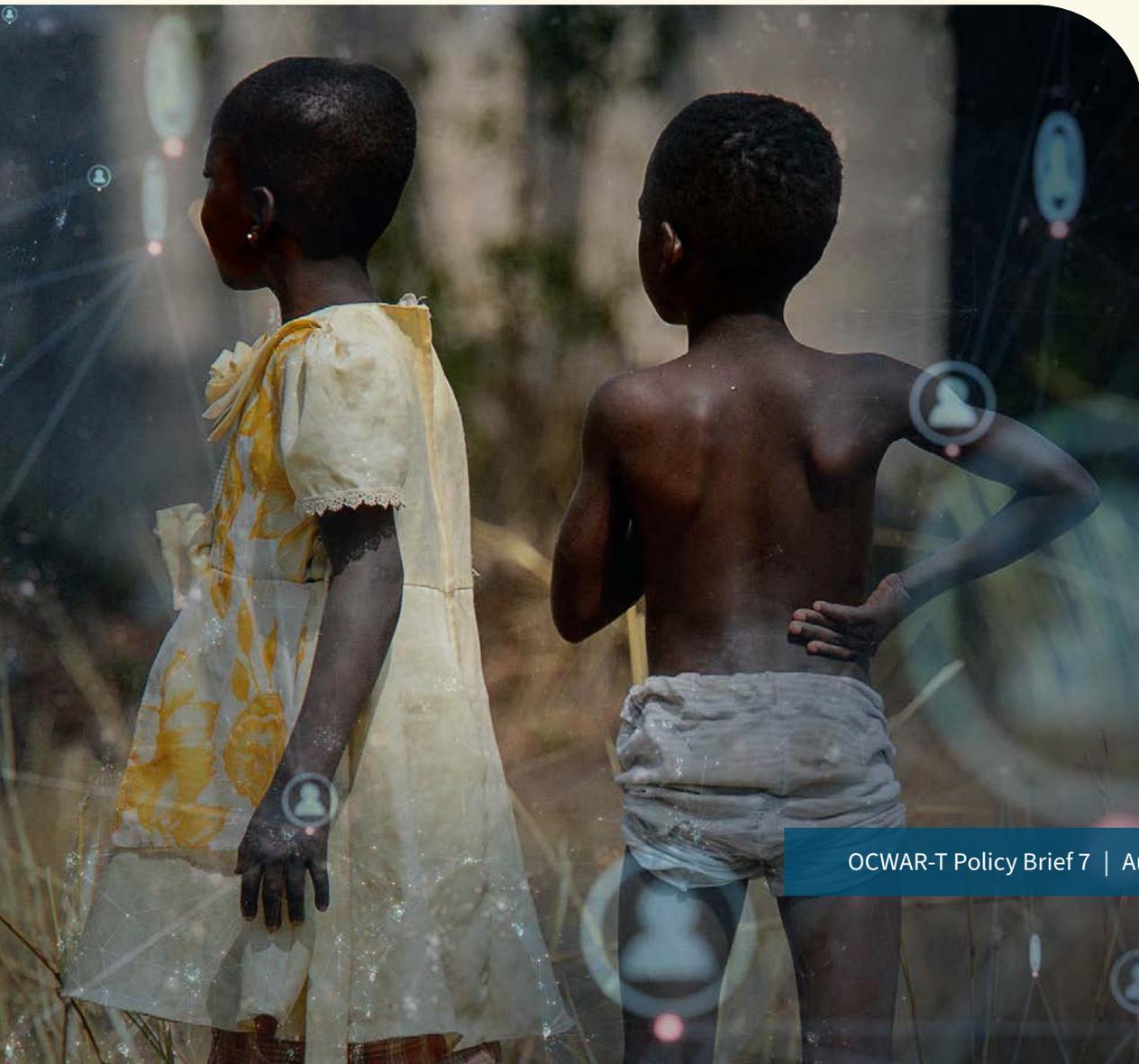




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Online child sexual exploitation and abuse in West Africa

Thi Hoang and Livia Wagner



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Summary

This policy brief examines the prevalence of online child sexual exploitation and abuse (OCSEA) in Ghana, Côte d'Ivoire and Cape Verde, highlighting key risk factors. Data on OCSEA indicates an acceleration in uploads since 2019. The case studies reveal gaps and shortcomings in victim identification, protection and prosecution. Urgent action is required to prevent devastating consequences for individuals in West Africa.

Key points

- Risk factors for OCSEA are prevalent and increasing across the ECOWAS region.
- Limited evidence exists regarding the regional prevalence and trends of OCSEA, but preliminary findings suggest that it is more widespread than official data indicates.
- Global trends indicate that regions with weak OCSEA identification processes and under-reporting tend to have a higher prevalence of OCSEA.
- Addressing the challenges of detection, investigation, prosecution and victim support requires sustained political will and greater prioritisation of OCSEA in the policy agenda.
- This is an opportune moment for ECOWAS states to take action and implement practical measures to prevent the expansion of OCSEA and strengthen identification and follow-up processes.



OCWAR-T

Organised Crime: West African Response to Trafficking

Introduction

In 2019 the African Child Policy Forum, in research presented to the African Union (AU), called Africa the ‘new frontier for online sexual abuse.’¹ The report found that African countries with the highest internet penetration demonstrate the highest prevalence of online child sexual exploitation and abuse (OCSEA) and child sexual exploitation and abuse materials (CSEAM).

Zooming in on West Africa, the region’s landscape of vulnerabilities for OCSEA mirrors that of global dynamics: economic hardship, accelerating internet penetration and digitisation shaping children’s growing access to the internet and electronic media,² coupled with the unmatched awareness of digital threats,³ fast urbanisation and growing sex tourism, political instability, conflicts and natural disasters, among others.

In addition, there are factors specific to the West African context which contribute to children’s vulnerability to (O)CSEA, including:

- widespread gender-based discrimination, which reportedly prevents boys from being recognised as victims of CSEA and OCSEA, with many programmes addressing CSEA failing to include male victims;⁴
- a high degree of violence against children, which is often normalised;⁵
- local and customary practices which can enhance vulnerability, including child marriage, female genital mutilation, the superstition that men can be cured of HIV/AIDS by having sex with a young virgin girl, and ‘kayaye’ (female porters);⁶ and
- some of the growth in CSEA is connected to the travel and tourism sector, including reportedly in Côte d’Ivoire and Ghana.⁷

Up-to-date data on OCSEA in West Africa is scarce, contributing to endemic low awareness of OCSEA across the case study countries, not only among parents, guardians and caregivers, who typically do not monitor their children’s online access and activities,⁸ but also among law enforcement, civil society organisations, social workers and judicial authorities who work on addressing CSEA.⁹

This policy brief takes a deep dive into the West African countries of Cape Verde, Côte d’Ivoire and Ghana.¹⁰ Full research findings are presented in an accompanying research report.¹¹

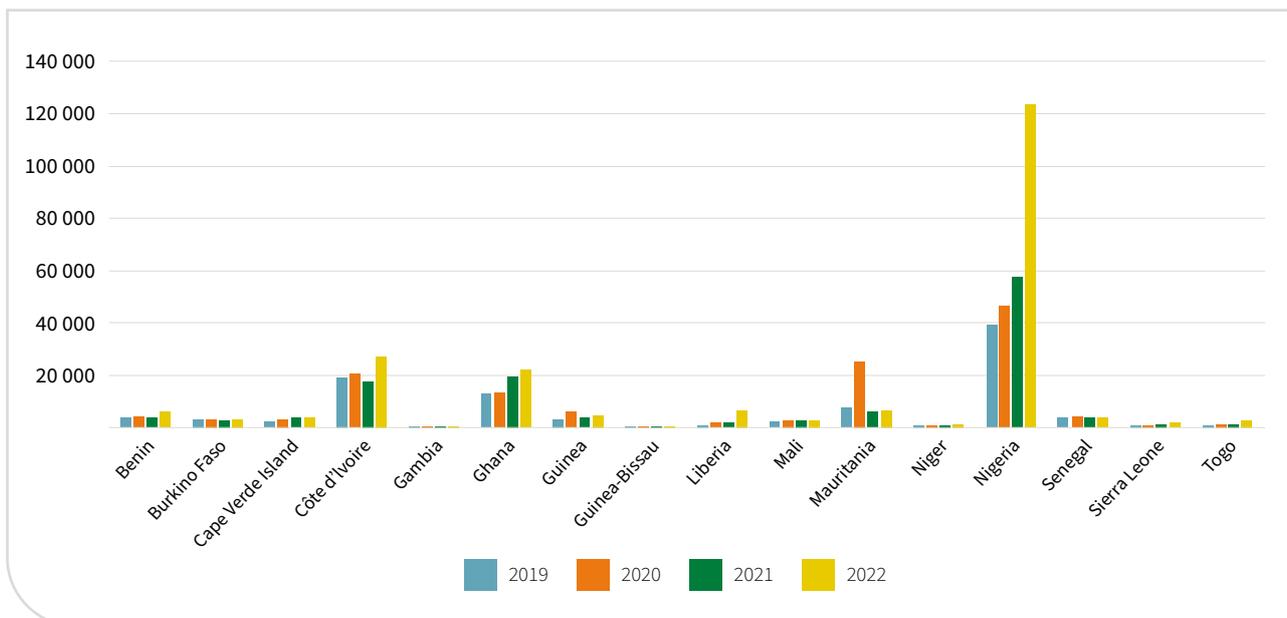
Despite the high OCSEA risks, most stakeholders in Côte d’Ivoire and Cape Verde believed that OCSEA was rare in their country, pointing to a lack of official reporting on the phenomenon as the evidence base for these conclusions.¹² In Ghana, the prevailing view was that OCSEA occurred, and was increasing, but was still a relatively new phenomenon.¹³

Research for this policy brief points to likely significant under-reporting of OCSEA across the case study countries. The databases that do exist, such as the National Center for Missing and Exploited Children’s (NCMEC) CyberTipline reports, point to an increase in incidents of OCSEA in the focus countries, and across the Economic Community of West African States (ECOWAS) region more broadly, since 2019 (Chart 1).

At about 21 000 reported upload incidents of CSEAM per year between 2019 and 2022, Côte d’Ivoire has the highest number of NCMEC reports among the case study countries and the second highest (after Nigeria) among West African countries. According to INTERPOL and the FBI, criminal networks based in the country are professionalised in the use of sextortion schemes, use a range of coercion techniques and are mainly motivated by financial gains.¹⁴ Although difficult to triangulate given the dearth of available data, interviewed stakeholders overwhelmingly affirmed that OCSEA has been on the rise in the country.¹⁵

The NCMEC reports show that Cape Verde and Ghana were among the ECOWAS countries with the highest growth of OCSEA between 2019 and 2021, the period of the Covid-19 pandemic, which saw global increases in OCSEA.¹⁶ In Cape Verde, prominent among cases of OCSEA identified by stakeholders are

Chart 1: NCMEC reports in ECOWAS, 2019–2022



Source: NCMEC, CyberTipline Reports for ECOWAS, 2020–2022

Note: Nigeria has the largest population in ECOWAS at 206 million people – 6.6 times higher than the country with the second largest population, Ghana, which had 31 million people in 2020. Côte d'Ivoire followed third at 26 million (Worldometer, Western Africa population, www.worldometers.info/world-population/western-africa-population/). Therefore, Nigeria's large number of CSEAM reports might correspond to its population size

instances of 'sextortion' and 'revenge pornography'. In Ghana, since 2020, UNICEF Ghana reported an increase in sexting, a high-risk factor which can precede self-generated OCSEA materials.¹⁷

As reports of OCSEA and CSEAM surged during the Covid-19 pandemic, the capacity of law enforcement agencies to address these issues significantly decreased across many regions, including in West Africa.¹⁸

In order to effectively implement the state of emergency and other pandemic-related restrictive measures, law enforcement tasked with OCSEA and other crimes was reportedly redeployed and mobilised to other thematic and geographic areas, which limited their capacity to investigate OCSEA cases and rescue victims.¹⁹ Child protection experts and private sector representatives in West Africa reported that this redeployment appears to have persisted after the pandemic.²⁰

Responses to OCSEA in the focus countries

Legal responses to OCSEA

The focus countries have amended existing regulatory frameworks to address tech-enabled trafficking and have ratified the UN Palermo Protocol on human trafficking where relevant provisions are included. However, use of the incorrect term 'child pornography' is endemic, as is the lack of required internet service provider (ISP) reporting of suspected CSEAM, which can feed into low OCSEA awareness, and hinder investigation and prosecution of OCSEA offences.

While there are several gaps which need addressing, we highlight key instances below:

- Cape Verde's 2017 cybercrime law, amended in 2021 to include several new offences, penalises OCSEA (law No. 8/IX/2017). However, it makes no reference to the private sector's duty to collaborate with law enforcement, especially regarding ISP reporting of suspected CSEAM.
- Côte d'Ivoire's penal code and cybercrime law explicitly criminalise 'child pornography', but the definition of



CSEAM included in the Cybercrime Act does not include the depictions of a child’s sexual organs, as dictated by best practice.²¹ Côte d’Ivoire’s laws do not include provisions which exclude the criminal liability of a child exploited in the sex industry, who might be subject to criminal prosecution if they solicit or attempt to solicit publicly, nor of those involved in the production and distribution of self-generated CSEAM.²²

- Ghana’s Cybersecurity Act 2020 (Act 1038) provides that the production, transmission and distribution, sale and possession of tech-facilitated CSEAM are considered criminal offences (s62). However, these criminal offences are underpinned by the term ‘sexually explicit conduct’, which is not itself defined in law. In order to ensure appropriate application of the law, these terms should be defined. The provision of therapeutic support, including emergency psychological care for children, as required by the Lanzarote Convention, is not provided for in the Cybersecurity Act, restricting the institutional care and protection required for OCSEA child victims.

Removing abusive online content is a crucial element of responding to OCSEA

Hotlines and helplines

While Côte d’Ivoire and Ghana have dedicated digital forensics laboratories to detect and investigate OCSEA, and remove CSEAM,²³ Cape Verde responds to OCSEA through several governmental institutions that work independently.²⁴

All three countries have technical procedures in place in the form of national child helplines and hotlines to assist and remove abusive content, a crucial element of responding to OCSEA.

Gaps in protection and prevention

Across the three countries, there are significant gaps in protection and prevention, including a lack of awareness of the problem, inadequate resources, poor coordination between agencies and organisations, insufficient training for frontline workers, limited policy enforcement and limited access to support services for victims.

The Covid-19 pandemic has aggravated challenges facing victim identification, protection and crime prosecution. Stakeholders in the region²⁵ shared that, in addition to the decreased law enforcement and policing efforts, the lack of physical meetings brought about by the Covid-19 pandemic led to a disruption of informal information sharing and cross-country/regional collaboration.

Victim identification and crime reporting

In general, the extremely low awareness of OCSEA among the public, law enforcement and governmental authorities, and even among the families of victims and survivors themselves, is a major barrier to victim identification, intervention and rescue. In addition, persisting victim stigmatisation has led to

Persisting victim stigmatisation has led to OCSEA cases being under-reported

OCSEA cases being under-reported. For example in the Cape Verdean database at the Polícia Judiciária, only two cases were registered in total for 2020 and 2021, but stakeholders report that there are more.²⁶

Due to a lack of human and financial resources, stakeholders are often not able to act on reports from global initiatives – such as the NCMEC CyberTipline and INTERPOL’s International Child Sexual Exploitation (ICSE) database²⁷ – in an adequate and timely manner.²⁸ This is partly also a structural challenge: only Ghana currently has a designated unit

(the Ghana Police Service) to act on the CyberTipline and ICSE reports.

Lack of funding, human resources and tech know-how significantly hampers OCSEA victim identification and reporting across the focus countries.²⁹ There was also an observed high turnover of personnel who received specialised technical training by multilateral organisations, which leads to a loss of expertise on addressing OCSEA.³⁰

Victim protection and support

Legally mandated procedures for victim protection and support are reportedly lacking. Government entities across the case study countries mostly rely on non-governmental organisations (NGOs) and civil society organisations working on trafficking, which are under-resourced and under-funded, to provide victim support services.³¹

The focus countries lacked common elements of victim support across the process of identification, legal investigations and rehabilitation. Illustratively, experts from Côte d’Ivoire pointed to the lack of systematic legal assistance for child victims.³²

The Lanzarote Convention requires intervention programmes to be put in place and monitored for both potential and convicted sex offenders. Such programmes were not in place in the case study countries.

Neighbourhood watch, Nigeria



Prosecution

Low technical capabilities among law enforcement and criminal justice officials are a key challenge hampering prosecution. While laws governing the admissibility and use of evidence are in place, law enforcement lack knowledge about how to preserve digital evidence, and judges and prosecutors often are not capacitated to recognise, understand and accept digital evidence.³³

Judges and prosecutors often are not capacitated to recognise, understand and accept digital evidence

High stigma attached to sexual offences has also contributed to few cases of OCSEA being prosecuted. Common obstacles preventing victims and witnesses of OCSEA from cooperating in criminal proceedings reportedly include slowness of the judicial process, bureaucracy leading to a prolonged investigation and prosecution, and the absence of a victim-centred approach.³⁴

Promising practices

Governments in the three focus countries have increasingly implemented **awareness-raising campaigns** on the signs of child sexual exploitation, internet security, protection of personal data as well as services in online social networks.³⁵ Many campaigns have, promisingly, adopted a multi-stakeholder approach. Leading involvement of the tech sector is a particularly promising element.

Growing engagement on **OCSEA awareness in educational institutions:** For example, Cape Verde has introduced training on the protection of personal data, safe internet behaviour and safe use of social networks to high schools and universities.³⁶

Enhancing national institutions: There are indications of greater institutional focus on OCSEA. For example, Ghana was the first to launch a Child Online Protection Reporting Portal in 2020 to report cases to platforms such as Facebook for image takedown, and to facilitate collaboration with international NGOs such as the Internet Watch Foundation (IWF).³⁷ (The Child Online Protection framework, which is a crucial element for enabling collaboration between law enforcement and the tech industry, is still to get the government's cabinet approval.)³⁸

Building coalitions: At a regional level, the Regional Child Protection Working Group was established in 2019 as a coalition of 15 civil society organisations and international NGOs with a common objective of strengthening child protection measures in the West Africa region.³⁹

Role of tech sector in responding to OCSEA

The tech sector plays a crucial role in the prevention, detection and prosecution of OCSEA, including by developing and implementing measures to detect, report and remove CSEAM from their platforms.

The role of the private sector is under-developed across the ECOWAS region. Interviews with representatives from regional government and the tech companies operating in the region identified four key trends:⁴⁰

- Increasing regulatory requirements globally enhances measures taken against OCSEA in the region, but a lack of national laws and structures hampers accountability and application.
- There are insufficient personnel to identify OCSEA, with Africa typically not prioritised in resource allocation.
- Cooperation between the private sector and law enforcement agencies is limited.
- Broader multi-stakeholder engagement on OCSEA – with government, the private sector, civil society and international UN and law enforcement organisations – is improving in the ECOWAS region, but lags behind developments in other regions.

The tech sector plays a crucial role in the prevention, detection and prosecution of OCSEA, including by reporting and removing CSEAM from their platforms



Conclusion

Across the ECOWAS region, the risk factors for OCSEA are rife and increasing. Although evidence regarding the regional prevalence and trends of OCSEA is scarce, preliminary findings, based on existing industry reporting and interviews with government and non-government stakeholders in-country, indicate that OCSEA is more widespread across the focus countries of Cape Verde, Côte d'Ivoire and Ghana than official data suggests. This would align with global trends, particularly in regions with weak OCSEA identification processes and high levels of under-reporting.

Across the case study countries, challenges hamper detection, investigation, prosecution and victim support. Addressing these challenges will require sustained political will and commitment – and greater prioritisation of OCSEA in a crowded policy agenda. It will also require the development of effective strategies to promote trust and collaboration among all stakeholders involved in fighting organised crime in West Africa.

Fortunately, there is a wide range of good practices implemented by states which have the data to fully recognise the scale of the challenge in their geographies. This is a key moment for ECOWAS states to take action and implement practical measures for preventing the wholesale expansion of OCSEA, and strengthening identification and follow-on processes.

Recommendations

For ECOWAS

- Develop a directive addressing the fight against tech-facilitated child sexual exploitation, including the harmonisation of laws, penalties, terms and statistical definitions across the member states, and the formalisation of cross-border collaboration and investigation channels and pathways.⁴¹
- Support regional and international capacity-building efforts to improve policy and operational measures that consider the best interests of children in the digital environment, including sharing of successful learning and awareness-raising tools.
- Ensure effective coordination of work between the various international and regional organisations and bodies that play a role in supporting government efforts, including by holding regular cross-sectoral regional roundtables.

For member states

- Continue to improve digital literacy of children, schools and adults, including regarding digital hygiene and OCSEA risks.
- Set up regional working groups to facilitate the exchange of good practices and work on concrete initiatives to generate tangible results. The working groups could be organised by profession (such as healthcare practitioners, social workers, education practitioners, law enforcement, judicial authorities, prison authorities, policymakers and researchers).
- Become a member of the INHOPE member hotlines.

For law enforcement and criminal justice bodies

- Develop and deliver specialised training curricula on OCSEA across the criminal justice chain, including police academies and centres of education for judges and prosecutors.
- Perform a training needs assessment and establish special annual plans for professional development of all relevant stakeholders included in the child prevention and protection infrastructure.
- Develop national protocols on how to access, identify, investigate and remove abusive material since most of the regional intelligence comes from external sources and expertise (NCMEC, INTERPOL's ICSE, IWF, etc.).
- Establish a single national database recording reported OCSEA cases with unique case numbers to avoid duplications, and appropriate disaggregated data.
- Complement national strategies with local action plans.
- Engage children, including child victims, in the drafting and implementation process of various national action plans.
- Improve direct communication lines between police officers, prosecutors and cybercrime unit laboratories.
- Organise regular joint meetings for law enforcement and prosecution representatives on national and regional levels.

For international donors

- Invest in developing the capacities of NGO and civil society groups, given that awareness raising, helplines and reporting, de-stigmatisation, victim support and safeguarding are community-based activities which civil society and local NGOs are best placed to deliver.
- Enhance donor coordination and follow-up capacity-building initiatives. Focus on specialised modules rather than generic training and support the establishment of a structured knowledge management mechanism to ensure institutional expertise is retained through individual rotations.
- Support the provision of regional training on the commercial sexual exploitation of children (CSEC), specifically for cybercrime units, prosecutors and law enforcement personnel instead of targeting individual countries.
- Encourage ECOWAS countries to participate in collaborative efforts between ECOWAS, the AU and international groups to identify children at risk in the NCMEC CyberTipline reports, or the INTERPOL ICSE, IWF and INHOPE databases.

For the tech sector

- Have a reporting mechanism (e.g. a hotline) that allows for the monitoring, receipt and recognition of URLs that have CSEAM and/or CSEAM transmitted through their networks, platforms and/or electronic communication devices and services. This mechanism should allow for coordination with the authorities for investigation and removal of the content.

- Ensure that online platforms have enhanced safety and safeguarding measures, and promote and facilitate child safety referral services and helplines.
- Collaborate more proactively with local NGOs, especially regarding sharing knowledge, experience and information, raising awareness among information and communication technology (ICT) employees, safeguards and victim protection mechanisms.
- Develop and implement ‘safety by design’ features, such as automatically blocking strangers from connecting with and messaging underaged users on social media platforms, to help underaged users protect themselves and report suspicious activities.
- Work closely with the government to develop a framework that helps achieve consistency in cross-sector collaboration and responses, share good practices and agree on what should be expected of service providers to protect their users from abusive behaviour and content online.
- Improve the limited liability regime of intermediary service providers, along with the unregulated area of notice and takedown procedures. ICT companies should establish protocols and clear procedures and policies regarding removal of illegal or inappropriate materials from the platforms and services which they provide.

For civil society organisations and NGOs

- Collaborate with the private sector and government in addressing OCSEA.
- Contribute to multi-stakeholder public awareness-raising campaigns to address and reduce the stigmatisation of OCSEA victims/survivors and sexual offences at different levels: with children and parents, as well as in the communities and among society in general.
- Train staff on child-centred and trauma-informed approaches when working with OCSEA victims and survivors.
- Promote the training of child protection and health professionals on the integration of content relevant to their main themes, such as mental health and psychosocial support, risk communication and life skills materials.

For focus countries

We outline below a series of country-specific recommendations for law enforcement, the criminal justice system and policymakers.

Cape Verde

Cape Verde has adequate legal instruments in place; however, there remains a large gap in enforcing and implementing these policies and legal standards, which the government should address and prioritise. Recommendations are:

- Include provisions on the private sector’s duty to collaborate with law enforcement, which specifically requires ISP reporting of suspected CSEAM in the cybercrime law (law No. 8/IX/2017).
- Promote the harmonisation of records on OCSEA, especially between the Judiciary Police and the National Data Protection Commission.
- Develop media campaigns on OCSEA, including via television from young people for young people.
- Operationalise the National Cybersecurity Strategy which was established and approved in 2016.
- Harmonise existing mandated institutions’ work on (parts of) OCSEA which are currently operating independently, and/or mandate a specific governmental institution to address CSEA, OCSEA and CSEAM.

- Equip specialised units and provide tools/equipment for the Judiciary Police for investigation and prosecution of OCSEA.
- Build the capacity of existing peer educators, such as members of the Youth Action Movement – working with the Cape Verdean Association for the Protection of the Family (VerdeFam)– to better investigate and intervene in OCSEA reports.
- Ensure that staff at the broader hotline (the toll-free number 800 1010) are sufficiently trained in identifying and supporting OCSEA victims, as well as in coordinating with the authorities for investigation and removal of the content.
- Establish a dedicated helpline to provide support, legal and counselling services, and other related assistance to OCSEA and CSEC victims.
- Appoint a designated unit to action the country’s OCSEA reports by international stakeholders such as the NCMEC CyberTipline reports, reports from INTERPOL’s ICSE database and the IWF-MTN Child Safety Online Africa Portal.
- Activate the necessary measures to accede to the Lanzarote Convention.

Côte d’Ivoire

Currently, human trafficking frameworks are not applied to prosecute OCSEA. Instead, laws relating to cybercrime, such as Law No. 2013-451 of 19 June 2013, are applied. Child protection legal frameworks should be used in responding to OCSEA cases as they typically adopt a more victim-centred approach and increase the chances of identifying cases of human trafficking. Recommendations are:

- Continue specific training on OCSEA for law enforcement, investigators and criminal justice practitioners to develop and strengthen their capabilities and capacities.
- Conduct multi-stakeholder public awareness-raising campaigns to address and reduce the stigmatisation of OCSEA victims/survivors and sexual offences, and monitor impacts on behavioural change.
- Include provisions in the Cybercrime Act that:
 - address the depictions of a child’s sexual organs in the definition of CSEAM, and
 - exclude the criminal liability of a child involved in the production and distribution of self-generated CSEAM.
- Criminalise knowingly accessing CSEAM, or soliciting or obtaining sex from children.
- Accede to the Lanzarote Convention.
- Ratify the Budapest Convention on Cybercrime.
- Develop and implement a specific national action plan to combat CSEA and OCSEA.
- Appoint a designated cybercrime unit to manage and action the country’s OCSEA reports from the NCMEC CyberTipline, the INTERPOL ICSE database and the IWF-MTN Child Safety Online Africa Portal.

Ghana

With the growing use of the internet across Ghana, it is imperative to shape internet-related policies to meet and protect the interests of all stakeholders, particularly children. There must be a review of relevant legislation in order to align it to international treaties that the country has signed and ratified. Recommendations are:

- Define or clarify the meaning of ‘sexually explicit conduct’ in Article 136 of the National Electronic Transaction Act.

- Legally require ISP reporting of suspected CSEAM in the Electronic Transaction Act.
- Include the provision of therapeutic support, including emergency psychological care for children, in the Cybersecurity Act.
- Develop and implement a specific national action plan to combat CSEA and OCSEA.
- Ratify the Optional Protocol to the Convention on the Rights of the Child, on the Sale of Children, Child Prostitution and Child Pornography.
- Activate the necessary measures to accede to the Lanzarote Convention.
- Approve the Child Online Protection framework and ensure its full implementation by the Ministry of Communication for proper coordination of all stakeholders and players identified in the framework.
- Introduce government-led actions to ensure that the capacity needs of the key implementation partners, particularly the Cyber Crime Unit of the Ghana Police Service, are addressed.
- Decentralise the Cyber Crime Unit of the Ghana Police Service to regions other than Accra.
- Continue to encourage public–private partnerships in addressing child online protection issues to encourage self- and co-regulation by industry players who are critical in restricting children’s access to potentially harmful and inappropriate content without compromising their right to information and freedom of expression.

Notes

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- 3 Notably, low digital literacy is typically understood as a key risk factor. However, a West African study found that being educated and having some digital literacy 'do not necessarily constitute a preventive factor,' as is commonly believed. C. Hounmenou, Exploring child prostitution in a major city in the West African region, *Child Abuse & Neglect*, 59, 2016, 26–35, <https://pubmed.ncbi.nlm.nih.gov/27490517/>.
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- 8 African Child Policy Forum and OAK Foundation, Sexual exploitation of children in Africa: A silent emergency, 2019, <https://app.box.com/s/6hfgneeupeenyws7fcy63ygyaflzwf>.
- 9 Côte d'Ivoire and Cape Verde country-specific reports drafted by local consultants (unpublished); Consultant interviews with stakeholders, July–December 2022.
- 10 Children have also been trafficked for sexual exploitation in Santa Maria, Praia and Mindelo. Reports of child sexual abuse in Cape Verde increased fourfold between 2009 and 2014. InfoGreen, Child sexual exploitation – Focus on Cape Verde, 12 May 2017, www.infogreen.lu/Child-sexual-exploitation-Focus-on-Cape-Verde.html.
- 11 Thi Hoang and Livia Wagner, A growing threat? Online child sexual exploitation and abuse in Ghana, Côte d'Ivoire and Cape Verde, *OCWAR-T Research Report 7*, August 2023, <https://issafrica.org/research/books-and-other-publications/a-growing-threat-online-child-sexual-exploitation-and-abuse-in-ghana-cote-divoire-and-cape-verde>
- 12 Ghana country-specific report drafted by local consultant (unpublished); Consultant interviews with stakeholders, July–December 2022.
- 13 Côte d'Ivoire, Ghana and Cape Verde country-specific reports drafted by local consultants (unpublished); Consultant interviews with stakeholders, July–December 2022.
- 14 INTERPOL, Cyber-enabled financial crime: USD130 million intercepted in global INTERPOL police operation, 24 November 2022, www.interpol.int/en/News-and-Events/News/2022/Cyber-enabled-financial-crime-USD-130-million-intercepted-in-global-INTERPOL-police-operation; <https://enact-africa.s3.amazonaws.com/site/uploads/2018-12-12-interpol-west-africa-report.pdf>; <https://edition.cnn.com/2022/12/19/politics/justice-department-sextortion/index.html>.
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- 16 NCMEC country reports for Cape Verde, 2019–2021.
- 17 'Sexting' has been defined as the 'self-production of sexual images,' or as 'the creating, sharing and forwarding of sexually suggestive nude or nearly nude images through mobile phones and/or the internet.' ECPAT International, Online child sexual exploitation: A common understanding, 2017, https://ecpat.org/wp-content/uploads/2021/05/SECO-Booklet_ebook-1.pdf, p. 12.
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- 21 ECPAT, *Note d'information. L'exploitation sexuelle des enfants en côte d'ivoire*, 20 February 2023, https://ecpat.org/wp-content/uploads/2023/03/ECO-BRIEFING_Cote-dIvoire_2023_Final-20-February-2023.pdf, p. 1.
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 - 29 Côte d'Ivoire, Ghana and Cape Verde country-specific reports drafted by local consultants (unpublished); Consultant interviews with stakeholders, July–December 2022.
 - 30 Interviews with UNODC, ICMEC and ECPAT International, online and in person, between January and March 2023.
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 - 33 Ibid.
 - 34 Côte d'Ivoire, Ghana and Cape Verde country-specific reports drafted by local consultants (unpublished); Consultant interviews with stakeholders, July–December 2022.
 - 35 UNICEF, Country office annual report 2022 – Cote d'Ivoire, www.unicef.org/media/135841/file/Cote-d-Ivoire-2022-COAR.pdf.
 - 36 This is mandated by the National Action Plan to Prevent and Combat Sexual Violence against Children and Adolescents 2022–2024 and National Commission for Data Protection.
 - 37 Through the National Cyber Security Centre (NCSC).
 - 38 Interview with expert from Child Online Protection Unit of the National Cyber Security Authority. It has still not received approval.
 - 39 The Regional Child Protection Working Group comprises the International Social Service, Save the Children, World Vision International, Educo, African Movement of Children and Working Youth, ENDA, Terre des hommes-Lausanne, Handicap International, ChildFund, Plan International, SOS Children's Village, International Labour Organization, International Organization for Migration, UNODC and UNICEF. Interview with expert stakeholders, January–February 2023, online.
 - 40 Interviews with industry stakeholders, UNODC, ICMEC and ECPAT International, online and in person, between January and March 2023.
 - 41 See example of the EU directive 2011/92/EU: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:335:0001:0014:en:PDF>.

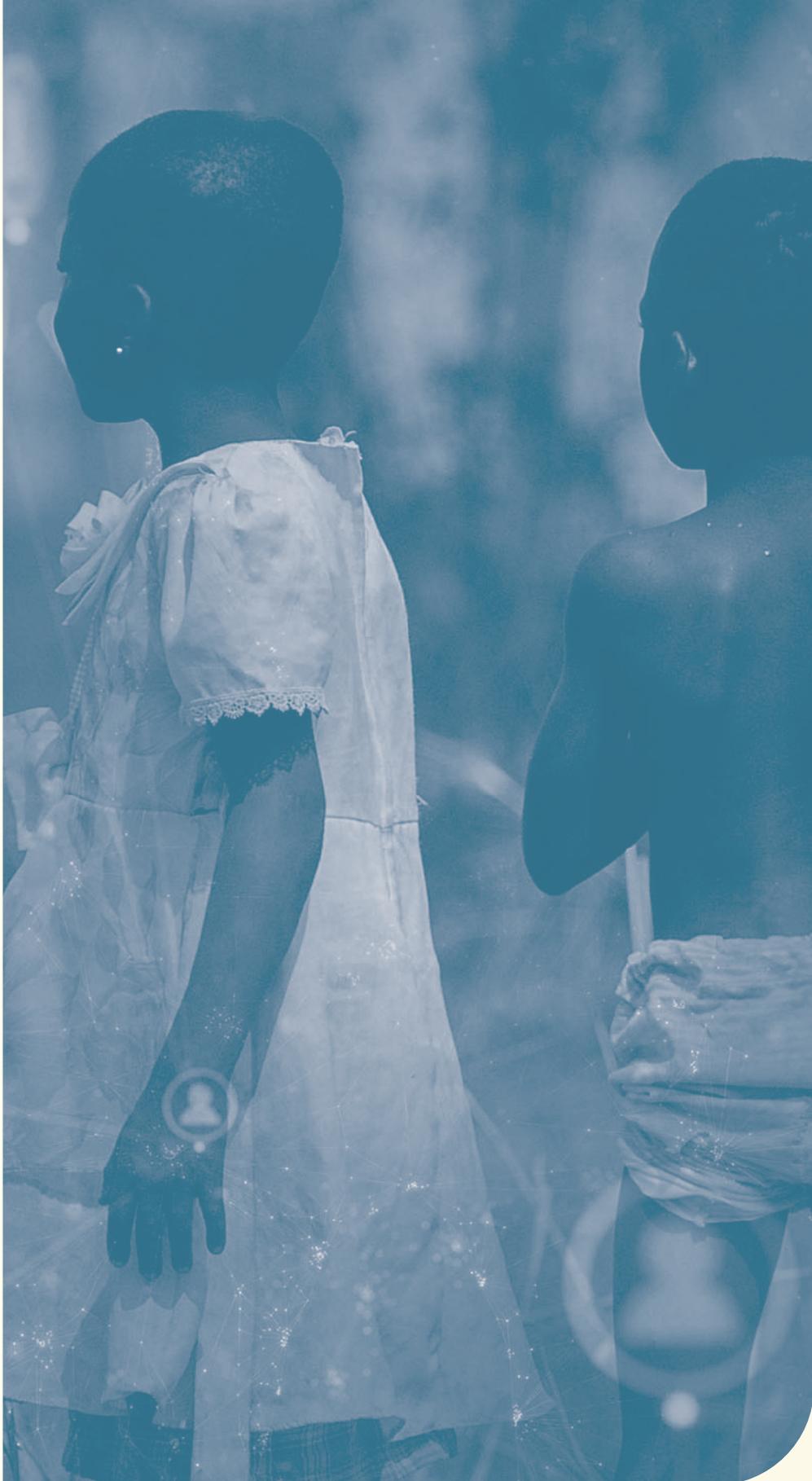


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