

Anti-Corruption Helpdesk Answer

Sexual corruption as a distinct offence: comparative lessons from Tanzania, Rwanda, Madagascar and Sri Lanka

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Date: October 2026

Sexual corruption is increasingly recognised as a form of corruption, yet it is rarely codified as such in law. Drawing on Tanzania, Rwanda, Madagascar and Sri Lanka, this paper examines what happens after specific legislation is adopted and what further steps are needed to strengthen them. It identifies transferable design lessons — precise definitions, clear institutional ownership, statutory victim protection — while showing that legislative gains remain fragile without sustained civil-society vigilance.



Query

How is sexual corruption being legislated as a distinct criminal offence, and how has implementation of these laws affected reporting, prosecution and victim protection where they have been adopted?

Main points

- Sexual corruption is a distinct form of corruption, defined as the abuse of entrusted power to demand or obtain sex or other sexual acts, which is different from sexual violence more broadly. UNCAC Resolution 10/10 (2023) which formally recognised sexual corruption gave this intergovernmental backing for the first time.
- Of 38 jurisdictions analysed to date by the UNCAC Coalition, only four have legislative provisions that explicitly address sexual corruption: Tanzania, Rwanda, Madagascar and Sri Lanka. Others are moving in the same direction: in Brazil, for instance, Bill 4534/21 would introduce a dedicated sexual corruption offence into the Penal Code.
- Most other countries still rely on criminal codes, gender-based-violence (GBV) legislation or general anti-corruption law, all of which have real gaps: consent thresholds that do not fit these cases, narrow judicial readings of terms like "benefit" or "gratification", and a risk of prosecuting victims as co-offenders.
- Under-reporting remains high, including where sexual corruption is expressly criminalised. Stigma, fear of retaliation and dependence on the perpetrator are recurrent barriers to reporting, alongside legal and procedural obstacles that may persist despite a dedicated offence. Criminalisation can provide a clearer basis for recognising and prosecuting sexual corruption, but does not in itself create the conditions in which victims can safely report it.
- Coordination between anti-corruption bodies and GBV services seems to be weak. Rwanda has made the most progress, through its Isange One Stop Centres, but even there, no formal referral path exists specifically for sexual corruption cases.
- Investigative and prosecutorial capacity varies a lot between the four countries. Sri Lanka stands out for its inter-agency training programmes, while comparable initiatives are less evident elsewhere. Published data on sexual-corruption prosecutions and convictions also remain fragmented.
- Victim protection differs significantly by country. Tanzania's Section 25 deliberately criminalises only the person who abuses their position. Sri Lanka's Act, by contrast, still leaves a coerced complainant technically exposed to liability as a co-offender.
- The lack of disaggregated data is a widespread problem. Sri Lanka provides greater visibility through CIABOC reporting, but none of the four countries systematically tracks sexual-corruption cases from reporting through to conviction, making it difficult to assess how the laws work in practice.
- Civil society has been the main driver behind both passing these laws and defending them afterwards. In 2024, Tanzania's Anti-Sextortion Coalition successfully blocked an amendment that would have weakened Section 25's victim protections.

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Introduction

Corruption is conventionally defined as the abuse of entrusted power for private gain (TI, s.f.). Yet corruption research and practice have tended to conceive that gain in monetary or material terms, paying far less attention to cases in which sex itself becomes the currency of the corrupt exchange (Basel Institute on Governance, n.d.; Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024). Entrusted power can just as easily be traded for benefits, positions, or loyalty as for sex. Since the International Association of Women Judges (IAWJ) coined the term ‘sextortion’ in 2008 to describe cases in which those entrusted with power – judges, teachers, police officers, immigration officials – extracted sexual benefits rather than cash in exchange for something within their gift, a growing body of scholarship and advocacy has argued that sex can function as a bribe in its own right (IAWJ, 2012).

The IAWJ’s founding definition described sextortion as “the abuse of power to obtain a sexual benefit or advantage” and stressed that it is a form of corruption in which sex, rather than money, is the currency of the bribe (IAWJ, 2012, p. 5). More recent scholarship has refined this framing. Bjarnegård et al. (2024) define sexual corruption around three elements: the misuse of entrusted power, the conditioning of a benefit on an exchange, and sex as the currency of that exchange (Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024). Transparency International has since adopted a related, victim-inclusive definition: sexual corruption is the abuse of entrusted power to demand or obtain sex or acts of a sexual nature. This formulation intended to capture both solicitations that go unreciprocated and cases in which the sexual act takes place, but the promised benefit is nonetheless withheld (Barnes & Bergin, 2025, p. 37; Castro, 2026).

Conceptually, the shift from ‘sextortion’ to ‘sexual corruption’ – advanced by scholars and civil society organisations – changes how the offence would be investigated and prosecuted, not just how it is named. Because the label sextortion foregrounds the extortion dimension, it risks excluding cases that are collusive rather than coercive in form, or in which a sexual bribe has become so routinised within an institution that it is no longer explicitly solicited at all (Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024). Crucially, sexual corruption does not depend on who initiates the exchange: sexual extortion and sexual bribery may both fall within the concept where entrusted authority is abused in a *quid pro quo* involving a sexual favour (Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024).

This framing also draws a clearer boundary around two adjacent categories with which sexual corruption is often conflated. The first is corruption in its ordinary, monetary sense. The distinction lies not in the abuse of entrusted power or the transactional logic, but in the currency exchanged and the consequences that follow from it. In monetary

corruption, the bribe is separable from the person who offers it; in sexual corruption, the good demanded cannot be separated from the body of the person who supplies it. Therefore, the usual distinction between briber, bribe-taker and the object of the bribe collapses (Lindberg & Stensöta, 2018; Castro, 2026). This substitution also unsettles the language of consent that anti-corruption frameworks tend to borrow, largely unexamined, from the law of contract: because the sexual act is conditional on the exchange, it cannot, by definition, amount to full and unconditional consent (Castro, 2026).

The second, and in practice more consequential boundary is with sexual violence and gender-based violence (GBV) more broadly. Rape, sexual assault and sexual harassment are frequently committed by people who hold power over their victims, and gender norms shape both phenomena in overlapping ways (UN WOMEN, 2020, pp. 6-8). What is specific to sexual corruption, however, is the corruption dimension: an entrusted authority is misused to condition access to a service, benefit, decision or opportunity that lies, at least in part, within the perpetrator's institutional gift – a grade, a visa, a promotion, a favourable judgment, access to water or medicine (Bergin, 2024). It is this transactional, institutional logic that distinguishes sexual corruption from sexual violence more broadly. Treating the two as interchangeable – filing every instance of sexual corruption as sexual violence, or every case of sexual violence involving a powerholder as corruption – obscures rather than clarifies the wrong being done and has direct consequences for the avenues of redress open to victims.

The legal landscape

Countries that have attempted to respond to sexual corruption have, in practice, done so through three overlapping legal routes.

The first route treats sexual corruption as a matter for ordinary criminal codes and gender-based violence legislation: rape, sexual assault and sexual harassment statutes are invoked to capture at least its more coercive instances. Such provisions can capture cases involving physical force or an unequivocally non-consensual act, but most require proof that the complainant did not consent, a requirement that sits uneasily with the more subtle forms of coercion characteristic of many sexual corruption cases (De Paolis, 2024). Some jurisdictions address this difficulty by providing that consent is invalid where submission results from an abuse or exercise of authority, as the criminal codes of Canada and the Australian state of Queensland expressly provide (France, 2022, p. 14). Sexual harassment law presents a related limitation: it is often structured around particular relationships, most commonly the workplace, and may not readily capture abuses of public or administrative authority. An official conditioning a public service or administrative decision on a sexual favour may therefore fall outside its conventional scope (Castro, 2026).

The second route relies on existing anti-corruption legislation, treating sex or sexual favours demanded in exchange for an official act as a non-monetary bribe. This has the advantage of recognising the conduct as an abuse of entrusted power. The difficulty lies

principally in the way bribery and extortion offences are framed: concepts such as ‘benefit’, ‘advantage’ or ‘gratification’ were rarely drafted with sexual acts in mind, leaving their application dependent on statutory wording and judicial interpretation (Ramirez Sirgo, Moreno Rodriguez, & Casas Cardenas, 2025; IAWJ, 2015). Some courts have nevertheless interpreted ordinary bribery offences to encompass sexual benefits: in Argentina¹, for instance, a public housing official was convicted of the Argentine bribery offence of *cohecho* after requesting sexual benefits in exchange for the allocation of a housing unit. By contrast, in 2010 a UK High Court judge publicly doubted whether the Bribery Act’s reference to “any financial or other advantage” was intended to reach sexual corruption at all (Bauhr, Owasanoye, & Petherick, 2025, p. 11). A further difficulty is that antibribery law commonly criminalises both giving and receiving bribe, creating a risk treating the person who supplied the sexual ‘currency’ as a co-offender rather than as a victim (International Bar Association, 2019).

The third route is legislation that expressly addresses sexual corruption, rather than relying on offences designed for other forms of conduct. Advocates argue that dedicated statutes can remedy precisely the gaps identified above: they can define the offence around the abuse of authority rather than around either sexual non-consent or monetary benefit, and, crucially, they can be drafted to criminalise only the party who abuses their position, shielding the victim from prosecution as a co-briber (International Bar Association, 2019). Only four of the 38 jurisdictions analysed to date by the UNCAC Coalition - Tanzania, Rwanda, Madagascar and Sri Lanka - have taken this step (UNCAC Coalition, 2026), a handful of states have taken this step, making their experience particularly relevant to understanding how a specific legal response operates in practice.

International recognition of this third route has, since 2023, lent it a degree of institutional weight it previously lacked. That year, the Conference of the States Parties (CoSP) to the United Nations Convention against Corruption (UNCAC) adopted Resolution 10/10 which expressly recognised that the demand for sex or acts of a sexual nature in the exercise of entrusted authority may itself constitute a distinct form of corrupt conduct and called on states to identify and close the relevant legislative gaps (U4, 2024). The resolution stopped short of prescribing a model offence, and explicit statutory recognition remains confined to the four jurisdictions noted above.

Against this background, other states are considering specific criminalisation. In Brazil, [Bill 4534/21](#) (2021) would introduce a dedicated offence into the Penal Code, defining sexual corruption as the conditioning of official duties or services on sexual activity. The bill provides for a harsher penalty where the sexual act is actually carried out, and extends liability to anyone who takes advantage of employment, position or function to place themselves in a position of supremacy over the victim (Martinelli, 2025).

¹ In *Reyna* (Tribunal Unipersonal de Comodoro Rivadavia, 2019), a public housing official was convicted of *cohecho* for requesting sexual favours in exchange for allocating a housing unit. The case is notable because the sexual benefit was treated as the object of ordinary bribery, in the absence of a specific offence of sexual corruption.

Taking these four jurisdictions as its starting point, this paper assesses how specific legal responses to sexual corruption operate in practice. The case studies consider their design and application, as well as enforcement, reporting mechanisms, institutional coordination and the role of civil society, identifying both promising practices and recurring implementation challenges. The comparison draws out lessons from these experiences for countries considering similar reforms.

Country case studies

Tanzania

The sexual corruption legal framework

Tanzania is among the most consolidated cases in this study and was one of the first jurisdictions worldwide to codify sexual corruption as a distinct offence. Section 25 of the Prevention and Combating of Corruption Act (PCCA), No. 11 of 2007 — adopted as part of a broader reform that replaced and modernised the country's prior anti-corruption regime and enforced by the Prevention and Combating of Corruption Bureau (PCCB), the state agency responsible for investigating corruption — introduced an offence under the heading "Sexual or any other favours."

The provision penalises any person who, occupying a position of power or authority, demands or imposes sexual acts, or any other benefits, on another person as a condition for employment, promotion, a right, a privilege or any other preferential treatment. On conviction, the offence carries a fine of not less than two million shillings (approx. USD 750) and not exceeding ten million shillings (approx. USD 3.800), or imprisonment for a term of not less than five years and not exceeding ten years — penalties revised upward under the 2024 Amendment. The offence has also been carried through into prosecutorial practice: the National Prosecution Service's own operational guidelines expressly direct the office to handle cases of demanding sexual benefits under Section 25, embedding the provision in day-to-day case management rather than leaving it as a dormant statutory clause.

The provision did not emerge in a vacuum. From the early 2010s, UN Women, women judges led by the Tanzania Women Judges Association (TAWJA) and Tanzanian women's rights organisations campaigned for "sextortion" — in schools, universities, the public service and the police — to be recognised as a form of corruption rather than dismissed as a private matter of sexual misconduct (Eldén & Bjarnegård, 2022, pág. 10). The campaign could build on unusually favourable ground: the phenomenon already had a name in everyday Swahili², *rushwa ya ngono* — literally "sexual corruption" — a colloquial term in wide circulation long before any statute or policy took it up, and one that translated directly into the vocabulary of the 2007 Act (Bjarnegård, Calvo, Elden, & Lundgren, 2025) (Eldén & Bjarnegård, 2022, pp. 17-20). Advocates and legislators were not importing an alien concept but giving legal form to something the public already had words for.

This pre-existing vocabulary proved consequential beyond the statute itself. The vernacular frame was taken up well beyond the women's movement — most visibly in

² Kiswahili (Swahili) is Tanzania's national language.

the PCCB's own street-level campaign, *Kataa rushwa ya ngono* ("Reject sexual corruption"), launched in 2019 (AA, 2020) and it helped consolidate the issue on the public and policy agenda, later sustaining Section 25's implementation, prosecutorial uptake and distinctive asymmetric architecture, defended against amendment in 2024 (Bjarnegård, Eldén, Jayasundara, & Semakafu, 2025).

Unlike Section 15 of the same Act, which criminalises both the giving and receiving of monetary bribes, Section 25 is deliberately asymmetric: it targets only the party who holds and abuses power, leaving the person pressured into sex outside the scope of criminal liability. Empirical research confirms that this allocation of responsibility is a distinctive and deliberate feature of the Tanzanian model as subsequently interpreted and implemented: responsibility is directed exclusively at the actor who holds power, in contrast to the ordinary bribery offences elsewhere in the PCCA, which treat both parties to the transaction as culpable (Eldén & Bjarnegård, 2022, págs. 17 - 21). This design choice — shielding the person subjected to sexual corruption from prosecution — has proved the single most contested feature of the Tanzanian framework in implementation, precisely because the transactional element can make victims appear “complicit” and expose them to blame (Eldén & Bjarnegård, 2022, págs. 29 - 42).

This asymmetric architecture is legally significant in a further respect: the “demand” or “imposition” of a favour — accomplished or not, tied to the promise or withholding of a benefit, is sufficient to constitute the offence. Unlike conventional bribery, the offence turns on a vertical abuse of power, not a transaction between equals.

Implementation dimensions

Reporting mechanisms

Reporting channels for sexual corruption exist on paper. The PCCB accepts complaints directly, and has run public campaigns jointly with police gender desks explaining sexual corruption and how to report it, including its particular risks to victims (AA, 2020). The legislative framework also provides some protection for those who come forward. Tanzania's Whistleblower and Witness Protection Act (Cap. 446) covers corruption offences and protects whistleblowers and witnesses against retaliation or victimisation, including through confidentiality requirements. The formal reporting architecture is therefore relatively well developed, although these safeguards are not specifically tailored to the risks faced by victims of sexual corruption.

In practice, however, reporting remains limited. Research from Tanzania points to stigma, fear of professional retaliation, dependence on the perpetrator and scepticism that reporting will lead to action as important deterrents. These barriers are particularly acute in settings such as universities, where students may depend on lecturers for grades and academic progression. They mirror obstacles identified in the wider sexual corruption literature, alongside the evidentiary difficulties of exchanges that typically take place in private (Eldén & Bjarnegård, 2022). Civil society researcher and PCCB's

own campaigners describe a persistent gap between the existence of these channels and victims' willingness to use them.

Importantly, the Tanzanian implementation experience suggests the institutional response can itself reproduce the barriers it is meant to remove. EBA's study of Folk Development Colleges — an explorative case study of one organisation's early implementation work — found that prevention efforts were heavily directed at students, who were simultaneously taught that sexual corruption was improper conduct and expected to take responsibility for reporting it. This framing risked reinforcing shame and perceived complicity, notwithstanding the legal rule that responsibility lies with the person abusing entrusted authority. The study therefore points to implementation challenge likely to travel beyond Tanzania: reporting mechanisms must not only be physically accessible, but must also be accompanied by messaging that clearly locates responsibility with the perpetrator and avoids reproducing victim-blaming norms (Eldén & Bjarnegård, 2022).

This logic recurs also outside the education sector. Tanzania Media Women's Association (TAMWA) has documented sexual corruption within Tanzania's media sector since 2020. Its first study found that the practice extended across the professional chain: editors, managers and media owners were identified alongside news sources, including politicians and directors of large organisations, while junior female journalists, correspondents and journalism students were particularly exposed. The leverage involved was often directly professional. Respondents described editors withholding publication of stories, senior staff conditioning employment or access to broadcasting opportunities on sex, and news sources seeking sexual favours in return for information. Low and irregular pay compounded this dependency, particularly among correspondents (TAMWA, 2020, pp. 18-19).

The same dependency made reporting particularly difficult. Respondents pointed to fear of losing their jobs or professional opportunities, stigma and shame, evidential difficulties and uncertainty over whether complaints would lead to any action; the study also found that some media houses had no specific policy or procedure for dealing with sexual corruption (TAMWA, 2020, pp. 21-23). A follow-up TAMWA study in 2023 suggests almost none improvement: among 100 journalists surveyed, 77% reported having experienced sexual harassment at work or in the field; 27% had faced demands for sex from news sources in exchange for information or stories; and 4% had been solicited for sexual bribes linked to jobs, workplace favours or lucrative assignments (TAMWA, 2023, p. 14). The report expressly links reluctance to resist or report these practices to fear of losing employment, reputation or professional opportunities (p. 15).

Prosecution of cases

Documented prosecutions under Section 25 remain few relative to the scale of sexual corruption documented by civil society organisations and researchers, as the evidence discussed above illustrates. One of the earliest documented cases involved Michael Ngilangwa, a teacher convicted under Section 25 for demanding sexual intercourse

from a student in exchange for favourable treatment. In 2010, the Resident Magistrate's Court at Iringa sentenced him to a fine of only 500,000 Tanzanian shillings (approx. USD 355 at 2010 exchange rates) or, in default, a year's imprisonment³ – a quarter of the minimum fine that applies since the 2024 amendment, and a penalty widely criticised by human rights activists as disproportionately lenient relative to the harm caused (Mandago, 2018; Kambole, 2012).

Other reported cases show that allegations have reached the investigative stage without necessarily producing publicly documented prosecutions. In 2018, a University of Dodoma lecturer was arrested after allegedly soliciting sexual benefits in exchange for examination marks. The PCCB later investigated allegations of sexual corruption at both the University of Dar es Salaam and the University of Dodoma, gathering victim testimony and identifying institutional shortcomings (Africa Press, 2020).

Publicly available data on prosecutions remain limited. Between March 2019 and March 2020, the PCCB's Gender Desk received 31 sexual-corruption case files from 15 regions; 14 were taken to court and 17 remained under investigation (LHRC, 2020). This is a small number compared with the prevalence and under-reporting documented by researchers and civil society organisations. Prosecution is particularly difficult where the exchange takes place in private, corroborating evidence is limited, and victims may be unwilling to testify because of stigma, fear of retaliation or dependence on the perpetrator (Transparency International, 2020).

At least some cases have nevertheless resulted in conviction, most notably *Mwakitalima v Republic*, discussed below.

Judicial decisions

The most significant reported decision is [Godfrey Andilile Mwakitalima v Republic, Criminal Appeal No. 683 of 2021, \[2024\] TZCA 1072](#). In 2021, the High Court upheld the conviction of a lecturer who had demanded sexual favours from a student in exchange for passing grades (Geofrey Mwakitalima vs Republic (DC Criminal Appeal 40 of 2020)). The prosecution relied on the student's testimony, electronic communications and evidence gathered through a PCCB-controlled operation, with the High Court finding that the electronic evidence corroborated her account. The Court of Appeal upheld the conviction in 2024, rejecting challenges concerning, among other issues, the admissibility and authentication of the electronic communications. The case confirms the application of Section 25 to sexual demands linked to academic grades and illustrates how digital and independently gathered evidence can support victim testimony where the demand itself takes place in private.

³ At the time of Ngilangwa's conviction, Section 25 provided for a fine not exceeding TSh 5 million or imprisonment for up to three years, or both. The Prevention and Combating of Corruption (Amendment) Act 2024 subsequently increased the penalty to a fine of TSh 2–10 million or imprisonment for five to ten years.

As Section 25 has generated few reported judgments, the available case law is too limited to identify a consistent approach to sentencing or other questions of judicial interpretation.

Institutional coordination

The anti-corruption design is strong along the PCCB–prosecution axis, but its systematic articulation with gender-based violence (GBV) response institutions appear less formalised in the evidence reviewed. The programme examined by EBA shows collaboration between the PCCB and educational and social actors, which is promising, but this falls short of an integrated national protocol obliging coordination between criminal investigation, psychosocial support, healthcare, employment measures and victim protection (Eldén & Bjarnegård, 2022).

The EBA study points to a more concrete difficulty underlying this lack of formalisation: an absence of clarity as to who is responsible for what once a case comes to light — how far the head of an institution is expected to investigate before escalating, at what point the Ministry becomes involved, and when the matter should properly pass to the PCCB. Informants interviewed for the study described the applicable rules as unclear even at ministerial level, suggesting that the ambiguity is not merely a gap between agencies but one that persists within the chain of authority meant to resolve it (Eldén & Bjarnegård, 2022, p. 27).

This is one of the principal silo risks in the field: if a case reaches only the disciplinary office as sexual harassment, its corruption dimension may be lost; if it reaches only the PCCB as corruption, its dimension of trauma, safety and GBV may be lost. The wider literature on sexual corruption has repeatedly identified this divide between anti-corruption and GBV frameworks as an obstacle to reporting, effective prosecution and access to appropriate support (Transparency International, 2020) (France, 2022).

Civil society participation

Civil society is the most consistently active actor in the Tanzanian case. This was particularly visible in 2024, when the Anti-Sextortion Coalition, comprising around 200 organisations, publicly opposed the proposed amendment to Section 25 and had previously submitted recommendations to the PCCB. The concerns raised by civil society and activists were subsequently taken up by the Parliamentary Committee on Constitution and Legal Affairs, which recommended changes to the Bill that were ultimately accepted by the Government (IPP Media, 2024).

This advocacy has taken place within a broader civic environment that remains constrained. Tanzania has a diverse and active civil society sector, but human rights and governance organisations have faced restrictive regulation, legal harassment and arrests. Freedom House downgraded the country from ‘Partly Free’ to ‘Not Free’ in 2024. Against that background, the mobilisation around Section 25 is a notable example

of civil society advocacy translating into a concrete legislative outcome (Freedom House, 2025).

Madagascar

The sexual corruption legal framework

Madagascar's current legal framework is built upon a combination of general criminal provisions and broad anti-corruption offences whose application to sexual favours has developed only gradually through institutional practice and judicial interpretation.

The principal reform of the country's anti-corruption framework came with [Law No. 2016-020 of 22 August 2016 on the Fight against Corruption](#), enacted following concerns that corruption had continued to expand despite earlier national strategies and institutional reforms. The legislation modernised corruption offences, strengthened protections for whistleblowers and witnesses, expanded the investigative powers of the Bureau Indépendant Anti-Corruption (BIANCO), and consolidated Madagascar's institutional framework in line with international standards.

Within that framework, Article 177 of the Penal Code, as amended by Law No. 2016-020, criminalises passive corruption by public officials who solicit or accept offers, promises, gifts or *avantages quelconques* (benefits of any kind) in connection with the exercise of their functions, while Article 177.1 establishes the corresponding offence of active corruption. Article 179.1 further criminalises the abuse of public office where an official performs or omits an act contrary to law or regulation in order to obtain an *avantage indu* for themselves or another person or entity, punishable by two to five years' imprisonment and a fine of one to ten million ariary (approx. USD 2,300). Although neither provision refers expressly to sexual acts, the concepts of *avantage quelconque* and *avantage indu* are arguably broad enough to encompass non-pecuniary benefits. Whether they do so is, however, a matter of judicial interpretation; the sources reviewed for this paper identify no judicial guidance on the point, and the first decision expressly treating sexual relations as such a benefit was handed down only in 2025 (see below).

Alongside these public-sector corruption offences, Article 333 bis of the Penal Code addresses abuses of authority in employment and service relationships. Rather than constituting a corruption offence *stricto sensu*, it criminalises conduct whereby a person conditions the performance of a service or an act falling within their functions on the granting of sexual acts or demands such benefits before assisting another person to obtain any favourable decision. The offence carries a penalty of one to three years' imprisonment and a fine of between one and four million ariary (approx. USD 900). Although enacted well before the contemporary debate on sexual corruption, Article 333 bis has become one of the principal criminal provisions available to address *quid pro quo* sexual demands in Malagasy law (Ministère de la Justice, n.d., p. 427).

The institutional framework established by Law No. 2016-020 comprises the Comité pour la Sauvegarde de l'Intégrité (CSI), BIANCO, the specialised Pôles Anti-Corruption (PAC), SAMIFIN, and the asset recovery agency. BIANCO is responsible for prevention, investigation and public education, while the PAC exercise specialised jurisdiction over the investigation, prosecution and adjudication of corruption and related offences. Neither the law nor the legislation establishing these institutions expressly refers to sexual corruption.

The legislative gap has also been acknowledged by Madagascar's own institutions. In November 2023, the CSI unveiled a [draft bill](#) on sexual corruption, prepared in consultation with the Ministry of Justice, the judiciary, BIANCO, the PAC, law enforcement agencies and civil society organisations. The proposal would establish a statutory definition of sexual corruption while strengthening protections for victims and whistleblowers, reflecting the view that the existing legal framework did not address the phenomenon with sufficient clarity (2424, 2023; CSI, 2023). As of September 2026, however, the bill had not been enacted.

Implementation dimensions

Reporting mechanisms

Madagascar has established a number of formal reporting channels for corruption complaints, including those involving sexual corruption. Law No. 2016-020 devotes an entire chapter to the protection of whistleblowers and witnesses. Article 58 prohibits retaliation against individuals who report corruption, while the preceding provisions require BIANCO to preserve the confidentiality of complainants' identities, subject only to limited judicial exceptions where disclosure is considered indispensable.

In addition to these statutory safeguards, BIANCO launched [i-Toroka](#) ("Dare to Report") in 2019, a secure online platform allowing anonymous corruption complaints to be submitted electronically. As complainants may make initial contact without immediately revealing their identity, the platform has the potential to reduce one of the principal barriers associated with reporting sexual corruption, where fear of exposure frequently discourages victims from approaching the authorities (Bergin, 2024, p. 45).

These safeguards, however, operate within Madagascar's broader whistleblower protection framework, which remains relatively underdeveloped. Comparative assessments of the country's legal framework note that Madagascar has yet to establish a comprehensive standalone whistleblower protection regime comparable to emerging international standards, while successive legislative initiatives have failed to produce a fully autonomous protection system (TI Madagascar, 2021). In the context of sexual corruption, where victims often depend upon the very individuals abusing their authority, protection against retaliation is only one element of an effective reporting framework. International guidance emphasises that victims also require safe, confidential and gender-sensitive reporting mechanisms, access to legal and

psychosocial support, and procedures capable of addressing the particular difficulties associated with reporting and proving sexual corruption (Transparency International, 2020) (Bjarnegård, Calvo, Elden, & Lundgren, 2025).

The available evidence nevertheless points to persistent under-reporting of sexual corruption. Research conducted by TI Madagascar under the CORSEX and [CORSEX-EDU](#) projects (2021–2022), based on surveys of more than 8,500 respondents across five regions, 67% of whom were women and including students, parents and teachers, found that most victims chose not to report incidents of sexual corruption. Respondents cited fear of professional or academic repercussions, the absence of institutions with dedicated procedures for handling sexual corruption complaints, and a lack of confidence that complaints would result in effective action as the principal reasons for remaining silent. Teachers' unions interviewed during the study further alleged that informal protection networks within educational institutions discouraged victims from pursuing formal complaints (TI Madagascar, 2022).

Prosecution of cases

Madagascar has no specialised offence or prosecutorial framework for sexual corruption. Consequently, the treatment of individual cases depends largely on how investigators and prosecutors choose to characterise the underlying conduct.

Nevertheless, judicial practice suggests that at least some forms of sexual corruption can be prosecuted through existing anti-corruption offences, despite the absence of a dedicated offence. In 2025, the PAC of Mahajanga issued what was widely reported as the country's first decision explicitly recognising sexual benefits as an *avantage quelconque* under the anti-corruption legislation, in proceedings against a university lecturer who had demanded sexual acts from a student in exchange for academic grades (L'Express, 2025; Rafitoson K. , 2021). The decision reflects an emerging prosecutorial and judicial approach under which sexual corruption is treated as a form of corruption notwithstanding the absence of an express statutory offence.

The need for greater legal certainty has also been recognised institutionally. The draft bill on sexual corruption presented by the CSI in 2023 proposed a statutory definition of the offence together with a dedicated legal framework, reflecting the view that reliance on interpretation of the existing anti-corruption provisions alone is insufficient (CSI, 2023, p. 23).

Judicial decisions

Publicly available case law on sexual corruption in Madagascar appears to be extremely limited. In fact, the PAC itself described its 2025 Mahajanga ruling as a “pioneering decision” while contemporary reporting characterised it as a jurisprudential first and noted that sexual corruption had until then rarely been prosecuted (L'Express, 2025).

Against that background, the proceedings before the PAC of Mahajanga in 2025 assume particular significance. The case concerned a university lecturer who had offered a

student favourable examination grades in return for sexual relations. The prosecution proceeded based on passive corruption, and the court accepted that sexual relations could constitute “presents or advantages of any kind” within the meaning of Articles 177 and 177.1 of the Criminal Code. The PAC described the ruling as a pioneering decision on sexual corruption (PAC, 2025). As in Tanzania, the leading case arose in higher education, where students depend on lecturers for grades and academic progression.

Institutional coordination

Madagascar's anti-corruption framework benefits from a well-established institutional architecture, centred on the CSI, BIANCO and PAC. Sexual corruption, however, requires coordination beyond the anti-corruption system. In the Malagasy context, the relevant counterparts include the ministries responsible for justice, population and the promotion of women, health and education, as well as the Police and Gendarmerie. Existing GBV services are particularly relevant: the Centres d'Écoute et de Conseil Juridique (CECJ) provide psychosocial and legal assistance and refer survivors to medical and other services, while the Centres de Prise en Charge Intégrée (CPCI) are designed to provide medical, psychosocial, legal and socio-economic support in a single setting.

Although the 2023 draft law on sexual corruption was prepared through a multi-sectoral process bringing together these actors, the available evidence does not indicate that this cooperation has developed into permanent operational arrangements or formal referral protocols for handling sexual corruption cases. The principal challenge therefore appears to lie not in the absence of institutions, but in the absence of an integrated response capable of linking anti-corruption enforcement with victim protection and specialised support services (2424, 2023).

Civil society participation

Civil society has played a central role in shaping Madagascar's response to sexual corruption, with TI Madagascar acting as the principal source of empirical research, public awareness and policy advocacy on the issue. Its broader citizen-support infrastructure also includes the Centres d'Assistance Juridique et d'Action Citoyenne (CAJAC), which provide channels through which victims and witnesses of corruption can seek assistance and submit reports, including anonymously (TI Madagascar, n.d.).

Beyond documenting the phenomenon, TI Madagascar has actively promoted legal and institutional reform. Its recommendations have included the express recognition of sexual corruption within integrity frameworks, stronger preventive measures and disciplinary sanctions, and the adoption of the [Pacte d'Intégrité Corporelle](#) dans l'Éducation et l'Enseignement Supérieur (PICEES). Developed through consultation with education-sector stakeholders, the PICEES sets out measures covering prevention, reporting, protection and support within educational institutions (TI Madagascar, 2022).

Although a specific sexual-corruption offence has yet to be adopted, existing corruption provisions have provided some scope for addressing the conduct.

Civil society organisations have also increasingly collaborated with public institutions. A recent example is Alternatives Madagascar's 2026 Campus pour l'égalité campaign, delivered jointly with BIANCO at the University of Ambondrona to raise awareness of sexual corruption and encourage students to report abuses (BIANCO, 2026).

Rwanda

The sexual corruption legal framework

Rwanda offers one of the most instructive comparators available, as its [Law No. 54/2018](#) of 13 August 2018 on Fighting Against Corruption folds sexual corruption into both the general definition of corruption and as a dedicated offence, rather than leaving it to be inferred from broader bribery or harassment provisions. The law also has an unusually wide institutional reach: under Article 3, it binds public bodies, private institutions, civil society organisations and international organisations operating, or seeking to operate, in Rwanda — a considerably broader net than the one typically cast around classic public-sector bribery offences.

[Article 2](#) defines corruption to include the soliciting, receiving or offering of an illicit benefit with a view to the unlawful acquisition of enrichment or of a favour of a sexual nature, given in exchange for rendering a service or carrying out an activity.. The bilateral wording warrants some caution. Rwanda-specific research conducted before the adoption of the 2018 Law had already identified the need to clarify whether both parties should be criminalised where sexual favours are offered rather than extorted (Camargo, Kassa, & Stahl, 2017, p. 4). Available evidence of its application, however, does not indicate that persons subjected to sexual demands have been treated as offenders; published cases and recent TI Rwanda research instead describe them as victims and direct criminal responsibility towards the person soliciting or exploiting the sexual act (TI Rwanda, 2022).

The operative offence sits in Article 6, "Soliciting or offering sexual favours". It reaches anyone who, by whatever means, solicits, accepts or promises a favour of a sexual nature, subjects another person to such a favour, or accepts a promise of one, with the aim of rendering or withholding a service. The ordinary penalty is imprisonment of more than five and up to seven years, together with a fine of between one and two million Rwandan francs (approx. USD 1.360); where the sexual act is sought so that the beneficiary will render a service that is itself unlawful, the penalty rises to more than seven and up to ten years, with a correspondingly higher fine (KT Press, 2022).

These ranges place the offence on a broadly comparable footing with the law's other serious corruption offences under the same law. More significantly, from a comparative perspective, Rwanda is among the small number of jurisdictions to have expressly

criminalised sexual corruption as corruption in its own right, rather than relying exclusively on general bribery, abuse-of-authority or sexual-misconduct provisions (Castro, 2026).

Two adjoining provisions extend the same logic. Article 7 brings the sexual element into trafficking in influence, providing a specific sanction where influence is exercised in return for the receipt or promise of a sexual favour. Article 24, by contrast, sits somewhat apart: it criminalises the sexual harassment of a subordinate by an employer or anyone else exercising authority over them, and offers a route to liability that overlaps with, but is analytically distinct from, Article 6 — harassment does not require the exchange-for-a-service structure that defines sexual corruption proper, so the two offences will not always be available on the same facts.

Institutionally, the 2018 law replaced weaker predecessor legislation from 2003 and 2012, bringing corruption offences more fully within the criminal law and consolidating the response around three bodies: the Office of the Ombudsman as coordinating institution, the Rwanda Investigation Bureau (RIB) as the investigative authority, and the National Public Prosecution Authority (NPPA), which prosecutes before specialised corruption chambers at the Intermediate Court level.

Implementation dimensions

Reporting mechanisms

Rwanda's reporting architecture is comparatively well developed. Victims can report corruption to the Office of the Ombudsman through multiple channels, including a toll-free hotline (199), free SMS (1990), email, institutional complaint boxes, written submissions and direct contact with Ombudsman officials. The availability of multiple reporting pathways is particularly valuable in cases of sexual corruption, where victims may be unable to safely use institutional reporting mechanisms or report through supervisory hierarchies controlled by the alleged perpetrator.

In parallel, the [Isange One Stop Centres](#), now operating in district hospitals across the country, provide integrated medical, forensic, legal and psychosocial support to victims of GBV through a nationwide network and 24-hour services that has been recognised internationally as a model of good practice (Police RW, 2015). However, these centres were designed to respond to GBV more broadly rather than to corruption-related abuses of entrusted authority, and there is no evidence that they function as dedicated reporting mechanisms for sexual corruption (UN Rwanda, 2019).

Rwanda also has a statutory [whistleblower protection framework](#), strengthened through reforms adopted in 2017. Law No. 44bis/2017 requires disclosures to be handled confidentially and recorded using a code in place of the whistleblower's identity, prohibits retaliation including dismissal, discrimination, threats and harassment, and provides administrative and judicial remedies for those subjected to reprisals.

Retaliation against a whistleblower is itself a criminal offence (Law No. 44bis/2017, Arts. 10–11, 14 and 17).

Nevertheless, civil society assessments of UNCAC implementation continue to identify significant practical shortcomings. A 2025 parallel review concluded that the legal framework still provides limited scope for anonymous reporting, that the presidential instrument required to operationalise key aspects of protection had not yet been adopted, and that awareness of whistleblower rights remained low, particularly outside major urban centres (UNCAC Coalition, 2025a). These concerns remained unresolved in 2026, with both civil society organisations and the Office of the Ombudsman continuing to call for the adoption of the implementing instrument (Parliament Rwanda, 2025).

Beyond state institutions, [TI-Rwanda's Advocacy and Legal Advice Centre \(ALAC\)](#) offers free and confidential advice to victims and witnesses of corruption. Such independent intermediaries may be especially valuable in sexual corruption cases, where victims often distrust reporting directly to the institution in which the perpetrator exercises authority. Even so, available evidence suggests that the principal barriers lie less in the formal availability of reporting channels than in victims' willingness to use them (TI Rwanda, 2019).

Empirical research by TI-Rwanda on gender-based corruption in workplaces identifies fear of retaliation, perceptions that reporting will not lead to meaningful action, and evidentiary difficulties as the main reasons for under-reporting (TI Rwanda, 2022). Similar patterns emerge from its research in higher education, where students rarely use formal complaint mechanisms despite their existence, reflecting persistent concerns about stigma, dependency on those exercising power over them, and the perceived futility of reporting (Healion, 2025).

Prosecution of cases

The principal implementation challenge in Rwanda lies not in the absence of a criminal offence but in its limited visibility in enforcement practice. Although the law expressly criminalises the solicitation or acceptance of sexual favours as an undue advantage, promise or offer of sexual favours, an analysis of conviction lists periodically published by the Office of the Ombudsman found that monetary bribery and embezzlement appeared frequently, whereas convictions involving the solicitation, promise or offer of sexual favours were almost entirely absent (Healion, 2025). This contrasts with the organisation's qualitative research, which documents repeated accounts of sexual corruption, particularly within higher education, suggesting a substantial gap between the apparent prevalence of the conduct and its translation into criminal proceedings (TI Rwanda, 2025).

The best documented example of successful enforcement concerns a university lecturer who was prosecuted and sentenced to five years' imprisonment after a student, identified under the pseudonym "Jovia", disclosed the abuse to her father. The matter was subsequently referred to TI-Rwanda, which engaged the RIB, ultimately leading to

the lecturer's prosecution and conviction. While a single case cannot demonstrate systematic enforcement, it shows that Rwanda's legal framework can be translated into successful criminal prosecution when cases are effectively investigated (TI Rwanda, 2025, pág. 15; Healion, 2025). **As in Tanzania and Madagascar, the best-documented case comes from higher education. This may partly reflect where research and advocacy have concentrated rather than the limits of the problem: TI Rwanda's research also documents sexual corruption in the workplace (TI Rwanda, 2022).**

Judicial decisions

The limited availability of judicial decisions remains one of the principal obstacles to assessing the practical operation of Rwanda's sexual corruption offence. Although at least one successful prosecution has been publicly documented, there is no accessible body of case law that would allow analysis of how courts interpret core elements of the offence, including the meaning of a "sexual favour", the evidential threshold required to establish the offence, or the relationship between coercion, consent and abuse of authority (TI Rwanda, 2025).

The scarcity of publicly available decisions also limits the development of consistent enforcement practice. Without accessible judicial reasoning, investigators and prosecutors have few precedents from which to draw when applying a relatively recent and uncommon offence.

Institutional coordination

Rwanda has the most developed institutional coordination framework among the four jurisdictions examined, although it was not designed specifically to address sexual corruption. The anti-corruption regime led by the Office of the Ombudsman, the RIB and the National Public Prosecution Authority operate alongside a well-established GBV framework centred on the Gender Monitoring Office (GMO) and the Isange One Stop Centres. The latter brings together the Ministries of Gender and Family Promotion, Health, Justice and Local Government, as well as law enforcement and prosecutorial authorities, through regular multi-sectoral coordination and monitoring mechanisms (GMO, 2025).

Coordination extends beyond the co-location of services. Standard operating procedures govern the multidisciplinary response, while the GMO conducts joint monitoring of Isange centres with RIB, the NPPA, relevant ministries and hospital authorities. Referral arrangements allow victims entering through health facilities, law enforcement, prosecution services, local authorities, legal-aid providers or civil society organisations to be directed to an Isange centre for assessment and access to appropriate services, with further coordination at district level during reintegration. This provides an established pathway from reporting to medical, psychosocial, legal and investigative support, although the available evidence does not indicate that a specific referral protocol has been developed for cases involving sexual corruption (MIGEPFOP, 2024).

Civil society participation

As discussed earlier, civil society has played a central role in bringing sexual corruption onto Rwanda's anti-corruption agenda. TI-Rwanda has combined empirical research with sustained advocacy, helping to establish dedicated reporting mechanisms and encouraging institutional responses to a form of corruption that had previously received little official attention. Its work has also provided much of the evidence base on which subsequent policy and institutional initiatives have been built (TI Rwanda, 2025).

The organisation's work has also contributed to institutional change. Following its research and advocacy, the Office of the Ombudsman established victim support helpdesks, several universities introduced anti-sexual harassment policies, and student Anti-Corruption Clubs expanded awareness-raising activities on university campuses. At the same time, TI-Rwanda notes that stigma, victim blaming and entrenched social norms continue to discourage disclosure, underscoring that sustained civil society engagement remains essential to translating legal reform into effective implementation.

TI-Rwanda's work sits within a wider civil society infrastructure addressing the gender-based harms that frequently accompany sexual corruption. Rwanda Women's Network, for example, operates 24 women's safe spaces across 12 districts, providing survivors of gender-based violence with psychological counselling and referrals to legal and medical services, alongside community awareness and advocacy on women's rights. Other organisations working on GBV, women's rights and legal empowerment similarly provide forms of support that may be relevant to victims of sexual corruption, even where their programmes do not frame the abuse expressly as corruption. This broader ecosystem is important because an effective civil society response requires both the corruption-focused advocacy developed by TI-Rwanda and access to organisations equipped to address the gender-based violence, dependency and support needs that may accompany the abuse.

Sri Lanka

The sexual corruption legal framework

Sri Lanka adopted a conceptually distinct approach to sexual corruption by integrating sexual favours into the general law of bribery rather than creating a standalone offence. Under the former Bribery Act 1954, the concept of "gratification" was generally understood as referring to pecuniary or material benefits and did not expressly extend to sexual conduct, leaving prosecutors to rely on expansive interpretations of ordinary bribery provisions where public officials demanded sexual acts in exchange for official decisions. Reform gathered momentum during the broader overhaul of Sri Lanka's anti-corruption framework undertaken to strengthen compliance with the UNCAC and governance commitments associated with the IMF reform programme (IMF, 2023, p. para. 30). At the same time, [Commission to Investigate Allegations of Bribery or Corruption](#) (CIABOC) and civil society organisations, particularly the Centre for Equality

and Justice through its *Open Secret* campaign, advocated for the explicit recognition of sexual bribery within the new legislation (De Soysa, 2020).

The resulting [Anti-Corruption Act, No. 9 of 2023](#) fundamentally restructured the legal framework. Rather than establishing a separate offence of sexual bribery, it redefined the concept of "gratification" to include a "sexual favour" alongside money, property, employment, contracts and other benefits. The Act further defines a sexual favour broadly to encompass sexual intercourse and other physical, verbal or non-verbal conduct of a sexual nature, including conduct facilitated through information and communication technologies. The legislation also extended bribery offences to the private sector for the first time and reconstituted the CIABOC with enhanced investigative and prosecutorial powers.

Embedding sexual acts within the general architecture of bribery has the advantage of treating sexual and financial gratification as legally equivalent, avoiding the creation of a separate or lesser category of corruption. At the same time, the drafting gives rise to an important doctrinal concern. As bribery under the Act encompasses the offer, solicitation and acceptance of any gratification, the legislation does not expressly distinguish between the public official abusing a position of authority and the individual compelled to provide the sexual favour. Unlike the Tanzanian model, the statute contains no explicit exemption protecting victims who comply under coercion. This omission attracted criticism during the legislative process, with the Women Parliamentarians' Caucus and civil society organisations calling for an express distinction between perpetrators and victims to ensure that those subjected to abuse of power would not be exposed, at least in theory, to criminal liability (Parliament LK, 2023).

Implementation dimensions

Reporting mechanisms

The Anti-Corruption Act permits complaints to be submitted to the CIABOC orally, in writing or by electronic communication, with procedural safeguards for oral complaints and a statutory duty on public authorities and law enforcement agencies to refer suspected corruption offences to the Commission. Complainants are entitled to receive basic updates on the progress of investigations and, where a case is discontinued, may request the reasons for that decision. The Act also establishes a dedicated protection regime for whistleblowers, witnesses and others assisting CIABOC, including safeguards against retaliation and access to legal representation, while expressly recognising victims as persons who have suffered physical, psychological, emotional or economic harm because of an offence under the Act. These provisions address several of the procedural barriers commonly associated with reporting sexual corruption, particularly uncertainty over case handling and fear of reprisals.

Practical accessibility, however, remains more uneven. CIABOC is headquartered in Colombo, which can create practical barriers for complainants outside the capital. Civil society has partly addressed this gap: Transparency International Sri Lanka (TI- Sri Lanka), through its Mobile Advocacy and Legal Advice Clinics has operated mobile legal clinics that bring independent advice and assistance on corruption complaints closer to communities outside Colombo. Earlier, TI-Sri Lanka research found that women preferred these face-to-face mobile services over urban offices or telephone hotlines, highlighting the importance of proximity and personal trust when reporting conduct as sensitive as sexual corruption (TI Sri Lanka, 2014; Castro, 2026).

Prosecution of cases

Before the legislative reform, the CIABOC, working with the Centre for Equality and Justice (CEJ), had already introduced specialised training for investigators, legal officers and prosecutors on identifying, investigating and prosecuting sexual bribery, with particular emphasis on its gendered dimensions and the evidential challenges these cases present. CIABOC's 2022 Annual Performance Report records training delivered to approximately 190 officers, while CEJ reports that seven dedicated workshops were conducted for investigation officers, legal officers and prevention officers between June and August 2022 using a victim-survivor-centred approach (CIABOC , 2022). This capacity-building accompanied an enforcement practice that was already capable of reaching sexual demands under the previous legal framework, although without the express statutory recognition introduced in 2023.

The early implementation of the Anti-Corruption Act provides some evidence that the new offence is being used operationally. In January 2024, CIABOC conducted the first private-sector raid under the Anti-Corruption Act, arresting the Human Resources Manager of a hotel in Dambulla for allegedly attempting to obtain a sexual bribe from a female employee (CIABOC, 2024, p. 10). In October 2024, CIABOC filed indictments in the Colombo High Court against the Officer-in-Charge of the Wanathawilluwa Police Station for allegedly soliciting a sexual bribe. The Commission identified the operation as one of the year's significant investigations, indicating that the express recognition of sexual gratification under the 2023 Act has begun to translate into investigative practice rather than remaining a purely symbolic reform.

The scale and outcomes of this enforcement remain much harder to establish. CIABOC reported 75 cases filed under the new Anti-Corruption Act between March and December 2024, and its subsequent reports document continued investigative and prosecutorial activity. Yet published statistics continue to classify cases principally under aggregate bribery and corruption categories, without a separate statistical series for cases involving sexual gratification. Neither the 2025 Progress Report nor the report covering January to April 2026 provides disaggregated data on sexual-corruption cases. Individual cases can therefore be identified from CIABOC's case releases, but the available data do not permit a systematic assessment of how frequently such allegations are investigated, prosecuted or resulting in conviction (CIABOC, 2025; CIABOC, 2026).

Judicial decisions

Sri Lanka's courts first grappled with sexual corruption nearly three decades before the current statutory framework existed. In [Kathubdeen v. Republic of Sri Lanka \[1998\] 3 Sri LR 107](#), the Court of Appeal upheld the conviction of a public official on four counts of soliciting and attempting to obtain sexual intercourse from a complainant as a condition for arranging her transfer. The Court read the Bribery Act's definition of "gratification" — "any other service, favour or advantage or any description whatsoever" — broadly enough to capture non-pecuniary sexual demands, holding that gratification extends to whatever affords satisfaction to bodily or mental appetite, sexual intercourse included, and that attempt under section 25(1) of the Act is punishable on the same footing as the completed offence.

The most significant judicial development since then came in May 2025, when the Colombo High Court convicted former Divi Neguma Development Officer J. M. Ruwan Pradeep Madushanka on four counts of soliciting a sexual bribe. The complainant, a low-income mother of three, had approached the officer for help obtaining Samurdhi benefits and assistance for her son's kidney condition; the officer conditioned his assistance on a sexual encounter and was arrested following a Bribery Commission operation (Sunday Times, 2025). CIABOC's 2025 Annual Performance Report independently records the conviction of a Divi Neguma Development Officer during that year.

The 2025 case is notable because the underlying conduct pre-dated the Anti-Corruption Act 2023 and was therefore prosecuted under the former Bribery Act, which — as in Kathubdeen — did not expressly name sexual favours as a form of gratification (Adaderana, 2025).

Sentencing in the 2025 case was severe, though its structure warrants care in description. The High Court imposed twenty years' rigorous imprisonment across the four counts, ordered to run concurrently for an effective ten-year term, together with a fine of LKR 20,000 (approx. USD 60) and loss of civic rights. According to contemporaneous media reports, Judge Adithya Kumara Patabendi regarded the complainant's vulnerability and the defendant's abuse of his publicly funded position to obtain a sexual benefit from a woman seeking government assistance as aggravating factors warranting a severe sentence (Daily Mirror, 2025).

Beyond these two cases, verifiable judicial data on sexual bribery in Sri Lanka remains thin.

Institutional coordination

The Anti-Corruption Act 2023 strengthens institutional coordination within Sri Lanka's anti-corruption framework by requiring public authorities that become aware of conduct amounting to an offence under the Act to refer the matter to the CIABOC. The Act also authorises the Commission to conduct joint investigations, obtain information from

other public authorities and cooperate with competent institutions where necessary for the investigation or prosecution of offences. In addition, complainants and witnesses fall within the protection of [Sri Lanka's Assistance to and Protection of Victims of Crime and Witnesses Act](#), providing a statutory link between anti-corruption enforcement and the national witness protection regime.

Coordination is less developed, however, at the intersection between anti-corruption enforcement and gender-based violence services. Neither the Anti-Corruption Act nor publicly available institutional guidance establishes a dedicated referral pathway between CIABOC and agencies responsible for gender-based violence or victim support when complaints involve sexual bribery. As a result, a complainant reporting sexual corruption to CIABOC is not automatically connected with the psychosocial, medical or legal assistance that would ordinarily accompany a gender-based violence referral. This institutional gap has been identified by civil society organisations as one of the practical challenges in implementing the new offence (UN WOMEN, 2020).

Civil society participation

Long before the enactment of the Anti-Corruption Act 2023, the CEJ had framed sexual bribery as both a corruption and a gender equality issue through empirical research, survivor documentation and sustained public advocacy. Its Open Secret campaign combined technical engagement with policymakers on the drafting of the legislation with a nationwide public awareness initiative based on victims' experiences, which CEJ reports reached more than three million people across the country's three official languages. The explicit inclusion of sexual favours within the statutory definition of gratification is widely regarded as one of the campaign's principal legislative achievements.

Civil society organisations have also continued to shape implementation after the legislation entered into force. Rather than treating enactment as the end of the reform process, CEJ and its partners have monitored the operation of the new law, produced guidance for victims and practitioners, and continued to advocate for amendments addressing issues left unresolved by the 2023 Act (CEJ, 2023b) (CEJ, 2022). Among the most prominent is the risk that a victim who complies with a coercive sexual demand could be characterised as a participant in bribery rather than solely as the victim of an abuse of authority (Mawrata News, 2024). The Women's Parliamentarians' Caucus similarly raised this concern during the legislative process, arguing that the offence should clearly distinguish between the public official abusing a position of authority and the person subjected to the demand (Women Parliamentarians Caucus, 2023; Bjarnegård, Eldén, Jayasundara, & Semakafu, 2025) .

Civil society advocacy has also been supported by broader gender-equality organisations. Research undertaken by UN Women and local partners documented how widows, women-headed households and other economically vulnerable women were disproportionately exposed to demands for sexual favours when seeking access to public services and social assistance. That evidence helped situate sexual bribery

within wider debates on gender-based violence, access to justice and public sector accountability, reinforcing the case for recognising it as a distinct form of corruption rather than simply an instance of sexual exploitation (UN Women, 2024).

Emerging patterns: lessons for future legislation and implementation

Read together, the four case studies point less to a single model than to a set of recurring tensions that any country legislating on sexual corruption will need to resolve, and to a smaller set of design choices that appear, on the available evidence, to mitigate them. Combined with the broader literature on sexual corruption, they offer a working reference for legislators, anti-corruption bodies and civil society organisations considering how to draft or strengthen a legal response.

Recurring implementation challenges

The most consistent finding across all four jurisdictions is that under-reporting persists regardless of how the offence is drafted. Sexual corruption combines the barriers associated with corruption and with sexual abuse alike: stigma, fear of retaliation from a perpetrator on whom the complainant often remains dependent, doubt that a complaint will be believed, and uncertainty about what happens once one is made.

These pressures are sharpest where the person demanding sex controls something the victim needs. Higher education is a recurring example: the leading cases in Tanzania, Madagascar and Rwanda all involve university lecturers demanding sex in exchange for grades. Tanzania, Madagascar and Rwanda each document this same combination of causes (Eldén & Bjarnegård, 2022) (TI Rwanda, 2022) (TI Madagascar, 2022) and the wider literature reaches the same conclusion: reporting mechanisms that are not safe and victim-centred can themselves expose complainants to re-victimisation (Bjarnegård, Calvo, Elden, & Lundgren, 2025) (Castro, 2026). Sri Lanka's experience adds a further dimension: of the four jurisdictions with the most developed formal reporting architecture, its own research found that women overwhelmingly preferred face-to-face mobile clinics to hotlines or a centralised office in Colombo (TI Sri Lanka, 2014).

A second, closely related, challenge is the institutional divide between anti-corruption and gender-based-violence response systems. Sexual corruption sits across both fields but fits neatly within neither. The literature identifies different shortcomings on each side: conventional anti-corruption frameworks may capture the abuse of entrusted authority and the quid pro quo exchanges but fail to account adequately for coercion, consent and the position of the person providing the sexual benefit; GBV and sexual-harassment frameworks, conversely, may address the sexual harm while overlooking its corruption dimension, and often confined to particular forms of conducts or relationships, such as employment (De Paolis, 2024) (France, 2022). The difficulty is

also intersectional: the institutional power imbalance on which the corrupt exchange depends may overlap with gender, economic dependency and other forms of vulnerability, shaping both exposure to the abuse and the victim's ability to report it (De Paolis, 2024). The UNCAC Coalition has identified precisely this problem, noting that cases often fall between existing anti-corruption, GBV and anti-discrimination frameworks.

Tanzania's own implementation research illustrates the practical consequence: it found no clarity, even at ministerial level, over who is responsible for a case once it surfaces — the head of an institution, the relevant ministry, or the PCCB — and identified this ambiguity, rather than any gap in the law itself, as the principal obstacle to a coordinated response (Eldén & Bjarnegård, 2022). Madagascar and Sri Lanka show the same structural gap: neither has a formalised referral pathway linking the anti-corruption authority to psychosocial, medical or legal support, so that a complainant approaching BIANCO or CIABOC is not automatically connected to the assistance a GBV referral would ordinarily trigger.

What the Tanzanian, Malagasy and Sri Lankan cases show, in other words, is that cooperation between systems does occur, but is still largely programme-based rather than governed by a permanent referral pathway. Rwanda comes closest to resolving this on paper, but its Isange One Stop Centres were built for gender-based violence generally rather than sexual corruption specifically, and there is no evidence that they function as a dedicated referral channel for cases involving an abuse of official power (UN Rwanda, 2019).

Specialised capacity within the justice system is a third recurring challenge. A distinct offence does not remove the evidential difficulties of conduct that typically takes place in private and is rarely witnessed. Investigators need to understand how authority and dependency operate in these cases and how to collect corroborating evidence — including digital communications — without exposing victims to further risk (Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024). Prosecutors and judges likewise need to distinguish apparent acquiescence from a voluntary transaction between equal parties: the emerging literature stresses that responsibility should remain centred on the abuse of entrusted authority, including where the person subjected to the demand appears to consent to, or even initiates, the exchange (Birdsall, Mulvihill, Yapp, & Richards, 2025).

A further recurring challenge is ensuring that legislative gains are preserved over time. The experience of the jurisdictions examined shows that recognising sexual corruption as a distinct offence should not be treated as the end of the reform process. Victim protections, definitions and the scope of liability remain open to revision whenever legislation is amended, making continued scrutiny essential. Tanzania provides the clearest example. In 2024, a proposed amendment would have extended criminal liability to the person offering a sexualact, effectively removing the protection that Section 25 affords to coerced complainants (The citizen, 2024). Following sustained advocacy by the Anti-Sextortion Coalition and women's rights organisations, the proposal was rejected by the National Assembly (Bjarnegård, Eldén, Jayasundara, & Semakafu, 2025). The episode illustrates that safeguards secured through legislative

reform cannot be assumed to endure without continued legislative and civil society vigilance.

There is also a persistent gap between complaint mechanisms and victim protection or remedy. None of the four jurisdictions fully resolves this. The systems reviewed are generally stronger at receiving complaints than at guaranteeing a continuous pathway from disclosure to protection, healthcare, psychosocial support, legal advice and effective redress — and this need not require building an entirely new infrastructure. Rwanda is a good illustration: it already runs 48 Isange One Stop Centres nationwide, offering free medical, legal and psychosocial services through a multi-sectoral model spanning gender, health, justice, local government, investigators and prosecutor (MIGEPROF, 2026). Yet the available evidence does not establish a dedicated referral route from a sexual-corruption complaint into that system — the implementation lesson is as much about connecting existing institutions as creating new ones.

Finally, sexual corruption remains unusually difficult to measure. The problem goes beyond missing prevalence surveys; administrative data frequently disappear into broader categories of bribery, corruption, sexual harassment or GBV, making it difficult to trace how many complaints become investigations, how many investigations result in charges, and how courts dispose of those charges. Even in Sri Lanka, where CIABOC has publicly reported individual sexual-bribery operations (CIABOC, 2024), its general corruption reporting does not add up to a readily visible sexual-corruption case series. The UNCAC Coalition accordingly recommends systematic data collection disaggregated by gender, age, sector and other relevant characteristics.

Promising practices

The case studies broadly reinforce a number of principles already identified in the academic and civil society literature on sexual corruption. Rather than presenting these as entirely new lessons, the comparison provides practical support for recommendations concerning the design of sexual-corruption offences, victim protection, institutional coordination and reporting (Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024; Bjarnegård, Calvo, Elden, & Lundgren, 2025). Four practices merit particular attention:

- **Defining the offence around the abuse of entrusted authority.** The comparative evidence supports an approach that identifies responsibility through the abuse of authority rather than through the formal structure of an exchange. Tanzania's Section 25 offers the clearest example: it criminalises the person who uses a position of authority to demand or impose a sexual favour, without requiring that the favour actually be provided, and does not expose the person subjected to the demand to corresponding bribery liability. This closely reflects the emerging literature, which treats abuse of entrusted authority as the defining feature of sexual corruption and places responsibility on the person exercising that authority, irrespective of who ostensibly initiated the transaction (Eldén & Bjarnegård, 2022; Bjarnegård, Calvo, Elden, Jonsson, & Lundgren, 2024).

Rwanda likewise recognises sexual favours expressly within its anti-corruption legislation, avoiding the need to stretch concepts designed primarily for pecuniary benefits. Madagascar illustrates the greater uncertainty where no specific offence exists: existing corruption provisions have proved capable of reaching sexual favours, but their application continues to depend on prosecutorial and judicial interpretation rather than an express statutory rule

- **Connecting anti-corruption enforcement with victim-support systems.** The case studies do not support assigning the response exclusively to a single anti-corruption body. Sexual corruption requires both the investigative capacity to address an abuse of entrusted authority and services capable of responding to its gendered and potentially traumatic consequences. This reflects the wider literature, which identifies sexual corruption as lying at the intersection of anti-corruption and gender-based-violence frameworks and highlights the gaps that can arise when it is addressed exclusively through either system (France, 2022) (De Paolis, 2024). Rwanda provides the most developed example among the four jurisdictions: the Ombudsman–RIB–NPPA anti-corruption structure operates alongside the GMO and the Isange One Stop Centres, which provide medical, psychosocial, legal and other support to victims of gender-based violence. The relevant lesson is therefore less about institutional ownership than about an identifiable pathway between enforcement, protection and support. Existing institutions need not be replicated, but responsibilities, referral routes and coordination arrangements should be clear before cases arise.
- **Building victim protection, support and redress into the response.** Accessible reporting channels are necessary but insufficient if disclosure exposes the complainant to retaliation, criminal liability or further harm. The literature accordingly cautions against encouraging victims to report in the absence of adequate legal protection, support and avenues for remedy (Bjarnegård, Calvo, Elden, & Lundgren, 2025). Legislation should, at a minimum, avoid treating a person who acquiesces to a coercive sexual demand as the giver of a bribe; provide effective confidentiality and protection against retaliation; and connect complainants, where necessary, with legal assistance, physical and mental-health support and witness-protection measures. Reporting mechanisms should also be accessible outside the complainant's immediate institutional hierarchy. The case studies illustrate different elements of such an approach. Sri Lanka combines multiple channels for approaching CIABOC with statutory protections for victims, witnesses and whistleblowers, while TI Sri Lanka's mobile legal clinics illustrate the value of trusted, face-to-face avenues through which complainants can obtain independent advice before deciding how to proceed. Rwanda combines remote reporting through the Ombudsman's toll-free hotline and SMS service with a wider GBV support infrastructure through the Isange One Stop Centres, which provide medical, psychosocial and legal services. None of these mechanisms was designed specifically for sexual corruption, but together they illustrate how reporting can be connected to protection and support rather than treated as an end in itself.
- **Recognising civil society as a part of the implementation infrastructure:** Across the four cases, sustained civil society engagement is the single most

consistent driver of both legislative reform and its defence once enacted. Civil society organisations have generated much of the empirical evidence through which sexual corruption became visible as a policy problem, supported complainants, provided legal advice, developed reporting tools, trained practitioners and pressed institutions to address weaknesses exposed during implementation. CEJ's research and advocacy contributed to the recognition of sexual gratification in Sri Lanka's 2023 legislation and has continued to identify gaps in victim protection; TI Madagascar's CORSEX work supplied much of the evidence underpinning advocacy for a dedicated legal framework; and TI Rwanda has combined research with victim support and engagement with universities and anti-corruption institutions. Tanzania provides a further example of civil society engagement extending beyond enactment, including advocacy to preserve the core features of Section 25 when amendments were subsequently proposed. More broadly, emerging research on feminist anti-corruption similarly identifies grassroots and women's-rights organisations as anti-corruption actors in their own right, particularly because they operate close to communities in which the harms of corruption are experienced (Kirya & Peters, 2026). The comparative lesson is therefore not simply that civil society can help secure reform, but that sustained implementation benefits from organisations capable of connecting anti-corruption expertise with gender, victim support and community-level experience.

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