In collaboration with Africa Practice and the Thinking Ahead on Societal Change (TASC) Platform

GENEVA GRADUATE INSTITUTE

CENTRE FOR TRADE AND ECONOMIC INTEGRATION

THINKING AHEAD ON SOCIETAL CHANGE

WORLD ECONOMIC FORUM

Trade and Labour: Pathways for Decent Work in Kenya's Digital Economy

WHITE PAPER

SEPTEMBER 2025

Images: Getty Images, Pexels

Contents

Disclaimer
This document is published by the World Economic Forum and the Geneva Graduate Institute as a contribution to a project, insight area or interaction. The findings, interpretations and conclusions expressed herein are a result of a collaborative process facilitated and endorsed by the World Economic Forum and the Geneva Graduate Institute but whose results do not necessarily represent the views of the World Economic Forum and the Geneva Graduate Institute, nor the entirety of its Members, Partners or other stakeholders.

Foreword

Maroun Kairouz
Managing Director,
World Economic Forum

Cédric Dupont
Professor, International Relations/Political Science and Co-Chair, TASC Platform, Geneva Graduate Institute

Marcus Courage
Chief Executive Officer,
Africa Practice

The global economy is being reshaped by the digital transition. Digitally delivered services now account for more than half of global services exports, while platform technologies and artificial intelligence (AI) are transforming the movement of goods, trade in services and the organization of supply chains. These shifts are redrawing the geography of trade and creating new avenues for economic participation, especially for emerging markets. At the same time they are disrupting traditional employment structures and raising urgent questions about labour rights, social protection and inclusion, as well as development.

This case study, focused on Kenya's digital economy, was undertaken in collaboration with Africa Practice as part of the Trade and Labour Programme jointly led by the Centre for Regions, Trade and Geopolitics at the World Economic Forum and the Thinking Ahead on Societal Change (TASC) Platform at the Geneva Graduate Institute, with support from Laudes Foundation. The programme generates insights and policy recommendations to ensure trade and investment contribute to better labour outcomes in the face of global digital, green and geopolitical changes.

Kenya provides a compelling perspective on this transformation. With one of Africa's most dynamic digital economies, Kenya has become a regional hub for gig work, business process outsourcing and AI-enabled service exports. Its digital labour market reflects both the promise and precarity of the global digital transition: expanded access to income-generating opportunities on one hand, and rising informality, legal ambiguity and automation risks on the other.

This report draws on in-depth interviews and multistakeholder engagement to assess the current state of Kenya's digital labour ecosystem and identify reforms that can bridge the gap between digital growth and decent work in global value chains. It underscores the importance of modernizing labour laws, promoting responsible business practices and using regional and multilateral trade frameworks to align economic competitiveness with labour protections.

Kenya's experience offers timely lessons on how to build a global digital economy that is not only fast-moving but fair, inclusive and resilient. We hope this report will spark further dialogue and action towards shaping labour standards and opportunities for workers throughout digital value chains.

Executive summary

Kenya's digital economy is expanding rapidly, but risks from unequal access, weak protections and looming automation demand urgent policy action.

Kenya's digital economy is undergoing rapid growth, driven by expansion in gig work, business process outsourcing (BPO) and digitally delivered services. The sector is expected to reach $23 billion by 2025,[1] accounting for 9.24% of GDP.[2] An estimated 1.9 million Kenyans are now engaged in digital jobs,[3] including 1.2 million gig workers.[4] Kenya has positioned itself as a regional leader in financial technology (fintech), cloud services and remote outsourcing, bolstered by a young, tech-savvy population and strong mobile infrastructure.

However, labour challenges persist in terms of:

– Access to digital jobs: Only 23.8% of households have access to the internet,[5] with rural communities, women and low-income groups facing disproportionate exclusion. Access to infrastructure, devices and digital skills training remains highly unequal. While government programmes have reached hundreds of thousands of learners, stakeholders point to gaps in curriculum relevance, certification recognition and links to employment. Job creation through trade, investment and domestic ecosystem development is needed.

– Decent work[6] deficits in digital jobs: Digital workers operate largely outside the formal protection of labour laws. Most are classified as independent contractors and lack protections such as minimum wages, social insurance, paid leave and recourse against algorithmic management decisions. Risks related to mental health – especially in content moderation and data labelling roles – remain unaddressed. Kenya's five core labour laws, last comprehensively revised in 2007, do not account for platform-mediated, gig-based or remote forms of work. Employers face unclear regulatory obligations, while workers lack bargaining power and formal recognition. The result is a growing segment of the labour force that is productive but in a precarious position.

– Job churn in the context of AI and automation: AI is reshaping roles across sectors, from transcription to customer service, and threatens many of the digital jobs Kenya has created and attracted. Kenya's National AI Strategy outlines national ambitions but lacks targeted support for worker reskilling or transition planning.

To address these challenges, this white paper explores three areas for coordinated action:

– Modernizing labour laws to better reflect the realities of digital and platform work: Options may include introducing a third "worker" category (in addition to "employee" and "self-employed"), extending basic protections to contractors and mandating algorithmic transparency.

– Developing guidance for business action: Decent work toolkits co-created by government, employers and workers can set sector-wide standards for pay, grievance mechanisms, mental health and fair management.

– Using regional platforms such as the East African Community and African Continental Free Trade Area to advocate for common digital labour standards: Investment incentives and public procurement rules should reinforce decent work expectations domestically.

Kenya stands at a pivotal juncture. With deliberate policy choices and inclusive governance, it can become a model for building a digital economy that delivers both innovation and dignity at work.

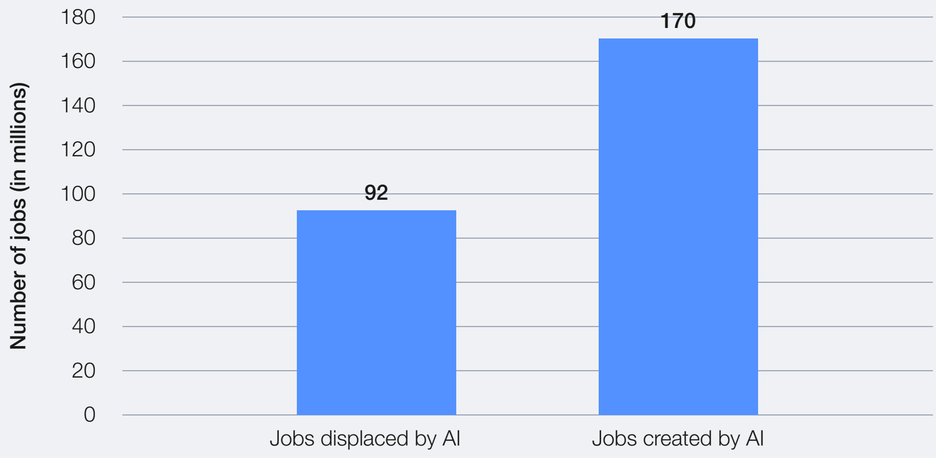
Introduction

With rising ICT exports and a vibrant tech ecosystem, Kenya offers strong investment potential in digital trade and services.

The global digital transition is reshaping economies, supply chains and labour markets. The World Trade Organization (WTO) estimates that the value of cross-border digitally delivered services has nearly quadrupled since 2005, growing at an average annual rate of 8.1% between 2005 and 2022. This growth has outpaced that of goods (5.6%) and other service exports (4.2%). Digitally delivered services now make up 54% of total global service exports,[7] as firms use platforms to access talent and markets. Meanwhile, total corporate investment in AI reached $252.3 billion in 2024, a 13-fold increase over a decade.[8]

These shifts are not only transforming business models and trade flows – they are fundamentally redefining the nature of work. More than 162 million people (20–30% of the workforce) in the US and Europe engaged in some form of independent work in 2016,[9] with growth continuing in online freelancing, e-commerce, ride-hailing and microtasking services. Governments are launching AI strategies as global tech firms are reshaping labour markets through remote outsourcing and algorithmic workforce management.

FIGURE 1 | **Global impact of AI on jobs, 2025–2030**



Source: World Economic Forum. (2025). Future of Jobs Report 2025

Kenya stands at a critical juncture in the digital transition. The country is experiencing a rapid expansion of digitally enabled employment, much of it through cross-border trade and investment. Kenya's digital economy includes standout sectors such as fintech, anchored by mobile phone-based money transfer service M-Pesa and a $11.2 billion ICT software market growing at nearly 6% annually.[10] Emerging creative and gaming industries supported by Konza Digital Media City and a rising e-sports scene present growth opportunities.

However, structural challenges persist. The sector remains dominated by informal and precarious labour practices, with 86.5% of Kenya's workforce outside the formal labour market in non-agricultural sectors.[11] Platform earnings often fall below minimum wage, especially in domestic work, data labelling and microtasking. Women and young people face systemic barriers such as income inequality, caregiving burdens and safety risks – amplifying their exclusion from high-value digital work.

AI adds urgency, potentially automating up to 52% of jobs in Kenya,[12] especially in low-skill, repetitive roles such as data entry and customer service (see Figure 1 for the global impact of AI on jobs). While AI could also involve new, higher-value jobs in model validation and content creation, limited rural infrastructure and low enrolment (25%) in science, technology, engineering and mathematics (STEM) courses[13] pose constraints. Without further deliberate investment in skills, protections and inclusive governance, Kenya risks a deepening digital divide.

In this context, this study was undertaken in collaboration with Africa Practice[14] as part of the Trade and Labour Programme. Through close to 40 structured interviews with government officials, trade unions, worker groups, digital platforms, private-sector actors and academic experts, the study aims to identify policy and business pathways for decent work in Kenya's digital economy. These interviews were supplemented by a multistakeholder workshop in Nairobi. The study focuses on three main questions:

1. What are the key labour challenges in the digital economy in Kenya, given its important position in international digital trade and investment flows?

2. What government actions are needed at the national and international levels to improve digital labour opportunities and outcomes in Kenya, including through trade and investment policies?

3. What business actions are needed to improve labour outcomes in digital supply chains, and where is more guidance needed?

Combining desk research and stakeholder insights, the study identifies coordinated regulatory, trade and investment pathways to ensure that digital transformation is inclusive and sustainable.

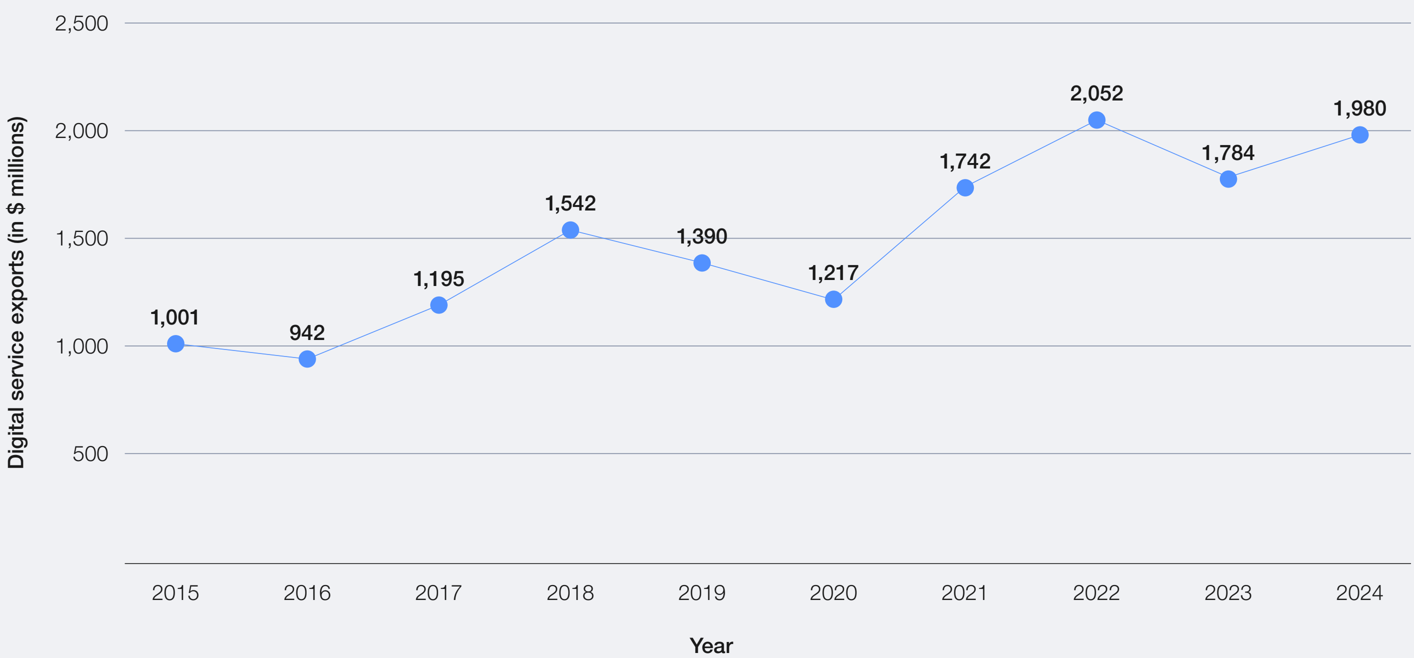
1 Digital trade and investment flows and the regulatory landscape

The current trade and investment landscape provides entry points to regulate digital and platform work.

1.1 Trade

International trade policy is still adapting to the realities of platform-mediated work and cross-border digital services. Kenya exported $1.98 billion[15] in digitally delivered services in 2024 (Figure 2). However, regulatory and trade policy frameworks lag in addressing labour impacts. Kenya is party to trade agreements that cover digital services and investment, such as the agreement establishing the African Continental Free Trade Area (AfCFTA) and the EU–Kenya Economic Partnership Agreement (EPA). Trade negotiations with the US began in 2020 under the Trump administration and continued as the US–Kenya Strategic Trade and Investment Partnership (STIP) under the Biden administration. These frameworks reference a range of labour issues, yet do not directly tackle platform labour or AI governance, and lack focus on platform worker issues, such as classification, algorithmic management and access to social protection – leaving a gap in how trade policy engages with the realities of Kenya's rapidly growing digital economy.

FIGURE 2 **Growth of digitally delivered services exports from Kenya**



Source: WTO. (July 2025). Digitally delivered services trade dataset

The EU–Kenya EPA includes an annex (Annex V) referencing trade and sustainable development. While the annex is binding under Article 147 of the main text, it does not contain sanction-based provisions and thus cannot be considered fully enforceable. It includes references to labour standards, climate change, biodiversity and gender equality, including a commitment not to lower labour or environmental standards to attract trade or investment.[16]

The US–Kenya STIP[17] aims to promote worker rights and protections through commitments on labour law enforcement, social dialogue and addressing forced labour in global supply chains, while also supporting inclusive participation in trade by women, young people and vulnerable groups.

The AfCFTA Investment Protocol requires investors to respect core labour standards,[18] but does not make reference to labour rights or working conditions. The current version of the Protocol on Investment to the AfCFTA of January 2023, however, includes State commitments relating to labour standards and a prohibition on weakening such standards to attract investment. It also requires investors to comply with certain labour standards through a chapter on "investor obligations" and exempts regulatory action to protect labour rights from the scope of the provisions regarding indirect expropriation.[19]

The East African Community (EAC) has made progress on regional digital integration – including the Common Higher Education Area (CHEA) for talent mobility – but labour protections remain fragmented. Efforts to align digital trade policies with labour standards in the EAC could help address concerns such as wage competition, fragmented regulation and labour arbitrage across borders. Stakeholders such as the Central Organization of Trade Unions, Kenya (COTU) and the Kenya Private Sector Alliance (KEPSA) have emphasized the need for a regional framework to ensure ethical and sustainable gig work throughout the EAC.

Most digital economy agreements also omit labour provisions. An exception is the 2022 UK–Singapore Digital Economy Agreement.[20] Article 8.61-P of the agreement commits both parties to "adopting or maintaining labour policies that promote decent conditions of work for workers who are engaged in or support the digital economy". It also provides for cooperation to promote digital inclusion for groups facing barriers, such as women, young people and informal workers. Further, the agreement covers data portability, algorithmic transparency and ethical AI – important for platform fairness.

Several stakeholders emphasized the role of mutual recognition agreements (MRAs) and professional mobility protocols in enabling Kenyan freelancers and business process outsourcing (BPO) workers to access regional and global markets. The EAC and AfCFTA can provide the scaffolding for this, but such mechanisms must be designed with worker protections, not just employer flexibility, in mind.

1.2 Investment

From cloud computing to fintech and BPO, Kenya has positioned itself as a regional tech hub. In April 2024, the government removed its 30% local ownership requirement for ICT companies to attract greater foreign direct investment and enhance competitiveness in the sector.[21]

Microsoft and G42 launched a $1 billion initiative in cloud infrastructure, AI and training;[22] Google has invested in AI and developer training;[23] and Huawei has supported university labs and bootcamps.[24] While these initiatives expand access, stakeholders cited persistent issues around certification, market alignment and inclusion of marginalized groups.

Government initiatives – through 1,450 digital hubs[25] and programmes such as Ajira Digital[26] and Jitume[27] – aim to boost digital literacy, rural access and employment. While these have achieved considerable scale, stakeholders noted outdated curricula, weak employer linkages and low job retention. They called for greater market alignment, AI literacy and certification recognition.

Kenya's BPO sector has drawn particular attention from investors. The Tatu City BPO hub,[28] a public–private partnership within a 5,000-acre special economic zone (SEZ), has attracted $50 million from CCI Global to build the country's largest call centre. The facility is expected to create more than 5,000 jobs in the short term and is a notable example of infrastructure-backed investment to support outsourcing. However, the absence of a robust policy and regulatory framework for platform and BPO workers limits the potential for these investments to yield high-quality jobs. The National BPO Policy (2025),[29] if implemented effectively, could serve as a blueprint for inclusive growth by tying investment incentives to compliance with labour standards.

To unlock the full potential of digital investment, Kenya must ensure that inflows of capital are accompanied by enforceable norms on fair pay, fair working conditions, social protection and skills development. Stakeholders advocate "investment-plus" strategies – public–private partnerships designed with labour outcomes and community benefit at the core.

1.3 Domestic policy landscape

Labour, copyright and data protection laws

To modernize labour standards, five core laws were enacted in Kenya in 2007: the Employment Act, Labour Institutions Act, Labour Relations Act, Occupational Safety and Health Act (OSHA) and the Work Injury Benefits Act (WIBA) (Figure 3). These statutes laid the foundation for a unified approach to formal employment regulation in Kenya.

However, these reforms were largely designed for traditional, formal employment relationships.

FIGURE 3 | **Key labour laws in Kenya (2007)**

Employment Act

Governs employment relationships in Kenya, covering a wide range of issues, including employment contracts, termination of employment and employee rights.

Labour Institutions Act

Establishes the framework for labour institutions, such as the Labour Disputes Tribunal, which addresses labour disputes.

Labour Relations Act

Governs the relationship between employers and employees, including matters related to collective bargaining and trade unions.

Occupational Safety and Health Act (OSHA)

Focuses on securing the safety, health and welfare of employees in the workplace, as well as any other persons who may be present or affected by workplace activities.

Work Injury Benefits Act (WIBA)

Provides compensation to employees for injuries and illnesses sustained at work.

Source: Authors

Labour, copyright and data protection laws

To modernize labour standards, five core laws were enacted in Kenya in 2007: the Employment Act, Labour Institutions Act, Labour Relations Act, Occupational Safety and Health Act (OSHA) and the Work Injury Benefits Act (WIBA) (Figure 3). These statutes laid the foundation for a unified approach to formal employment regulation in Kenya.

However, these reforms were largely designed for traditional, formal employment relationships.

They do not address the growing prevalence of platform-mediated and gig work arrangements, which typically fall outside the employer–employee category. Most digital workers in Kenya are considered independent contractors under contracts for service and are therefore excluded from entitlements for employees (under contracts of service), such as minimum wage, leave, social protection and the right to collective bargaining.[30]

In recent years, some stakeholders have proposed amending the Employment Act and OSHA to expand the definitions of “employee”, “employer” and “workplace”, to explicitly include digital labour contexts, for instance.[31] Such changes would allow for employee protections – such as minimum wage guarantees, safety standards and parental leave – to be extended to gig workers, even in the absence of formal employment contracts. However, reforms have not been passed, due to the government’s decision to first undertake a comprehensive review of all five 2007 labour laws before advancing sector-specific changes.

Beyond labour laws, other regulatory instruments touch on aspects of the digital economy. The Copyright Act (2001) provides protections particularly relevant for freelancers and gig workers who create copyrightable works. The Data Protection Act (2019) introduces safeguards around personal data, including protections against algorithmic profiling – an important but under-enforced provision in the gig work context. However, Kenya is not yet a signatory to the African Union Convention on Cyber Security and Personal Data Protection, which seeks to harmonize data protections for digital workers across borders (Chapter II on Personal Data Protection).[32]

A detailed breakdown of which government agencies are responsible for Kenya’s digital economy programmes can be found in the National Digital Masterplan (2022–2032).[33]

National strategies

Recent national strategies acknowledge the shift towards a digital-first economy but need to guarantee worker protections.

- Kenya's Digital Economy Blueprint (2019)[34] sets out a comprehensive vision for using digital technologies to drive national development, guided by five pillars: digital government; digital business; infrastructure; innovation-driven entrepreneurship; and digital skills and values. The blueprint recognizes the gig and platform economy as part of the broader digital economy and identifies opportunities for job creation, youth employment and small and medium-sized enterprise (SME) growth. It recognizes the gig economy but lacks a labour-rights framework or specific protections. The National Broadband Strategy (2018–2023)[35] promotes affordable broadband access.

- Kenya's National AI Strategy[36] outlines a comprehensive framework to position the country as a regional AI leader through investments in digital infrastructure, ethical governance and human capital development.

- Kenya's National Policy on Business Process Outsourcing (2025)[37] aims to position the country as a global BPO hub for job creation and economic growth, with explicit attention to decent work deficits, gig economy regulation and the integration of labour protections into digital outsourcing models.

- Kenya's National Action Plan on Business and Human Rights (2020–2025)[38] recommends mandatory human rights due diligence (HRDD), gender-sensitive consultation and stronger grievance mechanisms. Its relevance to platform work is indirect and underdefined.

2 Labour challenges in Kenya's digital economy

Limited infrastructure, outdated training and weak job protections limit Kenya's ability to turn digital work into stable, high-quality employment.

2.1 Equitable access to digital jobs and skills

The most immediate constraints are related to Kenya's infrastructure. Overall, only 37% of the population and 23.8% of households have access to the internet.[39] Usage rates vary from 64.7% in Nairobi City to 9.1% in West Pokot.[40] While mobile (SIM) penetration is 130.5% and smartphone penetration is 58.3%,[41] the high cost of laptops, mobile data and consistent internet access is a significant barrier for low-income individuals seeking entry into the digital economy.

Electricity reliability remains a concern, particularly in rural areas. The Energy and Petroleum Regulatory Authority (EPRA) has revealed that in 2024–2025 Kenyans have so far experienced an average of more than nine hours of power blackouts per month,[42] affecting freelancers and firms by inflating costs and reducing productivity.

The digital divide also reflects broader inequalities. Ajira Digital and Jitume aim to improve access, but uptake remains uneven and skills mismatched. Many digital workers lack market-relevant skills. According to stakeholders across government, academia and industry, Kenya's education system, including universities and Technical and Vocational Education and Training (TVET) institutions, often lags behind the needs of the digital job market due to rapid changes in technology and inadequate capacity in advanced emerging digital skills, with outdated curricula[43] and an insufficient focus on emerging areas such as AI. Private-sector interviewees emphasized that while skilling programmes reach a wide share of the workforce, they are often not designed to make workers truly job-ready. On-the-job training and apprenticeship programmes that build practical, market-aligned experience are key.

Moreover, a gender gap persists. While 53% of Ajira Digital trainees were women in 2023,[44] women remain under-represented in the digital workforce, especially in high-skill and high-income areas of tech.

Beyond physical infrastructure and skills, it is also crucial to recognize the role of social infrastructure and intermediary labour – such as workers who build trust, mediate digital access and extend platform services into communities – as vital to the functioning of digital economies. As recent research from India has shown,[45] even digital financial services rely on such often-invisible forms of labour to ensure reach, uptake and continuity.

2.2 Labour rights and fair working conditions in digital jobs

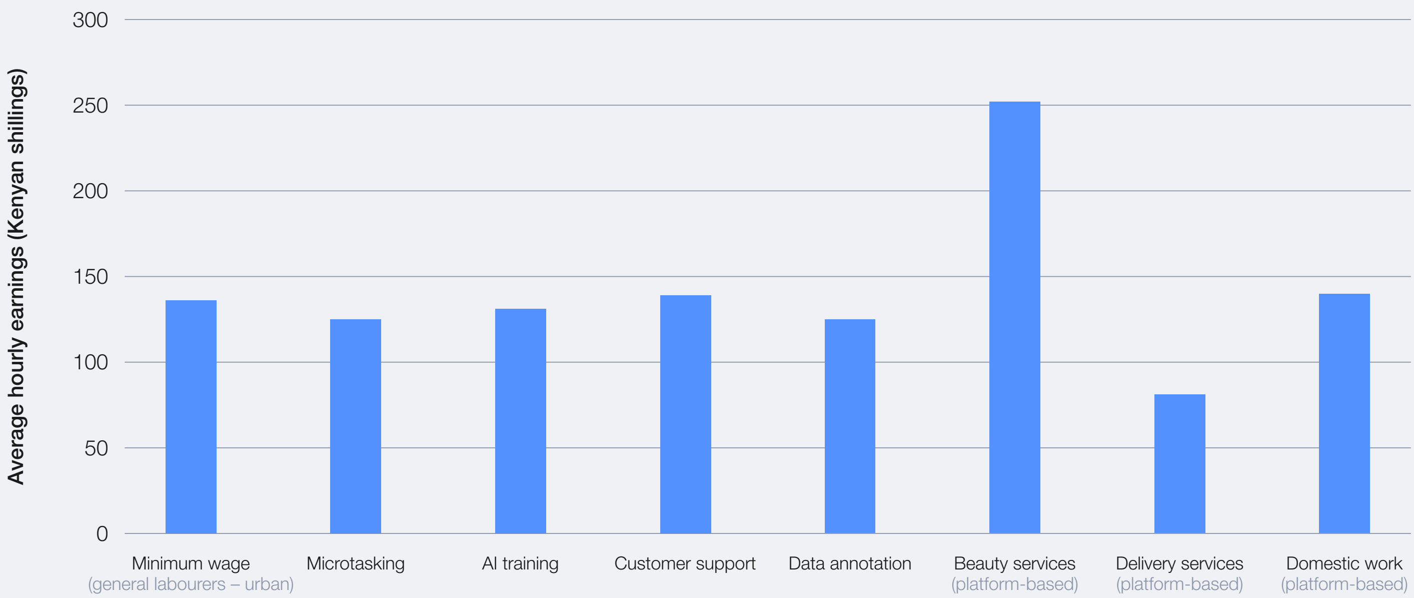
While digital jobs offer flexibility and new income streams, they are often precarious. Roughly 1.2 million Kenyans are engaged in gig work,[46] primarily through digital platforms, but most lack protections such as health insurance, paid leave and dispute mechanisms.[47]

Wage instability is a core concern. Average hourly earnings on microtask platforms are KES (Kenyan shillings) 125 (97 cents) – below Kenya's statutory hourly minimum wage of KES 135.9 ($1.05)[48] (Figure 4). Payment delays and denials, unregulated hours and sudden job terminations are common.

Terms such as "platform worker" or "online work" are missing from Kenya's labour laws. The absence of effective unionization and collective-bargaining mechanisms compounds the challenge. The dispersed, platform-based and cross-border nature of online work – and the lack of a shared workplace – necessitates innovative union and social dialogue strategies, as international experience shows.[49] Recent developments, such as the creation of the Kenyan Union of Gig Workers (KUGWO) and its affiliation to the Central Organization of Trade Unions, Kenya (COTU), are promising. Previously, gig workers relied on informal associations, some of which were short-lived and had limited advocacy capacity as they were not recognized within Kenya's formal industrial relations system.

Occupational safety and health (OSH) concerns are emerging, especially in BPO and content moderation roles. Interviewees expressed the view that long hours and exposure to distressing content cause burnout and anxiety. Formal OSH guidelines for digital workers are absent. Even when mental health services exist, workers report issues of surveillance and retaliation – raising questions about confidentiality and trust.

FIGURE 4 **Minimum wage versus earnings in platform work in Kenya**



Source: [International Labour Organization. (2024, March 20). Digital labour platforms in Kenya: Exploring women's opportunities and challenges across various sectors]

2.3 Long-term viability in the context of AI and automation

The digital labour market faces structural risks from AI and automation, with 86% of employers expecting AI to change their business by 2030.[50] Up to 52% of jobs in Kenya may be automated, especially in low-skill tasks such as data entry, transcription and customer service. Many of the very roles that have driven digital job creation – low-skilled, repetitive and often outsourced from overseas – are among the first to be automated. Kenya's recently launched National AI Strategy 2025–2030[51] does not provide detailed implementation frameworks for workforce transition or reskilling programmes that would prepare workers vulnerable to displacement.

There is a need to move up the value chain – from microtasking and basic digital services to higher-value areas such as AI development, cybersecurity, software engineering, strategic advisory and tech entrepreneurship. Yet this shift requires significant investment in advanced digital skills, industry partnerships and institutional capacity-building.

The risk is two-fold: Kenya may lose out on labour-intensive digital jobs due to automation, while simultaneously failing to compete for more specialized work due to a shortage of highly skilled talent. Addressing this requires a proactive mix of education reform, digital infrastructure development, social protection mechanisms and ethical AI policy.

3 Policy and business responses

Corporate action on skilling and worker protection must complement government policies and programmes to tackle digital labour challenges.

Potential and ongoing public- and private-sector responses to digital labour challenges are summarized in Table 1 and explored below.

TABLE 1 **An overview of government and business responses to digital labour challenges**

Labour challenges	Domestic initiatives	Trade, investment and regional initiatives	Business action
Access to jobs and job creation	– Infrastructure – Digital hubs – Skilling and certification	– Easing digital services trade and talent mobility – Investment promotion and facilitation; SEZs; trade missions – Reducing trade barriers on ICT products – Mutual recognition of qualifications	– Partnering with government and educational institutions on demand-driven skilling – Investing in digital infrastructure
Decent work in digital jobs	– Labour law reforms to protect digital workers – OSH guidelines for digital work – Support for digital worker unions	– Common digital labour standards in the EAC – Trade and investment incentives conditioned on digital labour compliance – “Tripartite+” engagement in trade negotiations	– Responsible business conduct guidelines (including on content moderation and data labelling) – Specialized insurance schemes – Human rights due diligence in digital value chains
Job displacement due to AI and automation	– Social protection	– Attracting higher value-added digital jobs	– On-the-job upskilling

Source: Authors

3.1 Expanding access to jobs and skills

The government is investing in national connectivity infrastructure, including the rollout of 100,000 kilometres of fibre-optic cable and the expansion of last-mile connectivity through public–private partnerships.[52] In tandem, the establishment of digital hubs is aimed at equipping young people and women with employable digital skills, with more than 350,000 individuals trained under Ajira Digital as of 2023[53] and 13,153 beneficiaries of Jitume's training.[54] County governments such as Kisumu, Uasin Gishu and Machakos have launched youth innovation centres,[55] and the Council of Governors' ICT Committee[56] contributes to shaping devolved digital infrastructure and education plans. Despite large training figures, private-sector stakeholders have highlighted that the programmes often fall short of making participants fully "job ready", indicating a mismatch between training content and labour-market needs.

To address skills mismatches, stakeholders from the education and training sector emphasized the need for ongoing curriculum reforms. Employers echoed this view, pointing to the high costs of retraining recent graduates whose skills do not match current digital labour requirements. A public official shared that curriculum development institutions and qualification-awarding bodies guided by National Occupational Standards are working in collaboration with industry to incorporate skills such as AI, data analytics and software development. At the regional level, stakeholders identified the mutual recognition of digital qualifications and easing of labour mobility restrictions within the EAC as important levers to scale digital job access and fill skills gaps. Harmonizing qualifications and removing cross-border regulatory barriers would not only enhance worker mobility but also facilitate the growth of cross-border digital services trade.

3.2 Promoting decent work and fair conditions in digital labour

Stakeholders recommended a comprehensive review and reform of existing labour legislation to explicitly recognize digital and gig workers and to enact additional amendments to tackle aspects of remote, digital and gig work that are not currently well addressed.

Stakeholders urged the national BPO policy to go beyond investment promotion and include enforceable standards such as fair contracts, grievance mechanisms and OSH provisions. Discussions on digital labour reforms are ongoing, including through the ILO's Community of Practice on Digital Skills and Jobs in Kenya.[57]

Regional policy alignment was also identified as a crucial area for action. Stakeholders proposed that trade and investment incentives across the EAC should be tied to compliance with fair labour standards for digital work. There was support for a "tripartite+" approach – bringing together government, employers, workers and civil society – to co-create and oversee implementation of such standards.

From the business perspective, several stakeholders recommended the development of responsible conduct guidelines for companies involved in content moderation, data labelling and other forms of platform work. Suggestions included piloting sector-specific insurance schemes and conducting human rights due diligence aligned with Kenya's National Action Plan on Business and Human Rights.[58]

3.3 Preparing for job displacement in an AI-driven future

While Kenya has published its National AI Strategy, stakeholders noted that it lacks clear implementation mechanisms for supporting worker transitions or reskilling at scale. The strategy, as a high-level policy framework, does not contain detailed implementation provisions or regulatory tools, because these fall within the remit of legislation and accompanying policy instruments, which do not yet exist. To address this, stakeholders recommended that AI-related regulations/legislations be linked to social protection frameworks. This could include developing publicly funded reskilling programmes and incorporating digital workers into unemployment and health insurance schemes.

Business and academic representatives called for partnerships with educational institutions to train workers for AI-related roles – e.g. machine learning, cybersecurity and algorithmic auditing. To benefit workers, such programmes could combine online and in-person formats, include job placement support and address barriers such as connectivity and affordability. On-the-job upskilling was highlighted as being critical. In parallel, stakeholders emphasized the role of trade and investment policy in shaping the future of digital work. Kenya should target higher value-added jobs – such as software engineering and AI development – through trade missions and export promotion. Such shifts would reduce dependence on low-wage microtasking and enhance global competitiveness. These supply chain strategies would complement domestic skilling efforts and enhance the country's competitiveness in an increasingly automated global services market, while navigating a volatile geopolitical climate – marked by trade wars, tariff uncertainty and forecasts of net job losses – and contending with intensified competition for talent as sectors and roles are reshaped.

4 Policy options in detail

Policy proposals call for stronger standards and better alignment among national, private-sector and regional actors.

4.1 Amending labour laws to better include digital economy workers

Kenya's five core labour laws do not reflect the realities of platform-mediated, gig-based or remote work.

Currently, most digital workers are classified as independent contractors and excluded from protections such as minimum wage, sick leave and social security. Kenyan courts have begun to engage with the complexities of employment relationships in the digital economy. Tests such as the "integration test" (which considers whether the worker is part of the core business) and the "economic dependency test" (which examines if the worker relies primarily on one platform for income) are applied in case of disputes, but legislative reforms would provide more certainty for the estimated 1.2 million gig workers in Kenya and the companies and platforms engaging them.

The National Institutions Act requires that labour law reform in Kenya be guided by tripartite social dialogue through the National Labour Board (NLB). Efforts to amend the law face two significant challenges:

– **The complexity of comprehensive reform:** While there have been attempts to amend the Employment Act through the NLB to include BPO workers, these efforts were subsumed under a broader reform agenda. Tripartite partners committed to reviewing all five core laws to align them with the 2010 national constitution and to better reflect changes in national, regional and global labour markets. Given the interrelated nature of the legislation – where altering definitions in the Employment Act affects corresponding provisions in the Labour Relations Act, the Occupational Safety and Health Act, the Work Injury Benefits Act and the Labour Institutions Act – piecemeal reform has proven difficult to justify.

– **Balancing protection with flexibility and growth:** If not carefully calibrated, modifying legal definitions of employment could unintentionally undermine the very features that make platform work attractive, such as flexible hours, multiple income streams and remote work. Policy-makers thus face a dual imperative: to safeguard workers from precarity and exclusion while preserving the agility and innovation that digital platforms bring to Kenya's economy.

Although additional, in-depth multistakeholder discussion is required at the domestic level, some options for consideration are given below.

– **Include digital economy workers in the Employment Act to ensure adequate labour protections.** This may involve considering one of the following options and adapting it to the Kenyan context:

a. Introducing a **third "worker" category** (in addition to "employees" and "self-employed") within the Employment Act: Kenya could introduce a third worker category, covering those who are economically dependent on platforms but do not meet the strict legal test of employment. Workers in this category would be entitled to intermediate protections such as minimum wage guarantees, paid leave, access to social insurance schemes and protections from unfair deactivation.[59] For instance, the UK's non-statutory guidance for employers[60] entitles individuals in the third worker category – who are likely to be working in less permanent, full-time employment with a single organization – to a core set of employment protections without revoking their independent status.

b. Applying a rebuttable **presumption of employee status** for certain platform workers: An alternative approach is to presume that platform workers who are under the direction and control of a platform are employees by default, unless the platform can prove otherwise. This reverses the burden of proof and ensures that workers receive full employment protections unless the platform can demonstrate that the individual is genuinely self-employed. This approach has been adopted in the European Union's Platform Work Directive (2024).[61]

c. Extending targeted rights to platform workers without changing their legal classification under the Employment Act: This model retains the flexibility of independent contracting while ensuring basic targeted protections for workers in the digital economy such as minimum pay floors, health stipends and so forth. This approach has been implemented in parts of the United States – in California, Proposition 22 (2020)[62] classified app-based drivers as independent contractors but mandated that platforms provide a healthcare stipend, occupational accident insurance and a guaranteed minimum earning standard. (Table 1 in the Annex highlights further examples of legislative approaches adopted globally.)

– **Expand the definition of the "workplace"** under the OSHA to include digital and remote environments. This would require platforms –

where practicable – to ensure safe and healthy working environments and conditions, including psychosocial health safeguards.

– **Mandate platform accountability protocols,** including transparency of algorithms, protections against arbitrary deactivations and access to digital dispute resolution mechanisms.

The Ministry of Labour and Social Protection is already working with partners such as the International Labour Organization (ILO) and the German Agency for International Cooperation (GIZ) to review existing laws and develop policy frameworks for the digital and BPO sectors.[63] A participatory, phased approach rooted in worker realities is essential.

4.2 Decent work toolkits for businesses in the digital economy

The BPO sector is a major employer within Kenya's digital economy and a cornerstone of its global competitiveness. The National BPO Policy proposes the creation of a "decent work toolkit" for the BPO sector.[64] Although it is not yet clear what this toolkit will specifically entail, stakeholders supported the idea of developing guidance for businesses in the BPO and other digital economy sectors, especially if co-created with workers, employers and their representative organizations and tailored to Kenya's labour and investment environment. While some companies are making commitments and taking action (see Box 1), sector-wide guidance would provide clarity.

BOX 1

Glovo's Couriers Pledge: An example of voluntary commitments to platform economy workers

Glovo's Couriers Pledge, launched in 2021 and implemented in Kenya, outlines commitments to improving working conditions for delivery couriers across four areas: fair earnings, safety, equality and community. Key provisions include predictable pay structures aligned with regional living wage benchmarks and accounting for fuel and maintenance expenses, insurance coverage, safety features such as an in-app SOS button (linked to rescue.co in Kenya) and access to sick pay and parental benefits. An appeals process allows couriers to challenge decisions such as deactivations. Couriers are also offered optional training in digital and financial skills, with more than 3,000 participants to date.

The *Fairwork Kenya Ratings 2022* report[65] highlighted Glovo's minimum earning thresholds and insurance coverage. It listed the need for clearer contracts, more robust grievance mechanisms and stronger protections around algorithmic management and deactivation processes as areas for improvement.

Such private-sector examples could inform a decent work toolkit for the sector.

Sources: Glovo, The Couriers Pledge; Fairwork, Fairwork Kenya Ratings 2022

Based on interviews and global good practice, the toolkit(s) could include:

– **Clear pay standards:** Locally benchmarked wage baselines for different BPO platform and other digital economy roles could provide clarity on pay. The minimum wage in Kenya differs according to occupation and location, and hourly, daily and monthly rates are specified.[66] Informal workers, however, are not well protected, and more clarity is necessary for digital economy occupations.

– **Advance payment structures:** Guidelines for partial upfront payment or milestone-based remuneration, particularly for freelancers and gig workers, could be developed. This would help reduce income insecurity and protect workers from wage theft or excessive delays in payment due to prolonged review periods.

– **Mental health and OSH guidelines:** Guidelines for protecting mental health, particularly for content moderators and data labellers, need to be developed. These could build on the protocols developed by the Global Trade Union Alliance of Content Moderators, including on limiting exposure, establishing realistic quotas, providing trauma training and counselling and setting up OSH committees.[67] Crucially, mental health services must be provided by independent professionals, not performance evaluators, and handled confidentially to address trust and privacy concerns.

– **Algorithmic management transparency:** Transparency requirements for algorithmic pricing, task assignment, rating and deactivation processes are necessary to ensure fairness and build trust. Firms could be encouraged to co-design performance benchmarks with worker representatives where they exist or directly with workers, reducing the risk of unfair ratings or income loss.

- **Pre-assignment transparency protocols:** Employers could be required to clearly inform workers about the nature of tasks, especially those involving sensitive or graphic content, before they accept a project. This ensures informed consent and protects workers' mental health.

- **Tailored insurance products:** Partnerships could be recommended with insurance providers and financial institutions to develop sector-specific insurance schemes. For example, ride-hailing and delivery app riders could access bundled personal accident and vehicle insurance plans that account for common safety risks, such as attacks or theft (see Box 2).

- **Standard grievance procedures:** Grievance mechanisms could be made accessible via mobile tools, particularly for remote or part-time digital workers.

- **On-the-job training:** Considering the "deskilling" nature of many of the jobs in question, repetitive tasks could be time-limited and alternated with other kinds of work and training to help workers upgrade. Additional, specific guidelines for data labelling, content moderation and related roles could be developed.

As a next step, a multistakeholder working group – including the relevant government ministries, KEPSA, trade unions, gig worker associations, labour experts and civil society – could be formed to co-design the toolkit and pilot its use across BPO firms.

BOX 2

Britam Connect: Embedded insurance for Kenya's informal economy

In March 2025, Britam launched Britam Connect, a licensed microinsurance subsidiary aimed at expanding financial protection to low-income households, gig workers and small businesses in Kenya. With insurance penetration in Kenya at just 2.4%, Britam Connect addresses affordability and accessibility barriers by embedding insurance into everyday transactions.

Through strategic partnerships with platforms such as Little and Safaricom, Britam Connect offers pay-as-you-go personal accident cover. For instance, taxi drivers on the Little ride-hailing app can access coverage for as little as KES 5 (4 cents) per trip. These micro-premium models ensure that gig workers are protected during their daily activities without the burden of upfront costs.

Since its inception, Britam Connect has insured more than 300,000 gig workers and aims to reach 25 million people across Africa within five years. By using technology and forming partnerships with insuretech firms, savings and credit cooperatives and organizations such as Oxfam, Britam Connect is pioneering a model of inclusive, embedded insurance that aligns with the financial behaviours of underserved populations.

Source: Britam. (2025). Britam Connect to revolutionize insurance for low-income households

4.3 Harmonizing labour standards through trade and regional frameworks

Kenya's integration into regional and global digital markets makes the harmonization of labour standards a strategic priority. Digital work frequently crosses borders, yet protections and obligations vary between economies. This regulatory mismatch hinders business, creates scope for a race to the bottom in working conditions and undermines efforts to formalize the sector.

Trade agreements and regional forums present opportunities for coordination. Stakeholders proposed that Kenya use its participation in the EAC and AfCFTA to promote the development of minimum digital labour standards.
Key proposals included:

- **Common digital labour standards at the EAC:** Article 104 of the EAC Treaty calls on member states to "harmonise their labour policies, programmes and legislation including those on occupational health and safety".[68] The EAC could provide a venue for developing common digital labour standards, including on pay, dispute resolution, algorithmic fairness and OSH.

- **An annex on labour rights under the AfCFTA Digital Trade Protocol,** addressing digital, gig and BPO labour explicitly: Digital trade chapters in FTAs often include obligations on consumer protection and privacy; these "restrictions" on digital trade are justified on the basis that they support the growth of the digital economy by improving trust and safety. A similar rationale could support the inclusion of provisions on digital labour protection. In the case of the AfCFTA's Digital Trade Protocol, while labour standards are not included, there is scope to negotiate additional annexes in the future.

- Other supporting measures discussed included improving labour data collection and **setting expectations on decent work in investor dialogues and procurement rules.** Business representatives acknowledged that foreign clients increasingly require demonstrable due diligence across labour rights and working conditions, especially in data services, content moderation and e-commerce.

Implementing these proposals would require coordinated action through regional mechanisms, such as the EAC's Sectoral Council on Labour and AfCFTA's technical committees. In parallel, engaging digital platforms and tech firms in dialogue about shared responsibilities and best practices will be important for shaping workable and inclusive labour standards. Participants stressed that regional harmonization must not be an excuse for delay at home. Kenya's domestic laws and enforcement mechanisms must lead the way, both to protect its own workforce and to shape regional norms.

Conclusion

Kenya’s labour law review and policy discourse offer a model for global debates on decent work in the platform economy.

As in many economies, the expansion of digital work in Kenya has outpaced the development of regulatory and corporate governance frameworks to manage it.

Yet Kenya is not standing still. Policy conversations about updating labour laws to reflect the realities of gig and platform work are gaining traction. The government, supported by the ILO’s Community of Practice, is reviewing key legislation and working towards policy guidance to better account for digital work. Stakeholders across sectors are exploring innovative approaches, including functional frameworks for extending protections and tools such as decent work toolkits to support business adoption. These developments signal an evolving policy ecosystem, in which labour reform is seriously debated with regard to labour standards, trade agreements and industry guidelines.

Kenya’s experience reflects a broader global struggle, and its national dialogue can offer valuable insights to global discussions, particularly those underway at the ILO aiming to produce an international labour standard on decent work in the platform economy.

Ultimately, building a fair digital economy in Kenya – and elsewhere – requires more than piecemeal reform. It calls for a governance shift across both the trade and labour communities: from fragmented responses to coherent, multistakeholder policy coordination.

Annex

Global legislative approaches to protecting platform and gig workers

Jurisdiction	Statutory/judicial intervention	Year	Key provisions for platform/gig workers
Chile	Law No. 21.431 – Digital Platform Work Law	2022	Defines dependent and independent platform workers; mandates written contracts or service agreements; includes 12-hour disconnect; ensures social security, safety training, equipment, insurance; stronger OSH duties for dependent workers
European Union	Directive on Improving Working Conditions in Platform Work	2024	Presumption of employment if control exists; rights to transparency, human oversight in algorithmic management; protection of personal data; collective bargaining rights
France	El Khomri Law (2016), Mobility Orientation Law (LOM) (2019), Authority for Social Relations of Employment Platforms (ARPE)	2016–2024	Platform workers retain self-employed status (El Khomri Law, 2016); have the right to refuse tasks (LOM, 2019); benefit from minimum earnings guarantees and safeguards against account deactivation through sectoral agreements (2023–2024); and participate in social dialogue via ARPE
Italy	Legislative Decree No. 81/2015 and Law No.128/2019	2015–2019 (ongoing interpretation)	Article 2 of Legislative Decree No. 81 states personal, continuous work where time/place/methods are organized by the client are treated as employment, so employee protections apply. Law No.128/2019 (delivery platform workers/riders decree) mandates written contracts; fixed minimum pay (not piece-rate only); OSH insurance; data protection; no deactivation for refusal; social protections Courts and inspectorates have ordered certain platforms to reclassify ~60,000 riders as employees, applying back-payment of wages and contributions
Mexico	Amendment to Federal Labour Law	2024	Defines digital platform work; presumes employment above income threshold; prohibits misclassification; mandates contracts with algorithm transparency
Singapore	Platform Workers Act	2024	Guarantees retirement, work injury compensation, OSH protections and collective bargaining for ride-hailing and delivery workers
Spain	Riders Law	2021	Presumes employment relationship for food delivery riders; requires platforms to issue contracts, ensure occupational safety; mandates algorithmic transparency
United Kingdom	Court Ruling (e.g. Uber BV v Aslam) and Third Worker Category	2021	UK employment law includes non-statutory directive that recognizes “worker” as an intermediate status between employee and self-employed. Extended to gig/platform workers; gig workers (e.g. Uber drivers) entitled to minimum wage, paid leave and protection from unfair treatment

United States (California)	Ballot Measure on Platform Workers	2024	Classifies app-based drivers as independent contractors; provides limited benefits (minimum pay, health stipend, accident insurance)
United States (New York City)	Minimum Pay Regulation	2024	Establishes minimum pay of $21.44/hour before tips for app-based food delivery workers
Uruguay	Digital Platform Workers Protection Law	2025	Applies to both employees and self-employed; mandates minimum pay, OSH training, algorithm transparency and collective rights; enforced by Labour Ministry

Sources:

ILO. (2024, January 31). Realizing decent work in the platform economy

ILO. (2024, July 31). Decent work in the platform economy: law and practice update

Peiris, R. (2021). Ramifications of the UK Supreme Court judgement in Uber B V v. Aslam and Others. Labour Law Journal, 2021-III-LLJ

Industrial Relations and Labour Law. (2022, May). Chile: New law regulating digital platforms employees' contracts

Library of Congress. (2015, August 20). Italy: Updated legislation on employment contracts

ETUC. (2022). France: Country report 2022

NYC Government. (2025, April 1). Mayor Adams announces full minimum pay rate for app-based restaurant delivery workers is now in effect

Spring, M. (2024, July 30). California Supreme Court upholds Proposition 22.CDF Labor Law

Contributors

World Economic Forum

Mekhla Jha
Inclusive Trade Specialist, World Economic Forum, Switzerland

Aditi Sara Verghese
Policy Lead, International Trade and Investment, World Economic Forum, Switzerland

Thinking Ahead on Societal Change (TASC) Platform, Geneva Graduate Institute

Kitrhona Cerri
Executive Director, TASC Platform, Geneva Graduate Institute, Switzerland

Maria Mexi
Senior Advisor, Labour and Social Policy, TASC Platform, Geneva Graduate Institute, Switzerland

Acknowledgements

Sincere thanks are extended to all steering group members, interviewees and in-country workshop participants for their guidance and insights, and we appreciate the contribution of those who provided critical input and feedback on the drafts.

Rosie Akester
Head of Responsible Business Advisory, Partner Africa

Wycliffe Alutalala
Industrial Relations Officer, Transport Workers Unions Kenya

Martjin Arets
Independent Researcher

William Benthall
Global Director of Government Relations, Delivery Hero

Paul Breloff
Chief Executive Officer and Co-Founder, Shortlist

Ellam Brian
General Secretary, Kenya Union of Gig Workers

Teresios Bundi
Gig and Data Economy Advisor, GIZ

Sam Chappatte
Chief Executive Officer, Kapu Africa

Sarah Chege
Senior Manager, PR and Communications, Network International

William Farmer
Senior Consultant, Africa Practice

Magalí Gurman
Government Relations Specialist, Glovo

Kennedy Kachwanya
Founder, Bloggers Association

Winnie Karanu
AI National Skills Director, Microsoft

Magdalene Kariuki
Regional Manager, Africa Practice

Tanushree Kaushal
Researcher and Lecturer, University of Bern

Joseph Kibugu
Regional Manager, Africa, BHRRC

Joan Kinyua
President, Data Labellers’ Association

Festus Kiragu
Vice-President Global Operations and Country Director, CloudFactory

Christopher Maclay
Co-Founder, Jobtech Alliance

Nick Markham
Investments Lead, Jobtech Alliance

Jason Masai
Digital Finance Specialist (Head of Product – Digital), M-Pesa Africa

Winnie Mitullah
Research Professor of Development Studies, Institute for Development Studies (IDS)

Marco Molina
Partner, Molina & Associates

Judy Muriuki
Consultant, Africa Practice

Fridah Mwangi,
Director and Co-Founder, i workers Kenya

Mercy Mwangi,
Executive Director, Kenya Women Parliamentary Association (KEWOPA), Secretariat

Stephen Mwangi,
National Project Coordinator – Digital Jobs, ILO Kenya

Judy Njino
Executive Director, Global Compact Network Kenya (GCNK)

Nicodemus Nyakundi
Digital Accessibility for PWDs Program Officer, KICTANet

Angela Oduor Lungati
Executive Director, Ushahidi

Mophat Okinyi
Founder and President, Techworkers Association

Benson Okwaro
General Secretary, Communication Workers' Union

Jacob Omolo
Department of Applied Economics, Kenyatta University

Brian Omwenga
Team Lead, Tech Innovators Network

Vincent Omwenga
Director, School of Computing and Engineering Sciences, Strathmore University

Bruno Otiato
Communications Manager, Central Organization of Trade Unions

Uma Rani
Senior Economist, International Labour Organization

Ben Roberts
Chairperson, ICT Sector Board, Kenya Private Sector Alliance

Gideon Rotich
Head of Finance and Strategy, Glovo

Edinah Samuel
Fellow, Africa Practice

Mary Sila
Digital worker and Ajira Digital beneficiary

Eugene Simiyu
Government Affairs, Little

Erick Sirali
Director – Digital Trade, TradeMark Africa

Ross Stewart
Executive Director, Global Careers Africa

Nerima Wako
Executive Director, Siasa Place Kenya

Mishael Wambua
Trade Policy Advisor, GIZ

Judy Waruiru
Regional Managing Director, Eastern Africa, Network International

Marie Wilke
Director of Innovations and Solutions, Africa Practice

Endnotes

1. International Labour Organization. (2023, April 14). *Social dialogue promotes decent work in Kenya's digital economy.* https://www.ilo.org/resource/news/social-dialogue-promotes-decent-work-kenyas-digital-economy
2. International Trade Administration. (2024, July 5). *Kenya commercial country guide.* https://www.trade.gov/country-commercial-guides/kenya-information-communications-and-technology-ict
3. Ibid.
4. World Bank. (2024). *Working without borders: The promise and peril of online gig work.* https://documents1.worldbank.org/curated/en/099011724092026769/pdf/P1773021669c080021bb971499c18a61008.pdf
5. KICTANet. (2025, January 16). *Digital divide in Kenya: ICT access and usage data reveals disparities.* https://www.kictanet.or.ke/digital-divide-in-kenya-ict-access-and-usage-data-reveals-disparities/
6. As per the International Labour Organization, decent work "involves opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for all, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men".
7. International Monetary Fund, Organisation for Economic Co-operation and Development, United Nations, World Bank, & World Trade Organization. (2023). *Digital trade for development.* https://www.wto.org/english/res_e/booksp_e/dtd2023_e.pdf
8. Maslej, N., et al. (2025). *The AI index 2025 annual report. AI Index Steering Committee, Institute for Human-Centered AI, Stanford University.* https://hai-production.s3.amazonaws.com/files/hai_ai_index_report_2025.pdf
9. McKinsey Global Institute. (2016, October 10). *Independent work: Choice, necessity, and the gig economy.* https://www.mckinsey.com/featured-insights/employment-and-growth/independent-work-choice-necessity-and-the-gig-economy
10. Mordor Intelligence. (2024, September 2). *Kenya ICT market: Market share analysis, industry trends and statistics, growth forecasts (2024–2029).* https://www.mordorintelligence.com/industry-reports/kenya-ict-market
11. ILOSTAT figure is 86.5% in 2019. ILOSTAT. (n.d.). *Informal employment rate.* Retrieved August 15, 2025, from https://ilostat.ilo.org/data/snapshots/informal-employment-rate/
12. World Economic Forum. (2017, May). *The future of jobs and skills in Africa: Preparing the region for the Fourth Industrial Revolution.* https://www3.weforum.org/docs/WEF_EGW_FOJ_Africa.pdf
13. UNESCO. (2023). *Mapping research and innovation in the Republic of Kenya.* https://unesdoc.unesco.org/ark:/48223/pf0000386938
14. Mastercard Foundation, eMobilis Technical Training Institute, & Africa Practice. (2024). *A policy guide for digital economy progress: Advocating and implementing for a stronger gig work sector.* https://resources.africapractice.com/policy-guide-digital-economy
15. World Trade Organization. (2025, July). *Digitally delivered services trade dataset.* https://www.wto.org/english/res_e/statis_e/gstdh_digital_services_e.htm
16. International Labour Organization. (2022). *Can the African Continental Free Trade Area promote the implementation of Sustainable Development Goal 8?* https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40dgreports/%40inst/documents/publication/wcms_903939.pdf
17. Office of the United States Trade Representative. (2024, September 9). *United States and Kenya to hold eighth negotiating round under the Strategic Trade and Investment Partnership*. https://ustr.gov/about-us/policy-offices/press-office/press-releases/2024/september/united-states-and-kenya-hold-eighth-negotiating-round-under-strategic-trade-and-investment
18. World Trade Institute. (2023). *Protocol to the Agreement establishing the African Continental Free Trade Area on Investment.* https://edit.wti.org/document/show/8993cb69-cbc5-4f07-a372-5ef5c74e7b78
19. International Labour Organization. (2022). *Can the African Continental Free Trade Area promote the implementation of Sustainable Development Goal 8?* https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40dgreports/%40inst/documents/publication/wcms_903939.pdf
20. UK Government. (2022). *Digital Economy Agreement between the United Kingdom of Great Britain and Northern Ireland and the Republic of Singapore*. https://assets.publishing.service.gov.uk/media/6229f350e90e0747aa8eb6ad/CS_Singapore_1.2002_UK_Singapore_Digital_Economy_Agreement.pdf
21. United Nations Conference on Trade and Development. (2024). *Kenya removes the 30 per cent local shareholding requirement in the ICT sector.* https://investmentpolicy.unctad.org/investment-policy-monitor/measures/4425/kenya-removes-the-30-per
22. Microsoft. (2024, May 22). *Microsoft and G42 announce $1 billion comprehensive digital ecosystem initiative for Kenya.* https://news.microsoft.com/source/2024/05/22/microsoft-and-g42-announce-1-billion-comprehensive-digital-ecosystem-initiative-for-kenya/

23. Google. (2024, May 23). *Improving connectivity and accelerating economic growth across Africa with new investments.* https://blog.google/intl/en-africa/company-news/improving-connectivity-and-accelerating-economic-growth-across-africa/

24. Open University of Kenya. (2024). *Huawei Kenya, Equity Group Foundation and the Open University of Kenya partner to launch Huawei ICT Academy at OUK and expand digital skills and health innovations.* https://ouk.ac.ke/huawei-kenya-equity-group-foundation-and-open-university-kenya-partner-launch-huawei-ict-academy

25. Government Advertising Agency. (2024). *Government to establish 1,450 new digital hubs across the country.* https://www.mygov.go.ke/government-establish-1450-new-digital-hubs-across-country

26. Ajira Digital. (n.d.). *Ajira Digital Program.* Retrieved August 6, 2025, from https://ajiradigital.go.ke/#/index

27. Konza Technopolis. (n.d.). *Jitume program.* Retrieved August 6, 2025, from https://jitume.konza.go.ke/#/home/index

28. Tatu City. (2024). *CCI launches USD 50 million call centre at Tatu City.* https://www.tatucity.com/news/cci-launch-us-50-million-tatu-city-call-centre/

29. Ministry of ICT and National Guidance. (2025). *National Business Process Outsourcing Policy – 2025.* https://ict.go.ug/site/documents/bpo-policy.pdf

30. International Labour Organization. (2024). *Digital labour platforms in Kenya: Exploring women's opportunities and challenges across various sectors.* https://www.ilo.org/publications/digital-labour-platforms-kenya-exploring-women%E2%80%99s-opportunities-and

31. Kwanya, T., & Wakunuma, K. J. (2023). *Regulation of digital platforms for a socially-just gig economy in Kenya. Alexander von Humboldt Institute for Internet and Society.* https://zenodo.org/records/7895722; Munyu, M., et al. (2024, November 4). *Protecting labour rights for gig workers. DLA Piper Africa.* https://www.dlapiperafrica.com/en/africa-wide/view.html?item=c9393551-9a77-11ef-a7bc-069fd42faff7

32. African Union. (2014). *African Union Convention on Cyber Security and Personal Data Protection.* https://au.int/sites/default/files/treaties/29560-treaty-0048_-_african_union_convention_on_cyber_security_and_personal_data_protection_e.pdf

33. Ministry of ICT, Innovation and Youth Affairs, Kenya. (2022). *The Kenya National Digital Master Plan 2022–2032*. https://cms.icta.go.ke/sites/default/files/2022-04/Kenya%20Digital%20Masterplan%202022-2032%20Online%20Version.pdf

34. Ministry of ICT, Innovation and Youth Affairs. (2019). *Digital Economy Blueprint.* https://smartafrica.org/wp-content/uploads/2021/08/Kenya_Digital_Economy_2019.pdf

35. Ministry of ICT and the Digital Economy. (2023). *National Broadband Strategy (2018–2023).* https://ict.go.ke/sites/default/files/2024-09/National-Broadband-Strategy-2023.pdf

36. Ministry of ICT and Digital Economy, Republic of Kenya. (2025). *Kenya Artificial Intelligence Strategy 2025–2030.* https://www.ict.go.ke/sites/default/files/2025-03/Kenya%20AI%20Strategy%202025%20-%202030.pdf

37. Office of the Attorney General and Department of Justice, & Kenya National Commission on Human Rights. (2024). *National Action Plan on Business and Human Rights (2020–2025).* https://globalnaps.org/wp-content/uploads/2024/01/NAP-Kenya-2020-2025-English.pdf

38. Ibid.

39. Paradigm Initiative. (2022). *Artificial Intelligence in Kenya.* https://paradigmhq.org/wp-content/uploads/2022/02/Artificial-Inteligence-in-Kenya-1.pdf

40. KICTANet. (2025). *Digital divide in Kenya: ICT access and usage data reveals disparities.* https://www.kictanet.or.ke/digital-divide-in-kenya-ict-access-and-usage-data-reveals-disparities/

41. Communications Authority of Kenya. (2023). *Mobile subscriptions hit 66m in March 2023.* https://www.ca.go.ke/mobile-subscriptions-hit-66m-march-2023

42. The Star. (2025, March 28). *Kenyans stayed longer without power in 6 months to December.* https://www.the-star.co.ke/business/2025-03-28-kenyans-stayed-longer-without-power-in-6-months-to-december

43. The TVET curriculum is revised when the need arises to align with the National Occupational Standards (NOS), which are developed in collaboration with industry.

44. Kenya Private Sector Alliance. (2024). *The Ajira Digital: Making the digital economy a reality for young women in Kenya.* https://kepsa.or.ke/kepsanews/the-ajira-digital-making-the-digital-economy-a-reality-for-young-women-in-kenya-through-an-apprenticeship-program-by-emobilis

45. Kaushal, T. (2025). *Gendered labour produces finance: Navigating profits and care as intermediaries of finance. Economy and Society, 54(2), 209–232.* https://www.tandfonline.com/doi/full/10.1080/03085147.2025.2489881?af=R

46. World Bank. (2024). *Working without borders: The promise and peril of online gig work.* https://documents1.worldbank.org/curated/en/099011724092026769/pdf/P1773021669c080021bb971499c18a61008.pdf

47. Fairwork. (2021). *Fairwork Kenya ratings 2021: Labour standards in the gig economy.* https://fair.work/wp-content/uploads/sites/17/2021/12/Fairwork-Kenya-2021-report-accessible.pdf

48. International Labour Organization. (2025). *Digital labour platforms in Kenya*. https://www.ilo.org/sites/default/files/2025-04/ILOP-Digital-Labour-Kenya-v6_0.pdf

49. Bonvin, J.-M., Cianferoni, N., & Mexi, M. (eds.). (2023). *Social dialogue in the gig economy: A comparative empirical analysis.* Edward Elgar Publishing.

50. World Economic Forum. (2025, January 7). *The future of jobs report 2025.* https://www.weforum.org/publications/the-future-of-jobs-report-2025/

51. Ministry of ICT and Digital Economy, Republic of Kenya. (2025). *Kenya Artificial Intelligence Strategy 2025–2030.* https://www.ict.go.ke/sites/default/files/2025-03/Kenya%20AI%20Strategy%202025%20-%202030.pdf

52. Ministry of ICT and Digital Economy. (2022). *The Kenya National Digital Master Plan 2022–2032.* https://cms.icta.go.ke/sites/default/files/2022-04/Kenya%20Digital%20Masterplan%202022-2032%20Online%20Version.pdf

53. Kenya Private Sector Alliance. (2024). *The Ajira Digital: Making the digital economy a reality for young women in Kenya.* https://kepsa.or.ke/kepsanews/the-ajira-digital-making-the-digital-economy-a-reality-for-young-women-in-kenya-through-an-apprenticeship-program-by-emobilis

54. Konza Technopolis. (n.d.). *Jitume program.* Retrieved August 6, 2025, from https://jitume.konza.go.ke/#/home/index

55. United Nations Development Programme. (2023). *County Profiles: Mapping the innovation ecosystem in Kenya.* https://www.undp.org/sites/g/files/zskgke326/files/2023-03/County%20Profiles.pdf

56. Council of Governors. (n.d.). *Information communication technology (ICT) and knowledge.* Retrieved August 6, 2025, from https://cog.go.ke/technical_committee/information-communication-technology-ict-and-knowledge/

57. International Labour Organization. (2023, July 11). *Community of practice established to foster inclusive digital economy in Kenya.* https://www.ilo.org/resource/news/community-practice-established-foster-inclusive-digital-economy-kenya

58. Office of the Attorney General and Kenya National Commission on Human Rights. (2024). *National action plan on business and human rights (2020–2025).* https://globalnaps.org/wp-content/uploads/2024/01/NAP-Kenya-2020-2025-English.pdf

59. Deactivation refers to when a digital labour platform suspends or permanently closes a worker's account, preventing them from taking further jobs through the platform. This often results in immediate loss of income and may occur without adequate explanation or recourse.

60. Department for Business and Trade, Government of the United Kingdom. (2024, August 30). *Employment status and employment rights: Guidance for HR professionals, legal professionals and other groups.* https://www.gov.uk/government/publications/employment-status-and-employment-rights/employment-status-and-employment-rights-guidance-for-hr-professionals-legal-professionals-and-other-groups

61. International Labour Organization. (2025, April). *Law and practice update: Digital labour platforms in Kenya.* https://www.ilo.org/sites/default/files/2025-04/Law%20and%20Practice%20Update%20020425.pdf

62. California Secretary of State. (2020). *Proposition 22 – app-based drivers as contractors and labor policies initiative.* https://vig.cdn.sos.ca.gov/2020/general/pdf/topl-prop22.pdf

63. International Labour Organization. (2024). *Driving an inclusive and productive digital transformation for decent work.* https://www.ilo.org/sites/default/files/2024-08/Forum%20Extended%20Report_final.pdf

64. Ministry of ICT and Digital Economy, Republic of Kenya. (2025). *Kenya Artificial Intelligence Strategy 2025–2030.* https://www.ict.go.ke/sites/default/files/2025-03/Kenya%20AI%20Strategy%202025%20-%202030.pdf

65. Fairwork. (2023). *Fairwork Kenya ratings 2022.* https://fair.work/wp-content/uploads/sites/17/2023/02/230202_fairwork_kenya-report-2022_RZ_small.pdf

66. Ministry of Labour and Social Protection. (2024). *The Regulation of Wages (General) (Amendment) Order.* https://www.labour.go.ke/node/470

67. Ibid.

68. East African Community. (2000). *The Treaty for the Establishment of the East African Community, Article 104.* https://www.eala.org/uploads/The_Treaty_for_the_Establishment_of_the_East_Africa_Community_2006_1999.pdf

COMMITTED TO
IMPROVING THE STATE
OF THE WORLD

The World Economic Forum, committed to improving the state of the world, is the International Organization for Public-Private Cooperation.

The Forum engages the foremost political, business and other leaders of society to shape global, regional and industry agendas.

World Economic Forum
91–93 route de la Capite
CH-1223 Cologny/Geneva
Switzerland

Tel.: +41 (0) 22 869 1212
Fax: +41 (0) 22 786 2744
contact@weforum.org
www.weforum.org