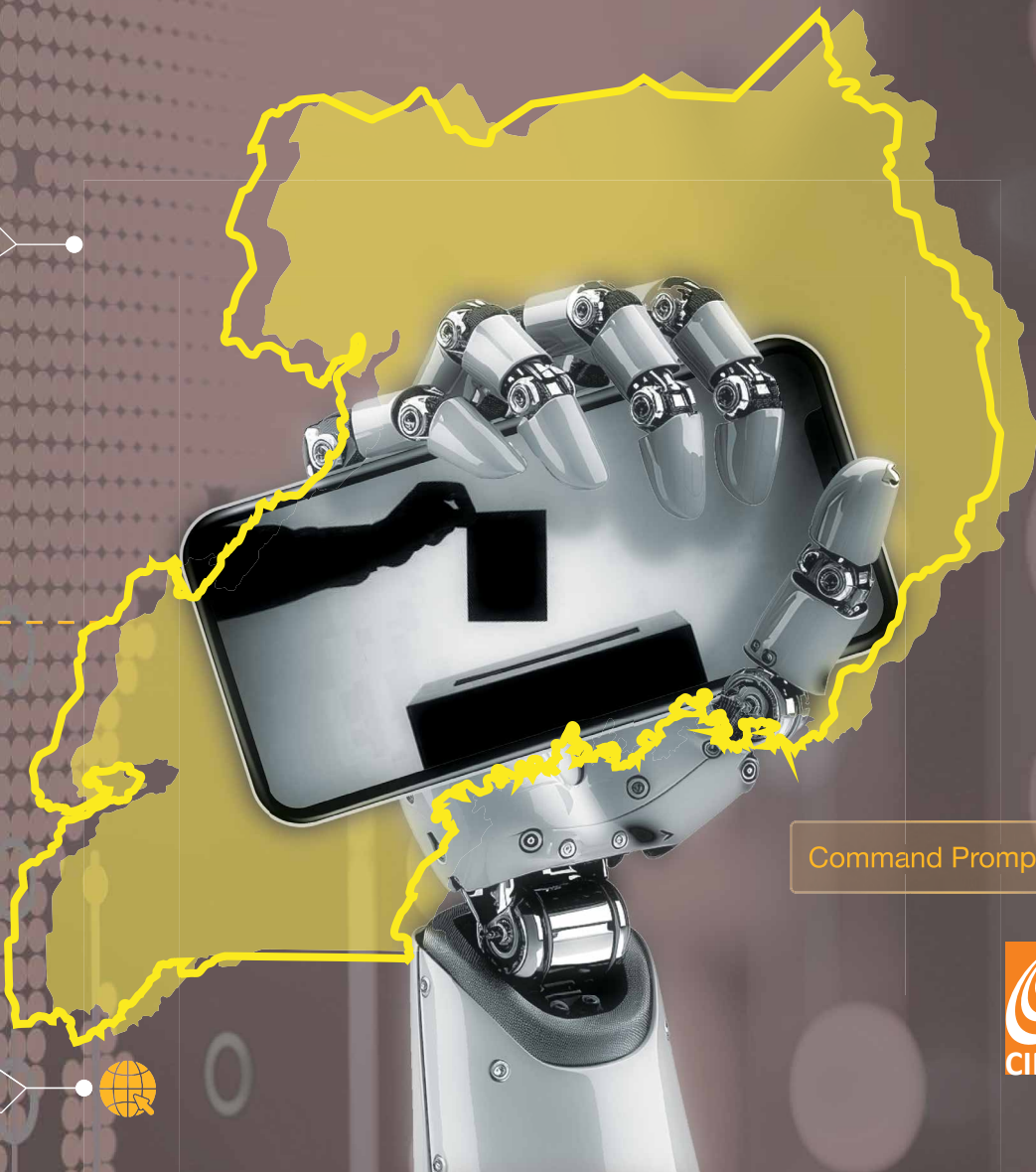


State of Internet Freedom in Africa 2025

# Navigating the Implications of AI on Digital Democracy in Uganda

September, 2025



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State of Internet Freedom in Africa 2025  
Navigating the Implications of AI on Digital Democracy in Uganda  
Written by Edrine Wanyama

*Published September 2025*



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# Acronyms

<b>UCC</b>	Uganda Communications Commission
<b>ICT</b>	Information and Communication Technology
<b>LLMs</b>	Large Language Models
<b>Telecos</b>	Telecommunications Companies
<b>ISPs</b>	Internet Service Providers
<b>Fin-tech</b>	Financial Technology
<b>NLP</b>	Natural Language Processing
<b>UTL</b>	Uganda Telecom Limited
<b>GDP</b>	Gross Domestic Product
<b>IMF</b>	International Monetary Fund
<b>MAAIF</b>	Ministry of Agriculture, Animal Industry and Fisheries
<b>UBOS</b>	Uganda Bureau of Statistics
<b>URA</b>	Uganda Revenue Authority
<b>URSB</b>	Uganda Registration Services Bureau
<b>PDPO</b>	Personal Data Protection Office
<b>STEI</b>	Science, Technology, Engineering and Innovation
<b>4IR</b>	National Fourth Industrial Revolution
<b>NDP III</b>	Uganda's Third National Development Plan
<b>NITA-U</b>	National Information Technology Authority-Uganda
<b>UNESCO</b>	United Nations Educational, Scientific and Cultural Organisation
<b>WOUUNET</b>	Women of Uganda Network
<b>BOU</b>	Bank of Uganda
<b>FIA</b>	Financial Intelligence Authority

# Executive Summary

Artificial intelligence (AI) is part of the technologies shaping the world today, including human rights and digital democracy. AI presents a mix of new benefits and challenges for Uganda's digital economy and democratic participation. On the one hand, it potentially enhances democratic participation, enjoyment of digital rights and could enable socio-economic transformation. On the other hand, AI is highly intrusive, can erode privacy and lead to harm as some AI tools can be used for suppression, control, and curtailment of fundamental rights and freedoms, including freedom of expression, access to information, assembly and association and privacy. Some AI applications can be used for disinformation and misinformation, digital surveillance, and online criminality.

This report highlights the major challenges and benefits presented by AI to Uganda's digital democracy. A qualitative approach was employed to provide a comprehensive analysis of AI's impact on civic space and digital rights in Uganda. Primary and secondary literature was reviewed, including academic, media, government, journal articles and stakeholder reports of local and international media and organisations' writings.

The study generates an understanding of the current developments, benefits, gaps, challenges, debates and issues on AI and its intersection with digital democracy in Uganda. It fundamentally contributes to filling the critical knowledge gaps by examining the impact of AI on civic space and digital rights in the country, and provides recommendations on how to enhance them.

This study establishes that AI presents benefits and challenges. It has fundamentally contributed to service delivery and improvement of the functioning of the health and agriculture sectors, as well as the bridging of the gap between the government and service delivery to the citizens. However, AI has been cited as existing in a largely legal and policy vacuum. It has also enhanced state surveillance, which in turn has had a chilling effect on the freedoms of expression, assembly, and association. AI has contributed to the spread of disinformation and misinformation, which has also given the state the opportunity to curtail digital rights and freedoms. Moreover, AI benefits continue to be limited by the digital divide, which primarily affects rural dwellers, women, the poor and persons with disabilities who have limited access to AI-enabled services and therefore exacerbate socio-economic inequalities.

The study recommends calculated efforts by the government, CSOs, tech companies, academia, media and the public to take strategic actions aimed at promoting responsible, transparent and accountable use of AI. Others include conducting digital literacy campaigns, developing inclusive AI tools by tech companies and the proper application of AI tools, especially by the media, to guard against information distortion and erosion of ethics in the use of AI.

# 1. Introduction

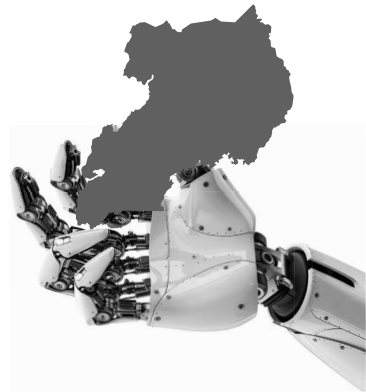
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The world today is fast evolving with technologies being at the heart of democratisation, communication and commerce. This shift of trends is made possible by the increased proliferation of information and communication technologies, which come with a range of promises ranging from enhancing connectivity to being tools that facilitate participation, accountability and transparency. However, time is proving that the envisaged benefits are instead getting overshadowed by misinformation, disinformation, digital surveillance and criminality in the online spaces.

AI refers to the use of technologies, including machines and software, which have high intelligence capacities that would have otherwise been performed by humans.<sup>1</sup> AI is very efficient and surpasses human knowledge, competencies and capacities to deliver to meet specific goals.<sup>2</sup> AI has raised the anticipated benefits and elevated fears associated with it, with utopian promises on the one hand and dystopian risks on the other.<sup>3</sup> Additionally, AI comes with enhanced capacities for navigating and utilising online systems. Generation of content and data analysis are now done with ease. Furthermore, automated decision-making in the advent of technologies presents multiple issues for democracies, which call for re-evaluation.

With a nascent scope of technology, especially the application of AI, Uganda is in a position that requires it to understand AI and its intersection with its digital economy, including democratisation. Moreover, the majority of Uganda's population is composed of youth, with the increased application of technologies presenting a somewhat complex terrain with a hunger for use and application by these citizens, while the state is hyped to control the space.<sup>4</sup> In the same vein, the state has previously been cited in the use of AI to shape disinformation narratives campaigns to manipulate public views and opinion and accelerate social divisions.<sup>5</sup>

The development of AI and its implications requires calculated efforts to mitigate the risks and threats it poses while maximising its potential benefits, including purging democratic deficits and promoting effective application of technologies to harness health information flow and build trust of the public in public institutions and political leaders.<sup>6</sup> In the period leading to the 2021 general elections, Meta and X removed content that was linked to government efforts to manipulate content and incline it to shape positive narratives that would garner support and debates in favour of the incumbent government.<sup>7</sup>



<sup>1</sup> George F Luger, *Artificial Intelligence: Structures and Strategies for Complex Problem Solving* (6th edn, Addison-Wesley 2009).

<sup>2</sup> Stuart Russell and Peter Norvig, *Artificial Intelligence: A Modern Approach* (4th edn, Pearson 2021).

<sup>3</sup> Shoshana Zuboff, *The Age of Surveillance Capitalism: The Fight for a Human Future at the New Frontier of Power* (PublicAffairs 2019).

<sup>4</sup> Uganda Bureau of Statistics 2024: *The National Population and Housing Census 2024 – Final Report - Volume 1 (Main)*, Kampala, Uganda, <https://nwoya.go.ug/sites/default/files/National-Population-and-Housing-Census-2024-Final-Report-Volume-1-Main.pdf>

<sup>5</sup> *Collaboration on International ICT Policy for East and Southern Africa (CIPESA), An Artificial Intelligence Eco-System for Uganda: A Policy Brief* (CIPESA 2024)

<sup>6</sup> UNESCO, 'Recommendation on the Ethics of Artificial Intelligence' (UNESCO 2021).

<sup>7</sup> Meta, 'Taking Down Coordinated Inauthentic Behavior in Uganda and an Update on Our Work Around the World' (Meta Newsroom, 11 January 2021), <https://about.fb.com/news/2021/01/taking-down-inauthentic-behavior-in-uganda/>

## Study Aims and Objectives

This report showcases how Uganda uses AI in the new digital democracy spaces and its impact on civic space and digital rights in the country. It aims to fill a critical knowledge gap by examining the impact of AI on civic space and digital rights in the country, and to provide recommendations. The study objectives focused on the state of AI in Uganda, its value to Uganda's civic space and digital rights, the main challenges and risks associated with it, including in design, deployment, usage and governance.

# 2. Country Context

## 2.1 Economy

Uganda's population is predominantly young. According to the 2024 National Population Census, the total population is 45,905,417.<sup>8</sup> Of these, males are 22,314,289, while females are 23,591,128. Additionally, 10,769,151 persons (23.5%) are youth. Those aged 15-16 years are 9,751,311 persons (21.2%), and accordingly, those aged 18 years and below constitute half of Uganda's population.<sup>9</sup> Those of voting age constitute 23.5% of the total population.<sup>10</sup>

According to the International Monetary Fund (IMF), as of April 2025, the country's Gross Domestic Product (GDP) stood at USD 64.28 billion.<sup>11</sup> In 2024, the World Bank estimated Uganda's growth to be at 6.0%, up from 5.3% recorded in 2023.<sup>12</sup> These figures tally with the Uganda Bureau of Statistics (UBOS), which noted a similar growth in the financial year 2024/2025 up to UGX 226,344 billion (USD 63.25 million).<sup>13</sup>

## 2.2 ICT Sector

Uganda's Information and Communication Technology (ICT) sector is fast growing with the telecommunications companies (telcos), internet service providers (ISPs) and financial technology companies (Fin-tech) leading. The telcos are dominated by MTN Uganda (22 million subscribers)<sup>14</sup> and Airtel Uganda (16.9 million subscribers),<sup>15</sup> the state-owned Uganda Telecom Limited (UTL) and other small market fraction holders like Lycamobile. Other ISPs include Roke Telkom and Liquid Intelligent Technologies, with a stake in fibre connectivity. The telcos also run mobile money services, while SafeBoda, a ride-hailing company, has integrated payment solutions into its platform. A mix of local and international establishments provides software, cybersecurity and hardware services.

Uganda's total population



45,905,417



22,314,289  
Males



23,591,128  
Females



10,769,151  
youth

<sup>8</sup> Uganda Bureau of Statistics 2024: The National Population and Housing Census 2024 – Final Report – Volume 1 (Main), Kampala, Uganda, <https://nwoya.go.ug/sites/default/files/National-Population-and-Housing-Census-2024-Final-Report-Volume-1-Main.pdf>

<sup>9</sup> Ibid

<sup>10</sup> Ibid., p.225

<sup>11</sup> International Monetary Fund, 'World Economic Outlook (April 2025)' (IMF DataMapper, April 2025) <https://www.imf.org/external/datamapper/NGDPD@WEO/UGA>

<sup>12</sup> The World Bank, 'The World Bank in Uganda: Overview' (World Bank, 3 June 2025) <https://www.worldbank.org/en/country/uganda>

<sup>13</sup> Uganda Bureau of Statistics, 'Preliminary Annual Gross Domestic Product 2024/25' (UBOS Press Release, 29 May 2025) [https://www.ubos.org/wp-content/uploads/publications/AGDP-2024\\_25-PRELIMINARY-ESTIMATES.pdf](https://www.ubos.org/wp-content/uploads/publications/AGDP-2024_25-PRELIMINARY-ESTIMATES.pdf)

<sup>14</sup> MTN Uganda Limited, 'Audited Financial Results For The Year Ended 31 December 2024' (MTN Uganda, 5 March 2025) 5 <https://www.mtn.co.ug/wp-content/uploads/sites/7/2025/03/MTN-Uganda-Limited-FY-2024-Earnings-Release.pdf>

<sup>15</sup> Airtel Uganda Limited, 'Financial Results For The Year Ended 31st December 2024' (Airtel Uganda, 31 December 2024) 1 <https://cdn-webportal.airtelstream.net/website/uganda/assets/pdf/FINANCIAL-RESULTS-FOR-THE-YEAR-ENDED-31ST-DECEMBER-2024.pdf>



**43.2**  
Million  
Mobile subscriptions



**22.3**  
Million  
Mobile  
internet subscriptions



**33.7**  
Million  
active mobile  
money subscriptions

According to the Uganda Communications Commission (UCC), Uganda's connectivity is growing with fibre connectivity (48,336 kilometres), mobile subscriptions (43.2 million), mobile internet subscriptions (22.3 million), active mobile money subscriptions (33.7 million), and Smartphones (18.4 million).<sup>16</sup> In early 2025, the telecom sector generated UGX 1.78 trillion (USD 49.74 billion), an increment from the 2023 Quarter Four revenue of UGX 1.70 trillion (USD 47.51 billion).<sup>17</sup> Additionally, social media plays a critical role in Uganda's ICT sector. Platforms such as WhatsApp, X, Meta, TikTok and YouTube have been instrumental in shaping communication. However, the Meta (Facebook) platform has been blocked by the government since 2021 following a standoff between the state and its owner, Meta Platforms Inc, over government content that was pulled down on grounds of being misleading.<sup>18</sup>

Access to ICTs by the population is fragmented, with urban settlements having better access to a range of ICT services such as faster internet (4G), public Wi-Fi hotspots and more stable electricity in comparison to rural-based counterparts, who are primarily on 2G and 3G networks, have unstable electricity and no Wi-Fi hotspots. Moreover, socioeconomic factors such as poverty and income differences that affect affordability,<sup>19</sup> gender, knowledge, education, and digital literacy gaps have aggravated digital exclusion.<sup>20</sup> The majority of the population relies on mobile networks for connectivity, which tends to be slower. The cost of 1 GB of mobile data in comparison with the Gross National Income (GNI) per capita is still high and falls short of the monthly GNI target of 2% of the UN Broadband Commission's affordability.<sup>21</sup>

## 2.3 Political Environment

Politically, there has been heightened control of the digital space. This has led to curtailment of online civil liberties of political activists, government critics and dissidents, including freedom of expression, access to information, assembly and association with enhanced surveillance. Enhanced surveillance using sophisticated intelligent technologies, including spyware like Pegasus against political opponents, human rights defenders (HRDs), journalists, and other online activists, violates the right to privacy and puts a chilling effect on the exercise of their rights and freedoms in fear of arrest and prosecution.<sup>22</sup> As such, Uganda's online space is characterised by internet shutdowns and disruptions, as in 2016 and 2021, as well as social media disruptions, especially during periods of unrest or political turmoil and elections.<sup>23</sup> National security is usually the justification, but in most cases is employed as a scapegoat to limit and curtail online engagements, the flow of information, and frustrate electoral observations and monitoring processes by cutting off media of communication.<sup>24</sup> Distabilisation of communications channels often accounts for distortion of information, such as disinformation and accounts for chaotic processes.<sup>25</sup>

<sup>16</sup> Uganda Communications Commission, 'Market Performance Report Q1 2025 (Jan-Mar 2025)', <https://www.ucc.co.ug/wp-content/uploads/2025/05/UCC-Market-Report-for-Q1-2025-March-2025.pdf>

<sup>17</sup> Ibid.

<sup>18</sup> Godfrey Olukya, 'Uganda's president bans Facebook for being 'arrogant,' 13 January 2021, <https://www.aa.com.tr/en/africa/uganda-s-president-bans-facebook-for-being-arrogant-/2107913>

<sup>19</sup> Alliance for Affordable Internet, '2023 Affordability Report' (A4AI 20i23) <https://a4ai.org/affordability-report/report/2023/>

<sup>20</sup> Women of Uganda Network (WOUUNET), 'Bridging the Gender Digital Divide in Uganda' (WOUUNET Policy Brief 2024) 2 <https://wouUNET.org/resources/publications>

<sup>21</sup> Alliance for Affordable Internet, '2023 Affordability Report' (A4AI 2023) <https://a4ai.org/affordability-report/report/2023/>

<sup>22</sup> The Citizen Lab, 'Pegasus vs. Predator: Dissident's Doubly-Infected iPhone Reveals Cyrox Mercenary Spyware' (Citizen Lab, 16 December 2021) <https://citizenlab.ca/2021/12/pegasus-vs-predator-dissidents-doubly-infected-iphone-reveals-cyrox-mercenary-spyware/>

<sup>23</sup> Unwanted Witness, 'Uganda 2021 general elections: The internet shutdown and its ripple effects, APC 25 January 2021' <https://www.apc.org/en/news/uganda-2021-general-elections-internet-shutdown-and-its-ripple-effects>; Freedom House, 'Freedom on the Net 2024: Uganda Country Report,' <https://freedomhouse.org/country/uganda/freedom-net/2024>

<sup>24</sup> Unwanted Witness, 'Uganda 2021 general elections: The internet shutdown and its ripple effects, APC 25 January 2021' <https://www.apc.org/en/news/uganda-2021-general-elections-internet-shutdown-and-its-ripple-effects>

<sup>25</sup> Jason Burke, 'Uganda elections: social media shutdown throws campaigns into chaos' *The Guardian* (12 January 2021) <https://www.theguardian.com/world/2021/jan/12/uganda-elections-social-media-shutdown-throws-campaigns-into-chaos>

## **2.4 Policy and Legislative Environment**

The primary enabler of the developments in democratic spaces are the laws and policies, which appear to be well-intentioned but are marred by broad and vague provisions which facilitate the use of state-controlled tools, including regulating agencies, to limit the exercise of civil liberties. For instance, the Computer Misuse Act, Cap 96, has a chilling effect on freedom of expression and information flow, with many registered arrests and prosecutions.<sup>26</sup> The Uganda Communications Act Cap. 103 gives excessive powers to the UCC to control the communications sector and even shut down and disrupt internet access. Also, the Anti-Terrorism Act Cap. 120 and the Regulation of Interception of Communications Act Cap 101 facilitate real-time interception of communications, which in turn leads to infringements on the privacy of communications and chills on expression, access to information, assembly and association.

<sup>26</sup> Human Rights Watch, 'Uganda: Repressive Law Threatens Free Expression Online' (HRW, 14 October 2022) <https://www.hrw.org/news/2022/10/14/uganda-repressive-law-threatens-free-expression-online>

# 3. Research Methodology

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This study employed a qualitative approach to provide a comprehensive analysis of AI's impact on civic space and digital rights in Uganda. The study employed a literature review approach that reviewed both primary and secondary sources. The legal and policy frameworks were reviewed and analysed to provide wide-reaching insights on their implication on the digital democracy in light of the operating environment, digital rights and their intersection with the AI transition in Uganda.

Furthermore, existing literature from academia, media, government, and other relevant works, such as journal articles and stakeholder reports of local and international media and organisations, was reviewed. These were compiled to generate an understanding of the current developments, benefits, gaps, challenges, debates and issues on artificial intelligence and its intersection with digital democracy in Uganda.

# 4. Overview of the Study Findings

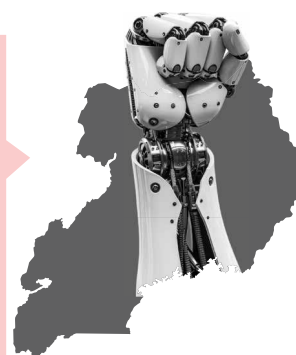
This section highlights the impact of AI on Digital Democracy in Uganda. It specifically looks into ways through which Uganda has and continues to make use of AI in shaping democracy in digital spaces, including the impact on civic space and digital rights. It responds to the emergence of AI while critically focusing on the benefits and challenges it poses for civic space and digital rights.

## 4.1 Value of AI to Uganda's Civic Space and Digital Rights

AI offers opportunities for Uganda's digital landscape, but also poses major threats to fundamental human rights. The integration of AI in digital platforms is increasingly shaping online discourse on democracy and civic participation, and also forming an important tool for holding governments and other stakeholders accountable.<sup>27</sup> Shortfalls in service delivery, such as in accessing medical supplies in public health facilities and hospitals, a poor state of roads and corruption often gain traction from the deployment of AI. AI also forms an important tool for checking, identifying and combating disinformation and fake narratives by individuals, political parties, organisations and civil society organisations. Some of the positive developments in the application of AI in the country can be observed from the various developments in the country.

The government of Uganda has, over time, been leveraging the use of AI to improve service delivery through enhanced transparency and efficiency. For example, the Uganda Revenue Authority (URA) analyses data sets related to tax administration using AI models, including data analytics and machine learning models to detect tax evasion and fraud.<sup>28</sup> The Uganda Registration Services Bureau (URSB), which provides registration services in the country, deploys AI in verifying authenticity and identities to expedite the registration of businesses and civil registration in the country. This has made business registration and access to government services more efficient. Similarly, the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), in partnership with other institutions like Makerere University, uses AI image recognition technologies to help farmers identify pests and diseases that have either attached or are affecting their crops by uploading a photo and getting a diagnosis and advice instantly.<sup>29</sup> With these applications, economic stability and food security for a healthy civic society can be attained.

There have been several efforts to navigate ways of harnessing a civic space that meets the citizens' civic needs, irrespective of literacy levels or comprehension of the English language. For instance, Sunbird AI, supports the collection of information from the public on the issues that affect them to contribute to improvement in service delivery.<sup>30</sup> With Sunbird, which uses Natural Language Processing (NLP), individuals can voice and express themselves in a local language of



<sup>27</sup> Parliament Watch Uganda, "About Us," (PWU, 2023) <https://parliamentwatch.ug/about-us/>

<sup>28</sup> Walakira Joshua, "No More Hiding as URA Deploys Super-Brain AI to Smoke Out Tax Defaulters," *Mulenger News*, <https://mulengernews.com/no-more-hiding-as-ura-deploys-super-brthenisain-ai-to-smoke-out-tax-defaulters/>

<sup>29</sup> Mak.CAD, "Development of Machine Learning Datasets for Crop Pest and Disease Diagnosis based on Crop Imagery and Spectrometry," [https://air.ug/?page\\_id=3136](https://air.ug/?page_id=3136) See also Mak.CAD, "AI in Agriculture," [https://air.ug/?page\\_id=3464](https://air.ug/?page_id=3464)

<sup>30</sup> Sunbird AI, "Citizen Feedback: African language technology," <https://sunbird.ai/portfolio/citizen-feedback/>

their choice, which are later translated and transcribed into English and then get feedback. Also, organisations like SEMA Uganda have feedback facilities in public hospitals and police services, which are then analysed outside the facilities. Similarly, TRAC FM uses the application to make sense of the views expressed on radio shows.<sup>31</sup> Through Sunbird AI, the public and citizens are empowered with information emerging from discourses that they can deploy to engage and hold service providers accountable.



AI has also been useful in enhancing access to justice on various fronts, especially for the vulnerable and marginalised populations

AI has also been useful in enhancing access to justice on various fronts, especially for the vulnerable and marginalised populations. Organisations such as BarefootLaw are utilising AI to provide legal aid across the country through virtual clinics called BarefootLaw Boxes, which also use social media and SMS.<sup>32</sup> With AI, legal aid services can be provided easily to many individuals in underserved areas since it makes connectivity with legal professionals boundless, with no physical barriers, since AI is the first point of contact. Similarly, while not directly deploying AI, organisations like Women of Uganda Network (WOUGNET)<sup>33</sup> in collaboration with other institutions like CIPESA<sup>34</sup> and Alan Turing Institute are pro-adoption of AI for enhancing access to justice. Policy makers, CSOs and other players are continuously getting equipped with knowledge and skills on how to best deploy AI in a manner that not only respects digital rights but also promotes their protection and realisation.

Electronic health is taking shape in the country with enhanced disease diagnosis and access to medical information, medicines and care. Various health initiatives and start-ups have in-built capabilities to help in disease diagnosis, and use AI algorithms to analyse medical images and accurately detect diseases such as cancer and malaria.<sup>35</sup> The establishment of an AI health lab at one of Uganda's leading universities enhances this potential of ensuring Ugandans are in good health to effectively engage in democratic spaces and galvanises the AI potential in the country.<sup>36</sup> These initiatives blend well with the initiatives of the Ministry of Health and its partners to deploy AI models, including machine learning, especially algorithms to collect and analyse health data on ailments like malaria and environmental data from various health facilities across the country.<sup>37</sup>

AI has gained traction in media with an increase in adoption and use of AI tools like Large Language Models (LLM) such as ChatGPT and Google Gemini to generate content and develop stories.<sup>38</sup> Furthermore, journalists are increasingly using AI tools to conduct transcription of videos into text and also to refine their articles. Similarly, AI has been spotted in increased productivity and efficiency, reduction in workloads, fact-checking and detection of disinformation and misinformation patterns.<sup>39</sup> These developments have positively contributed to timely and efficient reporting on issues affecting digital democracy, including common violations and abuses of digital rights and freedoms and provided possible solutions to the problems.

<sup>31</sup> *Ibid.*

<sup>32</sup> Rights CoLab, "BarefootLaw," [https://rightscolab.org/case\\_study/barefootlaw/](https://rightscolab.org/case_study/barefootlaw/)

<sup>33</sup> UNESCO, "Women of Uganda Network (WOUGNET) - Civil Society Organizations (CSO) for Ethics of AI and Academic Network on AI Ethics and Policy," <https://www.unesco.org/ethics-ai/ar/civil-society-organizations/women-uganda-network-wougnet>

<sup>34</sup> Collaboration on International ICT Policy for East and Southern Africa, "CIPESA Delivers Training to Ugandan Editors on AI in the Newsroom," <https://cipesa.org/2025/09/cipesa-delivers-training-to-ugandan-editors-on-ai-in-the-newsroom/>

<sup>35</sup> IAFRICA, "AI-Powered Malaria Diagnosis Breakthrough in Africa," 12 June 2025, <https://iafrica.com/ai-powered-malaria-diagnosis-breakthrough-in-africa/#:~:text=In%20the%20heart%20of%20Uganda,using%20low%20cost%20microscopy%20images.>

<sup>36</sup> Jane Anyango, "Uganda Launches AI Health Lab at Makerere University," May 31, 2024, <https://news.mak.ac.ug/2024/05/uganda-launches-ai-health-lab-at-makerere-university/>

<sup>37</sup> U.S. President's Malaria Initiative, "Uganda: Malaria Operational Plan FY 2022," (PMI, 2022) <https://reliefweb.int/attachments/e36f44cd-f69b-4c1c-b1ea-a6d3ca986dfa/FY-2022-Uganda-MOP.pdf>

<sup>38</sup> Africa Centre for Media Excellence, "Artificial Intelligence and the Future of Journalism in Uganda," <https://acme-ug.org/2024/08/29/artificial-intelligence-and-the-future-of-journalism-in-uganda/>

<sup>39</sup> Collaboration on International ICT Policy for East and Southern Africa, "CIPESA Delivers Training to Ugandan Editors on AI in the Newsroom," *supra.*

## 4.2 Challenges and Risks of AI to Digital Rights and Digital Democracy

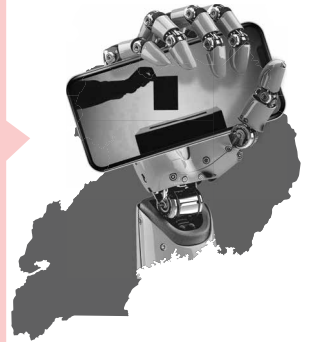
While AI is a tool for amplifying democratic voices, it poses formidable challenges and risks to digital rights and democratic participation. The situation is worsened by the lack of a specific or comprehensive legal and regulatory framework on how AI should be deployed, thereby posing potential risks for erosion of online civic liberties.<sup>40</sup> Limited knowledge and literacy on AI further aggravate the problem.

Amongst the forefront effects of AI deployment is the potential for the government to make decisions on public service delivery based on algorithmic automation that often produces predictable outputs. In most cases, decisions made based on algorithms often tend to be biased. This further facilitates discrimination based on political grounds, social status, and social location and marginalised groups.<sup>41</sup> It may also delineate service delivery to HRDs, CSOs, political activists, dissidents and journalists, since their privacy is often eroded using AI-enabled technologies.

AI systems on social media platforms are also used to create and promote disinformation and false or fake narratives, which are often elevated during election periods. In other instances, they may perpetuate social and political discrimination based on algorithmic bias. Also, they can be used to amplify or promote hate speech and misinformation narratives that may be entrenched in bias.<sup>42</sup> AI can also be an agent of discrimination on various fronts, which often becomes hard to address due to the lack of transparency and accountability in the deployment and use of AI technologies and systems.

Following a standoff between Facebook (Meta) and the government over what Meta considered to be smear campaigns against political dissidents while amplifying and promoting the incumbent government's narratives, Meta pulled down government accounts.<sup>43</sup> The government, in retaliation, blocked Facebook, which to date has not been restored. The actions by the government not only cut off an important platform for public engagement, marketing and innovation but also curtailed space for expression and access to information.<sup>44</sup>

In the period leading up to the general elections in January 2026, multiple fears emerged as to the potential role of AI in shaping electoral narratives through misinformation and disinformation. The potential usage of AI to disseminate deep fakes and propaganda targeting political dissidents and critics cannot be underestimated.<sup>45</sup> The government already signalled a plan to regulate social media using AI-powered tools to monitor and combat harmful content. This planned move raises fears of possible suppression of democratic activities, including political participation, criticism, competition and dissent.<sup>46</sup> Given the historical experiences of a controlled information ecosystem in the country, witnessed by direct government control, curtailment of the media spaces and self-censorship, technological advancement makes the situation more intensely predictable. AI stands to further entrench the precarity of Uganda's democracy since there is no level playing ground for the exercise of democratic freedoms.



<sup>40</sup> Uganda Needs a Clear AI Governance Framework to Protect Digital Rights, 2025, <https://innovateuganda.com/uganda-needs-a-clear-ai-governance-framework-to-protect-digital-rights/>

<sup>41</sup> AI Governance: Legal, Regulatory, and Gender Challenges in Uganda's AI Policy Landscape - Centre for Multilateral Affairs (CfMA), 26 January 2025, <https://thecfma.org/2025/01/26/bridging-the-gaps-legal-regulatory-and-gender-challenges-in-ugandas-ai-policy-landscape/>

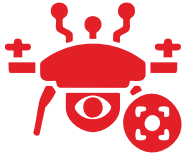
<sup>42</sup> Research: Social Media Algorithms, Uganda's LGBTQ+ Community Have a Complicated Relationship - Mozilla Foundation, 16 July 2024, <https://www.mozilla.org/en/blog/research-social-media-algorithms-ugandas-lgbtq-community-have-a-complicated-relationship/>

<sup>43</sup> BBC, "Uganda elections 2021: Facebook shuts government-linked accounts," 11 January 2021, <https://www.bbc.com/news/world-africa-55623722>

<sup>44</sup> The New York Times, "Uganda Blocks Facebook Ahead of Contentious Election, 13 January 2021," <https://www.nytimes.com/2021/01/13/world/africa/uganda-facebook-ban-elections.html>

<sup>45</sup> How might AI reshape democracy on the African continent? - Research ICT Africa (Research ICT Africa) <https://researchictafrica.net/research/how-might-ai-reshape-democracy-on-the-african-continent/>

<sup>46</sup> The Delicate Dance Between Uganda's Civil Society and Technology Ahead of the 2026 Elections (Femme Forte Uganda, 29 April 2025) <https://www.femmeforteug.org/the-delicate-dance-with-ugandas-civil-society-and-technology-in-the-run-up-to-the-2026-elections>



The government of Uganda has previously invested in AI-powered surveillance technologies

The government of Uganda has previously invested in AI-powered surveillance technologies, including CCTV cameras, facial recognition technologies, tracking vehicle license plates and monitoring social media.<sup>47</sup> These systems have been weaponised for state control, manipulation and curtailment of democratic spaces. The use of Surveillance technologies and surveillance capabilities has become more sophisticated through the use of AI. Amongst the leading surveillance initiatives in the country is the Safe City project, which has seen the installation of CCTV cameras in major cities and across the country.<sup>48</sup> Additionally, mandatory SIM card registration, registration of national identity cards, issuance of driving licences and registration of immigration documents have enhanced the ease of surveillance by the state and its agencies.

Recently, the introduction of the Intelligent Transport Monitoring System was installed on digital number plates.<sup>49</sup> The system that uses technology to track all vehicles and motorcycles in the country.<sup>50</sup> This erodes individuals' privacy and limits their capacity to engage in the exercise of fundamental rights and freedoms, including expression, access to information, assembly and association, in fear of being monitored by the big brother-AI as previously cited in spyware usage against these individuals and groups.<sup>51</sup>

These technologies enable the government to monitor political opponents, critics, activists, HRDs and journalists with ease.<sup>52</sup> As a result, freedom of expression, access to information, assembly and association aforementioned have been weighed down with chills on the exercise of the rights.<sup>53</sup> During the 2021 general election in the country, there were several arbitrary arrests, which are partly explained by the highly sophisticated technologies to spy on targeted individuals and activists.<sup>54</sup> The Uganda police has repeatedly acknowledged the use of surveillance technologies to crack down on political dissidents, critics and opponents.<sup>55</sup>

In the media sector, the use of AI in data-driven investigative journalism and the generation of more personalised content delivery is limited since it requires the deployment of more sophisticated AI systems and models, lots of resources and high-level skills. In addition to this gap, AI poses several ethical challenges to the media sector's performance. It does not fully integrate culture and local languages, which can further perpetuate misrepresentation, disinformation and misinformation.<sup>56</sup> Its application is further associated with potential loss of jobs and erosion of journalism ethics and integrity, which is currently a major concern for the media sector and the current breed of journalists.<sup>57</sup>

<sup>47</sup> Stephen Kafeero, 'Uganda is using Huawei's facial recognition tech to crack down on dissent after anti-government protests,' QUARTZ, November 27, 2020. See: <https://qz.com/africa/1938976/uganda-uses-chinas-huawei-facial-recognition-to-snare-protectors>

<sup>48</sup> 'Uganda: New report details surveillance and spyware network that is endangering journalists and human rights activists,' <https://www.business-humanrights.org/en/latest-news/uganda-new-report-details-surveillance-and-spyware-network-that-is-endangering-journalists-and-human-rights-activists/>

<sup>49</sup> CIPESA, 'Rollout of Digital Number Plates Poses Privacy Concerns in Uganda August 12, 2024,' <https://cipesa.org/2024/08/rollout-of-digital-number-plates-poses-privacy-concerns-in-uganda/>

<sup>50</sup> Uganda's AI-Powered Vehicle Surveillance System Raises Human Rights Concerns' (OECD.AI) <https://oecd.ai/en/incidents/2023-11-14-b206>

<sup>51</sup> Uganda: New report details surveillance and spyware network that is endangering journalists and human rights activists' (Business & Human Rights Resource Centre, 11 August 2025) <https://www.business-humanrights.org/en/latest-news/uganda-new-report-details-surveillance-and-spyware-network-that-is-endangering-journalists-and-human-rights-activists/>

<sup>52</sup> Berlinger J, 'Uganda Used Huawei's Facial Recognition Tech to Spy on Political Opponents, Report Says' CNN (16 August 2019) <https://www.cnn.com/2019/08/16/africa/uganda-huawei-spy-exclusive-intl/index.html>

<sup>53</sup> Human Rights Watch, 'Uganda: Elections Marred by Violence' (HRW, 21 January 2021) <https://www.hrw.org/news/2021/01/21/uganda-elections-marred-violence>

<sup>54</sup> Ibid.

<sup>55</sup> Stephen Kafeero, 'Uganda is using Huawei's facial recognition tech to crack down on dissent after anti-government protests,' supra.

<sup>56</sup> Apollo Kakaire, 'Lost in Translation: The Challenge of Local Languages in the AI Era for Ugandan Media,' The Observer, 22 June 2025, <https://observer.ug/news/75261-lost-in-translation-the-challenge-of-local-languages-in-the-ai-era-for-ugandan-media>

<sup>57</sup> Collaboration on International ICT Policy for East and Southern Africa, 'CIPESA Delivers Training to Ugandan Editors on AI in the Newsroom,' supra

The challenges affecting AI in the newsroom are further compounded by the lack of specific legal and policy frameworks on the ethical application of AI, which often breeds data privacy and algorithmic bias that often affects objective reporting and coverage of issues. The outright call is for the responsible application of AI in innovation and usage to promote people-centred journalism in reporting digital rights, civic rights, and freedoms.

### 4.3 State of AI Regulation in Uganda

Uganda does not have specific or standalone legislation on AI. The entire AI ecosystem depends on fragmented provisions found in different legislation.

Amongst the key legislations are the Data Protection and Privacy Act, Cap 96, which provides for the protection and regulation of personal data. Most of the data protection rights and principles laid down in the Act apply to data processing by AI systems since all personal data processing must be subject to data protection principles and rights of data subjects. A relevant provision to AI is in section 27, which provides for the rights of the data subject where automated decision making, which could be primarily manned by AI, is made by the data controller in respect of personal data. The provision requires that the data subject be notified and their rights be observed. However, critical aspects like transparency and accountability and the risk of algorithmic bias are not addressed by the Act.

The Copyright and Neighbouring Rights Act, Cap 222, provides for the protection of works, including literary and scientific works. The works extend to programmes and electronic data. While AI is not directly mentioned, its deployment and usage can not escape the use of AI, especially when questions of ownership of copyright and originality of works come into play, which are often used to train AI systems.

The National Payment Systems Act, Cap 59, requires all payment service providers to take serious security measures and manage risks, prevent fraud and ensure consumer protection. While not directly mentioning AI, the principles and rules govern the various players, such as fintechs, which use chatbots and mobile money through systems such as mobile money reversals and notification provisions, which largely depend on AI to manage their systems and transactions.

The National Information Technology Authority, Uganda (NITA-U), Cap 200 does not specifically provide for AI. However, it aims to provide high-quality information technology services to the Government and to promote standardisation in the planning, guidance, coordination, acquisition, implementation, delivery, support and maintenance of ICT equipment and services, to ensure uniformity in quality, adequacy and reliability of information technology usage in the country. By nature of its application and integration of ICT, it can not be implemented in disregard of AI, as most of the provisions potentially integrate AI.

Also, the UCC established by the Uganda Communications Act, Cap 103, which is the communications sector regulator, oversees the deployment of technology in the country, and although not explicitly mentioned, could also include AI. The broad nature of functions and powers given to the commission in sections 5 and 6 in respect to governance and regulation of the communications sector, including the content and nature of its dissemination and data, is a clear interpretation of application to AI. This is because several services offered by the communication service providers involve the deployment and use of AI. For instance, the output of services such as disinformation and misinformation, which may be AI-generated, often attracts the attention of UCC, which then invokes regulatory powers over misuse. Under section 22 of the Act, the establishment of a telecommunications station, provision of telecommunications services or the construction, maintenance or operation of telecommunications apparatus which are not exclusive of AI, such as sophisticated chatbots, requires licensing under UCC. And in section 45, UCC may investigate any matter related to communications services or apparatus provided or supplied in Uganda. Communications or service apparatus may be interpreted to include AI, such as sophisticated chatbots.



Furthermore, the Regulation of Interception of Communications Act (RICA), Cap 101 in section 8 (1) (b) requires communication service providers to install hardware and software facilities and devices to enable interception of communications at all times or when so required, as the case may be. These devices and software are essentially AI-enabled, which have the capabilities to automatically record conversations and allow for default interception as and when required.

The FinTech sector, which is regulated by the Bank of Uganda (BOU), supported by the Uganda Communications Commission (UCC) and the Financial Intelligence Authority (FIA) and guided by the National Payment Systems Act, depends on AI systems and data sets. Services, including mobile money, largely depend on algorithms to determine the creditworthiness of potential clients. This assessment must be conducted within the requirements of the data protection law. Cases of intrusive FinTech into individuals' data are currently under investigation by the Personal Data Protection Office (PDPO).<sup>58</sup> The gaps posed by the lack of a clear regulatory mechanism have put individuals' data at stake.



Uganda is yet to develop an AI strategy to guide the country on the direction to take in harnessing AI for socio-economic development

Uganda is yet to develop an AI strategy to guide the country on the direction to take in harnessing AI for socio-economic development within clear regulatory and ethical standards and safeguards.<sup>59</sup> The AI strategy could potentially address issues of transparency and accountability in the use of AI while at the same time enhancing research and public-private partnerships.

Other policy documents that offer guidance on standards and ethical application of AI include Uganda Vision 2040, which emphasises Science, Technology, Engineering and Innovation (STEI), including AI, is intended to drive Uganda into middle-income status by 2040.<sup>60</sup> Inference can also be drawn from the National Fourth Industrial Revolution (4IR) Strategy (2020), which aims to place Uganda ahead as a continental hub for 4IR technologies by 2040.<sup>61</sup> And Uganda's Fourth National Development Plan (NDP IV) 2025/26 - 2029/30 is a comprehensive framework to guide the country's development. These strategic frameworks have aspects of science, technology and innovation which integrate machine learning.<sup>62</sup> It also identifies and notes the benefits and costs associated with the deployment and application of AI.

The AI landscape in Uganda requires policy actions since there is no specific legal and regulatory framework for AI. AI usage as such poses multiple challenges and risks to human rights and has the potential to be widely used to promote and front authoritarianism ahead of the rule of law and democracy. It also undermines the transparency and accountability of the government in how the civic space is governed and utilised. Uganda's civic spaces, therefore, require immediate actions for legislation that promotes ethical usage of AI and its integration in democratic civic engagements, the rule of law and democracy in the online spaces.

<sup>58</sup> Personal Data Protection Office, 'Guidance on Consent' (PDPO, 24 February 2023) <https://www.pdpo.go.ug/resource/guidance-on-consent>

<sup>59</sup> Ministry of ICT and National Guidance, 'Development of the National Artificial Intelligence Strategy' (MICT, 15 May 2024) <https://www.ict.go.ug/development-of-the-national-artificial-intelligence-strategy/>

<sup>60</sup> Uganda Vision 2040: A Transformed Ugandan Society from a Peasant to a Modern and Prosperous Country within 30 years, <https://www.npa.go.ug/vision2040/>

<sup>61</sup> See Uganda National 4IR Strategy: A continental Hub that Enables a Smart and Connected Uganda Society, 2020, <https://ict.go.ug/wp-content/uploads/2020/10/Executive-Summary-Ugandas-National-4IR-Strategy.pdf>

<sup>62</sup> The National Planning Authority (NPA), 'Fourth National Development Plan (NDPIV) 2025/26 – 2029/30, p.113 - 121, <https://parliamentwatch.ug/wp-content/uploads/2025/01/PDF-FINAL-NDPIV-for-Parliament-Approval-13122024-1.pdf>

## 4.4 Towards Human Rights-Centred AI Governance in Uganda

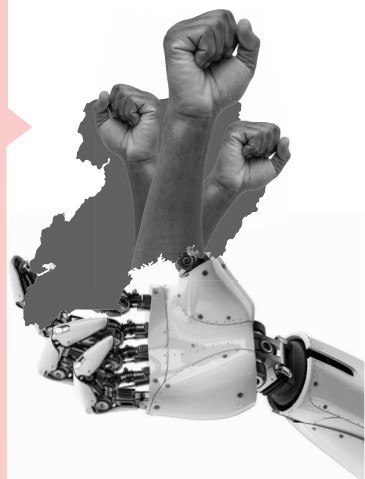
Technological development and digital transformation present an arena for AI and its potential operations in the online democratic spaces and improved service delivery. AI benefits, which must serve public interest, including digital democracy, come with costs such as chills on freedoms such as expression and access to information, assembly and association and violation and abuse of data privacy rights.<sup>63</sup> They also require the development and adoption of robust human rights protection frameworks to ensure the safeguards and protection of democratic values and avert possibilities of expanding socio-economic and political inequalities.

The multistakeholder approach is slowly gaining traction in AI governance, especially with the constitution of a task force on AI and the initiation of processes towards the development of the National AI Strategy by the MoICT and NITA-U.<sup>64</sup> Similarly, CSOs, including CIPESA and WOUUNET, have been at the forefront of undertaking initiatives which seek to shape the future and legal landscape and the governance of AI through research, advocacy and capacity building.

Uganda has no specific or clear legal, regulatory or policy framework for the responsible use of AI within the expected minimum standards. AI risks include algorithmic bias and enhanced levels of discrimination. Furthermore, digital exclusion of the rural majority and women, who have minimal access to digital technologies, including innovation, could be exposed to digital harms.<sup>65</sup> Ensuring inclusion and equity, which are democratic principles, is critical for individuals. While blending with the increased awareness of the potential benefits of AI, such as improved service delivery, algorithmic bias, and the potential threats to data protection, still pose a major challenge for Ugandans. Indeed, the gap between policies and readiness for implementation can be widely and deeply felt in the tech sector, with hopes for progressive digital democracy dwindling.

To ensure effective AI development, there is a need to incorporate human rights principles into AI deployment. Also, inclusion and non-discrimination are critical to address bias based on grounds such as race, gender or social and economic status. Non-discrimination is a key tenet of the rights set out in the national laws, including the constitution and regional instruments, especially the ACHPR and international human rights instruments such as the UDHR, ICCPR and ICESCR. Hence, it would be ideal that AI systems and data sets are frequently and transparently tested to ensure that any potential cases of discrimination against the vulnerable populace and communities are ironed out.<sup>66</sup> Similarly, Transparency and accountability are necessary.

Citizens must know how AI systems operate and how decisions made solely based on AI affect them. It then becomes necessary to determine who the responsible parties to be held accountable should be, as to whether it is the developer, deployer or the government agency making use of the system. Within the African Union Data Policy Framework, the principles set out offer the basis for adoption by Member States to ensure that AI serves the intended purpose and gains public trust.<sup>67</sup> These principles extend to cooperation among Member States, integration, fairness and inclusiveness, trust, safety and accountability, sovereignty, comprehensive and forward-looking environment and integrity and justice with the primary aim of fostering regional prosperity and social and economic growth and transformation.<sup>68</sup>



<sup>63</sup> Collaboration on International ICT Policy for East and Southern Africa (CIPESA), "State of Internet Freedom in Uganda 2021," <https://cipesa.org/2021/12/state-of-internet-freedom-in-uganda-report-2021/>

<sup>64</sup> Ministry of ICT and National Guidance, "Shaping Uganda's AI Future," <https://ict.go.ug/media/news/shaping-ugandas-ai-future>

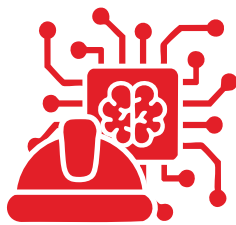
<sup>65</sup> Unwanted Witness, "The State of Digital Rights and Inclusion in Uganda 2020," <https://www.unwantedwitness.org/the-state-of-digital-rights-and-inclusion-in-uganda-2020/>

<sup>66</sup> See for instance, the African Declaration on Internet Rights and Freedoms Coalition, "African Declaration on Internet Rights and Freedoms," (2014) <https://africaninternetrights.org/articles/>

<sup>67</sup> African Union, "The African Union Data Policy Framework, 2022" [https://au.int/sites/default/files/documents/2022-10/Data\\_Policy\\_FrAI-basednd,,rights-centredhuman rights,amework\\_ENG.pdf](https://au.int/sites/default/files/documents/2022-10/Data_Policy_FrAI-basednd,,rights-centredhuman%20rights,amework_ENG.pdf)

<sup>68</sup> *Ibid.*, p.19.

With the current status and evolving developments, a human rights-based approach in AI applications is a critical guardrail to ensure a transparent and open democratic sphere that upholds and respects privacy. It also potentially builds legitimacy and fosters trust in the existing digital democracy. To achieve this, Uganda needs to engage a proactive and inclusive multi-stakeholder approach for AI. Further required is wide involvement of key stakeholders, especially the government, CSOs, media, academia, marginalised communities and the private sector. This approach would essentially lead to the creation of a human rights-centred AI terrain and system in the country that provides for fair, non-discriminatory and accountable application of an AI system akin to the United Nations Educational, Scientific and Cultural Organisation (UNESCO) Recommendation on the Ethics of Artificial Intelligence.<sup>69</sup>



**AI Task Force**

is operating effectively and efficiently as anticipated, and putting human rights at the core of its work

To achieve a human rights-centred approach, there is a need for coordinated efforts amongst the various stakeholders, including the government and its agencies, CSOs and the private sector in AI. The MoICT, NITA-U should ensure that the AI Task Force is operating effectively and efficiently as anticipated, and putting human rights at the core of its work. There is also a need for additional efforts in nation-wide initiatives that seek to promote digital literacy and empower citizens to effectively and meaningfully engage with AI governance and the governance of other technologies to shape their lives. This will ultimately lead to a sustainable, equitable, yet human rights-integrating and respecting digital democracy in Uganda. As a must, human rights impact assessments must be conducted for any public AI-based procurements to minimise the potential adverse impacts of AI, especially on human rights.

<sup>69</sup> UNESCO, "Recommendation on the Ethics of Artificial Intelligence, 2021" UNESDOC SHS/BIO/PI/2021/1, <https://unesdoc.unesco.org/ark:/48223/pf0000380455>

# 5. Discussion

This study has highlighted AI's impact on digital democracy in the country. The trends present a somewhat mixed set of positive and negative effects. While the benefits of AI are desirable, several challenges are evident given its capacity to entrench itself into people's private lives. In this section, the study postulates that while AI is associated with multiple benefits for the growth and development of democracy, it could be deployed by the state and its agencies, especially the security agencies, to extensively undermine democracy and digital rights.

## 5.1 Democratic Governance and the AI Potential

AI is transforming Uganda, although at varying speeds in the governance of the economic, social and political spheres. The rule of law and democracy, political discourse, and civic participation are being shaped by AI and its integration across citizen frontiers. Accordingly, AI potentially provides opportunities for improved service delivery, such as in health care and agriculture, enhancing democratic participation and governance and fostering accountability and transparency of the various sector players.<sup>70</sup>

Service delivery using AI is primarily deployed in sectors such as digital infrastructure and public-private partnerships in the financial, agriculture and health sectors.<sup>71</sup> For instance, the health sector is using AI-powered tools to diagnose diseases such as malaria and some forms of cancer. In other health dimensions, AI is used to bridge gaps between the overly served and underserved communities, to analyse and interpret medical images, including ultrasound technologies, to conduct more accurate assessments in expectant mothers by midwives.<sup>72</sup> In agriculture, AI is being deployed in soil analysis, disease and pest detection in crops, which has enhanced accuracy in taking appropriate actions to remedy the emerging situation.<sup>73</sup> The fintech sector depends on AI to manage mobile money transactions and to detect fraud.<sup>74</sup> Similarly, the government has widely deployed AI in business registrations, especially by the URSB and in tax collection by URA to check on cases of tax evasion and fraud. Thus far, Uganda has focused on using AI to improve service delivery and to counter socio-economic aspects such as ensuring food security and improving the health of Ugandans.

<sup>70</sup> Unwanted Witness, "Digital Rights and Freedoms in Uganda: A Ticking Time Bomb, 2022", <https://www.unwantedwitness.org/wp-content/uploads/2025/06/Report-06.06.2025-FINAL.pdf>

<sup>71</sup> Abdyl Azeez Yusuf and Mukasa Charles, "The Development And Growth Of Ai In Uganda: How Is Uganda Faring From A Legal Perspective?" (Kampala International University Law Journal, 2023) [https://kiulj.kiu.ac.ug/assets/articles/1736253783\\_the-development-and-growth-of-ai-in-uganda-how-is-uganda-faring-from-a-legal-perspective.pdf](https://kiulj.kiu.ac.ug/assets/articles/1736253783_the-development-and-growth-of-ai-in-uganda-how-is-uganda-faring-from-a-legal-perspective.pdf)

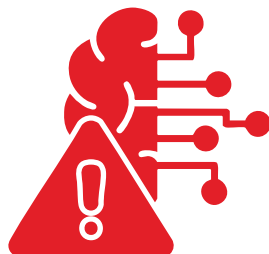
<sup>72</sup> ResearchGate, "Adoption of Artificial Intelligence in the Ugandan Health Sector: a review of literature," (ResearchGate, August 2025) [https://www.researchgate.net/publication/379158164\\_Adoption\\_of\\_Artificial\\_Intelligence\\_in\\_the\\_Ugandan\\_Health\\_Sector\\_a\\_review\\_of\\_literature](https://www.researchgate.net/publication/379158164_Adoption_of_Artificial_Intelligence_in_the_Ugandan_Health_Sector_a_review_of_literature)

<sup>73</sup> ICT Clubs, "Everyday Applications of AI in Uganda – From Mobile Money to Agriculture," <https://ictclubs.ug/everyday-applications-of-ai-in-uganda-from-mobile-money-to-agriculture/>

<sup>74</sup> Ibid.

## 5.2 Risks Presented by AI

There are AI's feared adverse impacts, which have already been witnessed in its deployment in curtailing the exercise of fundamental human rights and freedoms in the online civic spaces. Rights such as freedom of expression and access to information, assembly and association and individual privacy are increasingly getting eroded. Similarly, authoritarianism made possible by emerging sophisticated AI technologies continues to limit the enjoyment of internet freedoms and digital democracy.



The wide application of AI and huge investments into AI enable security systems such as the CCTV cameras by the government, which are equipped with facial recognition capabilities that ring a bell for monitoring, surveillance and control of people's habits physically and digitally. While national security and curbing crime were fronted for the mass installation of the CCTV system as noted above, there have been dire effects on digital democracy.<sup>75</sup> Surveillance on political opponents and activists, HRDs and citizens has had an overbearing chilling effect on freedom of expression, assembly and association since the targeted individuals are largely wary about pending arrests and detention over their activities.<sup>76</sup>

Beyond surveillance is the country's record of limiting engagements in the online spaces and cutting off information flow through internet shutdowns and disruptions, and other telecom service disruptions like mobile money during election periods.<sup>77</sup> The threats are currently elevated with technological advancements and the potential deployment by UCC of AI monitoring tools to track and monitor dissenting and critical voices during the 2026 general elections.<sup>78</sup>

As earlier noted, AI is a double-edged sword that can be deployed in the perpetration of mis/disinformation, which often undermines a healthy information ecosystem and distorts democratic debates and narratives. Previously in 2021, the deployment of AI bots on Facebook (Meta) in 2021 by the incumbent government to carry out smear campaigns against political dissidents while amplifying and promoting the incumbent government's narratives was stopped by Meta.<sup>79</sup> The government, in retaliation, blocked Facebook in the country which has been continuous for five years. Government actions against Meta have, over the period, cut off an important platform for public engagement, marketing and innovation.<sup>80</sup>

Such developments and stand-offs lead to loss of trust in media platforms and put the electoral processes at risk of losing credibility, while political institutions also lose trust from the public, with sinister suspicions as to the true intent of the disruptions. Like in the past, unfair and wrongful application of AI stands to put institutional and leaders' accountability and transparency in doubt. Moreover, AI could worsen the situation since it may be trained to use algorithms to perpetuate bias and therefore aggravate social exclusion in service delivery and democratic participation.

Moreover, there is limited digital infrastructure in the country, which perpetuates disparities in access to AI-enabled services due to notable differences in access to the internet between the rural and urban communities, women and men and the rich and the poor. This makes the value of AI questionable as to its potential to attain equity.

<sup>75</sup> Steven Feldstein, "The Global Expansion of AI Surveillance." *Carnegie Endowment for International Peace*, 2019, *supra*.

<sup>76</sup> *Privacy International*, "For God and My President? The Ugandan State is Abusing its Power to Surveil Citizens, 2019," <https://privacyinternational.org/long-read/3282/god-and-my-president-ugandan-state-abusing-its-power-surveil-citizens>

<sup>77</sup> *Access Now*, "#KeepItOn: Internet Shutdowns in Uganda, 2021," <https://www.accessnow.org/keepiton-internet-shutdowns-uganda/>

<sup>78</sup> *Franklin Draku*, "Govt plots online surveillance for 2026 General Election," *Monitor* April 8, 2025, <https://www.monitor.co.ug/uganda/news/national/govt-plots-online-surveillance-for-2026-general-election-4994400>

<sup>79</sup> *BBC*, "Uganda elections 2021: Facebook shuts government-linked accounts," *supra*.

<sup>80</sup> *The New York Times*, "Uganda Blocks Facebook Ahead of Contentious Election," *supra*

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### 5.3 The Legal and Regulatory Frameworks

Uganda has no specific legal framework on the use and regulation of AI. The absence of a specific law leaves a vacuum for responsible, transparent and accountable decision-making on AI-based issues at the cost of human rights. These gaps continue to affect the ethical application of AI. Laws like the Data Protection and Privacy Act are not sufficient in offering protection to individuals in case of overlaps between the use of AI and respect for human rights, like data rights and non-discrimination.

Despite the gap in legal and policy frameworks, there are efforts being undertaken to establish AI governance frameworks in the country. The process of developing a National Policy on AI had been initiated. The policy could potentially review the existing laws, identify the existing gaps in AI governance and provide avenues and recommendations for a robust AI governance framework in the country. With the successful development of the AI governance policy, a specific law could be born and enacted by the Parliament and spur innovation in the tech sector while ensuring security safeguards for individuals' rights.

The government, through UCC in 2024, announced the formation of a National AI Task Force. The task force brings together experts from government and other stakeholders, including civil society organisations, the private sector, and academia, who are charged with driving the development and shaping of the national AI strategy.<sup>81</sup> With their impetus and successful implementation of their roles, duties and responsibilities, policy considerations and ethical considerations for successful implementation will be attained towards an AI-regulated sector that meets the expected standards. However, the state, which has control over power and resources, often makes decisions such as on investment in AI technologies without public engagement and participation. In most circumstances, decisions are made in disregard of public opinion and without consulting any human rights impact assessments, and without substantive oversight mechanisms over AI-based decisions.

Strengthening the existing legal and policy frameworks for AI-readiness will potentially enhance the application of several legal and policy frameworks such as the Data Protection and Privacy Act, Cap 96, National Information Technology Authority, Uganda (NITA-U), Cap 200, Uganda Communications Act, Cap 103, Regulation of Interception of Communications Act (RICA), Cap 101 and the Computer Misuse Act, Cap 96 whose provisions offer guidelines on how AI should be deployed to contribute to socio-economic and political transformation of the country.



<sup>81</sup> Javira Ssebwami, UCC establishes AI task force to develop framework for adoption and utilization, PML Daily, July 26, 2024, <https://pmldaily.com/business/tech/2024/07/ucc-establishes-ai-task-force-to-develop-framework-for-adoption-and-utilization.html>

# 6. Conclusion and Recommendations

## 6.1 Conclusion

Uganda, like the rest of the world, is experiencing exponential growth in the adoption and use of AI. Although nascent in the country, AI has gained traction and is penetrating literally every sector. Matched with multiple benefits, AI's impact on digital democracy is broad with potential to enhance democratic growth and development, including the socio—economic and political aspects. At the same time, AI comes with multifaceted challenges, especially in ethics and compliance, and some of its applications could be highly intrusive, eroding privacy, especially where the human element of control is lacking. Some AI applications can be used as tools for suppression, control, and curtailment of fundamental rights and freedoms, including freedom of expression, access to information, assembly and association and privacy.

These benefits and challenges have become more pronounced, especially due to the regulatory gaps in the deployment and application of AI. The existing fragmented laws are not specific to AI and do not offer comprehensive protection against the risks posed by the largely unregulated deployment of AI, which makes it difficult to ensure transparency and accountability in AI usage.

Therefore, given the foregoing, it is imperative to identify strategies and ways to meaningfully deploy AI without violating digital rights and freedoms or narrowing the digital civic space.

## 6.2 Recommendations

### Government

- The established task force should fast-track the development of a National AI Strategy that is inclusive and integrates accountability, transparency and human rights standards.
- Undertake strategic efforts towards developing AI-enabled systems such as online portals that seek to enhance public service delivery in a transparent and accountable manner. This will inform future investments in AI and its application.
- Collaborate and partner with all stakeholders, including the big tech companies, private sector, innovators and civil society organisations to create a conducive environment that fosters the innovation and deployment of AI within the expected minimum standards for the sustainable and equitable deployment and application of AI technologies and systems.
- Parliament, in consultation with other government agencies that work on technology and AI-related issues, should enact a specific law on AI to provide direction for AI in Uganda. The laws should address all AI issues that could potentially perpetuate discrimination based on algorithmic bias and promote information disorder, such as disinformation and misinformation.

## **Civil Society Organisations**

- Collaboratively develop a movement/coalition to monitor and track the application of AI technologies and their impact on human rights, social, economic and political well-being of the citizens.
  - Carry out AI literacy campaigns through the use of information, communication and education materials to enhance citizens' understanding of AI and its application and guard against the risks posed by AI.
  - Progressively monitor and track the application and effect of AI through evidence-based research. This information can also be used for reporting to international human rights monitoring mechanisms to ensure accountability of the state.
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## **International Organisations**

- Recognise the nascent nature of AI in the country and provide AI-specifically tailored funds to support CSOs and academia to grow information and knowledge on AI for advocacy-oriented actions.
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## **Tech Sectors, Innovators and developers**

- Develop and adopt AI principles to guide the deployment of their products in an accountable and transparent manner.
  - Publish transparency reports on an annual basis to disclose all instances of government requests for users' data and removal of content that is managed by AI technologies and systems.
  - Partner with academia, civil society and university hubs to educate Ugandans and build AI knowledge and talents that could potentially work towards developing AI systems that are widely accessible and do not facilitate algorithmic bias
  - Ensure that privacy by default and design is embedded in all AI applications. Accordingly, all data protection rights and principles should be integrated into the building of the applications to ensure robust protection of individuals' privacy rights.
  - Make Algorithmic Impact Assessments (AIAs) part of their products before launch to determine the potential impact of the AIAs on human rights, especially for the vulnerable populace.
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## **Academia**

- Conduct evidence-based research on AI and its impact on Uganda's digital democracy to use in accountability drives and initiatives of the government, innovators and the tech sector.
- Progressively integrate AI ethics in the education curricula to train a generation of academicians and professionals and policy makers who are equipped with knowledge in AI application and governance.

## Media

- Design programmes to train and equip journalists' skills on AI application and investigation of how AI relates to algorithmic issues, privacy and data protection, detection of AI-generated disinformation and deep fakes and filing information requests about government-run AI programmes.
  - Collaborate with tech innovators, media houses and policy makers to develop journalistic work-focused AI tools, especially localised AI solutions. These tools could facilitate easy analysis of public data sets, uncover corruption and monitor online platforms such as social media for disinformation.
  - Run public tailored programmes to educate people about AI, its application and its potential impacts. These will demystify AI and its workings and lead to informed debates on AI and its impact on digital democracy.
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## Public

- Proactively demand transparency in the manner in which AI technologies and systems are run, including on their potential impacts on automated decision-making.



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