



**Kenya**  
**Suggested List of Issues Relating to the Rights of LGBTI Persons**

**Submitted by The Advocates for Human Rights**  
A non-governmental organization in special consultative status  
**The Eagles for Life, and**  
**Sign Ishara**

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Founded in 1983, **The Advocates for Human Rights** is a volunteer-based non-governmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact-finding, direct legal representation, education and training, and publications. The Advocates is the primary provider of legal services to low-income asylum seekers in the Upper Midwest region of the United States.

**The Eagles for Life** is a community-based organization formed in 2010, located in Kisii-Kenya. It champions the rights of sexual minorities, advocates for improved access to health services, and fights for the inclusion of minority persons in the policy formulation processes. The Eagles for Life works in the areas of human rights, economic empowerment, and self-advocacy.

**Sign Ishara** is a consultancy firm that works to encourage inclusivity in all aspects of disability, with particular expertise in the areas of disability and education. They are involved in advocacy and the rights of persons living with a disability and endeavor to see all schools becoming disability friendly. In addition, Sign Ishara focuses on developing materials that help the Deaf community to better perform in academic settings.

## I. EXECUTIVE SUMMARY

1. The Government of Kenya fails to prevent human rights violations against individuals based on their sexual orientation and/or gender identity. The criminalization of consensual same-sex relations of lesbian, gay, bisexual, transgender, and intersex (LGBTI) adults leaves them at serious risk of harm. LGBTI persons in Kenya report discrimination, violence, lack of protection by law enforcement and government officials, and limited access to services. LGBTI individuals with disabilities and other marginalized identities are particularly at risk for such human rights violations.

2. This report provides an overview of human rights developments since its last review in 2012 related to sexual orientation and gender identity. It concludes that the Government of Kenya has failed to uphold its human rights obligations regarding sexual orientation and gender identity minorities, resulting in violations and a context of fear for these groups. This report will review specific human rights violations that require immediate attention by the Government of Kenya, including the right to freedom from discrimination, harassment, and abuse, accountability for members of law enforcement and vigilante groups, and disability rights.

3. In January 2019, civil society organizations and human rights researchers conducted fieldwork to map the human rights violations of LGBTI individuals in Kenya. This report is based on first-hand information collected from the interviews and desk-research on news media outlets and reports on the issues of LGBTI individuals in Kenya. Interviews were conducted with twenty LGB<sup>1</sup> individuals living in the areas of Kisii, Nyamira, Homa Bay, Migori, and Nairobi. A portion of the study also focused on interviews with seven Deaf LGB individuals to understand their lived experiences and the intersections between two marginalized identities. The interviews primarily focused on the participants' interactions, as LGB persons, with law enforcement and government officials, health and education service providers, religious leaders, members of society, and vigilante groups. In addition, researchers visited local NGOs to gather data on cases of LGBTI human rights violations in Kenya.

### **Kenya fails to uphold its obligations under the International Covenant for Civil and Political Rights (ICCPR)**

4. The ICCPR recognizes that certain basic rights are guaranteed regardless of a person's race, color, sex, language, religion, political or other opinion, nation or social origin, birth or other status (Article 2; Article 25). Among such rights is equal protection of the law and effective protection against discrimination because of a person's race, color, sex, language, religion, political or other opinion, nation or social origin, birth or other status (Article 26), and hate crimes perpetrated against minorities are an affront to such persons' rights under Article 27. ICCPR explicitly protects every person's inherent right to life and protection under the law (Article 6). Furthermore, under the ICCPR, no person may be subjected to cruel, inhuman or degrading treatment or punishment (Article 7).

#### **I. The State Party's legislation does not meet the standards set forth in the ICCPR.**

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<sup>1</sup> Sample consisted only of individuals who identified as lesbian, gay, and bisexual.

5. In its August 2012 Concluding Observations, the Human Rights Committee (“Committee”) expressed concern that Kenya’s Penal Code continues to criminalize “same-sex relations between consenting adults of the same sex.”<sup>2</sup> The State Party made no mention of the Committee’s concerns in their replies to the Concluding Observations.<sup>3</sup>

6. Kenya is one of the 22 African countries that criminalize consensual adult same-sex relations by law,<sup>4</sup> yet police officers utilize the existing legal provisions to harass LGBTI individuals more often than prosecute them.<sup>5</sup> Under Section 162 of Kenya’s Penal Code, any person who has “unnatural carnal knowledge against the order of nature” is guilty of a crime of up to fourteen years imprisonment. In addition, under Section 165 of the Penal Code, any male person who commits any act of “gross indecency” with another male person is guilty of a felony of up to five years imprisonment.

7. While sections 162-165 of Kenya’s Penal Code do not criminalize LGBTI identities, they do criminalize same-sex sexual conduct. Even the vocabulary of the legal provisions is vague because it does not define what “unnatural carnal knowledge” constitutes. Therefore, much discretion is given to the interpretation of police officers and government officials to arrest LGBTI individuals under these provisions of the Penal Code based solely on their own perceptions of sexual conduct.

8. Although Kenya has taken some steps towards implementing and adopting a more comprehensive anti-discrimination law, **the State party has to date taken no specific actions to provide protection on the basis of sexual orientation and gender identity.** Kenya’s Universal Periodic Review Implementation Matrix 2015-2019<sup>6</sup> lists several actions that the government claims to have taken as anti-discrimination measures against sexual orientation and gender identity, such as conducting surveys on diversity in the public service sector, finalizing the Draft Equality Policy, and conducting a survey on the number of women in the public and private sectors. These actions do not address the issue of sexual orientation and gender identity; rather, they focus on women’s rights and gender diversity. Kenya’s government has not taken concrete steps to create inclusive laws that specifically protect individuals from violence and discrimination based on their sexual orientation or gender identity.

### **9. Suggested questions relating to bringing legislation in line with international standards:**

- Is the government of Kenya willing to decriminalize same-sex relations in its Criminal Code?
- What steps is the government of Kenya considering in order to create specific legislation preventing discrimination against individuals based on sexual orientation?

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<sup>2</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya*, U.N. Doc. CCPR/C/KEN/CO/3, (31 August 2012), ¶ 8.

<sup>3</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya, Information received from Kenya on follow-up to the concluding observations*, U.N. Doc. CCPR/C/KEN/CO/3/Add.1

<sup>4</sup> International Lesbian, Gay, Bisexual, Trans and Intersex Association, *State-Sponsored Homophobia: A World Survey of Sexual Orientation Laws: Criminalisation, Protection and Recognition*, by Aengus Carroll and Lucas Ramón Mendos (Geneva: International Lesbian, Gay, Bisexual, Trans and Intersex Association, May 2017), 26.

<sup>5</sup> Human Rights Watch, *The Issue is Violence: Attacks on LGBT People on Kenya’s Coast* (United States: Human Rights Watch, September 2015).

<sup>6</sup> Kenya Office of the Attorney General and Department of Justice, *Universal Periodic Review 2nd Cycle Implementation Matrix 2015-2019*, accessed March, 21, 2019, [https://www.upr-info.org/sites/default/files/document/kenya/session\\_21\\_-\\_january\\_2015/kenya\\_2nd\\_cycle\\_final\\_matrix\\_2016.pdf](https://www.upr-info.org/sites/default/files/document/kenya/session_21_-_january_2015/kenya_2nd_cycle_final_matrix_2016.pdf)

- How does the government of Kenya intend to include the issue of sexual orientation and gender identity in the Universal Periodic Review Implementation Matrix 2015-2019 and other existing initiatives in order to create adequately inclusive non-discrimination legislation?

## **II. The State Party fails to protect LGBTI individuals from acts of violence, harassment, abuse, and discrimination based on their sexual orientation.**

10. In its August 2012 Concluding Observations, the Committee expressed concern about “reports of acts of violence, harassment and abuse against lesbian, gay, bisexual, transgender, and intersex (LGBTI) persons based solely on their sexual orientation or gender.”<sup>7</sup> The Committee urged the Kenyan government to take steps to mitigate social stigmatization of the LGBTI community. The State Party failed to address the Committee’s concerns in their replies to the Concluding Observations.<sup>8</sup>

11. LGBTI individuals in Kenya suffer widespread violations of their right to life, liberty, and security. In 2015, for example, two men in Kenya were arrested and charged with committing “unnatural” offenses and the trafficking of “obscene material.”<sup>9</sup>

12. LGB individuals shared with the authors of this report that they feared being assaulted by family members if they disclosed their sexual orientation. In one case, a lesbian was physically and verbally assaulted by her male family members. While they physically assaulted her, they expressed “you are not enough to be a human being.”<sup>10</sup> In another case, a 25-year-old bisexual man was physically assaulted by his father and forced to abandon his house and family because of his sexual orientation. Interviewees reported that they were afraid to report these violations to law enforcement and other government officials because it could potentially exacerbate the situation.

13. LGB individuals also reported suffering attacks from members of their local community based on their sexual orientation. LGBTI individuals who present themselves more openly in Kenyan society are more at risk of aggression from people in their communities.<sup>11</sup> In addition, a 2016 survey found that in Kenya 40% of respondents strongly agreed that being LGBTI should be a crime.<sup>12</sup> Therefore, the Kenyan government fails to protect LGBTI individuals from human rights violations by members of their communities or to educate the public about LGBTI rights.

14. LGB individuals reported instances of physical assaults due to their sexual orientation. In one case, a lesbian woman was physically attacked by another woman when trying to explain her lifestyle. While these types of physical assaults were common, verbal assaults constituted the

<sup>7</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya*, U.N. Doc. CCPR/C/KEN/CO/3, (31 August 2012), ¶ 8.

<sup>8</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya, Information received from Kenya on follow-up to the concluding observations*, U.N. Doc. CCPR/C/KEN/CO/3/Add.1

<sup>9</sup> Human Rights Watch, *The Issue is Violence: Attacks on LGBT People on Kenya’s Coast* (United States: Human Rights Watch, September 2015).

<sup>10</sup> Interview with Participant, Nyamira, Kenya, Jan. 9, 2019.

<sup>11</sup> Neela Ghoshal, *Lesbian, Bisexual, and Queer Women Speak Out in Kenya*, Huffington Post, Feb. 20, 2016, [https://www.huffingtonpost.com/neela-ghoshal/lesbian-bisexual-and-queer-women-speak-out-in-kenya\\_b\\_9280166.html](https://www.huffingtonpost.com/neela-ghoshal/lesbian-bisexual-and-queer-women-speak-out-in-kenya_b_9280166.html).

<sup>12</sup> International Lesbian, Gay, Bisexual, Trans and Intersex Association, *The ILGA-RIWI 2016 Global Attitudes Survey on LGBTI People in Partnership with LOGO* (2016).

majority of attacks on LGB individuals in Kenya from other community members. Some of the participants stated that “they threaten that they will beat you when you are alone; that is why you never walk alone.”<sup>13</sup> Other comments were: “you should be banned and killed”<sup>14</sup> and “we should be treated like dogs.”<sup>15</sup> Therefore, LGB individuals are forced to protect themselves, without support from members of the community, law enforcement officials, or family members.

15. LGB individuals interviewed for this report described frequent persecution and arrests of LGB individuals by law enforcement officials. A common pattern emerged from the interviews in which LGB individuals were arrested because of their sexual orientation, but charged for other crimes like loitering, gambling or simply detained without a formal charge. In one instance, an MSM<sup>16</sup> man was attacked by a law enforcement officer because he was walking late at night with his partner. He stated, “He gave me a slap I will never forget. They have never been friendly to us.”<sup>17</sup> A common experience among the LGB individuals interviewed for this report was for law enforcement officials to pressure them for bribes in exchange for their release, in large part because there were no official charges to bring against them.

16. Law enforcement officials actively target and persecute LGB individuals by utilizing Section 162(a),(c) and 165 of the Penal Code.<sup>18</sup> They threaten LGBTI individuals and use violence to extract confessions. Furthermore, health care providers conduct forced anal examinations.<sup>19</sup>

17. Vigilante groups are one of the primary sources of fear for LGBTI individuals because of their violent attacks on LGBTI individuals that are supported by members of the community and even LGBTI individuals’ family members. Vigilante groups specifically target LGBT individuals in Kenya by creating fear and promoting violence. Most of the participants interviewed expressed great fear of vigilante groups, especially those living in rural areas. Statements like: “if they know you are gay they will kill you. They just kill,”<sup>20</sup> “they think you are promoting satanism, them murdering you would be very easy.”<sup>21</sup> The LGB individuals interviewed for this report universally observed that law enforcement officials are unwilling to prevent attacks or protect LGBTI individuals from vigilante groups.<sup>22</sup>

### *Access to Education*

18. Our interviews also suggest LGB individuals do not enjoy the right to access to education in Kenya despite the government’s international and constitutional obligation to provide the right to education. According to Article 53 (1) (b) of the Constitution, every child has a right to free and

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<sup>13</sup> Interview with participant, Homabay, Kenya, Jan. 12, 2019.

<sup>14</sup> Interview with participant, Homabay, Kenya, Jan. 12, 2019.

<sup>15</sup> Interview with participant, Migori, Kenya, Jan. 8, 2019.

<sup>16</sup> Men who have sex with men

<sup>17</sup> Interview with Participant, Migori, Kenya, Jan. 8, 2019.

<sup>18</sup> Human Rights Watch, *The Issue is Violence: Attacks on LGBT People on Kenya’s Coast* (United States: Human Rights Watch, September 2015).

<sup>19</sup> Human Rights Watch, *The Issue is Violence: Attacks on LGBT People on Kenya’s Coast* (United States: Human Rights Watch, September 2015).

<sup>20</sup> Interview with participant, Nyamira, Kenya, Jan. 9, 2019.

<sup>21</sup> Interview with participant, Kisii, Kenya, Jan. 12, 2019.

<sup>22</sup> Katy Migiro, *Homophobic Mobs Attack LGBT People in Kenya with Impunity*, All Africa, Sept. 28, 2015, <https://allafrica.com/stories/201509280135.html>.

compulsory education. In addition, Article 56 (b) provides protection for minorities and marginalized groups to ensure special opportunities for their educational development.

19. Multiple LGB individuals reported being expelled from schools based on their sexual orientation. School administration expelled and suspended students who were seen engaging in same-sex conduct. School staff members expressed concern about LGB students “influencing” other students into same-sex relations. According to interviewees, schools maintained policies to actively identify LGBTI students. One of the participants described how headmasters would physically abuse LGB students until they confessed their sexual orientation and were encouraged to give up other LGB students’ names.

20. LGB individuals also experience harassment at school from other students and enjoy little protection from school administrators. In one case, a perceived gay student was targeted with physical and verbal abuse from other students because of his sexual orientation. When he decided to go to the Deputy Director of the school with his mother to inform them of the situation and demand protection, he was asked to pay (2,000 Ksh), the equivalent of about twenty US dollars, to the Deputy Director in order to ensure his protection.

#### *Access to Healthcare*

21. Interviewees also expressed that they were denied their right to access to healthcare in Kenya. Participants’ experiences with health care providers showcase the barriers that exist as LGB individuals try to access essential services. There was a clear distinction between experiences with public healthcare providers versus private NGOs which provide services to key populations. Although a platform allowing government agencies to work with key populations exists, LGB individuals’ distrust of healthcare professionals may prevent them from attempting to access these services.<sup>23</sup>

22. Most of the LGB individuals interviewed for this report decided not to disclose their sexual orientation to health care providers because they feared it could affect their treatment. In addition, interviewees expressed fear regarding the lack of privacy for patients and how it could affect their reputation in the community. In one case, an LGB individual stated that “It is impossible, I would feel ashamed. I do not want doctors to start talking about me.”<sup>24</sup> In another case, a gay man changed his name when looking for STI treatment services out of fear of confidentiality issues. A sense of mistrust toward health care providers from LGB individuals was clear from the interviews, especially from providers in public hospitals.

23. LGB individuals were refused treatment by health care providers because of their sexual orientation. Health care providers used Section 162-165 of the Penal Code and their religious beliefs to deny services to LGB individuals. In one instance, a gay man decided to go to a public hospital for Pre-Exposure Prophylaxis (PrEP) medication, but was refused treatment from the doctors because they stated: “we do not treat people like you here.”<sup>25</sup> Therefore, even though there

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<sup>23</sup> Levis Nderitu, *Key Population Hero: Addressing stigma and discrimination among LGBT people in Kenya*, Linkages, Dec. 9, 2016, <https://linkagesproject.wordpress.com/2016/12/09/key-population-hero-addressing-stigma-and-discrimination-among-lgbt-people-in-kenya/>.

<sup>24</sup> Interview with participant, Nairobi, Kenya, Jan. 17, 2019.

<sup>25</sup> Interview with participant, Migori, Kenya, Jan. 8, 2019.

is a platform in place to work with high-risk populations, LGBTI individuals still risk limited access to services because of ongoing prejudice against them.

24. Interviewees emphasized the importance of training health care service providers on dealing with LGBTI individuals. Many LGB individuals stated that they would only go to NGOs and civil society organizations for health care services because of the relationship of trust that existed between them. Some of the participants expressed a lack of civil society organizations and NGOs providing direct services, however, specifically in rural areas. Therefore, LGBTI individuals are dependent on the existence of private entities to provide them with adequate access to health services.

### *Discrimination*

25. LGBTI individuals in Kenya face discrimination daily because of their sexual orientation and/or gender identity. Although constitutional provisions ensure equality for every person under the law, there is no clear statement of sexual orientation or gender identity as protected identities under the Constitution.

26. LGB individuals suffer discrimination in the workplace, both when applying for jobs and while employed. One gay individual expressed that he had to leave a position with a tourism company after his boss found out he was dating a man. The boss expressed that by having him as an employee he was “destroying the business.” In addition, he mentioned when he was trying to apply for a job at a catering company, the job application said they were only looking for straight people. Many other cases showcased the struggle of LGB individuals when trying to enter the job market. In some instances, documented discrimination in the workplace pushed LGB individuals to go into sex work as their only option for employment.

27. LGB individuals experience discrimination when accessing public spaces. For example, most interviewees reported that they were denied access to some bars, clubs or restaurants. In some instances, LGB individuals were attacked in public spaces because of their sexual orientation. One individual expressed that “in a restaurant, someone drunk started calling me names. I was told to walk out of the room because more people kept joining; there were ten.”<sup>26</sup> Another LGB individual stated, “When I go to restaurants you hear them talking about me. Some may come and mock me. I have lost a lot of friends because of who I am.”<sup>27</sup> LGB individuals were aware of the public spaces where they faced more danger and spread the word to each other to prevent further confrontations.

28. Sexual encounters for LGB individuals tend to be unsafe and risky because of social prejudice and stigmatization. One participant mentioned two males could never rent a room together in a hotel which made the sexual encounters dangerous and unprotected. He mentioned this practice further advanced the lack of protection in sexual encounters between LGB individuals.

29. LGB individuals suffer discrimination from religious leaders in Kenya. On some occasions, LGB individuals have been particularly targeted by religious leaders who perceive them as an evil

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<sup>26</sup> Interview with participant, Migori, Kenya, Jan. 8, 2019.

<sup>27</sup> Interview with participant, Migori, Kenya, Jan. 8, 2019.



that needs to be addressed. Many of the participants shared the sentiment that they were excluded from religious settings both by religious leaders and religious practitioners. One LGB individual expressed, “I stopped going to church. They stigmatize you and do not let you sit near people. You cannot pray or sing, they would preach about you.”<sup>28</sup> Many participants expressed they stopped going to church because of the treatment and hate speech they received as LGB individuals; when asked if they would like to go to church if the treatment and conditions changed, they expressed an interest in returning.

30. Many of the LGB individuals noted the importance of training religious leaders about LGBTI issues in order to decrease discrimination based on sexual orientation and gender identity. For example, the Nyanza Rift Valley and Western Kenya Network (NYARWEK) has focused on training religious leaders around LGBTI issues as part of their work; they expressed that much of the discrimination against LGBTI individuals is based on religious reasons. Additionally, denying services to LGBTI individuals often occurs because service providers discriminate based on their religious beliefs.

### **31. Suggested questions relating to acts of violence, harassment, abuse, and discrimination against LGBTI individuals:**

- What steps is the government of Kenya taking to raise awareness in order to mitigate social prejudices, stigmatization, harassment, discrimination, and violence against individuals because of their sexual orientation?
- Is the government of Kenya willing to include gender and sexuality concerns, specifically LGBTI concerns, and health information in university and medical school criteria?
- What training is the government of Kenya considering providing for government officials, educators, healthcare providers, and law enforcement with respect to LGBTI issues?
- Is the government of Kenya willing to stop the practice of expelling LGBTI students from schools because of their sexual orientation and/or gender identity?
- To what extent does the government of Kenya intend to collaborate with civil society organizations working on LGBTI issues and support their work by creating joint projects to prevent violations and build protections for LGBTI individuals?
- What measures has the State Party put in place to protect individuals from discrimination and abuse based on their sexual orientation by religious leaders?
- What measures is the government of Kenya considering in order to prevent law enforcement from arbitrarily arresting individuals based on their sexual orientation?
- How does the government of Kenya intend to prevent human rights violations perpetrated by vigilante groups?
- Is the government of Kenya willing to improve data collection efforts and disseminate information when arresting individuals under sections 162-165 of the Penal Code?

### **III. The State Party fails to hold accountable members of law enforcement and vigilante groups who harass and abuse members of the LGBTI community.**

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<sup>28</sup> Interview with Participant, Kisii, Kenya, Jan. 9, 2019.



32. In its August 2012 Concluding Observations, the Committee expressed concern that investigations and prosecutions for allegations of torture committed by police and vigilante groups remain inadequate.<sup>29</sup>

33. In its follow-up to the Concluding Observations, the State Party explained that the national Police Service Act of 2011 and the Independent Policing Oversight Authority (IPOA) help to ensure members of law enforcement are held accountable before the public. These measures appear to be limited to torture occurring in detention, however, rather than general allegations of torture perpetrated by law enforcement. There was no explicit mention of abuse perpetrated by law enforcement against individuals based on their sexual orientation.<sup>30</sup>

34. Because of their experience of arrests and persecution by law enforcement, LGB individuals in Kenya reported that they distrust law enforcement officials. LGB individuals interviewed expressed their inability to report criminal cases to the police and government agencies because it would affect them negatively. In some instances, respondents suffered crimes and human rights violations, but they did not seek services because the complaint was about a situation that happened because of their sexual orientation. For example, when one gay man was blackmailed by someone from his local community, he decided to pay 10,000 KSh, the equivalent of about 100 US dollars, rather than report the incident to the authorities out of fear that it would damage his reputation.

**36. Suggested questions relating to lack of accountability for abuse and harassment committed by members of law enforcement and vigilante groups:**

- What steps will the government take to ensure inclusion of LGBTI human issues in the curriculum used to train law enforcement officers?
- What steps will the government of Kenya take to hold members of law enforcement and vigilante groups accountable for human rights violations against LGBTI individuals?
- What steps will the government take to ensure LGBTI persons whose fundamental rights are violated are accorded compensation?

**IV. The State Party fails to protect LGBTI persons with disabilities.**

37. Deaf LGB individuals reported suffering widespread human rights violations because of their intersecting marginalized identities in the Kenyan context. Participants expressed that LGBTI advocacy groups often overlook their specific needs, and therefore they still experience human rights violations.

38. Deaf LGB individuals lack access to information compared to other members of the LGB community. Participants expressed a need for documents and training around LGBTI advocacy and training tailored for the Deaf community. Furthermore, participants expressed a lack of knowledge around safe sex practices because they are excluded from key populations training due to their disability.

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<sup>29</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya*, U.N. Doc. CCPR/C/KEN/CO/3, (31 August 2012), ¶ 11.

<sup>30</sup> ICCPR, *Concluding Observations on the third periodic report of Kenya, Information received from Kenya on follow-up to the concluding observations*, U.N. Doc. CCPR/C/KEN/CO/3/Add.1, ¶ 38-40.

39. Deaf LGB individuals expressed fear of coming out in their own community due to homophobia in the Deaf community. Because of this, most of the participants expressed that they would only discuss LGB topics with hearing people. Since the Deaf community is so small, they feared discussing LGB topics would damage their reputation throughout the entire Deaf community. One participant expressed, “there are so many in school, no one stands up. For us is so difficult, if you talk, everyone knows.”<sup>31</sup> A sense of fear exists among Deaf LGB individuals as they cannot come out since this would leave them without protection from their Deaf community.

**40. Suggested questions relating to LGBTI persons with disabilities:**

- To what extent is the government of Kenya engaging with deaf LGBTI individuals in order to gain information about their specific needs?
- What training does the government of Kenya intend to provide to government officials, law enforcement, and the community at large to educate them about the specific needs of deaf LGBTI individuals?
- How does the government of Kenya intend to protect LGBTI persons, such as deaf individuals, who are more vulnerable to discrimination, harassment, and violence?

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<sup>31</sup> Interview with Participant, Nairobi, Kenya, Jan. 15, 2019.