others in Kenya were able to draw examples from other contexts, however, this was rushed and not always able to be carefully contextualised to suit Kenyan audiences.

The COVID-19 pandemic therefore served as both a catalyst and a stress test for Kenya's response to TF-CSEA. It accelerated children's exposure to digital environments, heightened the visibility of online risks, and exposed critical gaps in preparedness, supervision, and institutional coordination. At the same time, the pandemic elevated TF-CSEA from a peripheral concern to an urgent national child protection issue, helping catalyse policy and attention, institutional engagement, and accelerated ecosystem development.

Roundtable participants strongly confirmed that COVID-19 was a significant accelerator of TF-CSEA risks. They also highlighted how Kenya's rapidly expanding digital ecosystem continues to expose children to new forms of harm through online learning platforms, online gaming environments, live-streaming services, artificial intelligence (AI), digital financial services, and other emerging technologies. These platforms create new opportunities for communication, content sharing, and financial transactions, which can be exploited by offenders if adequate safeguards are not in place.

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[40] Directorate of Children's Services, UNICEF & Terre des Hommes, (2022). National Plan of Action to Tackle Online Child Sexual Exploitation and Abuse in Kenya, 2022–2026. p. 22.

Participants further noted that, although increased digital engagement exposed children to greater risks, it also contributed to greater awareness of children's digital rights and privacy. Following the enactment of the Data Protection Act, schools, organisations, and other institutions became more conscious of the need to obtain parental consent before collecting, using, or publishing children's images and personal information. Participants cited cases in which schools faced legal consequences and compensation claims for using photographs of students in promotional materials without appropriate consent. These developments demonstrate how evolving digital governance frameworks are beginning to strengthen child protection practices in online environments.

Catalyst 6: Institutional Development

At least on paper, institutional development has been a central pillar in strengthening Kenya's response to TF-CSEA, translating legislative and policy progress into operational reality. This shift reflects growing recognition that addressing TF-CSEA requires specialised expertise, coordinated action, and sustained institutional investment. Yet interviewees were not always optimistic about the progress seen and the hill that must still be climbed.

Creation of Specialised Units and Departments

A defining feature of institutional development has been the establishment of specialised units focused exclusively on TF-CSEA within law enforcement, prosecution, and child protection services. The emergence of specialised institutional structures reflected growing recognition that TF-CSEA could not be effectively addressed through the existing child protection or criminal justice approaches alone. Technology-facilitated offences introduced forms of harm that did not fit the existing mould. These emerging harms were highly technical, digitally mediated, cross-jurisdictional, and evidence-intensive, often requiring capabilities that general institutional systems had not originally been designed to manage. Investigating TF-CSEA cases frequently required specialised digital forensic skills, understanding of online offender behaviour, coordination with technology companies and international actors, management of electronic evidence, and approaches to victim identification and safeguarding adapted to online contexts.

In this context, specialisation mattered not simply because new units were created, but because it enabled institutions to begin developing concentrated expertise and operational responsiveness around a rapidly evolving form of child exploitation. Specialised units created spaces where technical knowledge, investigative experience, and institutional attention could accumulate, helping to strengthen case handling, improve coordination between actors, and increase the visibility and legitimacy of TF-CSEA within institutional mandates. In practice, specialisation also helped move TF-CSEA from being treated as a peripheral or poorly understood issue to one increasingly recognised as requiring dedicated institutional responses and professional expertise. (More details are included in chapter IV because the success of this work relies on interactions and connections between ecosystem actors and institutions).

However, specialisation also introduced important limitations and trade-offs. Expertise often became concentrated within a relatively small number of trained officers, prosecutors, or departments, limiting broader institutional diffusion of knowledge and leaving many frontline actors insufficiently prepared to identify or respond to TF-CSEA cases. This created risks that institutional capacity would remain dependent on specific individuals, donor-funded programs, or external technical actors rather than becoming fully embedded across systems. As a result, while specialisation strengthened certain institutional capabilities, it did not necessarily translate into system-wide preparedness or consistent frontline response capacity nationwide.

Standardised Manuals and Training Materials for Use Across the Ecosystem

Institutional strengthening has been further reinforced by the development of the national, standardised SOPs and manuals for the social service workforce already mentioned[41] and digital safety curriculum and resources for children and families,[42] all enabled by Safe Online grants. These national and openly available resources – developed through broad national consultation – have attempted to address the opportunistic and fragmented nature that training related to TF-CSEA had prior. This represented an important shift from ad hoc and individualised responses toward a nationally-led institutionalisation of processes. Given the complexity and novelty of TF-CSEA cases, standardisation became important in creating shared guidance across sectors on issues such as evidence handling, victim-centred approaches, investigative procedures, and inter-agency coordination.

> *"We developed a handbook…on the standards of handling online child abuse…it was a game changer…pointing actors on what they need to do once they come into contact with the case."* (Interview 7, Law Enforcement)

These resources represent influential building blocks on which improvements to Kenya's response ecosystem can be anchored. Yet, the number of stakeholders who have actually been exposed to, or trained on, these resources remain small. The creation of specialised tools does not automatically guarantee institutional integration or practical implementation unless frontline actors are made aware of them through dissemination to the lower levels. This work also should be undertaken from a domestic government commitment – rather than grant-dependent activities – and funded through existing government programming rather than stand-alone. Repetition of their use until they become normalised is important, and that only comes from genuinely inserting them into systemic procedures.

While the building blocks may be in place now, there remains a need to motivate actors and earmark domestic resources so that government systems can adopt and promote broadly. The sustainability of these training efforts therefore depends not only on technical development of tools, but on their institutional embedding through government ownership, routine institutionalised training, operational reinforcement, and domestic financing.

Capacity and Understanding About TF-CSEA Amongst Professionals

Capacity building has been critical in improving practices regarding TF-CSEA. Many practitioners across law enforcement, prosecution, judiciary, and child protection systems initially lacked familiarity with digitally mediated forms of abuse, online evidence, and technology-enabled offending patterns. Specialised training therefore served not only to build technical skills, but also to reshape institutional understanding of the nature of TF-CSEA and the similarities and differences in how it impacts young people and how to respond to it.

> *"Having the training package on investigation and prosecution…was very important…you had a standardised way of building capacity…everybody moving forward in the same phase, having the same knowledge."* (Interview 2, Civil Society Officer)

In this sense, consistent capacity building also contributed to greater coherence across sectors that had historically operated with fragmented levels of understanding and preparedness on the issue.

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[41] UNICEF Kenya (2022). Strengthening capacity, networks and systems to make the internet safe for children in Kenya. Proposal submitted to Safe Online.

[42] ChildFund Kenya (2022). The Safe Community Linkages for Internet Child Safety (Safe CLICS) Project. Proposal submitted to Safe Online.

Consistent messaging to different sectors enabled collaboration between actors in different parts of the ecosystem. Experiential learning approaches have further contributed to building understanding of the impacts of TF-CSEA crimes.

> *"Actually, even in this training, we did have a survivor yesterday to speak to the magistrates…The voice of the survivor…is very important…it challenges mindsets…and creates 'aha moments' that transform how actors respond."* (Interview 11, Civil Society Officer)

These approaches are significant and particularly important in contexts where online abuse is minimised, misunderstood, or treated as less urgent than offline forms of exploitation, because they address not only technical competence, but also institutional culture and practitioner attitudes, helping actors better understand the lived realities and harms associated with TF-CSEA.

Yet, despite these gains, resourcing constraints mean that capacity building has mainly targeted criminal justice actors in certain geographical locations considered hotspots, and therefore it remains uneven across the country. This uneven distribution of expertise creates disparities in institutional readiness across Kenya's counties and limits the extent to which capacity building has translated into comprehensive system-wide resilience. Capacity building also relies significantly on development partner support with domestic funding commitments not yet seen. This obviously raises questions regarding sustainability. While development partners have played a critical catalytic role in building Kenya's TF-CSEA response ecosystem, continued reliance on external funding will constrain Kenya's capacity to scale the response.

Roundtable participants highlighted that these capacity and resourcing challenges are particularly evident among Children's Officers, who represent one of the few scaled child protection mechanisms available across the country. While they play a critical frontline role in case management and service delivery, participants noted that the position is often burdened with significant responsibilities but lacks adequate operational resources. This constrains the ability of Children's Officers to respond effectively to TF-CSEA cases and reflects broader disparities in institutional readiness across counties. Participants further emphasised that increasing investment in frontline child protection services is necessary, but that additional resources should be accompanied by strong accountability and oversight mechanisms at the local level to ensure funding is directed toward case management and child protection outcomes.

Kenya has made significant progress in establishing the institutional foundations required to address TF-CSEA, including specialised units, standardised operational tools, and workforce training mechanisms. However, the challenge has now shifted from creating institutional architecture to embedding it consistently across frontline systems nationwide. Uneven implementation, dependence on development partners, and limited domestic resourcing continue to constrain the transition from specialised pockets of expertise toward sustainable system-wide capability.

IV: INTERACTIONS AND CONNECTIVITY IN THE ECOSYSTEM

Mapping and understanding the systemic response to TF-CSEA includes looking not only at the different parts but also looking at the interactions and connections between elements. The interactions and influences between system elements and levels are what Bronfenbrenner characterised as the 'mesosystem.'[43] This chapter describes prominent examples of system elements effectively interacting, coordinating, and complementing each other in the Kenyan TF-CSEA ecosystem.

Multi-Stakeholder Coordination

Formal National- and Lower-Level Coordination Mechanisms

Respondents indicated that over the decade, the Technical Working Group on Child Online Protection (TWG) has been the main national mechanism for agenda-setting, and later, for coordinating regarding TF-CSEA. It is led, and includes key government agencies, as well as civil society representatives:

> *"We have the Technical Working Group on Child Online Protection that is led by government through the State Department for Children's Services, specifically the Child Online Protection Department."* (Interview 3, Civil Society Officer)

The TWG brings together expertise from multiple sectors, including policy-level actors, programming stakeholders, and other experts:

> *"Working with the Technical Working Group, where we have the expertise of all...instead of targeting the child, you target from the Ministry...So, the multi-sectoral approach has really worked in enhancing or in strengthening the response and prevention system for online safety concerns."* (Interview 9, Civil Society Officer)

A key strength of the TWG is its role in supporting the joint development of national policies. It coordinated government and civil society stakeholders to consult and develop the National Plan of Action to Tackle OCSEA (2022-2026)[44] which integrated efforts across child protection, ICT, law enforcement, justice, and social services into a concrete plan. Yet as already noted in chapter III, work to progress the stated actions in the NPA has been less successful. Interviewees noted that the power of the TWG ebbs and flows depending on external project financial support and during interviews it appeared that regular meetings had fallen away substantially. There unfortunately still appears to be limited motivation or investment from government to sustain this useful mechanism.

> *"For the national coordination...the Technical Working Group...is led by government... but the functionality is totally different...it's purely dependent on...do we [TWG members] have resources to have those meetings? When we don't have partners who have resources to support the meetings, then they never happen, which speaks now about how sustainable some of these structures are within our spaces."* (Interview 3, Civil Society Officer)

The TWG is also a mechanism to strengthen legitimacy and increase uptake of projects due to its capacity to enable government co-ownership of activities.

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[43] Bronfenbrenner, U. (1979). The ecology of human development: Experiments by nature and design. Cambridge, MA: Harvard University Press.

[44] Directorate of Children's Services, UNICEF & Terre des Hommes, (2022). National Plan of Action to Tackle Online Child Sexual Exploitation and Abuse in Kenya, 2022–2026.

> *"ChildFund worked with the Directorate of Children's Services to support them in coming up with the materials…with the Technical Working Group on online child sexual exploitation. And this process was led by the DCS, the Directorate of Children's Services…if we went to develop these materials as ChildFund, then they would have [just] been our material as ChildFund."* (Interview 9, Civil Society Officer)

This government-led partnership approach also strengthens training efforts.

> *"…partnering with the Directorate of Children's Services… government to government [training] became much more appreciated… as opposed to CSOs leading… that made it easier to facilitate sensitisation on tech facilitated abuse of children with government entities." (Interview 14, Civil Society Officer)*

Furthermore, the TWG strengthens relationships and enables collaboration among stakeholders, including informal and bilateral engagement.

> *"… just having a platform or a space where they [stakeholders] can engage…creates good working relationships. Because sometimes it's easier to engage with someone once you have interacted with them…the familiarity then helps to make the work and coordination much easier." (Interview 14, Civil Society Officer).*

Gaps includes the limited engagement of industry actors with the TWG and its dependence on external funding for functionality. Roundtable participants emphasised that more meaningful engagement of industry actors is required within multi-stakeholder coordination mechanisms. In particular, participants highlighted the importance of involving internet service providers, FinTech companies, and other technology actors whose platforms and services may be used in the commission of offences. Greater participation by these actors was viewed as important for improving understanding of legal obligations, evidence preservation requirements, information-sharing processes, and operational collaboration with law enforcement and child protection stakeholders.

The primary value of the TWG appears to lie in convening stakeholders, aligning priorities, building shared understanding, and elevating TF-CSEA within institutional agendas. However, its effectiveness is constrained by limited operational continuity and a heavy dependence on donor support. While external funding has so far helped sustain convening, capacity building, and coordination momentum, it has also exposed the fragility of donor-dependence. The TWG appears to be proven mechanism that government commitment to sustainably fund could have an obvious, cost-effective impact on.

At the sub-national level, county level 'Children's Advisory Committees' (formerly named Area Advisory Committees) provide important multi-sectoral mechanisms for disseminating, planning and addressing a range of child protection issues – including TF-CSEA – by creating a forum where stakeholders regularly meet and maintain collaborative working relationships.

These can also extend further down the chain to community-level coordination bodies: Interviewees mentioned that at local level, coordination structures occasionally also bring together community leadership, government child protection officers, and civil society actors—with differentiated but complementary roles in safeguarding and child protection responses.

> *"We have also location advisory council… LC where we have in nyumba kumi, we have elders, Children's Officers…other organisations working within that location. Every person has a role."* (Interview 17, Civil Society Officer)

This layered system is intended to strengthen local responsiveness and supports coordinated case management through mechanisms such as case conferences, where stakeholders jointly discuss cases, address investigative challenges, and identify how different actors can support case resolution.

Yet, these mechanisms are very inconsistent across Kenya. The likelihood of their existence at local level tends to depend on civil society actions funded externally. Where these systems are operational, this is usually resultant by NGO or CSO financial and technical support. The capacity and motivation of local Children's Officers also factors in. Yet the established mechanisms are an opportunity that bring together actors and mechanisms from all over the TF-CSEA ecosystem if support and motivation is present.

Informal Stakeholder Collaborations

Beyond formal, government structures, relationship-based collaboration between system actors and institutions plays an important role in advancing awareness and capacity building on TF-CSEA. These collaborations are often opportunistic and exist on trust and by slowly expanding existing networks.

> *"...we [as Communications Authority] have built an ecosystem of over 50 stakeholders... the manner in which we work is more of collaboration...if I'm having an activity, we invite each other...we've been working very closely...we have taken stakeholder collaboration on these matters very seriously."* (Interview 1, Government Officer)

This suggests that informal collaboration has functioned as an important complementary mechanism within Kenya's TF-CSEA response. (Such relational impacts are rarely captured in project reporting and project evaluations). Rather than relying solely on formal structures, these collaborations and friendships enable flexible pathways for information sharing, joint action, and practical cooperation. In this way, informal collaboration can help sustain momentum and engagement in ways that more bureaucratic structures may not always achieve.

These engagements are reciprocal and can even help reduce duplication.

> *"If we have a program that involves child online safety, we involve other agencies...it is a collaborative effort...they invite us...we invite them...it has helped to...avoid the overlapping mandates...when we come together it's even better."* (Interview 5, Government Officer)

This further suggests that informal stakeholder collaboration is not only relational but also functionally important in helping actors navigate overlapping mandates, reduce fragmentation, and improve complementarities across interventions. Such reciprocal engagement may therefore strengthen efficiency and coherence within a multi-actor safeguarding ecosystem. They can be especially important at the community level.

> *"So, the multi-sectoral approach has really worked in enhancing or in strengthening the response and prevention system, the online safety concerns...Sometimes, when there's not that linkage, you find that issues are identified at the community, and then they will never reach the formal structures. So, they just die there, they will never be reported, children will never get justice, and maybe people will keep on complaining about our system not working, and the perpetrators will feel it's okay to abuse the child because the system is weak."* (Interview 9, Civil Society Officer)

The above quote shows that informal connections can even be the glue that binds the whole response ecosystem. Where formal systems may be inaccessible, weak, or slow to respond, these informal relational linkages can help move cases from community identification into reporting, referral, and justice processes.

At the same time, informal collaborations have inherent limitations because they rely on personal relationships, trust, and existing networks rather than institutional mandates and consistent protocols. While this can make them flexible and responsive, it can also result in uneven engagement, inequity of access and dependence on individual actors. This should not be read as a criticism, but more as an illustration of how systems constantly move and adapt. Should an informal process be a key enabler for action, efforts should be made to integrate and formalise it into protocol.

Specialised Units

Police – AHTCPU

The Kenyan Police's Directorate of Criminal Investigations (DCI) established the specialist Anti-Human Trafficking and Child Protection Unit (AHTCPU) in 2016, initially through a bilateral collaboration with the UK National Crime Agency - Child Exploitation and Online Protection (NCA-CEOP).[45] The Unit now handles all TF-CSEA cases nationally.

> *"...before we had the Child Protection Unit, we had very huge challenges dealing with cases, especially difficult cases involving sexual violence...But now...that we have a specialised investigation unit to deal with these complex cases, we see that investigations have picked up."* (Interview 11, Civil Society Officer)

Uniquely for the Kenyan Police, the Unit uses a selective recruitment process to ensure police officers are committed to the work. The Unit also has an exception from compulsory regular rotation out of officers which allows them to build and retain specialist institutional knowledge:

> *"So, officers apply to the Unit...as opposed to just being posted there and you're not interested."* (Interview 11, Civil Society Officer)

> *"We do not have high staff turnover. They're also not really transferred because there is an agreement that they shouldn't be transferred..."* (Interview 6, Law Enforcement)

This continuity of staffing has enabled officers to accumulate high levels of specialisation – an acknowledged enabler of the Unit's effectiveness. By retaining officers over time, the AHTCPU builds institutional memory, deepens its own technical expertise through experience, and reduce the disruption associated with frequent staff turnover, which is often a challenge in general policing structures.

> *"...And what has happened is that they've become so good at what they're doing now. When we go for capacity building, we don't use our (IJM) staff. We use them, and they're able to speak to other officers and transfer their knowledge, which has been very effective."* (Interview 11, Civil Society Officer)

Now that the capacity and confidence of the Unit is strong, there is a flow-on effect with these officers increasingly taking on the development of other officers across the police force. Less complex cases referred to the Unit are now sometimes co-investigated with local police officers in attempts to further share skills and knowledge beyond the Unit.

The AHTCPU is widely seen as responsive and effective by partners working to support young people regarding TF-CSEA cases:

[45] Directorate of Criminal Investigations. (n.d.). DCI Anti-Human Trafficking And Child Protection Unit (DCI - AHTCPU).

> *"When [we] report…they normally act immediately…I myself have written several statements concerning different cases and I gave my witness in court."* (Interview 17, Civil Society Officer)

A focus on publicly promoting successes in high-profile cases, which are reported in the media has also helped build public confidence by demonstrating that these crimes are treated seriously, showcasing the capacity of specialised investigators to solve complex cases, and potentially encouraging reporting. The Unit has also triggered capacity building in other parts of the justice system.

> *"When the officers (AHTCPU) were trained…that triggered the prosecutors to be trained."* (Interview 6, Law Enforcement)

This suggests that specialisation within law enforcement may have acted as a catalyst for broader institutional strengthening across the justice chain, rather than functioning in isolation. However, this also highlights that specialist effectiveness depends not only on the existence of a specialised investigative unit, but on whether complementary actors such as prosecutors are similarly equipped to respond.

Despite these achievements, significant resource constraints remain. In response, the current Safe Online supported project enabled UNICEF,[46] together with administrative financing experts, to support AHTCPU strategic planning processes, including to gather costing information and support personnel to apply for and advocate internally for budget appropriations within Kenyan government processes. This work has led to some increases in the Unit's sustainability regarding staffing, maintaining annual licensing for forensic tools and other equipment and travel costs.

The successful continuation of the AHTCPU demonstrates the importance of sustained specialisation and protecting expertise. However, the difficulty of realistically scaling such specialist capacity to be available nationally is illustrated. A specialised unit must be integrated and financially supported within the national ecosystem. If cannot remain dependent on external financial or technical inputs or be project-dependent. While such inputs might allow it to manage complex TF-CSEA cases in the short-term, not establishing sustainability is a death knell. While initiatives like co-investigating less complex cases with local police are both a clever caseload management strategy and commendable as a capacity-building exercise, whether this is resilient and manageable as case volume continues to grow remains to be seen.

ODPP – Children's Division / Specialised Prosecutors

The Office of the Director of Public Prosecutions (ODPP) has established a Child Online Protection Unit within its Children's Division to concentrate and strengthen technical prosecutorial capacity.

> *"…we have the Child Online Protection Unit…the fact that we work very closely [with DCI], was a catalyst for a lot of…the capacity building."* (Interview 4, Government Officer)

Targeted training, including in identified geographic hotspots, has strengthened capacity:

> *"We've also had trainings with TdH…for prosecutors we've had trainings through UNICEF modelled to the handbook…on investigation and prosecution…I would say we've tried to look at hotspots…to have themed trainings in those places."* (Interview 4, Government Officer)

[46] UNICEF Kenya (2022). 'Strengthening capacity, networks and systems to make the internet safe for children in Kenya. Proposal submitted to Safe Online.

The implication of this 'hotspot' model is that specialisation is being strategically concentrated where case burdens are highest, thereby improving efficiency in knowledge deployment and ensuring that prosecutorial capacity is aligned with emerging patterns of digital exploitation.

A key strength of this unit is its close collaboration and regular interactions with investigators from DCI. Interviewees indicated that, while not a formal arrangement as such, prosecutors spent time on site at the AHTCPU on at least weekly basis.

This informal embedding of prosecutors within investigative environments represents a simple yet effective way of reducing fragmentation between investigation and prosecution and improving the continuity of evidentiary interpretation, charging decisions, and case readiness. Co-working throughout the case investigation also mitigates the risk of weak or delayed prosecutions in complex digital cases where evidentiary interpretation is highly technical. At the same time, this reliance on informal coordination mechanisms suggests that institutional integration remains partially personality- and relationship-dependent rather than fully systematised through formal structures or protocols.

Beyond law enforcement and prosecution, strengthening Kenya's response has also required institutions capable of coordinating child protection actors and linking community-level responses to formal justice mechanisms.

Directorate of Children's Services (DCS)

The Directorate of Children's Services (DCS) is mandated to lead in coordinating Kenya's child protection system. The establishment of a Child Online Protection Unit at DCS has strengthened institutional capacity and leadership as a convening actor. At the central level, this has enabled DCS to shape agendas, standardise policy development processes, and sustain multi-stakeholder engagement within an otherwise fragmented child protection system. Importantly, DCS functions as a bridging institution across multiple levels of the system. It interfaces with justice sector institutions and coordinates technical and development partners. This positioning improves coherence in a system where institutional mandates are often dispersed.

> *"Now that they have got a specialised unit...the DCS...are cognisant of what is happening on child online safety...bringing together the technical working group and ensuring that the meetings are happening."* (Interview 13, Civil Society Officer)

On paper, DCS officers at community level are charged with linking communities with law enforcement pathways. Yet the reality is these roles are over-burdened, under-resourced and frequently unmotivated to act in the range of responsibilities they technically should support. Yet, where they are supported, often by CSO or NGO programming, the Children's Officer role can be catalysing for action.

Their embedded presence in the ecosystem can directly facilitate referrals, reduce friction between community reporting mechanisms and formal investigative processes and support efficient linkage of victimised young people to support services.

> *"To me, Children's Officers have supported me so much...They normally refer us to the DCI...so that you lodge a complaint." (Interview 17, Civil Society Officer).*

Roundtable participants reinforced concerns regarding the disconnection between national-level policy and community-level implementation. While Kenya has established legal and policy frameworks for addressing TF-CSEA, participants noted that these frameworks often fail to translate into meaningful impact at community level without sustained investment in local systems, personnel, and services. Participants further observed that specialised online child protection policing capacity

remains concentrated in major urban centres such as Nairobi and Mombasa, limiting coverage in rural and underserved areas where cases are increasingly being identified.

It is noted that a DCS Children's Officer is stationed directly within the AHTCPU offices of the police on a full-time basis. This simple, cost-neutral strategy is commendable as it enables a relational and logistical collaboration amongst critical ecosystem actors that speeds processes for all involved. These small opportunities for multi-disciplinary collaboration are shown to bring informal and formal working benefits. The evidence suggests that these specialised units have certainly improved operational effectiveness and created identifiable centres of expertise. But this is a step in a journey towards system-wide resilience. The current concentration of skills within small units, and uneven diffusion of expertise across broader institutional structures shows more work is needed to scale.

Justice System Coordination

Formal Multi-Agency Structures

The National Council on the Administration of Justice (NCAJ) serves as the main coordination platform for justice actors in Kenya.

> *"Within the public justice system, the body that keeps us together is the National Council of Administration of Justice. And under that council, there's a committee that handles children's matters. And this committee brings about all organisations, whether civil, whether governmental, everybody who is working within the space of children together, so that they're able to align interventions, avoid duplication, and especially when it comes to harm that is being occasioned to the children."* (Interview 11, Civil Society Officer)

This coordination function is operationally significant because it creates a structured space for aligning mandates across institutions that would otherwise operate in parallel. By bringing actors together under a formal committee structure, the NCAJ reduces duplication of efforts, improves case continuity across the justice chain, and strengthens shared accountability for child protection outcomes. It also establishes routine communication channels that enable early identification of gaps and emerging risks in responses to technology-facilitated CSEA.

At the local level, Court User Committees (CUCs) support coordination and are sustainably resourced with domestic government funds.

> *"Every three months they receive...about 30,000 shillings [from government]...so at least they can have their meetings and activities."* (Interview 2, Civil Society Officer)

The operational importance of CUCs lies in their role as a predictable, locally anchored coordination mechanism. Regular meetings supported through domestic funding help institutionalise coordination at the sub-national level, ensuring continuity of dialogue between justice actors, reducing fragmentation in case handling, and enabling more consistent follow-up of cases within local justice systems.

Joint Capacity Building

Joint training across police, prosecutors, judiciary, and other legal professionals have strengthened coordination. By exposing actors across the justice chain to the same procedures, terminology, and case-handling standards, it creates a common operational language that reduces misunderstandings and improves inter-agency alignment thus improving case continuity, reducing delays, and supporting more predictable collaboration between investigators, prosecutors, and the judiciary. The 2024 prosecution and investigation handbook for TF-CSEA, developed as part of the Safe Online supported UNICEF project, was highlighted by interviewees as particularly impactful as a shared reference document.

> *"It has been a game changer because…it has been used to train prosecutors, police, and even lawyers."* (Interview 7, Law Enforcement)

> *"It has really brought people together from different departments or sectors for a multifaceted approach…the good thing there is a cohort of trainers for that manual, from the prosecution, from the judiciary, from LSK, from the law reforms, and also from the [AHTCPU] unit."* (Interview 7, Law Enforcement)

Investigator–Prosecutor Collaboration

Justice sector interviewees also noted that the value of system interactions were clear through strong collaboration between investigators and prosecutors throughout an investigation, rather than only a briefing at the end, has resulted in improved case outcomes.

> *"We are at least…in sync with the investigators, especially for where they've been trained. we're getting…better evidence…because we also do prosecution guided investigations…So I think for us we've gotten successful cases."* (Interview 4, Government Officer)

Despite these system changes, and improvements in case numbers, successful prosecutions of TF-CSEA cases are still very limited. Roundtable participants reinforced that while hundreds of online child abuse cases have been recorded through existing reporting mechanisms, only a small proportion have progressed to prosecution.

Decentralisation and Capacity Enhancement of Local Level Capacity

An encouraging ecosystem interaction noted by interviewees both from the police themselves and from NGO partners, was that with the current strength of the AHTCPU, as well as leading investigations, the Unit officers have also begun to mentor and strengthen capacity outside the unit within local police stations. While more complex cases continue to be held by the Unit, simpler cases are intentionally selected to be co-investigated with local police.

> *"We are targeting 10 police stations, and we are having mentorship programs with the police officers…we are having our officers go sit with these officers and review their files, take them through what they're expected to do. Because we've realised that we need to build that capacity within those stations."* (Interview 6, Law Enforcement)

The ODPP is also moving to decentralise and spread capacity in child protection cases:

> *"We've devolved the Children Division in all counties…highly specialised prosecutors who will now handle those matters."* (Interview 4, Government Officer)

These interactions demonstrate a gradual shift in Kenya's justice response from siloed or centralised institutional action towards dispersing skills and more collaborations for TF-CSEA investigations and prosecutions. Joint training, prosecution-guided investigations, and mentorship models appear to have strengthened operational coordination and improved evidence handling. However, realistically specialist expertise does still remain concentrated within a few units, and the long-term sustainability and nationwide consistency of these intentions remains to be seeen.

Public–Private Collaboration

Operational Collaboration Strengthening Investigations and Response

Public–private collaboration has improved since legal reforms – with interviewees noting that operational relationships between law enforcement and tech and telecommunications industry actors are more stable and efficient. This is reported to have improved efficiency of investigations and

responses to TF-CSEA. Dedicated liaison channels within telecommunications companies now enable faster communication and action on data requests.

> *"We've got liaison officers within those service providers...that becomes easy for us to coordinate... and even make requests when we are carrying out our investigations."* (Interview 6, Law Enforcement)

For law enforcement to access international technology platforms, collaboration that is facilitated through global networks was noted as more efficient than establishing individual relationships with platforms. But building and maintaining these working relationships also takes investment of time, resources and partnership with multi-lateral actors.

> *"When you look at the other tech actors like Meta, Google, we've had close working relations. Why? Because we usually have meetings together. Again, the DCI is a member of the Virtual Global Task Force. We are also in partnership with Internet Watch Foundation, and you find that this makes it easier for us to communicate with the tech industry. Sometimes even when we're making our requests, it's very easy to get a response because we've been introduced to the regional persons representing these tech industries."* (Interview 6, Law Enforcement)

Effective engagement with global platforms depends on institutional connectivity, network membership, and relationship-building that can create more direct pathways for cooperation. But numerous constraints counteract these circumstances – from restructuring and staff turnover to inconsistent company compliance with requirements. There is significant work to do to standardise protocols and reposition power in ways that enables rather than constrains law enforcement processes.

Structured Engagement Platforms and Dialogue Mechanisms

Structured engagement platforms, such as roundtables and annual conferences, play a role in fostering dialogue between government, civil society, and industry. These forums provide opportunities to address emerging issues and align approaches.

> *"Every year...I organise for the TikTok regional team...to come and interact with civil society...just engaging...in terms of takedowns, reporting, and our local themes."* (Interview 13, Civil Society Officer)

The Communications Authority of Kenya also convenes annual forums that bring together industry players and provide a platform for engaging them on expectations and requirements related to cybersecurity obligations. These platforms have the benefit of supporting relationship-building which is helpful, but their impact on the response ecosystem depends on whether follow-up actions and accountability are demonstrated or the events or more performative in nature. Without sustained engagement, these events may not bring about longer-term improvements in the protection of children. To be effective, such platforms must operate in parallel with mandatory industry accountability and sustainable actions. Funding and logistics from industry partners for such events is an appreciated opportunity, however, continuity rather than one-off status is preferable.

Industry Contributions to Programs and Capacity Building

Industry actors contribute to the TF-CSEA response through financial, technical, and in-kind support. Telecommunications companies, particularly Safaricom, was reported by interviewees as playing a significant role in providing infrastructure and funding.

> *"The AHTCPU unit is even given free internet by Safaricom…that was the agreement from the get-go."* (Interview 13, Civil Society Officer)

Support also extends to awareness and policy engagement, with Safaricom funding initiatives such as the Children's Internet Governance Forum and annual Safer Internet Day activities.

Global technology companies contribute in different ways, including Google's funding for community capacity-building on online safety and the identification of online violence, as well as Microsoft's support for teacher training on child online safety.

Program based private sector engagement in Kenya includes operational cooperation as well as preventive and educational interventions. However, much of this support appears voluntary and somewhat performative, which may limit predictability because it depends on discretionary corporate priorities rather than sustained institutional commitments.

Regulatory and Standards-Based Engagement

Evidence may suggest that the Kenyan government is tentatively considering a more active oversight role regarding child online protection. The Industry Guidelines for Child Online Protection[47] were launched by the Communications Authority of Kenya in 2025 and could represents an early step toward strengthening private sector accountability. The guidelines define expectations for how technology companies should protect children within digital platforms. These guidelines are still in the early stages of dissemination and remain at a 'guidance' rather than 'compliance' status. Some interviewees anticipated that these guidelines could enhance regulatory oversight and represent a precursor to later government mandated compliance. However, time will tell if this marks a shift from primarily voluntary engagement on child online protection toward a more mandatory, standards-based approach.

> *"Increase action from industry players…within the regulatory framework. We will be asking operators how they are protecting children…[The guidelines] introduce multiple touchpoints outlining expectations and compliance requirements."* (Interview 1, Government Officer)

Observing, and holding to account, government commitment to the implementation of these guidelines is recommended.

Public–private collaboration is an emerging component of Kenya's response to TF-CSEA, particularly in strengthening investigations, enabling operational communication, and supporting awareness and capacity-building initiatives. However, these relationships remain heavily dependent on voluntary cooperation, interpersonal relationships, and externally facilitated engagement. While the 2025 Industry Guidelines for Child Online Protection represent an important step toward more formalised accountability expectations for industry actors, the extent to which these frameworks will translate into enforceable compliance and sustained regulatory oversight remains uncertain.

Round table participants stressed that future public–private collaboration should extend beyond traditional telecommunications and social media actors to include FinTech companies and payment service providers. Given the increasing use of digital payment systems, virtual assets, and online financial services in technology-facilitated CSEA offences, participants considered these actors critical partners in prevention, detection, financial investigations, and evidence preservation.

[47] Communications Authority of Kenya, (2025). Industry Guidelines for Child Online Protection and Safety in Kenya.

Interactions for Reporting

Formal justice processes remain central for action on TF-CSEA crimes. Despite increasing availability of reporting pathways, navigating the formal response system remains complex and burdensome, particularly for children and caregivers without support from civil society actors.

> *"We report the matter to the police...we are provided with an OB [Occurrence Book] number...we go to the hospital...we rely on the DCS...we go back to the police and we record a statement so that this child may get justice system in the court."* (Interview 17, Civil Society Officer)

Reporting TF-CSEA cases is not solely a matter of disclosure, but also of navigating across multiple institutions. While such multi-agency engagement may reflect the complexity of TF-CSEA case handling, it also points to the need for extensive work in order to simplify and improve these processes for children.

Childline Kenya was frequently noted as a gateway to the reporting processes.

> *"We are encouraging more children to... put those numbers on the fridge... I feel like those channels really work" (Interview 16, Private Sector Representative).*

One interviewee noted that Children's Officers at country level may call the helpline for guidance on accessing the reporting process for TF-CSEA cases. The reason noted was that Childline has direct connections to the police and knowledge of available support services and sometimes TF-CSEA is seen as a separate issue sitting outside the violence that DCS is mandated to address.

Community-level actors can also be an entry points for young people to the formal reporting processes, especially where trust in local police is limited. Yet this remains highly uneven and as noted in chapter III is frequently dependent on CSO programming.

> *"One of our village elders and champions reported to us... when we reported the matter to the police, we worked with the DCI..."* (Interview 17, Civil Society Officer)

Improvements in accessibility to reporting and accessing assistance were described by some interviewees. The DCI hotline (0800 722 203) allows for anonymous reporting to police. Complementary tools such as the Communications Authority and IWF reporting portal were also noted.

Taken together, these mechanisms suggest that Kenya has increasingly developed reporting entry points for TF-CSEA cases, representing good progress since the very limited situation at the baseline described in chapter II. However, the existence of multiple channels does not automatically create a coherent reporting system, particularly where these mechanisms operate as parallel rather than integrated pathways with different mandates, referral processes, and follow-up practices.

This highlights an important tension between accessibility and system coherence. While multiple reporting channels may create more opportunities for children, caregivers, and community actors to disclose abuse, they may also create confusion if users are uncertain about where to report, which institution is responsible for different cases, how reports move between systems, and whether cases receive consistent follow-up. These challenges are not debilitating but need attention and consideration as the ecosystem moves towards more complexity and sophistication.

Anecdotally, police indicated that growing awareness has led to more reporting:

> *"Initially, there were no walk-in's... but because of the advocacy... we've seen people coming out to report"* (Interview 7, Law Enforcement)

However, while awareness and reporting pathways may exist, their effectiveness is undermined by weak system performance. Operational inefficiencies across the system have a direct impact on community trust and reporting behaviour. When systems fail to deliver timely and effective responses, survivors and communities become discouraged from seeking help.

> *"If the systems are not working... then people will get discouraged."* (Interview 10, Civil Society Officer)

Reporting infrastructure must be assessed not only in terms of the availability of reporting channels, but also in terms of what happens after disclosure—how cases are routed, tracked, referred, acted upon, and followed through across institutions.

While reporting pathways for TF-CSEA have expanded significantly over the past decade, effective access to justice remains uneven. The evidence suggests that successful reporting and case progression continues to depend heavily on intermediary support from civil society organisations, trusted community actors, and well-connected frontline personnel. This highlights that strengthening reporting mechanisms alone is insufficient without parallel investment in responsive, coordinated, and trusted systems capable of delivering meaningful outcomes for children and survivors.

Roundtable participants and survivors noted that Kenya has benefited from a strong tradition of human rights defenders, community advocates, and civil society actors who frequently stand alongside survivors and their families throughout reporting and justice processes. These actors often play an important intermediary role by helping survivors navigate complex reporting pathways, access services, understand their rights, and remain engaged with formal justice processes. Their contribution reinforces the finding that successful case progression frequently depends on trusted individuals and organisations that can bridge gaps between communities and formal institutions.

Constraints Across the Ecosystem

Uneven Capacity

Actors and institutions in the Kenyan ecosystem addressing TF-CSEA are constrained by uneven capacity, knowledge, and resources. Although awareness is growing across sectors, much work is still reactive, rather than attempts to refine and streamline the system.

> *"I feel like there is the awareness. It is there, but...we are caught in the loop of firefighting. I don't feel like we are yet to the point where we understand that there are things that are inevitable for us to just try and mitigate them before they happen. We want to put out fire ... I don't think we are doing enough, but I know there's something being done."* (Interview 16, Private Sector Representative)

Where it does occur, capacity-building efforts are limited in scale and uneven in reach. As a result, few frontline responders have knowledge and skills to confidently act regarding TF-CSEA. And while building blocks – such as a strong legal framework, SOPs, available curriculum and resources exist – operationalising these at scale for all actors across the ecosystem is needed.

> *"When you look at the police stations, in fact, they do not know most of the existing laws...most of the police stations do not even understand what is online, child safety, exploitation, and abuse."* (Interview 6, Law Enforcement)

Roundtable participants stressed this point. They shared examples where digital evidence was reportedly not preserved because local police believed that the apparent consent of a child to the creation of images or recordings negated criminality. Such misunderstandings were described as undermining accountability, weakening investigations, and limiting children's access to justice.

Survivors highlighted additional concerns in police evidence management practices, including cases where evidence was allegedly stored in unsecured locations or where unauthorised individuals had access to it. Participants viewed these practices as creating risks of evidence loss, tampering, and compromise,

These gaps indicate that responses often depend on individual exposure rather than institutionalised systems. Even where training has been conducted, coverage remains limited.

> *"Our trainings have not reached all prosecutors...we have a workforce of over 800...we had 17, the first lot, and maybe around 60 [in the 2nd round]." (Interview 4, Government Officer).*

The impact of training is further weakened by staff turnover:

> *"Sometimes you train someone, they've gotten maybe a better opportunity outside of the office. Of course, that's a knowledge gap now." (Interview 4, Government Officer).*

Geographic disparities also persist. While well-intentioned to target 'hotspot locations', training and programming are concentrated in specific regions, leaving many frontline actors without access to critical knowledge and skills.

> *"Programming...has also been limited to certain pockets of the country. It hasn't yet gone national." (Interview 3, Civil Society Officer).*

In addition, capacity-building efforts are not always directed at those most in need.

> *"When we are rolling out...capacity building, who are we targeting? Headquarters staff... But at the entry level, this person is struggling." (Interview 3, Civil Society Officer).*

Inconsistent Programming and Campaigning

Resource limitations undermine consistent and preventative approaches to TF-CSEA. Programming is overly reliant on project based funding and domestic funding commitments remain limited, particularly in capacity-building and awareness efforts, which remain heavily dependent on donor funding.

> *"We rely a lot on support from donors...capacity building almost ceases (without donor support)."* (Interview 4, Government Officer)

Although intermittent campaigns are noted, ongoing, consistent domestic budget appropriations are not being made.

> *"Ultimately, governments should be able to budget for some of these things. But even when you look at the way the...system is structured...even the Directorate of Children's Services, I don't think we budget for awareness sessions...mostly interventions after an incident has taken place. That's where the heavy budgeting is. But in terms of prevention, There's very little investment in it."* (Interview 14, Civil Society Officer)

NGO respondents described the annual global Safer Internet Day as a consistent reminder to put pressure on government that this issue is not going away. Their regularity has ensured continuity in messaging and sustained attention to the issue over time.

> *"We do have annual activities...and that is the Global Safer Internet Day, which we commemorate every year in February."* (Interview 13, Civil Society Officer)

The reliance on external funding and organisations shape national priorities.

> *"Ideally...government should have an agenda...But that is not the case...I have resources...I'll go to government...and they will structure their work plan based on my program, because I have the money." (Interview 3, Civil Society Officer).*

> *"Some counties are going to have more of a response because...of programming from different CSOs."* (Interview 3, Civil Society Officer)

Overall, while partner support enables implementation, it contributes to fragmented, short-term programming rather than sustained, strategic responses. Increased government investment is critical to enable a more coordinated, consistent and preventive approach.

Roundtable participants strongly echoed concerns regarding the sustainability of current interventions that depend on external donors. Participants cautioned that continued reliance on externally funded projects creates uncertainty regarding long-term continuity, geographic coverage, and institutional ownership. They emphasised the importance of increased domestic financing.

Technological Challenges (and the Shifting Nature of Abuse)

Respondents highlighted significant changes in how TF-CSEA is perpetrated, with offenders using more sophisticated and less detectable methods.

> *"The perpetrators as well have become smarter...they've already changed the tactics...they understand like perhaps this platform I can be easily caught...because of the advancing technology, they would know that WhatsApp is encrypted...and they knew if I share through this platform, the law enforcement might not be able to trace evidence."* (Interview 10, Civil Society Officer)

The use of encrypted platforms complicates evidence collection and attribution.

> *"The complexities of actually identifying you as a perpetrator online is more difficult than physically."* (Interview 11, Civil Society Officer)

There is also a need to recognise the local nature of these crimes rather than the commonly held opinion that most TF-CSEA offenders are perpetrating from abroad.

> *"It's not necessarily foreigners...even people within their community are using online platforms to perpetrate against children."* (Interview 10, Civil Society Officer)

Emerging forms of abuse, such as live-streaming and AI-generated material, present new challenges.

> *"So, we are now moving from images on Facebook to live-streaming. How does the court now get this evidence?"* (Interview 4, Government Officer)

> *"AI generated child sexual abuse materials...so how do we deal with that?"* (Interview 4, Government Officer)

Roundtable participants reinforced concerns regarding the growing use of live-streaming features on platforms such as TikTok Live, Instagram Live, and Facebook Live. They noted that harmful interactions, threats, and exploitation increasingly occur through live content which may disappear before reports are made,

Roundtable participants additionally highlighted emerging risks associated with Kenya's rapidly expanding digital economy and innovation ecosystem, often referred to as the "Silicon Savannah." While growth in digital products, educational technologies, and online learning platforms presents important opportunities, participants noted that some school-based communication platforms and educational technologies have been developed without adequate safeguarding measures. Cases of

online bullying, harassment, and abuse occurring through school-related digital platforms were reported as an emerging concern requiring greater attention from developers, education stakeholders, and regulators.

Participants also observed that in technology hubs such as Juja, some highly skilled and innovative young people are increasingly using their digital capabilities to develop harmful or illicit online tools and content as a source of income.

Misalignment Between Legal Frameworks and Digital Evidence

Positive legal reforms were described in Chapter III. However, there are issues with these changes being promulgated throughout all necessary processes.

> *"The Evidence Act has not yet been amended to appreciate the new type of evidence…How do you implement these sections (in the Children's Act) if the Evidence Act does not support the implementation of the sections in the new Act?"* (Interview 11, Civil Society Officer)

Efforts are underway to improve digital evidence handling, but current court practices were described by many interviewees as outdated, inadequate and inefficient. Respondents raised concerns about risks associated with existing required evidence management processes:

> *"Taking it on USB…DVDs…it [CSAM] can find its way to the wrong hands again…in the case it can be lost."* (Interview 7, Law Enforcement)

A key gap is the absence of a comprehensive digital evidence management system. Urgent improvements to these processes are important to both improve protections for survivors and reinforce the basis for prosecutions.

> *"We don't have digital evidence management system… proper handling of digital evidence becomes a problem… who is the custodian?"* (Interview 4, Government Officer)

There are, however, steps toward improvement:

> *"We did a feasibility assessment on establishment of a digital evidence management system…how do you handle, how do you store this kind of…soft evidence."* (Interview 2, Civil Society Officer)

Roundtable participants and survivors strongly confirmed these findings, noting that courts and justice actors remain more accustomed to handling physical forms of evidence than digital evidence. Participants observed that digital files are frequently transferred using DVDs, flash drives, and other physical media, creating risks of loss, duplication, unauthorised access, and further victimisation of children whose abuse material forms part of the evidence.

Participants further noted that limited familiarity with emerging technologies among some senior justice sector personnel can create additional challenges when interpreting evidence linked to modern digital environments, including online gaming platforms, virtual economies, and in-game transaction systems.

Participants also proposed digitisation of the police Occurrence Book (OB) system, replacing handwritten records with electronic case management processes that could improve information sharing, case tracking, and integration between police, prosecutorial, and court systems. Such reforms were viewed as a practical step toward strengthening evidence management and improving continuity across the justice chain.

Increasing Complexity of Financial and Cross-Border Investigations

TF-CSEA is increasingly linked to financial crimes and transnational networks, adding complexity to investigations that need new skills for police that branch out into new areas of capacity. Investigations may require team members with forensic accounting skills in order to access and decipher financial data. Powers for evidence gathering from financial institutions will also be needed, and such data is frequently protected by financial data privacy protections. The international nature of such cases also requires extensive multilateral cooperation that is resource and time intensive. Increasing the use of mechanisms for monitoring financial data – which can be accessed through existing anti-money laundering mechanisms – may be increasingly deployed.

> *"We haven't found a successful case...financial investigations...money laundering... cryptocurrency...it becomes complicated."* (Interview 4, Government Officer)

> *"If we really want to cover this...you need to follow the money...which hasn't been the case."* (Interview 4, Government Officer)

Another respondent highlighted the range of financial channels involved:

> *"We see involvement of cryptocurrency, virtual assets...PayPal...TikTok...Financial Reporting Centre... but it takes time."* (Interview 7, Law Enforcement)

While Kenya has made substantial progress in building foundational legal, policy, and institutional responses to TF-CSEA, the ecosystem is increasingly confronting a more complex phase of adaptation. Emerging offender tactics, encrypted platforms, AI-generated abuse material, and financially-enabled exploitation are challenges that existing systems were not originally designed to address. Future progress will depend not only on continued capacity building, but on sustained investment in technological capability, digital evidence systems, financial intelligence integration, and adaptive regulatory approaches capable of responding to rapidly evolving forms of abuse.

Informal Interference

Informal practices both within the justice system and at community level that circumvent formal processes are known to also present significant barriers to effective responses to TF-CSEA. These challenges disrupt due process, reduce trust in institutions, and limit children's access to justice.

Breakdowns in the Justice Process

Although efforts are made to support children victimised by TF-CSEA and initiate legal action, sometimes cases do not progress through the full justice process. As one respondent explained:

> *"You feel this child should get some justice. But now you have rescued the child, you have arrested the perpetrator...but...kangaroo court from police station...the police are not taking the person to court...there's a gap between ODPP and the police and the judiciary. Something's wrong somewhere there."* (Interview 17, Civil Society Officer)

This highlights a disconnect across the justice chain, where progress made at earlier stages can be lost due to informal interference.

Community-Level Suppression of Reporting

Community dynamics also play a significant role in shaping reporting and case outcomes. In some areas, informal social structures discourage reporting.

> *"I'll take case reporting in one of the counties in Kenya...They have organised themselves into clans and their clans are respected so when...something of this magnitude happens,*

> *they put pressure to the families for the kids to keep quiet and not to report."* (Interview 16, Private Sector Representative)

Fear, social stigma, and threats further suppress disclosure.

> *"And then most of the kids now in Kenya, they fear the blame and punishment. Of course, when you report, let's say a close relative of yours, now your parents might say that you're lying and there's a lot of punishment."* (Interview 16, Private Sector Representative)

Survivor-advocates at the side event reiterated that families and caregivers can suppress reporting because of stigma, shame, fear of social judgement, or informal interference by influential community members. Participants reported that in some cases community leaders, family members, or religious institutions may encourage mediation or informal settlements, resulting in families accepting financial compensation rather than pursuing justice and appropriate psychological support for the child. Participants identified this as a major barrier to effective child protection and survivor recovery.

While Kenya has strengthened formal legal and institutional responses to TF-CSEA, the effectiveness of these systems continues to be shaped by broader social and institutional realities. Informal community pressures, fear of stigma, procedural delays, and inconsistent progression of cases through the justice chain all undermine trust in formal systems and discourage reporting. Strengthening legal frameworks alone is insufficient without parallel investment in accountability, survivor protection, community trust-building, and reliable end-to-end justice processes.

On a positive note however, feedback from survivors at the side event indicated that younger generations are increasingly willing to question authority, challenge harmful practices, and speak openly about experiences of abuse, suggesting that important social and cultural shifts may be taking place and may positively influence reporting behaviour. Participants further noted that growing numbers of women and other survivors are speaking publicly about their experiences and identifying alleged perpetrators, which was viewed as a positive sign of increasing accountability, reduced stigma, and a greater willingness to seek justice.

These emerging shifts in social norms may create opportunities to strengthen reporting, accountability, and community engagement if accompanied by responsive, trusted, and survivor-centred systems capable of translating increased disclosure into meaningful protection and justice outcomes.

V: CHILD-CENTRED SUPPORTS, DATA SYSTEMS AND PUBLIC AWARENESS

Child-Centred Supports

While efforts have been made to strengthen reporting pathways, referral systems, and child-friendly approaches within institutions, challenges remain in ensuring clarity, accessibility, and sustained support for child survivors which remain weak.

There is clear evidence of institutional efforts to connect survivors of TF-CSEA with appropriate services through referral mechanisms. For example, the Office of the Director of Public Prosecutions proactively refer young people who struggle with the court processes.

> *"So, for us, we do referrals because we are prosecution...Okay, so we do it in this way. Maybe someone has come to us, they're saying maybe that child was violated...maybe we've seen a victim who looks traumatised, maybe during pre-trial, we try and talk to a child, she's crying and all those things. So, we can do referrals. We tell the investigative officer, we can even write to the DCS and tell them that we have this child...we sometimes also refer to psychologists."* (Interview 4, Government Officer)

Despite these efforts, limitations in the broader system still affect the accessibility, quality and effectiveness of support provided to children. The findings reveal significant gaps in survivor support services, particularly in relation to long-term, holistic care for children affected TF-CSEA. This is particularly significant in TF-CSEA cases, where harm may not end with the initial abuse, but can involve prolonged trauma, shame, fear of exposure, and risks of revictimisation linked to the continued circulation or threatened redistribution of exploitative material. Such cases may therefore require sustained psychosocial support that extends beyond immediate crisis response. There is a notable absence of standard, comprehensive victim support services during court processes.

> *"There's a very big gap because we don't have a victim support [program]. There's no victim support in Kenya."* (Interview 12, Civil Society Officer)

Existing services, such as those offered through Gender-Based Violence Recovery Centres, are often limited in scope and duration:

> *"They only offer like 6 counselling sessions...They are not able to handle online safety."* (Interview 12, Civil Society Officer)

This limitation is particularly concerning given the complex and long-term nature of TF-CSEA cases, which often require sustained, extended support. Access to psychosocial services is further constrained by cost and geographical barriers.

> *"I feel one of the things that we are really struggling with is psychosocial support...A lot of them are too expensive for our clients...there's a whole lot of struggle around even accessing that psychosocial support...You might find that a survivor is, I think the example...in Garissa, somewhere, or Turkana. So, someone accessing support services might be very difficult, maybe to access medical, or maybe to access psychosocial support. it's maybe not readily available or it will require very long distances for this person to access."* (Interview 4, Government Officer)

Roundtable participants and survivors reiterated these findings, emphasising that long-term support remains one of the most significant gaps in the current response system. Participants highlighted the need for sustained mental health services, post-case follow-up, educational and social support, and

continued care for survivors as they transition into adulthood. They noted that current responses often focus on immediate crisis intervention, while longer-term recovery and reintegration needs remain insufficiently addressed.

To ensure equitable access across all counties, there is a need to fully embed core services, such as psychosocial support, within government systems. Some efforts using technology are attempting to address accessibility gaps. For example, ChildLine Kenya has expanded access through tele-counselling and coordinated referrals, partially helping to bridge gaps in areas where trained counsellors or specialised psychosocial support services may be limited or unavailable.

> *"[Childline] provides tele-counselling for children and parent and caregivers, then it becomes easy in that sense to access that particular service...they have established partnerships with organisations so that when a case is reported...then they know which partner to collaborate within...for referral for some of those services."* (Interview 14, Civil Society Officer)

But again, even with this referral mapping, services are by no means available across the country. Roundtable participants expressed concern that children living in rural, remote, and marginalised communities are frequently overlooked in policy and programme design despite their increasing engagement with digital technologies and online environments. They stressed that future research, policy development, and service delivery models should place greater emphasis on ensuring that children in underserved areas are able to access prevention, reporting, and recovery services on an equitable basis.

Challenges are further compounded by a misunderstanding of the value of family-wide support following CSEA.

Even where the case is reported, evidence showed that caregivers often lack the awareness or capacity to support affected children, or understand their role in recovery and may decline to avail of services:

> *"Sometimes you feel you are struggling with the parents to understand the intensity and the heaviness of that case, particularly if there hasn't been actual physical abuse. So, there is that information gap...so if you have that problem at the beginning, even when you do referrals for professional counselling, you find most of them don't even take up and don't insist to go for those sessions as much as you would. The parent will not support."* (Interview 8, Government Officer)

This shows that the effectiveness of these referral systems is not determined only by service availability, but also by whether children and caregivers fully understand the impacts of TF-CSEA and are willing to follow through with utilising recommended support. Referrals alone are insufficient without education and building a supported and supportive system around the victimised child.

Further to this, participants in the survivor's side event also noted that children are not always meaningfully involved in support, assessment, and investigative processes. Adults often make decisions and discuss cases amongst themselves without adequately seeking children's views or involving them in decisions that affect them. This was viewed as inconsistent with child-centred approaches and children's right to participation.

Another key limitation relates to gaps in supervision and training for emerging frontline practitioners. Although case management guidelines exist, there is no systematic training to equip practitioners with practical, child-sensitive skills tailored to different developmental stages for dealing with the rapidly changing forms of TF-CSEA:

> *"So basically, we have the case management guidelines that talk about confidentiality, that talk about getting informed consent, that talk about the different stages of the case management process and what you need to do during case management process. But the other skills I feel like are really crucial, particularly in getting information from children of different ages. So, there's a lot of gap, particularly in dealing with children at different developmental stages, how to incorporate things like play, art...the moment you are recruited [into social work] and you are given that job, there isn't a lot of investment in training so a lot of people are learning...on the job."* (Interview 8, Government Officer)

This identified lack of clinical supervision and reliance on "learning on the job" for early career practitioners highlights a systemic weakness. Frontline workers are expected to apply complex support and interventions for a new and rapidly changing concern impacting children. In TF-CSEA cases – where disclosure, trauma response, and engagement can be sensitive – this can undermine the quality, safety, and effectiveness of case management.

Roundtable participants agreed that trauma-informed care remains insufficiently embedded across many sectors. They observed that service providers, including police officers and healthcare workers, often lack adequate understanding of trauma and its impacts on children. Participants emphasised that trauma-informed care should become a core component of training programmes across all sectors, particularly for frontline personnel who are frequently the first point of contact for survivors.

Participants also highlighted that prevailing social attitudes often result in the trauma experienced by boys being overlooked. Boys are frequently perceived as resilient, self-reliant, or more likely to be perpetrators than victims, which can reduce recognition of their vulnerability and support needs. Participants further noted that the limited availability of disaggregated data on boys and other under-recognised groups constrains evidence-based planning, resource allocation, and the development of targeted interventions.

Child-Friendly Approaches and Infrastructure in Justice Systems

There has been notable progress in Kenya towards integrating child-friendly approaches into responses to TF-CSEA, particularly through the establishment of child-friendly interview rooms and the development of prosecution guidance for engaging child survivors in law enforcement and justice systems.

> *"We have the prosecutor guide. We have this material just to show [a child] how a court looks like; the court setup just so that you can be able to help a child understand court processes. So, we have such like material which we developed and now we have what we call the child-friendly interview rooms. Countrywide, we have like nine. So, for Nairobi, we have three...somewhere where a child can be helped to testify."* (Interview 4, Government Officer)

These interview rooms, located within government premises, provide safe and supportive environments where children can be prepared for court proceedings:

> *"So, they are in our offices because...we found that sometimes it was very difficult talking to children in a very harsh court environment. And also you need to prepare your witnesses before you take them, even for trial. So we need a space...child friendly, where we can be able to talk to the child, they can be able to know you, you can be able to prepare them, you can have their story, clarify anything in case they need any sort of support."* (Interview 4, Government Officer)

They also facilitate alternative methods of providing testimony that reduce trauma:

> *"Some cases are very emotional here. So, you might find that maybe a child does not want to see a perpetrator because of the sexual component of this case. So, we can have the case handled from the space…So they [child] are remote. And the child is able to testify…we have screens."* (Interview 4, Government Officer)

Participants in the roundtable and survivor's side event confirmed these findings and noted that child-friendly interview rooms have now been established across parts of both the prosecution and court systems. Participants also highlighted increased use of pre-recorded evidence and reported that many judges increasingly rely on psychologist and counsellor reports rather than requiring children to testify directly in court. This was viewed as an important development in reducing the risk of re-traumatisation and promoting child-sensitive justice processes.

While the government has provided the infrastructure, partnerships have supported the development of technical guidance: For example, in collaboration with Lawyers Without Borders, the government received support to develop a guide for child-friendly interviewing, which helped formalise and strengthen interviewing practices with children.

Despite this progress, access to child-friendly facilities remains uneven, particularly in remote areas. Expanding these services nationwide is important for ensuring equitable access.

While Kenya has strengthened institutional awareness and referral mechanisms for TF-CSEA survivors, the evidence suggests that comprehensive child-centred recovery systems remain underdeveloped. Significant gaps persist in long-term psychosocial care, specialised practitioner skills, equitable geographic access, and family engagement. As a result, the effectiveness of child-centred approaches continues to depend heavily on localised partnerships and externally supported services rather than consistently available public systems nationwide.

Child Protection Information Management System

The Child Protection Information Management System (CPIMS) plays an important role in strengthening case management and coordination within the child protection system. It supports referrals and service provision, contributing to improved continuity of care:

> *"[CPMIS] has been serving to, let's say when you want to refer a case to a children's home, you can refer to them and they'll see it…For service provision."* (Interview 8, Government Officer)

However, CPIMS is not fully integrated across the child protection ecosystem. A key limitation is the lack of interoperability across institutions. Access is largely restricted to child welfare actors such as government Children's Officers, limiting the ability of institutions such as the Office of the Director of Public Prosecutions and the police to track cases effectively. This limits the potential for appropriate information sharing between allied services for more streamlined case management. across the child protection and justice chain. Certain case information could be available to those involved in a case through investigation, prosecution, and resolution.

> *"When you interact with like ODPP and the police, they say, oh, you guys have put cases in the system. But how as ODPP can we be able to see the…cases that have been referred?" (Interview 8, Government Officer).*

Access limitations in who may use the platform were further highlighted:

> *"Currently, for you to be able to log in cases into CPIMS, there are only three ways. You are either a Children's Officer who logs in a case within CPIMS, you are either working here for the helpline, so that data can go to the CPIMS." (Interview 3, Civil Society Officer).*

Operational challenges also affect the use of the platform. Lack of resources like computer or internet access can constrain system use. When the research team asked to see the system during interviews, the social worker was unable to successfully login on the day due to system errors.

> *"Yes, you have the (CPIMS) system. You've not been given the resources, maybe, for internet. You're expected to go into your own pocket and take care of that." (Interview 9, Civil Society Officer).*

In addition, the system is perceived as complex and time-consuming, particularly for frontline workers managing high caseloads:

> *"We also need to simplify the tools that we use. If you use CPIMS, it is so complicated for a children's officer in Bungoma to be motivated to even document that case. If you document it, you need to manage it. There's a lot that you need to do just to have it logged in as a case." (Interview 3, Civil Society Officer).*

Continued reliance on paper-based systems, combined with low motivation and difficult working conditions, further limits consistent use:

> *"They [frontline workers] have the [CPIMS] system, but they don't want to migrate into the system. They're used to working on paper...You've not been given the resources, maybe, for internet...they are expected to use it, but the government is not providing those resources." (Interview 9, Civil Society Officer).*

Another significant limitation is the lack of integration with other sectoral systems, such as health and education:

> *"We have so many systems...Ministry of Health, Ministry of Education, the police, child protection. But you'll find that...cases...never see the light of day to CPIMS." (Interview 3, Civil Society Officer).*

Without integration, institutions operate in silos, limiting effective case tracking across the full protection and justice pathway. As a result, cases may be managed within these individual sector services but are not consistently being tracked at a central level in CPIMS. Ultimately, this means that many TF-CSEA cases remain outside CPIMS, reducing the system's ability to ensure coordinated responses, track case outcomes, and generate reliable data that indicates the prevalence of child protection concerns. Addressing these challenges requires improving system integration across sectors, simplifying the platform to align with frontline realities, and domestic commitment to sustainable resourcing to enable functionality and uptake across the country, including in remote areas.

Roundtable participants acknowledged that CPIMS and the helpline have significantly improved real-time reporting and case management capabilities. However, they agreed that data systems used by prosecutors, courts, police, NGOs, and other actors remain largely disconnected, creating information silos that hinder coordinated case tracking and analysis. Participants noted, however, that complete consolidation into a single data system may neither be feasible nor desirable given the distinct mandates and operational requirements of different agencies. Instead, they suggested greater alignment of data structures, definitions, tagging systems, and reporting standards to enable interoperability, cross-tabulation, and more effective use of administrative data for monitoring trends and outcomes.

Public Awareness

Community Based Prevention Approaches

A range of approaches have been used over the years to raise awareness regarding TF-CSEA. These include community-based engagement through trusted platforms such as *barazas* and religious gatherings.

> *"We normally partner with national governments...when they are making a baraza [community gathering]...we normally get a chance to create awareness in the society."* (Interview 17, Civil Society Officer)

Religious institutions also play a role.

> *"UNICEF supported recently a handbook for religious leaders, and it's to do with child protection, and online child protection is actually one of the things that's mentioned...when the religious leaders work together with the justice sector, it's a very powerful collaboration."* (Interview 2, Civil Society Officer)

Participants of the survivor's side event agreed to the importance of engaging trusted community institutions and faith-based organisations in awareness raising and prevention efforts but also indicated the need for caution. Some participants noted sometimes cases of abuse occurring within religious settings may be concealed, minimised, or inadequately addressed, particularly where influential individuals are involved. Participants further reported that religious authority and community influence may sometimes contribute to pressure for informal resolution of abuse cases rather than formal reporting and accountability.

Roundtable participants also referred to the child protection training materials developed by UNICEF and the National Council of Churches of Kenya for religious leaders, expressing hope that these resources could be adapted into practical tools for use by religious leaders during sermons and community engagement activities emphasising the importance of moving beyond policy-level guidance towards resources that support open dialogue and community-level action

Participants therefore emphasised the importance of engaging and strengthening the capacity of religious institutions while recognising the limitations of their influence and the need for broader multi-sectoral approaches.

These approaches show that locally trusted community structures are important entry points for prevention messaging in Kenya, rather than relying on formal institutional channels or stand-alone programming. Barazas and religious gatherings serve not only as spaces for sharing information but also as social platforms where messages are more likely to be understood, accepted, and reinforced through existing community trust networks. Leveraging these platforms that shape everyday community norms and behaviour can strengthen the effectiveness of awareness creation.

Caregiver Knowledge

Significant gaps also exist among parents, caregivers, and communities. While access to digital technologies is widespread, digital literacy and understanding of online risks remain limited:

> *"Parents lack more knowledge about digital platform...they have the smartphone, but they don't know how to use it."* (Interview 17, Civil Society Officer)

> *"Sometimes you feel maybe you are struggling with the parents to understand... particularly if there hasn't been actual physical abuse...that this is a serious case."* (Interview 8, Government Officer)

These gaps limit the ability of communities to identify, prevent, and respond to TF-CSEA. Low awareness can also contribute to harmful responses, including dismissal, victim-blaming, and failure to seek support services for survivors.

Participants of the survivor event reinforced concerns regarding victim-blaming and emphasised that public understanding is often shaped by the language used to describe child protection issues. They noted that terms such as "teenage pregnancy" can unintentionally shift attention away from the realities that the pregnancy may be resultant from abuse and thus shifts blame to the child. Participants argued that more careful use of terminology could help shift public discourse away from victim-blaming and towards recognition of the violence and exploitation that children may experience.

Youth Engagement and Peer-to-Peer Models

Young people are increasingly engaged as active participants in prevention. Peer-to-peer approaches have been particularly effective.

> *"Young adults...going into schools...I feel like what we introduced in terms of digital well-being really helps...they're taking it upon themselves to help children to manage those spaces."* (Interview 16, Private Sector Representative)

Youth-led initiatives further strengthen engagement:

> *"The young researchers would explain...this is what we mean by password...it was easy for them to engage."* (Interview 12, Private Sector Representative)

Peer-led approaches can improve trust, relatability, and willingness of target groups to participate, as young people may be more open to messages delivered by individuals that understand them and that they identify with. This can enhance engagement with prevention messaging and increase help-seeking when things go wrong. This is particularly true in sensitive areas such as TF-CSEA where stigma or discomfort may limit open discussion in adult-led settings.

However, while youth participation adds value to prevention efforts, it also requires appropriate safeguarding measures, referral pathways and structured support systems, and careful facilitation to ensure that young people are not placed in roles that expose them to harm or undue responsibility beyond their capacity.

Campaigns, Mass Media and Digital Tools

Awareness campaigns and media engagement complement community efforts. As noted by several respondents:

> *"We [police] also observe Safer Internet Days...and participate in other activities...there's also media briefings."* (Interview 7, Law Enforcement)

These examples show that awareness efforts are sustained through both annual campaigns and periodic media engagement, suggesting an attempt to maintain visibility of TF-CSEA over time rather than relying on one-off messaging. However, while such campaigns help extend reach through national television, coordinated events, and multi-stakeholder participation, their effectiveness depends on whether messaging is accessible to different audiences and genuinely connects young people to the support services or reporting pathways when they are ready to access them.

Media reporting plays both an awareness raising and deterrent role.

> *"When the police arrest a perpetrator, they report...people actually see, oh, this is an actual crime and it repels other people." (Interview 2, Civil Society Officer).*

This reflects how media visibility can help move TF-CSEA into a publicly recognised crime, reinforcing the message that it is illegal and will result in prosecution. However, this deterrent effect is likely to depend on consistent arrests of offenders, positive judicial outcomes, and public trust in the justice system, rather than on isolated reports of arrests or prosecutions. At the same time, reliance on media reporting also carries potential risks, including sensationalised coverage, oversimplification of complexity and the possibility of retraumatising survivors if reporting is not handled in a sensitive and ethical manner.

Education-Based Interventions

There is integration of online safety into the education system through structured learning materials and contextualised Kenyan content.

> *"We have worked with [KICD] on the Kenya Education Cloud... where educational content is published...on online safety."* (Interview 1, Government Officer)

> *"We then developed some video clips... in a local school context... how a child would seek help."* (Interview 3, Civil Society Officer)

However, it is noted that access gaps definitely persist:

> *"We have our own content...on our website...and a repository. What I would say maybe we need to increase the channels...and also to make it more accessible to persons with disability."* (Interview 1, Government Officer)

Particularly for education campaigns, sustainability remains a major challenge due to reliance on short-term project funding. There are also geographic disparities in program reach.

> *"We visit a school maximum three times... it's a lot of touch and go... there's no sustainable way of keeping in touch."* (Interview 13, Civil Society Officer)

The evolution of public awareness efforts in Kenya reflects increasing recognition that prevention of TF-CSEA requires whole-of-community engagement involving schools, caregivers, peers, faith leaders, media, and digital platforms. However, while important foundations have been established, prevention programming remains fragmented, project-dependent, and unevenly accessible across regions and populations. Sustained investment in institutionalised, locally contextualised, and inclusive prevention systems will be necessary to move from episodic awareness raising toward long-term protective environments for children.

VI: FINANCING AND SUSTAINABILITY

Donor Dependency and Funding Uncertainty

During the past decade, external donor investments have played a fundamental role in strengthening Kenya's response to TF-CSEA.

Safe Online has played a central role by supporting interventions across the TF-CSEA ecosystem in Kenya. This includes five national projects and one multi-country research initiative. This report illustrates evidence that these investments have impacted legal reform, policy, institutional capacity, coordination mechanisms, and programmatic responses.

A key milestone enabled by this funding was the Disrupting Harm study, which provided critical evidence on the nature and scale of TF-CSEA in Kenya as well as naming strengths and vulnerabilities in the support systems – and how to address these.

At the national level, Safe Online grants enabled UNICEF to consult and support the development of Kenya's NPA to tackle TF-CSEA. Further implementing partners, including ChildFund Kenya, Zana Africa, and Mtoto News Africa used Safe Online funding to concretise the evidence and policy into targeted interventions. These include programs for public awareness, institution building and capacity development, and prevention initiatives.

Complementarily, projects from other multilateral and bilateral external grant sources include work by Terre des Hommes, UNODC, and IJM. These projects primarily have strengthened frontline capacity through specialised training for law enforcement and child protection actors.

While these external grant investments have gladly brought change, there is little evidence in Kenya yet of growing domestic investment regarding TF-CSEA. This is a concerning finding given the availability of external funding is shrinking, yet TF-CSEA is not going away.

Many interventions remain short-term and project-based, which hampers continuity of potentially impactful and catalytic changes. Interviewees consistently highlighted that short-term grant dependency disrupts sustainability:

> *"We rely a lot on support from donors...like Safe Online, (when) they are not giving money...capacity building almost ceases." (Interview 4, Government Officer).*

> *"It almost always boils down to the resources... funding to facilitate them (front line workers) to do their work...So you will find we are running a program in this area. We have funding for that period, a year or two... as soon as that project ends, the motivation also goes with it." (Interview 3, Civil Society Officer).*

Roundtable participants strongly validated these findings, noting that many of the major achievements, policy developments, institutional reforms, and capacity-building initiatives implemented over the past decade have been enabled through external funding, particularly through initiatives such as Safe Online. Participants expressed concern that ongoing global reductions in development funding have created significant risks to the sustainability of existing interventions if domestic financing mechanisms are not urgently found.

Limited Government Investment

There is a critical need for the Kenyan government to step up its commitment to provide the resources to sustain important work that is showing potential for systemic success. In many cases, the costs

may not be overwhelming, but the challenge is adjusting the systems to accommodate these emerging needs.

Already noted in the report is the innovative work by UNICEF to support the AHTCPU to gather costing information and generate projected budgets to submit internally for formal appropriations to cover enabling operational costs for the unit (such as forensic tools, transport etc.).

Without sustained financing or integration into government systems, programs struggle to maintain momentum, leading to cycles of progress followed by decline. This undermines long-term effectiveness and risks backward slides on progress that has been hard-won.

Despite the government's rhetorical commitment to address TF-CSEA – such as with the NPA, budget allocations to enable stated activities are insufficient. When forthcoming they prioritise administrative and operational costs but don't have allocation for costs related to implementation and service delivery:

> *"We also noticed that the biggest chunk of the budget allocated for the Directorate [of Children's Services] goes to operational costs and not the programs."* (Interview 9, Civil Society Officer)

This frustratingly positions the personnel but hampers their ability to do activities. For example, while Children's Officers are in place across all Kenya's counties, they frequently have no way to access internet or adequate office facilities with electricity.

> *"Could be attributed to that lack of motivation, lack of conducive work environment. Yes, you have the system. You've not been given the resources, maybe, for internet. You're expected to do that, to go into your pocket and take care of that. Maybe you have the system, yes, but the government has not paid for the electricity, some of these things. ...We've had officers complaining about the environment, the work environment. Yeah, they expected to work, but the government is not providing those resources. Yeah, so sometimes they just let it."* (Interview 9, Civil Society Officer)

Interviewees describe a frequent gap between policy commitments and actual disbursement of funding.

> *"We noticed...for the government budget, you'll find that everything is included in the budget. But when it comes to resource allocation, just a few things. are funded."* (Interview 9, Civil Society Officer)

> *"We've tried to do some costing for children, but you see now you have to go to Treasury. Treasury will not tell you, yes, so you have to work with what you're given... there was a costing that had been done for all the people, different organisations. But of course, in as much as you ask, you can only be given so much. So even for us, that has been a big challenge."* (Interview 4, Government Officer)

Fiscal constraints have further reduced available public funding. Austerity measures have forced institutions that previously relied on internal resources to increasingly depend on donors:

> *"What I would want to say is that over the years we've been doing a lot of activities at CA financed internally from a consumer protection perspective, but owing to austerity measures, our funding for consumer protection and specifically on online safety has significantly reduced to the point where...we are now hoping that we can be able to seek a lot of donor funding or support to do a lot of our activities, especially in online safety."* (Interview 1, Government Officer)

Developing Capacity for Planning and Budgeting Processes

The ability of agencies to plan, allocate, and utilise budgets in alignment with their mandates is a critical determinant of system effectiveness. The example of support from UNICEF to the AHTCPU strategic planning process is a positive example of capacity development to enable sustainable domestic funding. Supporting personnel to prepare and apply for budget appropriations within the Kenya Police Service processes led to the Unit being able to retain annual subscription licenses for forensic tools, maintain (and grow) personnel levels and equipment. However, work like this can take a number of budget cycles to become normalised. Over-budgeting with under-spending can equally be used to remove funds in future years – so the accuracy of the processes is important to get right too. Yet this example could be replicated within other Kenyan agencies such as DCS in future.

Validation participants identified opportunities to diversify funding sources and strengthen the long-term sustainability of responses to TF-CSEA. They noted that growing links between TF-CSEA and financial crime, money laundering, and the use of cryptocurrencies could be leveraged to motivate government investment. Positioning TF-CSEA investigations as aligned within existing anti-money laundering priorities or financial intelligence work could help raise the profile of TF-CSEA prevention and response efforts within a range of institutions.

Participants also suggested exploring private sector funding through Corporate Social Responsibility (CSR) initiatives. However, they emphasised that civil society organisations may be best placed to act as intermediaries, helping to mitigate potential conflicts of interest and ethical concerns that could arise if technology companies, financial institutions, or other private sector actors directly fund justice sector institutions. Care must be taken to safeguard the independence of any such collaborations.

Challenges to Sustainability

The combined effect of external donor dependency and limited government investment, results in operational constraints and weak sustainability of TF-CSEA programming. In this context, sustainability should not be understood simply as the continuation of donor funding, but as the degree to which interventions are institutionally embedded and supported by predictable domestic financing and government ownership. While important progress has been made, without funding commitments to enable sustainability, it will be difficult to maintain progress. This creates a pattern where programs are initiated, achieve results, and then decline once funding ends. This has a negative impact on how such services are perceived by the public who then doubt effectiveness and choose not to engage at all if an outcome is not guaranteed.

Financial constraints directly translate into operational challenges that affect the quality and reach of programs addressing TF-CSEA. Under-resourced institutions struggle to deliver consistent, high-quality services, while overstretched personnel face burnout and reduced motivation.

> *"Over the last four years, funding for children has continually diminished. And that is from a government point of budgeting. So, when we have fewer resources going to children through the Child Protection Department, then, of course, Children's Officers are not motivated. Even if you report that case, what can they do? ...They are saying: "I have 40,000 shillings to survive for a quarter. Within my space, I have seven offices that I need to make sure that when a child is reporting, they are taken to hospital. They're taken to the police for investigation. There's transport...40,000 Kenyan shillings is very little..." If they're not well motivated to support children, they will not, because they don't have the capacity. They don't have the spirit, no motivation to make sure these children are supported."* (Interview 3, Civil Society Officer)

Human resource shortages are particularly acute. Specialised law enforcement units remain under-resourced and this limited capacity leaves large parts of the country underserved. Even where structures exist, they are overstretched:

> *"The plan was to have at least three [DCI Child Protection] units. Nairobi, Mombasa and Kisumu. Of course, because of resources they haven't, but that hasn't stopped them...from doing work all over the country. Now only challenge is that they're so stretched thin that the output gets affected."* (Interview 11, Civil Society Officer)

At the institutional level, limited funding affects recruitment, placement, and professionalisation for police officers working at gender desks as was observed by respondent:

> *"it's compulsory for each police station to have a gender and children's desk...But the thing is this. It is often manned by the weaker person in the station...It's more like a punishment."* (Interview 15, Justice Sector Representative)

Institutionalisation of Training

Judiciary

The Judiciary has made notable progress in integrating training on technology-facilitated CSEA into its formal systems. A key milestone is the development and rollout of the training handbook on the investigation and prosecution of Online Child Sexual Exploitation and Abuse in Kenya. Led by the NCAJ in collaboration with the Kenya Judiciary Academy, the handbook is now being used to train magistrates and judges, embedding the issue within judicial learning processes.[48]

The handbook was developed in partnership with professional training institutions, strengthening its potential for long-term integration into institutional curricula.

> *"When we were developing the manual...we worked with the learning institutions for these professionals. For example, if it's the judiciary, you work with Kenya Judiciary Academy If it's prosecution, you work with the Prosecutors Training Institute...it sort of institutionalises the learning such that new recruits going through normal training...have to take units on online safety."* (Interview 15, Justice Sector Representative)

High-level endorsement, including the formal launch of the handbook by the Chief Justice, further demonstrates institutional ownership. This strengthens the likelihood that training on technology-facilitated CSEA will be sustained and embedded within judicial systems. Such institutionalisation shifts capacity building from one-off, donor-supported workshops to formal judicial learning systems, reducing reliance on external funding and ensuring continuous reinforcement of knowledge through routine professional development.

Prosecution

In the prosecution sector, training on technology-facilitated CSEA is developing but not yet fully institutionalised. Current efforts have focused on building capacity through trainings, workshops, and webinars, but these remain largely project-based.

> *"Around 70 prosecutors were trained on the handbook. Of course, we tried to also bring elements, like for us, the prosecutor guide...which talks about best practices in terms of handling children...and also now having experts maybe from DCI coming and telling us about investigations."* (Interview 4, Government Officer)

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[48] Mtoto News (2023). NCAJ launches Training Handbook on Investigating and Prosecuting OCSEA

These insights show that while important groundwork has been laid, training is not yet embedded within formal systems. The proposed use of e-learning through the Prosecution Training Institute offers a clear pathway to institutionalisation, but this remains a future step.

Law Enforcement

Training within law enforcement is also not yet fully institutionalised. However, there are active efforts to integrate technology-facilitated CSEA into police training curricula and operational frameworks.

> *"We have really tried to make sure to influence them to have it in their training curriculum, so that when they use it, it cascades...The police have very minimal training on how to handle children...One of the initiatives...is development of the National Police Service Standard Operating Procedures on Handling Children."* (Interview 2, Civil Society Officer)

These efforts highlight the importance of embedding training within formal systems such as Standard Operating Procedures and standing orders, which guide day-to-day policing. The development of child-focused Standard Operating Procedures is a key step toward integrating child-sensitive and technology-facilitated CSEA considerations into routine police practice.

Institutionalisation of training is essential for strengthening national responses to technology-facilitated child sexual exploitation and abuse. Although Kenya has made progress in building the capacity of justice and child protection actors, much of this has been driven by donor-funded and short-term initiatives. Embedding training within formal institutional systems—such as the Judiciary Training Institutes, Police Training Colleges, and Prosecution Training Frameworks – is essential. This shift will reduce reliance on donor-driven initiatives and support a more coordinated, consistent, and sustainable national response to TF-CSEA.

The experience of Kenya demonstrates that while external financing can play a catalytic role in establishing legal frameworks, institutional structures, and technical capacity for responding to TF-CSEA, long-term sustainability depends on progressively embedding these functions within domestic systems. Without sustained government investment in operational capacity, workforce support, infrastructure, and institutionalised training, important gains remain vulnerable to fragmentation, uneven implementation, and reversal as donor funding declines.

VII: CONCLUSIONS

Key Lessons

Building Durable Systems

- Clear legal frameworks and accessible legislation strengthen the confidence of civil society actors, survivors, and frontline practitioners to pursue accountability. Advocates can use the government-established terminology and expected conditions as a strong basis to advocate for survivors.
- Local referral networks are critical in bridging the gap between informal disclosure and formal systems, particularly where trust in formal institutions remains weak.
- Building legal and institutional frameworks is only the first phase of system development; the greater challenge is operationalising and sustaining those systems at scale through domestic financing, workforce development, and frontline implementation.
- Collaboration of investigators, prosecutors, tech sector actors, child protection actors, and community actors improves case quality, referral pathways, and prosecution outcomes.

Sustaining Progress

- There is little evidence of domestic funding or government ownership regarding TF-CSEA work – despite rhetoric. The over-reliance on external funding sources has high risks to sustainability.
- Standardised training materials, SOPs, and shared guidance frameworks with consistency across sector actors help harmonise responses and strengthen interagency collaboration. It's noted that this is an ongoing process requiring monitoring and adjustment to remain effective, not a one-off event.

Enhancing Capacity, Practice and Trust at the Frontline

- Local community organisations inspire community trust and visibility of emerging risks enabling earlier identification and reporting of TF-CSEA.
- The visible presence of trusted people in the community who regularly advocate for human rights, such as certain community leaders, faith leaders, elders, CSOs or school personnel, encourage cases to be identified and acted on.
- Over-reliance on external donor funded community programming means uneven geographic coverage of TF-CSEA programming and sustainability challenges.
- Collaboration, network-based approaches, and information sharing across sectors are critical for strengthening the broader child protection ecosystem and sustaining effective responses to technology-facilitated CSEA.

Prioritising Data, Evidence and the Outcomes Gap

- Evidence of the prevalence and impacts of TF-CESA specific to Kenyan children was essential in elevating TF-CSEA to a national policy issue. However, the heavy reliance on externally funded research raises sustainability concerns for ongoing evidence generation.

- Cross-country learning and peer exchange among Safe Online-supported countries can accelerate learning, support adaptation of promising practices, and strengthen programme effectiveness.

Addressing a Changing Threat Landscape

- Knowledge transfer from the regions of Europe and Southeast Asia have been a driver in shaping Kenya's understanding of TF-CSEA and informing contextually relevant responses.
- Flexible funding approaches can improve programme responsiveness by enabling implementing partners to address emerging needs and undertake complementary activities. This may be as simple as simple processes for budget amendments stemming from project monitoring so that that spending on well-subscribed services might increase or funds for planned activities that are found to duplicate other actors can be combined to increase reach or be redirected.

Recommendations

1. Policy, Legislation and Governance

A workable legislation and policy framework regarding TF-CSEA is a necessary first step but good progress has been achieved in this respect in Kenya. Shift from a focus on legislation and policy to resourced implementation and moves towards scale.

- Move towards resourcing awareness of, and procedural implementation for, the established legal framework across personnel in all counties.
- Position Kenya as a regional, or African champion on TF-CSEA and promote the country's success to utilise peer-country comparison to maintain momentum.
- Prior engagement with WeProtect Global Alliance spurred early government action, re-ignite these commitments through renewed engagement with WeProtect Global Alliance.
- Integrate goals for TF-CSEA into routine government systems like departmental annual work plans and key performance indicators (KPIs) in performance management systems for relevant personnel.
- Use the established NPA as a mechanism for reviewing progress and pushing for government leadership to meet the rhetoric it represents.
- Continue attention to legislative reform – particularly in terms of future-proofing for emerging threats such as AI-generated CSAM, and ongoing review of the Sexual Offences Act – but prioritise this behind the primary drive of scaled implementation.

2. Law Enforcement and Justice

Collaboration between investigators, prosecutors, tech sector actors and child protection actors have improved case quality and prosecution outcomes. Scale these impacts by disseminating and decentralising knowledge beyond urban hubs.

- Extend the impact of the excellent SOPs for law enforcement, justice and judiciary with extensive training, implementation and the *normalisation* of their use at scale across the country.
- Purposefully, with associated resourcing, continue work by the AHTCPU and other justice entities to professionally develop the broader police force through mentoring and co-investigations of TF-CSEA cases.
- Strategically position TF-CSEA with anti-money laundering and financial crimes priorities to open up resourcing and bring complexities of these crimes into the investigative and prosecutorial approaches taken with these crimes.
- Build distinct virtual-asset and cryptocurrency tracing capability through specialised training, tooling (e.g. blockchain analytics platforms), and partnerships with the Financial Reporting Centre and international counterparts, recognising that this requires different skills and infrastructure than traditional bank-transaction AML monitoring. Commit government funding that would establish a national digital evidence management system that would allow safe and secure control and use of digital evidence for investigations and prosecutions.
- Strengthen regional digital forensic capabilities – through country-wide access by police to tools and dissemination of knowledge and skills to use them.

- Continue to invest in multi-lateral mechanisms and networks for law enforcement such as AFRALTI, Virtual Global Taskforce and others for efficient linkages to global tech actors.

3. Social Services and Survivor Support

Solidify the building blocks that have been established and invest in enabling existing at-scale DCS mechanisms.

- Address funding shortfalls that prevent Children's Officers from doing the work regarding TF-CSEA cases that is needed.
- Ensure knowledge and skills regarding TF-CSEA is accessible to the social services workforce across all counties through digital learning methods coupled with accreditation and incentives for completion.
- Address constraints on the motivation and workloads of frontline staff holding complex and difficult child protection cases (including TF-CSEA) with innovations in support such as coaching and clinical supervision, incentivisation and training.
- Establish and sustainably fund an accessible resource library that collects, assesses and allows for updating of training materials, resources and policy documents regarding TF-CSEA in Kenya. This could sit under the DCS Child Online Protection Unit who could maintain responsibility for reviewing and updating materials and circulating and training actors amongst the TF-CSEA ecosystem.

4. Industry Engagement

Success with industry engagement has so far been somewhat superficial. The recent release by the Kenyan government of the Industry Guidelines together with global patterns however open the door for stronger expectations on industry.

- Leverage opportunities to access private sector CSR to support campaigns and opportunities for collaboration knowledge brokerage regarding responses to TF-CSEA.
- Sustain attention on voluntary uptake of the 2025 Industry Guidelines on Child Online Protection. Apply pressure to graduate these from voluntary to compliance-based in the medium term.
- Strengthen government engagement with and pressure on technology companies to improve required quarterly transparency reporting and provision of Kenya-specific data, responsiveness to law enforcement requests, and cooperation in public campaigns regarding TF-CSEA. Publishing public compliance records of companies required to report can motivate compliance in order to avoid reputational consequences.
- Promote Safety-by-Design approaches that are adapted to the Kenyan and wider African context and embed child protection considerations within platform design and operation.

5. Public Awareness and Education

There is an urgent need for domestically resourced, Kenya-specific public awareness and education campaigns.

- Strengthen digital literacy and online safety awareness among parents and caregivers to improve family-level prevention and supervision.
- Child-informed designs for campaigns can capitalise on the fact that younger generations often possess greater technological knowledge and digital skills.

- Train teachers on online safety education to enable the capacity of education in identifying and early intervention in TF-CSEA concerns.
- Integrate digital safety into existing curriculum such as sex and relationships education and other lessons for educating young people about interactions in the online world – TF-CSEA does not need to be a separate siloed topic.
- Education can lean into promoting families to co-explore the digital world and build digital resilience and digital soft skills together.
- Increase involvement and investments of grassroots community organisations.

6. Research, Data and Evidence

Research evidence has overwhelmingly relied on external donor sources yet been very influential in moving the needle regarding TF-CSEA. Domestic funding and alternative approaches to data that informs the situation are needed.

- Make domestic government commitment to periodically refreshing the TF-CSEA evidence base to account for the fast-evolving threat landscape and to underpin domestic and regional co-funding requests.
- Explore opportunities for systematically gathering and using administrative data from medical, legal, educational and welfare data management systems where possible. This likely means further investments to improve the accessibility and validity of CPIMS data to inform on the situation regarding TF-CSEA by setting out definitions, tagging systems and reporting standards to enable comparability of different data sources.
- Explore capacity for Kenya to host regional knowledge exchange events to promote the country's progress on TF-CSEA and maintain momentum.

7. Funding and Financing

Kenya has an urgent need to identify domestic funding for a range of ecosystem elements. This includes commitments to relevant social services and survivor supports, and investments in public awareness and research domains.

- Advocate for domestic funding so that Kenya set its own priorities in addressing TF-CSEA based on evidence rather than align with donor or external government priorities.
- Continue to support government agencies to strengthen costing, budgeting, and internal resource mobilisation processes to progressively embed TF-CSEA responses within domestic financing systems.
- Link TF-CSEA to existing departmental plans, goals and KPIs in relevant parts of the ecosystem to strengthen accountability and sustainability.
- Identify and utilise cost-effective ways to enable goals – such as existing examples like DCS staff being stationed within the AHTCPU office to enable collaboration.
- Find ways to collaborate and integrate TF-CSEA with anti-money laundering, FinTech and cross-border financial crime regulatory frameworks and investigative capacities.

ANNEXES

Annex A: Key Research Question Matrix

Case studies were undertaken for Kenya and the Philippines simultaneously and a consistent methodology was employed. The development and compilation of information for the initial development of the case study reports consisted of two main components: document review and key informant interviews.

Document Review

Conducted to understand and structure the case study reports that reflected each country's ecosystems for addressing TF-CSEA and specifically how change had happened in the last decade. Analysis sought to also explore relevant VAC, GBV, and cybersecurity-related risks affecting children to reflects the broader child online safety and digital safety ecosystems in each country. Review was completed of documents including project documents provided by Safe Online, outputs resulting from grants (such as papers and research reports), national laws and policies and other relevant materials from open sources that further illustrated the country ecosystems and changes that had occurred.

Key Informant Interviews

Interviews were intended to interrogate what is understood about the ecosystems in more depth. Interviews delved into both general aspects that reflect the overall ecosystem and questions specific to Safe Online supported projects. The interviews included three groups of informants: (1) grantee organisations, (2) stakeholders involved directly or indirectly involved in project implementation, including government, private sector, and civil society actors, and (3) representatives of people benefiting from ecosystem changes – resulting from Safe Online supported project activities or otherwise.

Following generation of the Case Study Reports, roundtable expert meetings with interview participants and separately with survivor advocates allowed for the further exploration and validation of the findings.

The question matrix was organised to explore the ecosystem, dissected by the six domains of the revised MNR.[49] The seventh category is added by the team to capture questions related to mechanisms and fund management processes.

The question matrix was designed to:

- Identify key system-level developments/changes over the past decade in how the two countries addressed technology-facilitated risks and harms against children,
- Document changes across policy, governance, services, data, and public engagement,
- Understand how Safe Online supported interventions contributed to these developments – including directly funded activities, catalytic influence, partnership strengthening, enhanced multi-sector coordination,
- Explore areas of alignment between TF-CSEA work and broader VAC/GBV prevention, child protection, and cybersecurity agendas,

[49] WeProtect Global Alliance (2023). Preventing and Tackling Child Sexual Exploitation and Abuse: A Model National Response: Maturity Model.

- Capture elements of change that may be unique to each country's context or transferable across countries,
- Identify persistent challenges, bottlenecks, and opportunities for future systems strengthening.

Comparative Lens

The question matrix integrated a comparative perspective to support cross-country learning between the Philippines and Kenya. This included:

- Identifying similarities and differences in system change trajectories,
- Comparing policy-driven, justice-driven, and data-driven reform pathways,
- Understanding contextual factors shaping progress – including political, economic, cultural, and technological dynamics,
- Examining how global and regional developments influence each country's ecosystem for child online safety and technology-facilitated harm.

Annex B: Ethical Review and Safeguarding

Ethical Review

The project did not present extensive risks from an ethical perspective, however, following clarification of the methodology and sampling during the inception phase, Evident and Safe Online took the decision to submit the project for an independent, external ethical review.

A full research protocol, including detailed design, personnel, participant information sheets, consent process and forms were submitted to the HML Research and Ethics Review Lab in late 2025. Following a review with minor adjustments, an expedited review was approved on 14th January, 2026 (HML IRB #3222).

Safeguarding

The study population consisted of adult professionals who are engaged in the national ecosystem responding to technology-facilitated child sexual exploitation and abuse. Participants included policymakers, government officials, law enforcement personnel, social service providers, civil society representatives and industry representatives in their professional capacity.

Adult survivor-advocates took part in the side-events to the roundtables. These participants had direct experiences of TF-CSEA, however, they participated in their capacity as advocates and speaking to the situation of the national eco-system, not focusing on their personal experiences.

Inclusion Criteria

- Adults aged 18 or older,
- Individuals working in a professional capacity related to child protection, law enforcement, policy, social services, civil society or digital safety,
- Survivor-advocates who choose to participate as expert contributors and not as individuals recounting personal victimisation,
- Individuals able to provide informed consent.

Exclusion Criteria

- Children and minors under age 18 (the study did not include any child participants),
- Individuals approached based on their personal experience of abuse or victimisation,
- Individuals unable to provide informed consent,
- Any group considered legally or ethically vulnerable for direct research involvement in this context.

Key Ethical Safeguards

- Clear Participant Information Sheet and informed consent,
- Separate consent for audio, video, and photography,
- Privacy protection and participant control over identification,
- No collection of personal data or health information,
- No discussions requiring disclosure of lived traumatic experiences,
- The research did not involve deception, sensitive personal data, or clinical procedures.

Annex C: Summary Table of TF-CSEA Research in Kenya

Study	Lead	Data Collection Period	Ecosystem of the Problem	Key Constraints / Gaps	Institutional / System Response
Situational Assessment for the Development and Implementation of a National Plan of Action to Prevent and Respond to Online Child Abuse and Exploitation (Proposal), 2018	UNICEF Kenya	2017–2018	- Rapid increase in children's internet use - Child online protection remained outside mainstream child protection agenda - Low awareness among parents, professionals and government	- No national strategy - Weak coordination - Limited technical capacity - Lack of Kenya-specific evidence - Limited public awareness	- Proposed National Plan of Action - Multi-sector coordination mechanism - Capacity building for justice and child protection agencies - Prevention and awareness programmes
The Dark Side of the Internet for Children: Online Child Sexual Exploitation in Kenya – A Rapid Assessment Report (2018)	Terre des Hommes Netherlands	Not specified	- One of the earliest assessments documenting TF-CESA in Kenya. - Rapid expansion of internet and smartphone use increased children's exposure to risks. - Social media, messaging, cybercafés created new opportunities for online grooming and sexual exploitation. - Online abuse intersected with existing socio-economic vulnerabilities.	- Limited awareness among children, caregivers and professionals. - Weak legal and institutional preparedness. - Limited reporting and identification of victims. - Lack of national evidence and coordinated response mechanisms.	- Recommended strengthening legislation, policy, awareness, professional capacity and multi-sector collaboration. - Provided early evidence that informed subsequent child online protection initiatives and policy discussions in Kenya.
Disrupting Harm, 2022	ECPAT, INTERPOL, and UNICEF	2020–2021	- First nationally representative evidence on TF-CSEA - Online abuse closely linked to offline vulnerabilities - Children increasingly exposed through social media, messaging apps	- Low disclosure by children - Limited reporting - Weak caregiver digital literacy - Limited specialised victim services - Fragmented institutional response	- Strengthened evidence base for policy reform - Supported implementation of Kenya's National Plan of Action - Capacity building across justice, law enforcement and child protection sectors - Improved multi-sector collaboration
Understanding online sexual exploitation and	Zana Africa	2024	- Unique and critical study with	- Extensive time online	-Targeted research needed.

Study	Lead	Data Collection Period	Ecosystem of the Problem	Key Constraints / Gaps	Institutional / System Response
abuse of children with intellectual disabilities in Kenya, 2024			under-researched population. - Data from 88 children, 48 carers, 10 experts about OCSEA and young people with mild to moderate disabilities.	- Barriers to accessing certain platforms - limited access to sex education. - Loneliness and isolation arising from disability. - Poverty intersects	- Accessible protection and sensitisation resources. -Improve safety measures. - Tech to adhere to universal design principles. age verification systems.
It's a FACT – Internet and Technology for Africa's Children Today	Mtoto News, African Union and ChildFund	2024	- Data from young people in Kenya, Malawi and Senegal. - 220 children aged 9-17 in child-led research project.	- High rates of engagement. Near universal access. - Only 4% learning digital skills at school. - Low rates of risk awareness. - Grown in children's digital creation brings positives and negatives.	- Urgent need to address the gap of access without literacy. - Young people need to vocabulary of harm – they cannot report what they cannot name. - Digital safety information is not enough, bridge the practice gap.