

## DISCUSSION PAPER No. 401

# EU international digital policy in action: The EU–Kenya partnership

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The EU and its member states launched the International Digital Strategy in June 2025: aiming to link digital diplomacy, trade, technical support, cooperation tools and investments under the Global Gateway strategy, now branded as the ‘EU tech business offer.’ Yet, there is a need to focus on how a strategic and integrated international digital policy can be implemented in practice, building on lessons from existing EU digital partnerships.

Using Kenya as a case study, we argue that if the EU wants to become a strategic and valued partner, it will need to continue to strengthen political and policy dialogue to ensure joint ownership, scale up the speed and level of financing for digital infrastructure and innovation ecosystems and increase the focus on digital trade and digitally enabled trade in services.

Kenya is a digital leader in Africa, with a thriving digital ecosystem and a strong emphasis on digital transformation in its wider economic development strategy. The partnership with Kenya demonstrates how the EU and member states – as Team Europe – have scaled up engagement, bringing together technical support, investments in innovation and skills, mainstreaming of digital across other policy areas, and digital trade. However, the partnership is hampered by slow strategic infrastructure investment and a complex European financing landscape (e.g. challenges in deploying EFSD+ guarantees).

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## Table of contents

<b>Acknowledgements.....</b>	<b>1</b>
<b>Acronyms.....</b>	<b>1</b>
<b>1. Introduction.....</b>	<b>3</b>
<b>2. Building an EU international digital policy.....</b>	<b>5</b>
<b>3. Partnering with Kenya.....</b>	<b>7</b>
<b>4. Team Europe in Kenya – Strategy.....</b>	<b>11</b>
a. Digital diplomacy and policy dialogue.....	12
b. Team Europe and Global Gateway.....	13
c. Digital Trade and Digitalising trade.....	16
<b>5. Team Europe in Kenya – Financial Instruments.....</b>	<b>17</b>
a. EFSD+ and beyond.....	17
b. Supporting EU–Kenya trade relations.....	20
<b>6. Conclusion and recommendations.....</b>	<b>21</b>
a. Stepping up political and policy engagement.....	23
b. Elaborating the Tech Business Offer.....	24
c. Coordination at multiple levels.....	25
d. Building inclusivity & meaningful connections.....	27
e. Accountability.....	27
<b>References.....</b>	<b>28</b>

## List of boxes

Box 1: Kenya's digital strategies.....	8
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## Acronyms

ACP	African, Caribbean and Pacific (Group of States)
AI	Artificial Intelligence
BETA	Bottom Up Economic Transformation Agenda
BPO	Business process outsourcing
CDP	Cassa Depositi e Prestiti S.p.A.
CoEU	Council of the European Union
D4D	Digital for Development
D4TVET	Digitalisation for Technical and Vocational Education and Training
DCO	Digital Cooperation Organisation
DFC	United States International Development Finance Corporation
DG	Directorate-General (European Commission)
DG CONNECT	Directorate-General for Communications Networks, Content and Technology
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
DG INTPA	Directorate-General for International Partnerships
DG JUST	Directorate-General for Justice and Consumers
DG TRADE	Directorate-General for Trade
DPI	Digital Public Infrastructure
DTC	Digital Transformation Centre
EC	European Commission
ECA	Export Credit Agencies
ECDPM	European Centre for Development Policy Management
EDFI MC	European Development Finance Institutions Management Company
EKN	Exportkreditnämnden (The Swedish Export Credit Agency)
EPA	Economic Partnership Agreement
EU	European Union
EUD	European Union Delegation
FDI	Foreign Direct Investment

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G42	Emirati technology group specialising in artificial intelligence and cloud computing
GDPR	General Data Protection Regulation
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GOK	Government of Kenya
HRVP	High Representative / Vice-President (of the European Commission)
ICT	Information and Communication Technology
ICTA	Information and Communication Technology Authority (Kenya)
KES	Kenyan Shillings
M-PESA	Mobile Pesa
MFAD	Ministry of Foreign Affairs and Diaspora (Kenya)
MICDE	Ministry of Information, Communications and the Digital Economy
MoU	Memorandum of Understanding
MSMEs	Small and Medium-sized Enterprises
NOFBI	National Optic Fibre Backbone Infrastructure (Kenya)
ODPC	Office of the Data Protection Commissioner (Kenya)
RMB	Renminbi (Chinese currency)
SDG	Sustainable Development Goal
TEI	Team Europe Initiative
TRIFIC	Team Europe Initiative on Regional Digitalisation and Innovation for East Africa
TVET	Technical and Vocational Education and Training
UAE	United Arab Emirates
UNCTAD	United Nations Conference on Trade and Development
UNGA	United Nations General Assembly
USTDA	United States Trade and Development Agency

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## 1. Introduction

The EU is stepping up its efforts to formulate an international digital policy and develop the necessary engagement with international partners. It has gradually brought together its toolkit of digital diplomacy, trade and investment and international cooperation policy. The prior approach had been fragmented and sometimes incoherent, with diplomatic efforts focused on the Global North, while it gradually developed an agenda around digital cooperation and investment towards the Global South. However, the [EU International Digital Strategy](#) points to a more comprehensive approach that would build meaningful partnerships with strategic geographies around the world. This includes developing digital dialogues with more countries in the Global South; upgrading some of these to ministerial-level digital partnerships; and developing a more comprehensive tech business offer that demonstrates the EU's added value as a digital partner ([EC & HRVP 2025](#)).

Kenya has emerged as a key digital player at both the regional and international level. Consolidating its position as a regional hub for technological innovation and connectivity, the country has attracted significant investment from key global digital players, giving rise to a rich digital ecosystem of start-ups, as well as international partnerships focused on digital investments. In 2024, foreign capital flows surged by 71% in 2024 to Kenyan Shillings KES 64.7 billion (USD 500.9 million), representing over a quarter of Kenya's total foreign direct investment (FDI), a marked contrast to 2020 when it stood at less than 10 per cent. Consequently, Kenya's technology sector has become the country's leading FDI recipient, exceeding sectors such as banking, manufacturing and retail ([Ashiru 2025](#)).

In 2021, the EU and its member states launched a Team Europe Initiative on human-centric digitalisation with Kenya, alongside a second on the Green transition. This began with Team Europe supporting the Kenyan government in implementing its data protection regulation, which should shortly allow Kenya to attain a data adequacy agreement with the EU. In 2023, Commissioner Urpilainen launched the EU's Digital Economy Package for Kenya, which included grants to expand the connectivity of schools, provide skills training for students and the setting up of a green digital innovation hub ([EC 2023](#)). More recently, Team Europe

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has had a growing focus on supporting private sector investment in Kenya's digital sector.

The EU and EU member states have also stepped up their wider political and policy engagement around digital issues, albeit relatively slowly. Germany notably launched a digital dialogue in 2023 ([Digital Dialogues 2023](#)). Finnish President Alexander Stubb paid a visit to a digital connectivity project co-financed by Finland and the EU during the first-ever visit of the Finnish Head of State to Kenya in May 2025 ([President of the Republic of Finland 2025](#)). At the same time, the Kenya-EU Business Forum 2025 focused on 'Digitalising Trade,' and included EU Trade Commissioner Maroš Šefčovič and European Investment Bank Vice-President Thomas Ostros ([EC 2025a](#)). The visit of the European Commission's Directorate-General (DG) – Connect Deputy DG Renata Nikolay in October 2025 further demonstrates the growing European interest.

On the whole, the approach in Kenya is an interesting demonstration of the potential for a more holistic digital partnership based on a responsive and iterative build-up of the relationship. Indeed, although not focused on one large Global Gateway flagship, the EU approach to digital cooperation in Kenya does begin to bring together many of the elements of the Global Gateway '360-degree approach.' That approach depends on integrating the six key principles of the Global Gateway Communication,<sup>1</sup> while its implementation involves combining a variety of policy tools, dialogues and agreements, with different implementation modalities (budget support, loans, grants, etc.) and technical expertise. Yet, even as elements of a strategic shift in digital policy are beginning to emerge in the Team Europe initiative, there are still a number of missing elements in terms of being comprehensive and implementing the 360-degree approach. While Team Europe has stepped up its policy dialogue and technical support, it continues to fall short in terms of encouraging strategic investments and a joined-up approach to private sector engagement.

In the first section, we look at the development of various policies over recent years that have culminated with the publication of the EU's international digital policy. Secondly, we turn to why Kenya is an interesting digital partner for the EU

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<sup>1</sup> These principles are; 1) democratic values and high standards; 2) good governance and transparency; 3) equal partnerships, 4) green and clean, 5) security-focused and 6) catalysing private sector investment.

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and for other international actors. We then look at the evolving digital international policy adopted by the EU and the wider Team Europe vis-à-vis Kenya, looking at the evolution of digital diplomacy, international cooperation, investment and trade. We conclude by looking at lessons learned and providing recommendations for Team Europe in Kenya, as well as drawing selected conclusions for the wider Team Europe approach to international digital policy.

## 2. Building an EU international digital policy

The EU's international digital policy has been evolving relatively swiftly over the past few years.<sup>2</sup> The launch of the Global Gateway Strategy ([EC & HRVP 2021](#)) had already pointed to a more political framing of digital cooperation and investments, but still lacked a clear linkage between policy dialogue, trade and cooperation. This included stepping up its efforts on digital diplomacy, with member states agreeing Council Conclusions on this topic in 2022 and 2023 ([CoEU 2022](#); [CoEU 2023](#)). With this, the EU began to develop a more comprehensive approach to multilateral institutions and to make the link between its international cooperation and its diplomatic efforts. The EU's International Digital Strategy in 2025 eventually brought together these elements more holistically in June 2025 ([EC & HRVP 2025](#)), but at the time of writing the strategy had not yet been endorsed by the EU Foreign Affairs Council Conclusions.

The relatively new focus on digital for development under the EU programming cycle of External Financial Instruments, 2021–2027, was reinforced in the Global Gateway Strategy ([EC & HRVP 2021](#)). The new digital cooperation teams in Brussels and in EU Delegations were given limited means to reach the ambitious 10% spending and other targets mentioned in that communication in 2021, while most of Europe's development banks had a limited track record in the digital sector and could not access and deploy EU guarantees until 2024 (for most). This resulted in a lapse between the goal of building the large and complex infrastructure projects identified in the Communication and the actual implementation of such projects. Meanwhile, private sector engagement has remained marginal due to a lack of appropriate instruments. The [Digital for Development Hub](#), launched in 2020 and now with a membership of 16 EU member states, allowed member

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<sup>2</sup> ECDPM has covered this evolution in various publications see:

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states to coordinate and to develop Team Europe at Headquarters level, playing a role in the development of Team Europe Initiatives, bringing together different member states alongside the European Commission.

Increasingly, the European Commission and a growing number of EU member states are moving away from narrow development cooperation towards an integrated approach to diplomacy, trade and international investment opportunities with a view to furthering the EU's own competitiveness, whilst supporting the economic development goals of partners. This shift towards trade and investment was already becoming apparent in a number of EU member states before the reelection of Donald Trump in the United States, but has received further impetus as the EU looks to engage its domestic private sector and deepen its trade relationships with other global blocs, including Mercosur and India.

Trade and competitiveness have thus become an increasingly important area of focus for EU relations, as has been very evident in the Commission's visit to India in February 2025, as well as in Ursula von der Leyen's repeated allusion to finalising and securing trade deals throughout 2025 ([EC 2025b](#); [EC 2025c](#)). This shift also reflects the European Commission's ambition to better link EU external investments to intra-EU policy objectives – including competitiveness, strategic autonomy, and defence and security – and working in a whole-of-EU type of approach. This involves the Commission's Directorate-General for International Partnerships (DG INTPA) working closer with other DGs, such as DG Trade, DG Grow (focusing on economic growth), and DG Connect (the digital DG).

At the same time, the European Commission is exploring ways to scale up the Global Gateway to deliver on its ambitions over the coming years, building new partnerships in areas such as digital transformation and clean transition. One element of this is encouraging member states to scale up their own strategic approaches, by better connecting different national players – often coined as the "Team National" – and to develop their own toolkits to allow for larger investments in strategic sectors. A second element of this includes working with member states to better coordinate between development finance and trade promotion



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instruments.<sup>3</sup> Thirdly, the European Commission launched the Global Gateway Investment Hub in October 2025, to better engage the European private sector in Global Gateway, by complementing, building on and coordinating the support coming from Team Nationals. Lastly, the Global Europe instrument of the new Multiannual Financial Framework 2028–2034 will need to be developed in a way that allows the EU to deliver on its ambitions, for instance, in the area of digital infrastructure and wider investments. Already, the proposed Global Europe Instrument shows a distinct shift towards accommodating this ‘mutual interests’ agenda compared with the previous Neighbourhood, Development and International Cooperation Instrument (NDICI-GE) ([Jones 2025](#)).

### 3. Partnering with Kenya

Often referred to as the ‘Silicon Savannah’, Kenya has consolidated its position as a regional hub for technological innovation and digital development. Driven by early successes of mobile money platforms such as [M-Pesa](#) (SafariCom), leading Sub-Saharan African connectivity, and the government's steadfast commitment to the country's digital transformation, a rich tech start-up ecosystem has been nurtured. The country's relatively robust democracy, existing trade relationship with the EU, and adoption of strong data protection regulation modelled on GDPR further contribute to the potential for a strengthened EU–Kenya digital partnership. But the EU will need to demonstrate its value as a partner and its responsiveness to the Kenyan agenda.<sup>4</sup>

Although Kenya's economy has faced several economic and political shocks in recent years, the country is a comparatively appealing base for investors and businesses in the region. Even though Kenya's economic growth slowed to 4.7% last year, it still outpaced the Sub-Saharan African average of 3.8%, underscoring the resilience of its dynamic, services-driven private sector, particularly compared to its peers ([Finnfund 2025](#)). This was confirmed through its recent USD 1.5 billion Eurobonds issuance in 2025, which was four times oversubscribed ([Mwangocapital 2025](#)).

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<sup>3</sup> ECDPM Director San Bilal and associated experts are advising the Commission on [strategic coordination of external financial tools](#) and facilitating two [High Level Conferences](#) on this topic.

<sup>4</sup> Laid out in a variety of policy documents, including: Kenya National Digital Master Plan 2022–2032, Digital Economy Blueprint (2019), National ICT Policy/ ICT Policy 2019, Kenya Cybersecurity Strategy 2022, Kenya AI Strategy 2025–2030.

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### **Box 1: Kenya's digital strategies**

Recognising the importance of connectivity and digitisation for economic development, the Government of Kenya (GOK) emphasised the importance of ICT development within the [Kenya Vision 2030](#) strategy. Strategic areas of focus are detailed in the [Kenyan National Digital Master Plan 2022-2032](#), consisting of four main pillars: digital infrastructure, digital government services and data management, digital skills, and digital innovation, entrepreneurship and digital business. The Bottom-up Economic Transformation Agenda (BETA) further emphasises the importance of enhanced connectivity to bridge digital divides, identifying the [Digital Superhighway Project](#) launched in 2023 as critical for economic development (Government of Kenya 2023). Designed to strengthen Kenya's ICT Backbone, this project entails the deployment of 100,000km of fibre cable, installation of 25,000 public wifi hotspots, the establishment of 1,450 digital smart hubs and the establishment of three data centres ([ICTA Authority Kenya n.d.](#))

*Source: Authors.*

Alongside domestic initiatives, Kenya has benefited from extensive digital cooperation, foreign partnerships and external investment. Beyond the European Union and Team Europe, collaboration is evident with China, the United States, and, to some extent, with India. A key defining characteristic of Kenya's digital diplomacy is its tactful navigation of strategic non-alignment, maintaining productive partnerships with both Washington and Beijing as they vie for increased influence in Nairobi's vibrant digital economy ([Chilkuri and Scanlon 2025](#)). For the EU and Team Europe, understanding these dynamics is crucial to identifying areas for complementary cooperation and value addition.

China has played a pivotal role in Kenya's digital transformation, financing and implementing major digital infrastructure initiatives such as the [National Optic Fibre Backbone Infrastructure \(NOFBI\)](#) and Konza Data Centre and Smart City project, while expanding into cloud computing, AI, and digital-skills programmes ([Calzati 2022](#)). Huawei's early market entry in 1998 and its landmark 2004 partnership with Safaricom to develop the country's national network firmly

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situated the company as a foundational player in Kenya's digital ecosystem ([Chilkuri and Scanlon 2025](#)). In partnership with the Kenyan Ministry of ICT, Huawei has served as the implementing partner for the Konza Data Centre and Smart City Project ([AidData 2017](#)), and committed to the rollout of 43,000km of fibre cable under NOFBI in 2022 ([China Org 2022](#)). More recently, the company's focus has broadened to Cloud and AI development – most notably through Huawei Cloud stacks selection for the Konza project ([Huawei Cloud n.d.](#)), and as a partner for the Newly launched Kenya AI & Cloud Pioneer Initiative. Jacqueline Shi, President of Huawei Cloud Global Marketing and Sales Service declared that, "Huawei Cloud will work hand-in-hand with our customers and partners to build a young, intelligent, and dynamic Kenya" ([Kanali 2025](#)). Talent pool development and digital skills enhancement have increasingly become integral to Huawei's activities in Kenya ([Tanoi 2025](#)), and to date, its 60 partnerships with Kenyan institutions have trained over 12,000 students ([Kamau 2025](#)).

Diplomatically, robust Kenya–China relations have underpinned this cooperation. In 2017, China's state-owned EximBank extended a concessional loan of RMB 1.225 billion (c. USD 181 million in 2017 prices) to support the Konza Data Centre and Smart City project—one of the flagship initiatives under Kenya's digital transformation agenda ([AidData 2017](#)). Building on this trajectory, during President Ruto's state visit to Beijing in April 2025, the bilateral relationship was elevated to a Comprehensive Strategic Partnership<sup>5</sup> ([MFAD 2025a](#)). The Ministry of Foreign and Diaspora Affairs subsequently reaffirmed China's role as a "vital partner" in light of the recent U.S. imposition of a 10% tariff on key Kenyan exports, framing Ruto's state visit as part of a broader "strategic reorientation" towards diversified partnerships and enhanced South–South cooperation ([MFAD 2025b](#)).

Yet over the past five years, the US's digital presence in Kenya has also played a pivotal role in the country's digital trajectory. The integration of U.S. technology firms into Kenya's digital economy has been transformative, with Google alone contributing an estimated USD 900 million in economic value in 2023 ([CIO Africa 2024](#)). Ambassador Margaret "Meg" Whitman, former eBay CEO and U.S. Ambassador to Kenya (2022–2024), was instrumental in advancing these

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<sup>5</sup> The Comprehensive Strategic Partnership was established following the signing of several MoU's and other frameworks of cooperation in various sectors spanning across the Belt and Road Initiative, digital economy, blue economy, vocational training, and e-commerce.

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partnerships, reflecting her pragmatic, action-oriented approach to diplomacy ([Toosi 2024](#)). Reflecting this momentum, the Biden administration placed technological cooperation at the core of its bilateral agenda ([Munga 2024](#)). This strategic shift was exemplified by President Ruto's 2023 visit to Silicon Valley alongside Ambassador Whitman to promote investment opportunities and trade incentives (trade admin), later followed by a week-long state visit to Washington in 2024.

This state visit yielded a series of landmark investments underscoring deepening U.S. engagement in Kenya's digital sector. Microsoft and the UAE-based AI firm G42 jointly committed \$1 billion to Kenya's digital ecosystem ([Microsoft 2024](#)), while Alphabet unveiled the [Omuja](#) cable project—Africa's first direct fibre-optic link to Australia ([Shepardson 2024](#); [Quigley 2024](#)). Microsoft's investment represents the largest single private digital investment in Kenya's history ([Munga 2024](#)). Complementing private investment, U.S. government development agencies reinforced this momentum: the USTDA awarded a \$1 million grant to the Kenyan firm Semiconductor Technologies Limited<sup>6</sup> ([USTDA 2024](#)), and the [U.S. International Development Finance Corporation's \(DFC\)](#) approved loans of \$51 million for digital connectivity<sup>7</sup> and \$10 million for e-mobility<sup>8</sup> ([US Embassy in Kenya 2024](#)).

As Kenya seeks to diversify its international alliances in a complex geopolitical climate, efforts to enhance South-South digital partnerships are also evident in the case of Kenyan-Indian cooperation. During talks with the Indian delegation in March 2025, the Cabinet Secretary for Information, Communication, and the Digital Economy Hon. William Kabogo Gitau underscored mutual ambitions to leverage the "rich culture, technological and innovation prowess of the two countries" (MICDE 2025). This builds on the 2023 Memorandum of Understanding (MoU) that was established to enhance closer cooperation and facilitate the exchange of experiences on digital-based solutions such as Digital Public Infrastructure (DPI).

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<sup>6</sup> The grant was awarded to support a feasibility study for the development of a semiconductor fabrication facility aimed at expanding production of legacy chips ([USTDA 2024](#)).

<sup>7</sup> The \$51 million loan was awarded to M-KOPA Kenya Limited to support digital connectivity throughout the country by enhancing access to affordable smartphones to underserved communities.

<sup>8</sup> The \$10 million loan was awarded to BasiGo to advance e-mobility in Kenya which builds upon previous support from the DFC's for the e-mobility economy in Kenya.

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Equally important to its digital partnerships, Kenyan digital diplomacy on the international stage has been instrumental in strengthening its regional influence and enhancing its global presence. Thus, Kenya is positioning itself not only as a regional lead but as a key continental digital player, underlining its ambitions to become Africa's leading digital hub ([Onyeagoro 2025](#)). This trajectory is reflected in Kenya's expanding presence within global AI governance. Participating in the inaugural International Network of AI Safety Institutes ([NIST 2024](#)), Kenya, as the only African member, sits amongst leading global democracies<sup>9</sup> shaping emerging norms for safe and responsible AI ([Mabongo 2024](#)). This builds on earlier engagement at the 2023 United Nations General Assembly (UNGA), where Kenya co-convened a ministerial side event on AI's potential to accelerate the Sustainable Development Goals (SDGs) ([Thigo 2025](#)).

Further demonstrating its multilateral commitments, Kenya's Cabinet Secretary for the Ministry of Information, Communications and the Digital Economy (MICDE) Hon. William Kabogo announced the intention to join the [Digital Cooperation Organization](#) (DCO) – an intergovernmental body promoting inclusive digital economic growth – aligning with the country's ambition to position itself as “Africa's tech trailblazer” ([Kabogo 2025](#)). Moreover, Kenya continues to advance and support continental digital development through its contribution to [Smart Africa's Digital Economy Blueprint](#), a framework aimed at fostering inclusive and innovation-driven socioeconomic growth ([Thigo 2025](#)).

Overall, far from relying only on European engagement, Kenya is increasingly defining its own digital position and strategy on the African continent and internationally, implying an opportunity for Europe if it can find productive ways to engage, but also obliging alignment with a Kenya-driven agenda.

## 4. Team Europe in Kenya – Strategy

*Kenya has been a key focus country for the EU and its member states' digital engagement over recent years, and can in many ways be viewed as a test case*

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<sup>9</sup> Members of the alliance include Australia, Canada, France, Japan, Korea, Singapore, the European Union, the United Kingdom and the United States.

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*for Team Europe's outreach towards digital leaders in the Global Majority. The Team Europe approach has undoubtedly led to digital cooperation with Kenya in a more comprehensive way, combining policy dialogue, technical support, development cooperation and investments. Yet, there is still room to improve on this progress.*

Under the programming of the NDICI-Global Europe Instrument of the MFF, 2021-2027, the EU Delegation and member states in Kenya created a [Team Europe initiative](#) on human-centric digitalisation. Later, a [Digital Economy Package for Kenya](#) was announced under the Global Gateway, bringing together various components of the EU's support to Kenya's digital transformation. Further, Kenya is one of the five countries where the EU set up an informal Digital Hub to support the implementation of the Global Gateway through a Team Europe approach.

#### **a. Digital diplomacy and policy dialogue**

As of October 2025, there is no formal EU digital dialogue with Kenya, but there is the possibility of such a dialogue being set up in the coming months. Deputy Director General of DG Connect Renata Nikolay is visiting Kenya at the end of October, which should provide an opening to explore such an opportunity. Indeed, the EU has been engaging in policy dialogue with the Kenyan ICT Ministry in a more fragmented way via projects offering technical support. Germany also has a formal [digital dialogue with Kenya](#) that included a visit by the then Minister for Digital and Transport, Dr Volker Wissing, in 2023. The EU and member states also very regularly invite high-level Kenyan officials and Tech Envoy Philip Thigo to speak at major events. *Yet, a formal digital dialogue would provide a framing for the relationship as a whole, demonstrating that the EU recognises Kenya's digital leadership in the region and is serious about stepping up its investments in the digital sector.*

The European Union has provided technical support to the Kenyan government with a view to supporting the strengthening of Kenya's data protection framework. This was delivered by Germany's GIZ, which provided technical support to the Office of the Data Commissioner in Kenya, but also included exchanges with the European Commission's DG Justice and Consumers (JUST). A data adequacy

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agreement between the EU and Kenya is expected in the coming months as a result of these exchanges.

Meanwhile, a series of activities has taken place under the auspices of the Kenyan-German Digital Dialogue, including several meetings at Ministerial and state-secretary level, as well as various business delegations in both directions. These particularly aim to facilitate greater trade and investment between the two countries. Germany and the EU Delegation are also working together with a view to developing a plan to facilitate further investment in Kenya following the data adequacy agreement.

Sweden and Finland have also been working with the EU Delegation in Kenya to develop the 'Draft Action plan for promotion of secure and trusted digital connectivity and infrastructures in Kenya.' This lays out the need to; develop a clear narrative through EU-wide engagement; to level the playing field for European companies to engage in the digital sector and on connectivity specifically; to back the narrative with concrete projects that can play a meaningful role in terms of encouraging Kenya to shift its approach; and to embed the concept of secure connectivity throughout the EU's actions in Kenya and the wider region.

Digital transformation is, of course, not a standalone topic, and digital dialogues need to be aligned with other priorities, particularly the green transition, agriculture, discussions around mobility partnerships, and the annual EU-Kenya Security and Defence dialogue.

## **b. Team Europe and Global Gateway**

Kenya was one of the few countries in the world where Team Europe developed a Team Europe Initiative (TEI) focused on digital transformation under the programming of the NDICI-GE, 2021-27. It was also one of a handful of countries with which the EU announced a [Digital Economy Package](#) under the Global Gateway. Yet, despite the narrative in Brussels that the Team Europe approach entails all European actors working together to feed into the Global Gateway, it is striking that European actors in Kenya view the Team Europe initiative and Global Gateway initiatives as separate, with much of their digital cooperation falling



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under the former and only big planned infrastructure projects falling under the latter.

The Team Europe Initiative was launched in 2021, when in the wake of COVID-19, the EU and its member states sought to package and communicate their development programmes in a more strategic manner, working together for greater impact and recognition ([Jones and Teevan 2021](#)). Kenya was one of the very few countries where the EU Delegation identified digital cooperation as a strategic area for engagement. Kenya's recent adoption of a [data protection law](#) in 2019, modelled on the EU's GDPR, and the creation of the Office of the Data Protection Commissioner (ODPC), made Kenya particularly interesting for European cooperation.

The EU, Germany and Estonia launched the Digital Transformation Centre (DTC) in Kenya in 2023, and have more recently been joined by France. The DTC has been actively involved in **technical support** aimed at supporting the development of Kenya's data governance and digital public services, as well as supporting the local innovation ecosystem. This included providing technical support to the ODPC during its set-up stage, supporting the Ministry of Information, Communications and Digital Economy (MICDE) in drafting the National Data Governance Policy, supporting the development of Kenya's Digital Public Infrastructure (DPI) Roadmap, as well as supporting specific use cases in the area of digital public services.

**Cybersecurity** has also become an important focus area for cooperation, notably given Kenya's adoption of a National Cybersecurity Strategy in 2022 and growing concerns about the high incidence of cybercrime in Kenya ([Mishra 2025](#)). In November 2025, Kenya hosted the Third African Forum on Cybercrime and Electronic Evidence, co-organised with the EU and the Council of Europe ([EEAS 2025a](#)). The EU is also supporting a project, "Strengthening Kenya's cybersecurity resilience," which focuses both on identifying gaps in Kenya's National Cybersecurity Strategy and on awareness raising around cybersecurity ([Expertise France 2025](#); [EstDev 2025](#)).

In the area of **innovation**, the DTC is supporting local ecosystem development through training and a variety of measures aimed at supporting local businesses.



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For instance, through the DigiKen initiative, the EU is supporting 15 Digital Innovation Hubs in Kenya with a focus on targeting vulnerable groups and supporting innovation and entrepreneurship. The project aims to create 4,500 direct jobs and 20,000 indirect jobs by 2027 ([EEAS 2025b](#)).

A further €44 million is currently foreseen for follow-up activities on Human Centred Digitalisation, including for continued policy and regulatory support by the Digital Transformation Centre, as well as supporting operationalisation of the Informal Digital Hub.

The European Commission is also supporting various cross-cutting projects. For instance, a €20 million assistance measure for the Kenya Defence Forces under the European Peace Facility includes support for a variety of military technologies and electronic warfare means ([CoEU 2024](#)).

Yet, despite the very active digital cooperation with Kenya, support to infrastructure projects – large and small – has been slower-moving for a variety of reasons. Only one major infrastructure project – on digitalising TVET – was announced as part of the Digital Economy Package with Kenya ([EC 2023](#)). There are several reasons for this. Firstly, very large projects such as subsea cables are slow-moving projects that take a long time to plan. For instance, stakeholder consultations are ongoing to explore the feasibility of extending the Blue Ramen cable – that is connecting the Mediterranean to India via the Gulf – along the coast of East Africa, with potential landing points in countries such as Kenya and Tanzania. Secondly, Kenya’s strong reliance on Chinese vendors makes it complicated for Team Europe to finance connectivity projects without supporting these “non-trusted vendors.” Further, as we will discuss in section 5, making use of European financing tools has not always been simple.

The aforementioned Action Plan on Connectivity aims to expand the opportunities for Team Europe to invest in infrastructure in Kenya through policy dialogue and continued engagement. At the same time, European DFIs and PDBs are beginning to scale up their activities and may be able to better deliver in the coming years. As we’ll explore in section 5, the key sovereign lenders active in the region – EIB, AFD and KFW – are gradually developing their own approach to digital connectivity, which may allow for more joint actions in the future. At the same

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time, DFIs like Finnfund and Proparco are beginning to engage much more actively in private sector operations in the digital sector, with Kenya a likely beneficiary in future. Similarly, the Digital Investment Facility, run by GIZ and Finland's Haus, should begin to deliver more bankable projects focused on data infrastructure.

### c. Digital Trade and Digitalising trade

Investments from EU member states make up more than 20% of Kenya's total stock of Foreign Direct Investment (FDI), making it a very significant trade partner and far surpassing the US and China. The EU-Kenya Economic Partnership Agreement (EPA), which entered into force in July 2024, should further increase trade in goods ([EC n.d.a, EU-Africa Business Forums](#)). Yet the EPA does not cover services, including the important growth areas that are digital services and digitally enabled global business services or business process outsourcing (BPO). While some major investments have already taken place in these sectors, many European companies still find the business environment difficult to navigate. The upcoming EU data adequacy decision on Kenya could potentially be a game-changer, by facilitating much greater investments in this vital sector for job creation and export growth. Further, digital technologies have a clear role to play in facilitating physical trade.

While the EPA with Kenya focuses largely on physical trade in goods, digital services and digitally enabled business process outsourcing are at present the largest export-growth sector globally and have significantly outstripped trade in goods since the pandemic ([UNCTAD 2025](#)). European companies have made selected BPO investments in Kenya. For instance, French company Teleperformance began operations in Kenya in 2021 with an initial 1,400 employees. The company announced an expansion in early 2025 that might potentially create 4-5,000 additional jobs at a new complex at the Two Rivers International Finance and Innovation Centre (TRIFIC) ([Kizito 2025](#)). Yet, the EU is underperforming in terms of investments in this area. Interviewees highlighted a number of major challenges for European companies, including; lack of skilled professionals, particularly in higher-skilled areas like cybersecurity; problems dealing with the bureaucracy and corruption; and the difficulty of getting work permits to bring in foreign professionals during set-up stages.

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Should the EU-Kenya adequacy decision on data protection come through, as expected in the coming months, this will not address all of these issues, but could provide a major impetus to other European companies to invest in Kenya. Very few countries globally have data adequacy decisions with the EU, meaning that this could make Kenya an increasingly attractive destination for such investments. This decision would allow personal data to flow from the EU to Kenya: “without any further safeguard being necessary. In other words, transfers to the country in question will be assimilated to intra-EU transmissions of data.” ([EC n.d.b](#)). This would vastly improve the ease of doing business in digital services and data-heavy industries like BPO.

Digital technologies can also play an important role in facilitating trade in goods and will be key to furthering Africa’s continental integration agenda. Indeed, the EU-Kenya Business Forum that took place in May 2025 focused on “Digitalising Trade,” exploring the implementation of the EPA and the role of digital tools. The Business Forum touched on both how digital tools can facilitate physical trade, as well as touching on some of the data sharing issues that are so important for trade in services. One area where this might be explored is in the Global Gateway Flagship around the Northern Corridor, which is being championed by the Netherlands, together with the EU Delegation. With its focus on agricultural trade and logistics, there is a clear role for digital technologies in this flagship that should be integrated from the beginning.

## **5. Team Europe in Kenya – Financial Instruments**

### **a. EFSD+ and beyond**

The European Fund for Sustainable Development (EFSD+), which is the key EU instrument serving the objectives of the Global Gateway, can, in principle, play a key role in facilitating investments in the Kenyan digital sector. This would be through two main tools: blending and guarantees, which are key means to mobilise private investments at scale. Yet, in practice, it is fair to say that the EFSD+ only played a limited role in facilitating investments in the Kenyan digital private sector.

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No blending operations were recorded in the Kenyan digital sector until December 2024 ([EC 2025d](#)). On the guarantee side for sovereign operations, the EIB has not approved or signed any transaction yet relating to the digital sector in Kenya. This is partly explained by the fact that market opportunities in the sector tend to be driven more by private than sovereign operations, and by the macroeconomic issues Kenya faced in the past years (debt and fiscal space). Sovereign operations are not only important in and by themselves but also to unlock opportunities downstream for the private sector.

Beyond the EIB, public development banks have shown limited activities in the digital sector in Kenya, but this may be in the process of changing as key European players begin to figure out how to engage in this sector. The main investment to date focused on [Digitalisation for Technical & Vocational Education and Training](#) (D4TVET) focused on digitalising TVET and developing the digital programmes of the institutions, which is co-financed by KfW (loan 28m), AFD (grant 10m) and EU (grant 9.9m).

Yet, work is ongoing to develop a pipeline of bankable projects that sufficiently integrate the idea of “secure and trusted connectivity.” For example, AFD recently co-invested with the EU Delegation to Ethiopia in a €120 million investment in Renewable Integrated Sustainable Energy and Digitalisation (RISED), which is expected to be supplemented by a further EIB loan. This has provided a methodology for how to approach further investments in the area of digital connectivity. Italy’s Cassa Depositi e Prestiti (CDP) also received support to invest in the digital sector through the renewable infrastructure & sustainable energy programme (RISE) – though the digital component does not seem to feature prominently. European public development banks are thus quite active in building their pipeline of projects, including on fibre, which is a key issue for the Kenyan government. At the same time, such an approach depends on Kenya’s fiscal space to invest, which has been improving lately with two successful Eurobonds issuances in 2024 and 2025.

Further collaborations between European public development banks and the EIB are also facilitated by the [mutual reliance initiative](#), which allows them to rely on the process on whoever is in the lead of the transaction. The fact that AFD, KfW and the EIB (which is able to finance at scale, in contrast to AFD and KfW that can

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invest in smaller projects) have to some extent a different focus, experience and expertise, and networks also help build synergies, building on their relative complementarity.

As for the open architecture guarantee that covers private sector operations, only the [Africa Connected](#) guarantee managed by Finnfund has been deployed to date, and topped up with an additional budget by the European Commission in 2025 for activities covering the recently launched [Finnfund Digital Access Impact Fund](#). Thus far, one operation has focused explicitly on Kenya: a **USD 4 million debt investment** in Poa Internet, a Kenyan internet service provider, to extend affordable broadband to underserved communities in Kenya. Two other [operations](#) include Kenya, but are not specific to Kenya: i) **USD 90 million equity investment** to Cassava Technologies for expanding digital infrastructure across Africa; and ii) **USD 10 million investment** in Beacon Power Services, an energy tech company that uses data-driven solutions to distribute electricity more efficiently across Africa's power sector.

Though not dedicated to the digital sector, it is worth noting that EFSD+ guarantees that are sector-agnostic can also benefit technology companies. This is the case of the MSMEs Platform Plus, managed by the European Development Finance Institutions Management Company (EDFI MC), which was used by Swedfund to invest in the agri-fintech company Apollo Agriculture in Kenya through a loan of USD 5 million, which by using machine learning, can assess creditworthiness, even to those without a formal financial history ([Swedfund 2024](#)).

Beyond EFSD+ guarantees, the EIB can rely on other mandates and instruments than the EFSD+ to carry out private operations in the digital sector in Kenya. With the [ACP Trust Fund](#) and [Boost Africa](#), the EIB was able to invest in at least two venture capital funds covering Africa, which play a key role in fostering access to finance for innovative technology companies ([EIB 2025a](#)). Yet, to date, it appears that neither of these funds – The Helios Fund V, focused on supporting digital infrastructure and services companies to grow ([EIB 2025b](#)), and Seedstars Africa Ventures, focused on investments into high-growth small and medium-sized enterprises (SMEs) leveraging digital technologies ([EIB 2025c](#)) – has yet been deployed in Kenya.

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Finally, the Digital Investment Facility (DIF), co-led by GIZ and Finland's Haus, has also been very actively engaging with the African data centre ecosystem, and has provided small grants to a number of private sector operators – several of which are in Kenya. As the DIF moves into the next stage of setting up the facility, it aims to develop a useful pipeline of bankable projects that could also provide more opportunities for investments in data infrastructure. Kenya is likely to be one of the main beneficiaries.

Overall, European development finance institutions were ill-equipped to make use of financing tools for investments in digital cooperation when the Team Europe initiative was first developed and Global Gateway was announced. Yet, Team Europe's tools for investing in digital transformation are gradually beginning to bear fruit. Kenya is well placed to benefit over the coming years as the use of these tools is scaled up.

#### **b. Supporting EU–Kenya trade relations**

In Kenya, several EU member states have set up a chamber of commerce, including France, Germany, the Netherlands, Sweden, Ireland, as well as Finland (through Business Finland) and Italy (through the Italian Trade Agency / Embassy). Their activities include: i) advocacy & policy dialogue; ii) networking and matchmaking; iii) trade and investment promotion/facilitation by providing market intelligence and information on the regulatory frameworks, including standards, trade agreements, etc. Importantly, a European chamber of commerce, Eurocham, was launched in 2025 during the EU–Kenya Business Forum, with a view to:

1. Provide a unified platform for European businesses operating (or planning to operate) in Kenya, to engage more effectively, to advocate for a favourable environment, and to deepen EU–Kenya private sector links.
2. Complement the national Chamber of Commerce by focusing on broader EU interests and cross-cutting issues (especially in light of the EU–Kenya Economic Partnership Agreement).

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The digital sector is a growing focus for at least some of the European chambers of commerce. For example, the French Chamber of Commerce dedicates the first day of its flagship [French Week 2025](#) to Digital innovation and AI; the focus of the [2025 EU-Kenya Business Forum](#) was on Digitalising Trade, and so was the case of the 2025 [Italy meets Kenya forum](#), which is further promoted by CDP's Business Matching platform. While interests seem to be converging between European actors, interviews suggested that initiatives remain relatively fragmented, with limited appetite for wider initiatives involving collaboration between several EU member states' private sectors. In addition, there is no "safe space" for the European private sector to share concrete investment opportunities, as they fear that their ideas will be stolen by a competitor.

Another key actor that can directly support the European private sector trade and investments in the Kenyan digital sector is the European export credit agencies (ECAs). These can play a key role in unlocking transactions, including in the digital sector, by providing political risk insurance and other derisking mechanisms. Yet, the nature of the digital sector and the prominence of services, not necessarily goods, makes it more difficult for some ECAs to engage. Others can find it more difficult to engage in countries like Kenya that are assessed as high-risk, as exposure limits will constrain the volume of transactions they will be able to back ([EKN 2025](#)).

In terms of process, it is important to keep in mind that ECAs come at the end of the financing process, once the transaction parameters have been worked out by the European private sector itself. This means that a more coordinated and integrated approach between development and trade-type support depends less on ECAs' than businesses' role and responsibilities. Given the very national/bilateral approach illustrated by the number of European member states' chambers of commerce, and indeed of the businesses themselves, it will require considerable efforts to build a truly European private sector approach in the digital sector or "tech business offer" in Kenya.

## 6. Conclusion and recommendations

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The partnership with Kenya demonstrates how Team Europe is gradually building out its international digital policy in practice. The EU and its member states have begun to develop a more comprehensive Team Europe approach in Kenya, building on the strengths of different actors and laying the groundwork for a more comprehensive approach in future. The approach to date was built on an iterative process of building up the diplomatic and policy dialogue, some key political engagements, building trust with key government actors, and laying the groundwork for future investments.

To demonstrate the **benefits of the EU–Kenya digital partnership** and **how Team Europe can support Kenya’s digital sovereignty**, Team Europe members will need to demonstrate that they can deliver on strategic investments in digital infrastructure and services, coupled with more traditional support on e.g. business and regulatory environment or skills development (as promoted in the Global Gateway 360 degrees approach), in a way that contributes to local innovation and job creation whilst supporting European economic interests. This means investing politically and diplomatically, and delivering meaningful impact through strategic investments and cooperation.

The current geoeconomic moment demonstrates to advanced and developing economies alike that overdependence on one supplier or market is a high-risk strategy, and thus, the EU and Kenya alike have an interest in diversifying their partnerships. Given its regional leadership and diplomatic weight on digital matters in Africa, Kenya could be a valuable diplomatic partner at the regional and multilateral level. This is particularly important at a time of increasing strain for multilateralism and international law, which are highly valued by both the EU and Kenya. Kenya could also become an important hub for European companies looking to expand and become competitive in an emerging African continental free trade area. This will require working together to invest in connectivity, digital services, and digital skills, as well as continuing to make efforts to improve the business environment.

Team Europe is in many ways already beginning to **implement the EU’s international digital strategy in Kenya, and to develop its tech business offer**, but further efforts will be necessary to demonstrate to Kenyan partners that Team Europe members can collectively deliver a meaningful partnership. The EU and its



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member states should ensure that they work in the spirit of Team Europe to truly **combine their resources in Kenya** and to implement a 360-degree approach to digital cooperation, so as to effectively demonstrate Europe's overarching significance as a digital partner. In particular, Team Europe should increase political and policy engagement, help **create avenues to support greater digital investments**, and increase the focus on crosscutting areas such as green digitalisation, digital aspects of security and mobility programmes focused on digital skills and innovation.

#### a. Stepping up political and policy engagement

- Visiting **political leaders from the European Commission and EU member states should actively engage with the EU-Kenya digital partnership**, highlighting Team Europe's joint commitment and, where possible, highlighting major new investments. As with the example of President Stubb of Finland, European political leaders should demonstrate commitment not only to national initiatives but to the wider Team Europe efforts by highlighting digital cooperation projects. This political commitment would give Team Europe more credibility and weight as it seeks to demonstrate a commitment on par with that of the US and China.
- The EU should seriously **consider opening a digital dialogue with Kenya**, demonstrating that it takes Kenya seriously as a partner with which to seriously engage at the highest levels across a range of digital policy and regulatory issues. Such a dialogue could also help shape common positions in regional and multilateral fora.
- The **communication around Team Europe and the Global Gateway will need to be refined and streamlined**. As mentioned above, there seems to be some confusion amongst Team Europe members about what qualifies for which initiative, and as a result, Global Gateway still appears to be an empty shell. Greater political and policy engagement would also further this goal by increasing the visibility of the initiative.
- In line with this, it is essential to emphasise the need for, and take, a 360-degree approach to digital cooperation with Kenya as a whole, rather than for any individual Global Gateway digital flagship project that might be announced. This might start by using various modalities to support and invest in trusted connectivity. But meaningful connectivity is intertwined

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with and depends on parallel investments in other areas, such as cybersecurity, data policy, digital skills and innovation ecosystems, so it is essential that thinking is holistic.

## b. Elaborating the Tech Business Offer

Many of the elements of the **European Tech Business Offer in Kenya** appear to already be present, with different member states offering different focus areas and potential added value. Yet, these **various components need to be further elaborated and strategies developed across different pillars in a 360-degree manner**. Team Europe will need to keep working in a comprehensive manner across the different pillars, from supporting policy reforms to building the capacity of public authorities, investing in public sector projects with a focus on infrastructure, and supporting private sector development. In that sense, building synergies between the Global Gateway 360 degrees approach, the EFSD+ investments, political dialogue and trade efforts will be critical elements to an effective tech business offer.

Team Europe members will also need to be strategic about **clarifying where Europe adds value and can make a difference**, and where Europe should be more pragmatic – investing more modest amounts to remain in the market.

- **Trusted Connectivity:** The development of the Draft Action Plan on Connectivity by the EU, Sweden and Finland demonstrates a first step in this regard. Other member states, their institutions and private sectors may also have an important role to play in future, notably France, Germany and Italy.
- **Data Policy, Data Infrastructure and AI:** The policy work conducted by GIZ and the private sector engagement of the DIF are laying the groundwork, but a more integrated approach between public and private engagement will be necessary.
- **Digital public infrastructure:** Germany, France and Estonia are all actively engaging with Kenya, including by supporting the development of the DPI Roadmap, as well as in supporting a variety of pilot projects across different sectors.

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- **Business process outsourcing:** EUD–German Embassy initiative on data adequacy is a first step, particularly when combined with Team Europe’s strong support for digital skills development, including through the TVET system.
  - **Digitally enabled services:** There is also room for Team Europe to integrate its technological solutions across other areas, from digital grids to logistics to health. While some member states, like the Netherlands, are not strongly engaged in digital cooperation, they have important digital services sectors and could play an essential role in mainstreaming digital technologies across other sectors, such as health and agriculture.

Continued support for building Kenya’s cybersecurity structures and raising awareness about cybersecurity, as well as support for specialised digital skills, is cross-cutting across all of the above areas.

### c. Coordination at multiple levels

Coordination around digital cooperation on the ground in Kenya has grown over recent years, but there is still room to build on this. There remain major gaps between the rhetoric and approach emanating from Brussels and capitals and the realities for those working on the ground.

- Team Europe members will increasingly need to coordinate at multiple levels. The development of the Informal Digital Hub is a good first step, allowing for better ongoing coordination, but more work will need to be done to see how different Team Europe members can be engaged more actively. This is particularly important when it comes to **engaging both at the political level and also with member states’ private sectors**, where many member states still do not fully embrace Team Europe.
- The mutual reliance initiative between the AFD, KfW and the EIB is an excellent means to **foster collaboration between European public development banks**. This can create mutual benefits for them and their clients, avoiding duplication whereby clients share the same information multiple times with different actors.
- More work will be needed to **coordinate sovereign and private sector operations and add value in specific contexts**. While coordination

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between public development banks and implementing agencies is happening on a regular basis, there is room to strengthen such collaboration to better link investments and technical assistance at the policy level. By working at the policy level, these actors often help unlock opportunities for private sector actors, which can be supported by DFIs. Yet, linkages between sovereign and private sector operations are limited, and would need to happen more systematically in specific digital sub-sectors. Actors do not need to coordinate for all types of transactions, but should identify those areas where a more comprehensive and coordinated approach is required. The aforementioned Action Plan on Connectivity is a positive first step in this direction, but it will need to be followed up with further coordination with PDBs and DFIs.

- Team Europe members need to **further coordinate to engage European digital businesses under the Team Europe umbrella**. The shift and push towards working more with the European private sector is also pushing public development banks and DFIs to rethink their approach and tools, and leverage their complementarities with export credit agencies. Some of them interact with Chambers of Commerce, but key constraints (complying with the untied aid principle and open public procurement regulations) prevent them from engaging directly with the European private sector. Beyond the principles and tools, several actors adopt more of a national rather than European approach to engage their own private sector, and more work (such as providing a safe space for European private sector collaboration) needs to happen. The Eurocham could play a key role in this endeavour.
- There is still a need to bridge the gap between the rhetoric emanating from Brussels, with its focus on major Global Gateway flagship projects, and the realities of digital cooperation on the ground, which requires building out a cross-cutting approach to digital policy. The Digital International Strategy begins with this integrated approach to policy dialogue and cooperation for the whole sector rather than on a project basis. Yet, truly implementing this will also ultimately require more personnel and deeper digital expertise on the ground in Kenya and other partner countries.
- There is a need to continue to invest in mainstreaming digital expertise across other policy areas, so as to ensure that interesting opportunities are not missed. While digital policy is gradually being brought into various

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other areas of work, there is a lot of potential to continue this work, both within EU Delegations and within EU Member state embassies. This is particularly true for teams leading on trade and finance, political and security cooperation, but also for those focused on agriculture and green transition.

#### d. Building inclusivity & meaningful connections

Ensuring that the partnership is truly inclusive and built on a base of equal consideration and understanding will require not only deepening political connections, but also deepening people-to-people connections and exchanges. This means making sure that the European digital offer reaches not only the political class, but entrepreneurs, students and civil society actors. The [EU-AU Innovation Agenda](#) demonstrates the joint importance that European and African actors place on developing joint innovation efforts and provides a useful backdrop for scaling up efforts in this area.

- Education and research are vital aspects of developing digital ecosystems and of building connections with key partner countries. The EU might consider extending its outreach and efforts around EU programmes such as Erasmus+ and Horizon Europe in key partner countries such as Kenya. This would create meaningful connections to students and researchers in the STEM fields, support the development of local ecosystems in Kenya and also create important networks for funding and collaboration in future.
- Professional exchanges and study trips could allow innovators and investors from both Europe and Kenya to meet to discuss collaborations, financing and market development on both continents. Bilateral exchanges that include study trips in both directions – and not only towards Europe – are essential to create understanding on both sides, and can open up new opportunities for entrepreneurs from both Europe and Kenya.
- The EU has a long and rich history of civil society engagement and of supporting local civil society actors around the world. The EU and its member states' engagement with and support for civil society actors is not only a vital component in upholding a free and open internet, but is also a vital source of soft power for Team Europe.

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## e. Accountability

Team Europe actors should develop a monitoring and evaluation (M&E) framework that would track performance against the key objectives of the EU as laid out in the International Digital Strategy and other EU policy documents. It would capture not only development but also trade and economic outputs, results and impacts, with a view to:

- Understand the state of play of the EU-Kenya digital partnership, and highlight the key successes and challenges/gaps thus far;
- Draw lessons learnt that could be translated into concrete actions aiming to improve the way the partnership works; and
- Trigger dialogue with Kenyan counterparts, to make the partnership more mutually beneficial, active and strategic.

In doing so, Team Europe actors would be pushed to focus their efforts and resources where they have an added value, be more intentional in what and how they develop interventions, and carry out a more strategic and transparent dialogue with partner countries regarding development and trade outcomes in the digital sector. This has a cost – some experts suggest that an effective M&E mechanism can account for 10% of the total budget of a programme. Yet, one could also argue that the learnings from this experience could be valuable not only for the digital sector but also for other Global Gateway sectors.

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