



DIGITAL RIGHTS AND INCLUSION IN AFRICA REPORT

ZIMBABWE
COUNTRY REPORT

2024

Zimbabwe



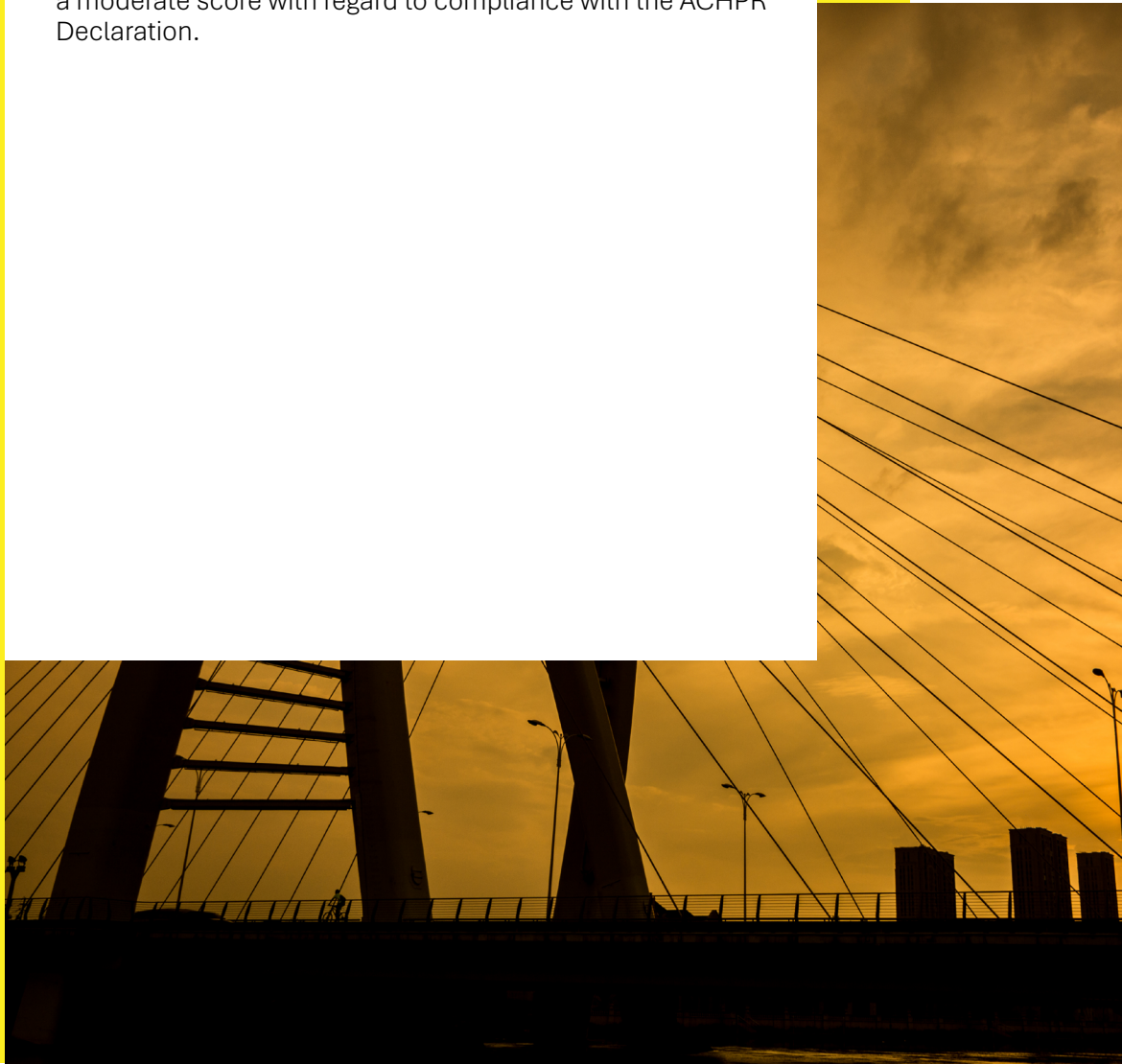
Executive Summary

This report highlights internet accessibility in Zimbabwe and assesses the regulatory landscape providing information on available legislation of internet access, data protection, freedom of expression, access to information, privacy and digital inclusion. The report highlights smart city initiatives that have been undertaken during the reporting period and provides recommendations for the improvement of policies and practices. The country assessment involved a comprehensive desk review examining relevant documents such as country reports, legislation and media reports. The report relied on Paradigm Initiative's TheScore Index to assess the country's compliance with the African Commission on Human and People's Rights' Declaration on Freedom of Expression and Access to Information (The Declaration). While the government has taken steps to protect digital rights, the report asserts that challenges remain in areas such as freedom of expression, digital inclusion, and combating online gender-based violence. The report notes that the Universal Service Fund (USF) is existent but more needs to be done to ensure inclusive access for marginalised groups, including persons with disabilities. This year, there was no internet shutdown in Zimbabwe compared to 2023 when the internet was shut down on the eve of the elections. Zimbabwe's overall score on TheScore Index is 34. The country recorded a moderate score with regard to compliance with the ACHPR Declaration.

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Zimbabwe is situated in the Southern African region and has a population of 15,178,957.¹⁵⁰⁷ Human rights are guaranteed by the Constitution of Zimbabwe Amendment (No. 20) Act, 2013 (the Constitution) but Zimbabwe is classified as repressed by the Civicus Monitor¹⁵⁰⁸ and in September 2024, Zimbabwe joined three other countries on the Civicus watchlist,¹⁵⁰⁹ meaning that the country has a declining civic space. This came after human rights watchdogs such as Amnesty International reported¹⁵¹⁰ that at least 160 people were arrested since mid-June a few months before the country hosted the Southern African Development Community (SADC) Summit.

1507 Zimbabwe National Statistics Agency (ZIMSTAT) 'Zimbabwe 2022 Housing and Census Report' https://www.zimstat.co.zw/wp-content/uploads/Demography/Census/2022_PHC_Report_27012023_Final.pdf (Accessed 27 October 2024).

1508 Civicus Monitor 'Zimbabwe' <https://monitor.civicus.org/country/zimbabwe/> (Accessed 8 January 2024)

1509 Civicus, Civicus Watchlist September 2024. <https://monitor.civicus.org/watchlist-september-2024/zimbabwe/> (Accessed 28 October 2024).

1510 Amnesty International 'Zimbabwean Authorities Must End their crackdown against civil society members ahead of the Southern African Development Community Summit scheduled for 17 August 2024 in Harare' <https://www.amnesty.org/en/latest/news/2024/08/zimbabwean-authorities-must-end-their-crackdown-against-opposition-and-civil-society-members-ahead-of-the-southern-african-development-community-sadc-summit-scheduled-for-17-august-2024-in-harare/> (Accessed 8 January 2024)

Internet Access

Guiding Policy

Zimbabwe adopted a National Development Strategy (NDS1) in 2021, which sought to use ICT to improve the country's digital economy. The government sought to entrench ICTs across all national development strategies to achieve universal access by 2030. The government set targets to increase the internet penetration rate from 59.1% in 2020 to 75.4% by 2025 and increase the mobile penetration rate from 94.2% to 100% by 2025. NDS1 lapses in 2025. Government data shows that in 2023, the Internet penetration rate stood at 70.1% and has increased to 83.52%¹⁵¹¹ in 2024. However, independent data shows that in 2023, the internet penetration rate stood at 34.8%¹⁵¹² in 2023 and dropped to 32.6 %¹⁵¹³ in 2024. Independent research data shows that Zimbabwe is far from reaching the goals set out in the NDS1.

In March 2024, the Zimbabwean President, Dr. Emmerson Mnangagwa, launched the National ICT Policy (2022-2027),¹⁵¹⁴ National Broadband Plan (2023-2030)¹⁵¹⁵ and the Smart Zimbabwe 2030 Master Plan¹⁵¹⁶ to accelerate digital transformation. The President also commissioned a 1500-kilometre-long Bandwidth and Cloud Services (BCS) Group Limited Zimbabwe Optic Fibre Network,¹⁵¹⁷ to improve internet connectivity speed, reliability, and accessibility.

From January 2024, using Starlink was illegal¹⁵¹⁸ due to the lack of an operating licence in Zimbabwe. Neighbouring countries like Zambia have already adopted Starlink to enhance efficient internet access. In April 2024, Starlink imposed roaming restrictions on users who were using Starlink outside their registered service country for more than 60 days. Starlink advised users that they were accessing Starlink services in an unauthorised territory, and services would be turned off as they work with POTRAZ to obtain the necessary regulatory approvals.¹⁵¹⁹ In April 2024, a Zimbabwean politician's son, Neville Mutsvangwa, was arrested¹⁵²⁰ on charges of illegally possessing a Starlink terminal and violating the Postal and Telecommunications Act. In May 2024, the President of Zimbabwe, Emmerson Mnangagwa, announced¹⁵²¹ on X, the approval of Starlink's licence, citing that it would "...result in the deployment of high speed, low-cost Low Earth Orbit internet infrastructure throughout Zimbabwe, particularly in all rural areas." On September 6, 2024, POTRAZ confirmed¹⁵²² issuing two licences to Starlink, heralding potential opportunities for

1511 TechZim 'Second Quarter Abridged Sector Performance Report' (2024) <https://www.potraz.gov.zw/wp-content/uploads/2025/02/Third-Quarter-2024-Abridged-Sector-Performance-Report-Hmed-final.pdf> (Accessed 10 February 2025).

1512 Paradigm Initiative 'Zimbabwe Country Report' (2023) <https://paradigmhq.org/wp-content/uploads/2024/06/Zimbabwe-Country-Report.pdf> (Accessed 30 October 2024).

1513 Data Reportal 'Digital 2024-Zimbabwe' (2024) <https://datareportal.com/reports/digital-2024-zimbabwe?rq=zimbabwe> (Accessed 30 October 2024).

1514 Ministry of ICT, Postal and Courier Services 'National ICT Policy' (2024) <http://www.ictministry.gov.zw/wp-content/uploads/2024/01/National%20ICT%20Policy%202022-2027.pdf> (Accessed 27 October 2024).

1515 Ministry of ICT, Postal and Courier Services 'National ICT Policy' (2024) <http://www.ictministry.gov.zw/wp-content/uploads/2024/01/National%20Broadband%20Plan.pdf> (Accessed 27 October 2024).

1516 <http://www.ictministry.gov.zw/wp-content/uploads/2024/01/Smart%20Zimbabwe%202030%20Master%20Plan.pdf> (Accessed 27 October 2024).

1517 Ministry of Information, Broadcasting Services 'President Mnangagwa Commissioned the 1500 kilometre long BCS Zimbabwe Optic Fibre Network Project' (2024) <https://www.infomin.org.zw/he-president-mnangagwa-commissioned-the-1500-kilometre-long-bcs-zimbabwe-optic-fibre-network-project/> (Accessed 29 October 2024).

1518 Tech Central 'Zimbabwe Starlink cut off services' (2024) <https://techcentral.co.za/zimbabwe-starlink-cut-off-services/242892/> (Accessed 27 October 2024).

1519 Techpoint Africa 'Potraz cutoff Starlink Zimbabwe' (2024) <https://techpoint.africa/2024/04/15/potraz-cutoff-starlink-zimbabwe/> (Accessed 26 October 2024).

1520 My Broadband 'Zimbabwe arrests minister's son for using Starlink' (2024) <https://mybroadband.co.za/news/broadband/536301-zimbabwe-arrests-ministers-son-for-using-starlink.html> (Accessed 16 October 2024).

1521 X 'ED Mnangagwa' (2024) <https://x.com/edmnangagwa/status/1794345897221902640?t=rSF3UICrcDn7eA2gdcAtSA&s=19>

1522 Postal and Telecommunications Regulatory Authority of Zimbabwe 'Press Statement on the Licensing of Starlink' (2024) <https://www.potraz.gov.zw/?p=2810> (Accessed 15 October 2024).

increased access to the Internet for communities in remote areas. However, despite the promise of increased accessibility, there are concerns over unfair competition¹⁵²³ and about the affordability of Starlink as initial hardware costs of at least \$170 and monthly subscriptions of \$30,¹⁵²⁴ which can be prohibitive for at least 4.4 million people who live on less than \$1.90 per day.¹⁵²⁵ The costs are relatively cheaper than that of local service providers whose highest family package costs \$292 a month.¹⁵²⁶ Starlink's entry has intensified competition among local internet providers, pushing them to adapt their services. In September 2024, POTRAZ authorised reselling of Starlink by internet service providers such as Telone¹⁵²⁷ and subscribers on roaming were officially cut off from the service.¹⁵²⁸

Overall, the existence of laws, policies, and other measures to promote universal, equitable, affordable, and meaningful access to the Internet demonstrates Zimbabwe's steps towards improved internet access.

Internet restrictions

In the year under review, Zimbabwe did not experience a government-imposed internet shutdown. This demonstrates progress compared to 2023, when Zimbabwe experienced an internet disruption on the eve of the August 2023 harmonised elections. However, on June 3, 2024, Zimbabwe experienced internet disruptions that caused slow to no connectivity for internet users across networks, due to cable infrastructure challenges that affected countries in Sub-Saharan Africa.¹⁵²⁹

Freedom of Expression

The criminalisation of false news/sedition and media freedoms

Contrary to principle 22 (2) of the Declaration, which calls on states to repeal laws that criminalise sedition, insult and publication of false news, under Section 31(a)(iii) of the Criminal Law (Codification and Reform) Act, it is an offence to publish or communicate a statement that is wholly or materially false with the intention of undermining public confidence in law enforcement agencies or the state. Violators can face penalties of up to 20 years in prison for such offences. On July 22, 2024, the High Court of Zimbabwe acquitted former member of parliament Job Sikhala on charges of 'publishing or communicating false statements prejudicial to the State' and 'incitement to commit violence.' On January

1523 Centre for Innovation and Technology 'Starlink tax exemptions raise concerns of unfair competition in Zimbabwe' (2024) <https://cite.org.zw/starlinks-tax-exemptions-raise-concerns-of-unfair-competition-in-zims-telecom-sector/#:~:text=Starlink's%20tax%20exemptions%20raise%20concerns%20of%20unfair%20competition%20in%20Zim's%20telecom%20sector,-Staff%20Reporter&text=The%20entry%20of%20Starlink%20into,Econet%2C%20NetOne%2C%20and%20Telecel> (Accessed 13 November 2024).

1524 Starlink 'Residential' (2024) <https://www.starlink.com/zw/residential> (Accessed 15 November 2024).

1525 Futures ISS Africa 'Zimbabwe' (2024) <https://futures.issafrica.org/geographic/countries/zimbabwe/> (Accessed 7 November 2024).

1526 Zim Price Check 'New Starlink roaming prices is it still worth it for Zimbabwean users' (2024) <https://zimpricecheck.com/market-intelligence/new-starlink-roaming-prices-is-it-still-worth-it-for-zimbabwean-users/?srsltid=AfmBOoplPancHdzRchYvuC-flJpEZwxRn9BeHuUVj-tA3F-UG3AON-GZ> (Accessed 7 November 2024)

1527 Herald 'Telone gets nod to resell Starlink services' (2024) <https://www.herald.co.zw/telone-gets-nod-to-resell-starlink-services/> (Accessed 27 October 2024).

1528 Tech Zim 'Starlink shuts down roam customers in Zimbabwe-Harare forced to use resellers charging much more' (2024) <https://www.techzim.co.zw/2024/10/starlink-shuts-down-roam-customers-in-zimbabwe-harare-forced-to-use-resellers-charging-much-more/> (Accessed 12 November 2024).

1529 Media Institute for Southern Africa 'Zimbabwe experiences internet degradation due to infrastructure issues' (2024) <https://zimbabwe.misa.org/2024/06/05/zimbabwe-experiences-internet-degradation-due-to-infrastructure-issues/> (Accessed 13 November 2024).

30, 2024, Sikhala was released, after spending 595 days in pre-trial detention.¹⁵³⁰

Arbitrary Arrests and Harassments of the Media, HRDs and Citizens

The landscape in Zimbabwe is characterised by a tension between constitutional protections for free speech and the crackdown on dissent. Media freedom protected in section 61 of the Constitution was under attack in the period under review, often leading to self-censorship. The NewsHawks, a privately owned investigative online newspaper, announced on X that the news site was halting investigations and shelving the story of the dismissal of three army generals on allegations of corruption, citing fears for the safety of its journalists, after being accused of attempting to “peddle falsehoods about the army and individuals taking advantage of the alleged corruption.”¹⁵³¹

Online Gender-Based Violence

Zimbabwe is a signatory to the Beijing Declaration and Platform for Action 1995, the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) 1991, Protocol to the African Charter on Human and People’s Rights on the Rights of Women in 2007 and the SADC Protocol on Gender and Development 2009, all of which call on states to eliminate gender-based violence. The Cyber and Data Protection Act (2021) complements the mentioned laws as it is the country’s first law with provisions criminalising online violence. Zimbabwe has existing laws such as the Domestic Violence Act,¹⁵³² whose scope is more focused on “domestic” violence, with limited mentions of addressing harassment that happens through sending and delivering messages through electronic mail. In 2024, cyberbullying emerged as a cause for concern, often unchecked and without mechanisms for safeguarding women and girls against it. A recent study¹⁵³³ titled “*An examination of cyberbullying among Zimbabwean female social media influencers*” uncovered cyberbullying that is experienced by social media influencers.

Given the above, Zimbabwe is making considerable progress in developing policies that guard against gender-based violence. However some of the laws require reform as they have a limited scope of addressing OGBV.

Data Protection and Privacy

Data protection and governance

Zimbabwe enacted the Cyber and Data Protection Act, 2021(CDPA)¹⁵³⁴ but has not ratified the African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention). The CPDA establishes baseline protections for personal information. In Part II, Section 6(2) the CDPA asserts the independence of the Postal and Telecommunications Regulatory Authority (POTRAZ) from “control by government or by political means.” The Data Protection Authority is the Postal and Telecommunications Regulatory Authority of Zimbabwe established in terms of section 5 of the Postal and Telecommunications Act [Chapter 12:05]. Under Part III, Section 6 of the Postal and Telecommunications Act, Chapter 12:05, the President of Zimbabwe has the authority to appoint the Board which governs POTRAZ, adding to the challenges on the independence of the DPA.

In a move that operationalises the CDPA, Zimbabwe gazetted the Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations (the Regulations), which came into effect on September 13, 2024. The regulations impose a mandatory registration requirement for entities processing personal information and the appointment of a

¹⁵³⁰ Amnesty International ‘Zimbabwe: Further information: Former opposition leader’s convictions quashed: Job Sikhala’ <https://www.amnesty.org/en/documents/afr46/8374/2024/en/> (Accessed 11 November 2024).

¹⁵³¹ The News Hawks ‘Top army generals fired over housing corruption’ <https://thenewshawks.com/top-army-generals-fired-over-housing-corruption/> (Accessed 8 November 2024).

¹⁵³² Veritas ‘<https://www.veritaszim.net/node/146>’ (Accessed 12 November 2024).

¹⁵³³ An examination of cyberbullying among Zimbabwean female social media influencers’ (2024) <https://www.ojcm.net/download/an-examination-of-cyberbullying-among-zimbabwean-female-social-media-influencers-15016.pdf> (Accessed 8 November 2024).

¹⁵³⁴ Postal and Telecommunications Regulatory Authority of Zimbabwe ‘Data Protection Act’ <https://www.potraz.gov.zw/wp-content/uploads/2022/02/Data-Protection-Act-5-of-2021.pdf> (Accessed 11 November 2024).

Data Protection Officer to oversee Data Controllers' compliance with the Data Protection Act. The regulations outline breach notification expectations, compelling data controllers to notify the Data Protection Authority of any data breaches within 24 hours and making it only necessary to inform affected individuals within 72 hours if there is a high risk to their rights. The gazetting of the regulations is a huge leap for Zimbabwe's implementation of the CDPA. However, a month after gazetting the regulations, there were concerns over enforcement following alleged remarks¹⁵³⁵ by the Minister of Information Communication Technologies, Postal and Courier Services that users of WhatsApp Business would be required to pay licences, raising fears of surveillance and invasion of privacy of communications which is prohibited in paragraph 41 of the Declaration. Two days after these remarks, the Minister distanced herself¹⁵³⁶ from the statement citing false claims, malicious fake news and emphasising that "the claim is not applicable especially to players who do not collect and process personally identifiable information for commercial or business use."

In alignment with the CDPA, which mandates Zimbabwe conduct training for DPOs, the Harare Institute of Technology (HIT) launched¹⁵³⁷ a Data Protection Officer Training programme in collaboration with the Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) and began offering courses. The course is a prerequisite for certification and registration as a DPO in Zimbabwe, targeting professionals who are interested in becoming DPOs. In the period under review, the DPA made positive strides by conducting a series of public sensitisation meetings¹⁵³⁸ to educate data subjects about their rights and data controllers about their obligations as enshrined in the CPDA.

The CDPA establishes the Cyber Security and Monitoring of Interceptions of Communications Centre as a unit in the Office of the President. The guiding policy absolves the centre of its independence.

Smart City Developments

Zimbabwe has introduced an advanced biometric border control system that utilises fingerprint and iris recognition technology. The Department of Immigration secured equipment to set up an Online Border Management System (OBMS), which is expected to facilitate automated self-service immigration clearance, enhance security and efficiency by verifying travellers' identities against a national immigration database.¹⁵³⁹ So far, 14 electronic gates have been installed¹⁵⁴⁰ at the Robert Gabriel Mugabe International Airport as part of the first phase.

In the City of Bulawayo, Closed-Circuit Television (CCTV) cameras were installed¹⁵⁴¹ in August 2024, to curb crime and enhance the easy flow of traffic. The installation of CCTV cameras, while it can enhance security, may also be abused to intrude into the lives of ordinary people, posing threats to rights guaranteed in Article 17 of the International Covenant on Civil and Political Rights (ICCPR). Given the above, Zimbabwe is moderately compliant with the Declaration as there is an existing CDPA, regulations and a vibrant DPA.

Access to information

Zimbabwe enacted the Freedom of Information Act in 2020 to repeal the Access to Information

1535 LinkedIn Hon Tatenda Mavetera https://www.linkedin.com/posts/hon-tatenda-mavetera-7821b96b_potraz-breakfast-meeting-i-would-like-to-activity-7260191912416956416-wsy4?utm_source=share&utm_medium=member_ios (Accessed 13 January 2025)

1536 X Tate Mavetera https://x.com/TateMavetera/status/1855254130597494840?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1855254130597494840%7Ctwgr%5E5e159bf7a1cbd05c86584d2c7477338cc8d60aab%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fbulawayo24.com%2Findex-id-news-sc-national-byo-247709.html (Accessed 13 January 2025)

1537 Harare Institute of Technology 'HIT enters into agreement with POTRAZ' <https://www.hit.ac.zw/2023/11/09/hit-enters-into-agreement-with-potraz/> (Accessed 10 November 2024).

1538 Facebook POTRAZ <https://www.facebook.com/Potraz.Zw/photos/masvingo-and-mutare-public-sensitisation-awareness-workshops-on-the-cyber-and-da/746879650966953/> (Accessed on 13 January 2024)

1539 Sunday Mail 'Zim rolls out unmanned borders' (2024) <https://www.sundaymail.co.zw/zim-rolls-out-unmanned-borders> (Accessed 2 November 2024).

1540 Sunday Mail 'Zim rolls out online border management system' <https://www.sundaymail.co.zw/zim-rolls-out-online-border-management-system> (Accessed 1 November 2024).

1541 Centre for Innovation and Technology 'Bi brother is watching TTI installs street cameras on cbd roads' <https://cite.org.zw/big-brother-is-watching-tti-installs-street-cameras-on-cbd-roads/> (Accessed 4 November 2024).

and Protection of Privacy Act (AIPPA) and empower interested stakeholders to have full and justified access to information. Under Article 5 of the Act, public and public commercial entities should have information disclosure policies and disclose information in the interests of public accountability or information that is required for the exercise or protection of a right. However, some entities are not compliant with the Act.¹⁵⁴² Entities such as POTRAZ do not have up-to-date information on their website to reflect work done in the year. The section on the Universal Service Fund has information for the first, second and third phases of the USF, dating as far back as May 2013. In this section, no other information is available. In addition, in the fourth quarter of the year, the only sector performance report that was available on the website was the first quarter report. POTRAZ shares some updates on social media platforms. While this is not a representative sample, there is a general trend amongst government websites to not display full information. For example, the Ministry of ICT, Postal and Courier Services' website is not secure.

In this regard, Zimbabwe is mildly compliant with principle 29 (3) as government websites often carry outdated information.

AI and Emerging Technologies

The Zimbabwean government is reportedly developing a national artificial intelligence (AI) policy to regulate the use of AI and related technologies across various sectors. The Minister of Information Communication Technology, Postal and Courier Services, Tatenda Mavetera¹⁵⁴³ highlighted this initiative. The policy is intended to create a governance framework that ensures ethical use, security, and the promotion of IoT and AI technologies in the country. However, there have been limited public consultations in the development of the policy. As of the time of writing, the policy was not yet available for scrutiny by the public.

On November 5, 2024, Zimbabwe voted in favour of the draft resolution L.77 on Lethal and Autonomous Weapon Systems (LAWS)¹⁵⁴⁴ adopted by the First Committee of the United Nations General Assembly (UNGA). The resolution reflects states' apprehensions about the potential negative implications of LAWS on global security, ethical considerations and regional stability. The Resolution asserts that algorithms should not have full control over decisions that can result in killing or harming humans, underscoring the need for accountability in military operations. The resolution was adopted with 161 states voting in favour, 3 against, and 13 abstentions, demonstrating broad support for addressing the challenges posed by autonomous weapons.

Despite the vote on resolution L.77 on LAWS, Zimbabwe is mildly-compliant with the Declaration as it currently provides for automated decision making in the CPDA and has voted on resolution L.77 on LAWS. However, Zimbabwe has no publicly available national AI Policy despite public announcements that the policy is now in its final stages. In addition, the lack of public calls for stakeholders' participation is concerning and exclusive.

Digital Inclusion

In 2024, Zimbabwe utilised the USF to improve telecommunications infrastructure and digital literacy. However, challenges remain in enhancing transparency and addressing the digital divide. This section will highlight key developments and challenges related to the USF in Zimbabwe and spotlight capacity-building efforts undertaken by the POTRAZ for purposes of addressing digital skills gaps among persons with disabilities. The section will also highlight existing legal and regulatory frameworks for the protection of children in the digital environment.

Universal Service Fund

Zimbabwe has existing legislation on the Universal Service Fund (USF) which was established by section 73 of the Postal and Telecommunications Act, 2000(Chapter 12:05)] of 2000. The purpose of the USF is stipulated in Section 74(c) of the Postal Telecommunications Act (PTA). Holders of licences in terms of the Act, including telecommunications operators pay licence fees that finance

1542 Newsday 'Government institutions violating freedom of information act' (2024) <https://www.newsday.co.zw/thestandard/news/article/200031734/govt-institutions-violating-freedom-of-information-act> (Accessed 2 November 2024).

1543 Zimbabwe Broadcasting Corporation 'Government to launch AI Policy' (2024) <https://www.zbcnews.co.zw/government-to-launch-ai-policy/> (Accessed 6 November 2024).

1544 United Nations 'Resolution L.77 Lethal autonomous weapons systems' <https://documents.un.org/doc/undoc/ltd/n24/305/45/pdf/n2430545.pdf> (Accessed 10 November 2024).

or assist in financing the extension of postal and telecommunication services to under-served areas and community centres within or outside such areas. These funds are meant to promote affordable access to the internet for marginalised groups.

In January 2024, the government deployed new base stations in addition to 6896 base stations in the country, to support mobile services in rural and urban areas under the Universal Services Fund (USF).¹⁵⁴⁵ However, the specific number of new base stations is not specified. By 31 March 2024, POTRAZ had established at least 202 Community Information Centres (CICs) across the country with a total of 146 of these located at ZIMPOST Offices, 24 in containerised units deployed across 24 rural sites and 32 existing in brick-and-mortar structures built in rural areas. A total of 182 CICs are operational and twenty of the brick-and-mortar sites are not yet complete and are at various stages of completion.¹⁵⁴⁶ There is currently no publicly accessible information on the completion date of the 20 unfinished CICs.

Building capacity of persons with disabilities

In July 2024, POTRAZ trained at least 30 individuals from Manicaland province with hearing impairment in a week-long ICT skills training funded through the Universal Service Fund.¹⁵⁴⁷ Zimbabwe gazetted the Persons with Disabilities Bill (The Bill)¹⁵⁴⁸ on February 9 2024, with the aim of replacing the Disabled Persons Act of 1992. The Bill seeks to establish a Commission for Persons with Disabilities whose role in Section 5j will be “to promote research, development of, availability and use of new technologies, including information and communications technologies, mobility aids, devices, assistive technology and languages suitable for persons with disabilities.”

Improving digital access for children

Zimbabwe has an existing Cyber and Data Protection Act (2021) which protects personal information, including that of children, in the digital environment. This legislation safeguards children’s online activities and ensures that their rights are respected in digital spaces. The Government of Zimbabwe is a State party to the United Convention on the Rights of the Child (UNCRC), the United Nations Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography OPSC) and the African Charter on the Rights and Welfare of the Child (ACRWC). At the national level, Zimbabwe’s section 81 of the Constitution provides for children’s rights. Zimbabwe also has in place the Children’s Act Chapter 5: 06. However this Act has not been updated to address digital developments and cannot offer redress for online violence. Zimbabwe has existing child online protection guidelines,¹⁵⁴⁹ to safeguard children against online harms.

On digital inclusion, Zimbabwe is moderately compliant with the declaration principle 37 (3). However, the lack of official public information on the projects implemented under the fund and the annual allocation of the fund reduces the country’s score, as available information is often through news reports and not official public reports shared on government websites.

1545 Ministry of ICT, Postal and Courier Services ‘Various base stations deployed in Zimbabwe’ <https://www.ictministry.gov.zw/various-base-stations-deployed-in-zimbabwe/> (Accessed 6 November 2024).

1546 Sunday News ‘Over 200 community information centres established nationwide’ <https://www.sundaynews.co.zw/over-200-community-information-centres-established-nationwide/> (Accessed 11 November 2025)

1547 The Chronicle ‘ICT Minister reiterates commitment to digital inclusion’ https://www.chronicle.co.zw/ict-minister-reiterates-commitment-to-digital-inclusion/#google_vignette (Accessed 6 November 2024).

1548 Persons with Disabilities Bill https://www.veritaszim.net/sites/veritas_d/files/Persons%20with%20Disabilities%20Bill%20H.B.%202%2C%202023%20.pdf (Accessed 10 March 2025)

1549 POTRAZ https://www.potraz.gov.zw/wp-content/uploads/2015/05/POTRAZ_COP.pdf (Accessed 7 November 2024).

Londa 2025 Key Indicators	ACHPR Declaration (P stands for Principle)	Score	Justification
Internet Shutdowns	P38(2)	4	No internet shutdown was recorded.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37	4	Policies such as the National Broadband Plan, National ICT Policy and NDS1 among others exist, however, universal, affordable, meaningful access for all including children and persons with disabilities to the internet is still work in progress.
False News Criminalisation	P22(2)	1	Under Section 31(a)(iii) of the Criminal Law (Codification and Reform) Act, it is an offense to publish or communicate a statement that is wholly or materially false with the intention of undermining public confidence in law enforcement agencies or the state. Violators can face penalties of up to 20 years in prison for such offenses.
Sedition Legislation	P22(2)	1	Under Section 33 of the Criminal Law (Codification and Reform) Act, it is an offense to undermine the authority of or insult the President. Violators can face penalties of up to 20 years in prison.
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)	3	In the reporting period, no journalists and human rights defenders were arrested in line with freedom of expression and access to information online. However, online journalists self-censored themselves in response to threats.
Data Protection Legislation.	P42	3	Zimbabwe adopted the CDPA; however, the regulations do not provide a general requirement for data breach notification of data subjects. Despite the work being undertaken, there are lingering concerns that the Data Protection Authority may not allocate adequate time and resources for data protection as the data protection mandate is an add-on to its primary mandate of regulating the telecommunications sector.
States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)	5	No cases were recorded. Meta and Tiktok transparency reports for 2024 reflect that Zimbabwe did not make any content takedown requests. Google's transparency report has no information on Zimbabwe.

Londa 2025 Key Indicators	ACHPR Declaration (P stands for Principle)	Score	Justification
Invasion of Privacy of Communications	P41	2	The Cyber Security and Monitoring of Interceptions of Communications Centre is housed in the Office of the President and suggests the potential to target vulnerable groups through targeted surveillance. Section 6 of the Interception of Communication Act Section 6 (a,b and c) mandates the Minister to issue a warrant to authorised persons if there are reasonable grounds for the Minister to believe that the gathering of information concerning an actual threat to national security or to any compelling national economic interest is necessary or the gathering of information concerning a potential threat to public safety or national security is necessary. The above provisions expose individuals to invasion of their private communications.
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)	3	Government websites often carry outdated information. Zimbabwe has an existing Freedom of Information Act.
AI and Emerging Technologies national strategies	P39(6)	2	Despite being announced as complete, Zimbabwe's AI Policy is not yet publicly available. However, the CPDA in section 4 (1) provides for automated decision-making.
Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online	P37(5)	3	Zimbabwe adopted the CPDA, which has provisions protecting children's rights online.
Digital Inclusion	P37(3)	3	There are laws in place to support digital inclusion through the Universal Service Fund. However, the lack of official public information on the projects implemented under the fund and the annual allocation of the fund culminates in a lower score. Zimbabwe gazetted the Persons with Disabilities Bill which will seek to ensure access to technology for person's with disabilities.
TOTAL (up to 60)		34	

Conclusion

Zimbabwe's 2024 Londa report highlights both positive and negative developments. Zimbabwe's score of 33 demonstrates that the country is moderately compliant with the African Commission's Declaration. During the period under review, Zimbabwe developed new policies and regulations and made progress in digital inclusion and data protection. However, the existence of sedition laws and false news criminalisation is a major stumbling block that requires policy reform. Policy implementation challenges also inhibit the country's progress. Despite existing challenges, Zimbabwe has opportunities to improve its digital landscape.

Recommendations

Government should:

- Amend GBV-related laws such as the Domestic Violence Act to make them more effective in preventing and combating Online GBV
- Sign and ratify the African Union Convention on Cyber Security and Personal Data Protection
- Conduct public consultations human rights impact assessments before implementing surveillance initiatives.
- Create public participation opportunities for stakeholders to influence policy making processes.
- Repeal clauses in the Criminal Law (Codification and Reform) Act that criminalise false news
- Proactively disclose information by making it up-to-date and readily available on government websites.
- Disclose implementation of frameworks such as the African Union's Data Policy Framework.¹⁵⁵⁰
- Update the Children's Act Chapter 5: 06 to address digital developments and offer redress for online violence.
- POTRAZ should promote regular proactive disclosures of information through official channels and publish regular reports.
- The Ministry of ICT, Postal and Courier services should improve the accessibility of its website and provide up-to-date information.
- The Ministry should also make deliberate efforts to gather public views during policy design processes.

Civil Society Organisations should:

- Advocate for the implementation of the CPDA
- Conduct awareness campaigns on digital rights and inclusion
- Advocate for policy reform in instances where policies are not compliant with human rights

Media should:

- Investigate developments in the ICT sector to ensure the development and implementation of policies is human rights respecting
- Educate the public on digital rights and inclusion

Private Sector should:

- Conduct human rights impact assessment and due diligence measures before deploying surveillance technologies
- Conduct public consultations to engage citizens on the deployment of new technologies to ensure products are human rights compliant
- Implement the recently gazetted Cyber and Data Protection Regulations
- Publish transparency reports on the use of surveillance technologies to ensure transparency and accountability

