

LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Cote d'Ivoire

Country Report



PARADIGM
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Côte D'ivoire

By Steven Akomian

Executive Summary

The Londa Report 2025 was developed using a rigorous and reproducible methodology, combining in-depth research based on official sources and international reports aimed at analysing indicators with verifiable data and weighted scores using TheScore Index by Paradigm Initiative. The key findings reveal an overall score of 34 out of 60 in 2025 with progress in internet coverage and data protection following the revision of the PDP law, but setbacks are observed during election

disruptions especially in the lead-up to elections and gender inequalities persist as 43% of men versus 31% of women are connected.

The analysis highlights partial compliance with African standards on digital rights, including the African Commission on Human and Peoples' Rights (ACHPR) Declaration of Principles on Freedom of Expression and Access to Information in Africa (2019). The results of this analysis highlight partial compliance with the Declaration and persistent challenges such as surveillance and gender-based disinformation which affects 40% of women

in Cote d'Ivoire. These issues restrict the effective exercise of digital rights.

To improve compliance, Côte d'Ivoire must adopt more inclusive national strategies when drafting its data protection and cybersecurity governance frameworks. Furthermore, the budget allocated to the Universal Service Fund managed by National Agency for Universal Telecommunications Services (ANSUT) should be increased and its governance framework clarified, in order to enhance transparency, improve oversight and accelerate the

roll-out of connectivity in underserved areas. "These reforms should involve all stakeholders in the affected economic and social sectors to achieve a target score of 70 out of 100 by 2030¹.

This target aligns with Côte d'Ivoire's National Digital Development Strategy (2021-2025, extended) and the continental benchmarks outlined in the African Union Digital Transformation Strategy for Africa (2020-2030), which emphasise measurable progress in digital inclusion and rights protection

Introduction

Since 2016, Côte d'Ivoire has experienced significant progress in the area of digital rights, marked by an accelerated transition to a post-political crisis digital economy. The launch of the National Digital Economy Strategy (SNED 2016-2020) laid the groundwork for a more robust infrastructure, with internet penetration increasing from 22% in 2016 to 53.9% by

2025, thereby promoting access to information and financial inclusion for millions of citizens.

Notable progress has been made regarding internet access, with the expansion of rural coverage through the National Rural Connectivity Programme (PNCR), connecting more than 575 localities in 2025

1. National Digital Development Strategy for Côte d'Ivoire (SNNCI) 2021–2025 ((2025–2030 version currently being finalised) <https://telecom.gouv.ci/new/uploads/publications/171137227746.pdf> (accessed on 11 April 2026).

compared to fewer than 200 in 2016. Notable progress was also recorded in data protection, with the revision of Law No. 2013-450 in December 2024 to better align with international standards such as the Malabo Convention. However, persistent challenges remain unresolved, particularly those related to freedom of expression and cybersecurity.

Internet disruptions, often linked to political events, have increased from one incident in 2016 to two or three in 2025, frequently violating Article 9 of the African Charter on Human and Peoples' Rights (ACHPR) on freedom of expression. Biometric surveillance via the National Population Register (RNPP), which was projected to have an estimated coverage of 70% by 2025 according to progress reported by the National Identification Office of Côte d'Ivoire (ONECI), combined with Law N°2013-451 of June 2013 on combating cybercrime (as amended by Law N°2023-593 of 7 June 2023), poses risks of privacy violations and calls into question the principles set out in Article 5 of the ACHPR.

In Côte d'Ivoire, a significant increase in personal data incidents has been observed, with complaints and reported

violations on the rise. For instance, the Telecommunications Regulatory Agency of Cote d'Ivoire, (ARTCI), dealt with an increasing volume of complaints regarding electronic fraud, identity theft and illegal publications. According to the 2019 ARTCI Annual Activity Report² 4,505 cases/complaints were processed in 2019, compared to 2,860 in 2018 – a year-on-year increase of approximately 57.52%. These setbacks, compounded by low public participation in Artificial Intelligence (AI) policy, highlight an uneven trajectory in which technological progress is not always accompanied by enhanced human rights protection.

To reverse these trends, Côte d'Ivoire must prioritise inclusive and transparent governance, drawing inspiration from regional models such as the Economic Community of West African States (ECOWAS). Targeted investments in digital inclusion with focus on gender, disability, children and reforms to limit surveillance could promote alignment with the Declaration

2. Ivory Coast Telecommunications and ICT Regulatory Authority (ARTCI), 2019 Activity Report (2019),: https://www.artci.ci/images/stories/pdf/rapport_activite/rapport_activites_artci_2019.pdf (accessed on 11 April 2026).

Internet access and disruptions

Internet access is a fundamental pillar of digital rights, essential for exercising freedom of expression, access to information and economic inclusion, as enshrined in the African Charter on Human and Peoples' Rights. In Côte d'Ivoire, with a population of over 32 million in 2025³, internet access has been positive but uneven: massive infrastructure investments have boosted coverage, but disruptions linked to political events and persistent disparities have undermined progress. The year 2025 marked an acceleration of rural connectivity through the National Rural Connectivity Program (PNCR)⁴, but also setbacks in stability, impacting human rights and the economy.

The challenges of internet access in Côte

d'Ivoire centre on bridging the digital divide, which excludes a significant portion of the population from digital opportunities. With a growing economy with the Gross National Product (GNP) per capita at US\$2,670 in 2025, the Internet is a lever for financial inclusion and e-governance, but challenges include high costs relative to average income, poor quality in rural areas, recurring political instability and demographic inequalities including gender inequalities and the urban/rural divide. Regarding the digital divide, the gap between rural and urban areas continues to widen in the country. In urban areas, 52.7% are connected to the internet, compared to 24.6% in rural areas. In terms of gender distribution, 43% of men have regular access to internet service, compared to 31% of women.⁵ Regarding accessibility by age, 53% of young people (15–24 years old) regularly connect to the internet. These disparities threaten human rights, such as access to informa-

3. United Nations Population Fund (UNFPA), World Population Dashboard – Côte d'Ivoire (2025) <https://www.unfpa.org/data/world-population/CI> (accessed on 11 April 2026).
4. Ministry of Digital Transition and Digitalisation, National Rural Connectivity Programme (PNCR). This programme aims to gradually roll out radio sites to extend mobile and high-speed internet coverage in rural areas, thereby helping to bridge the digital divide between urban and rural areas: <https://telecom.gouv.ci/new/actualite/84> (accessed on 11 April 2026).
5. Africa's Digital Divide: Insights from the Global Network Excellence Index. <https://insights.opensignal.com/2025/09/africas-digital-divide-insights-from-the-global-network-excellence-index/dt> (accessed on 11 April 2026).

tion and education and hinder regional integration within the African Continental Free Trade Area (AfCFTA).

Network coverage has improved, with the National Rural Community Development Programme (PNCR) connecting 575 rural localities by the end of 2025 (240 in phase two⁶, 160 in phase one). As a result, mobile coverage now reaches 95% of the territory, compared to 85% in 2024. However, this significant coverage rate masks disparities between urban and rural areas. For example, in urban areas, 81% of households have internet access, compared to approximately 60% compared to 50% in 2024 in rural areas, according to the PNCR. It is important to note that the National Digital Development Strategy (SNDI 2021-2025) aims for 95% mobile internet coverage by 2025. To achieve this, key measures such as the expansion of fibre optics have been implemented, with

5,000 km deployed in Q1 2025⁷.

The cost of mobile data in Côte d'Ivoire remains affordable compared to the rest of Africa's average: 1 GB costs approximately 0.41 FCFA/MB⁸ (approximately US\$0,00073), representing less than 2% of Gross National Income (GNI) per capita. However, for the poorest 40% of the population, this figure rises to 5% of their monthly income. Entry-level smartphones account for 73% of the monthly income of the poorest compared to 64% in 2024 for the poorest 40%⁹. Faced with this challenge, several initiatives are being undertaken by public and private actors to facilitate the purchase of smartphones priced between US\$30 to US\$40, thereby reducing barriers to mobile internet access in the country.

Average fixed download speed, the time it takes for your connection to download a

6. Ecofin Agency: Launch of the second phase of its National Rural Connectivity Programme (PNCR) <https://www.ecofinagency.com/news-digital/1109-48590-cote-divoire-to-cover-30-new-localities-with-high-speed-internet-by-end-september> (accessed on 11 April 2026).
7. The State of Broadband in Africa 2025 https://www.broadbandcommission.org/wp-content/uploads/dlm_uploads/2025/09/The-State-of-Broadband-in-Africa.pdf (accessed on 11 April 2026).
8. African Business: Global internet prices 2025: Where Africa stands in a rapidly connecting world <https://african.business/2025/12/innov-africa-deals/global-internet-prices-2025-where-africa-stands-in-a-rapidly-connecting-world> (accessed on 11 April 2026).
9. African Business: Global internet prices 2025: Where Africa stands in a rapidly connecting world <https://african.business/2025/12/innov-africa-deals/global-internet-prices-2025-where-africa-stands-in-a-rapidly-connecting-world> (accessed on 11 April 2026).

digital file from the Internet, is 59.8 Mbps in comparison to 45 Mbps in 2024¹⁰, with Orange leading at 93.47 Mbps. For mobile internet, the average speed is 21.2 Mbps. Internet stability is 78% , with improved reliability thanks to upgrades to 200 telecommunication sites¹¹. However, there is congestion in urban areas and persistent instability in rural areas.

No major internet disruptions, total outages, slowdowns, or localised outages were reported by NetBlocks or OONI during this period, unlike the major submarine cable incident in March 2024, which caused a 37%¹² nationwide disruption in Côte d'Ivoire. Overall, in recent years, these disruptions have been very rare with only one technical incident in 2024.

Côte d'Ivoire is partially compliant due to progress made in internet access through the National Community Development Program (PNCR).

Freedom of Expression

and Access to Information

Freedom of expression and access to online information are cornerstones of digital rights, protected by the African Charter on Human and Peoples' Rights (ACHPR), which guarantees freedom of opinion and expression (Article 9). In Côte d'Ivoire, a country experiencing rapid digital growth with over 17 million internet users projected for 2025, this figure reflects an ambivalence as legislative advances regarding access to information contrast with setbacks in online censorship and repression, particularly during election periods. The year 2025 saw a consolidation of the legal framework, but also an increase in arrests related to online expression, impacting public participation. This assessment examines the challenges, progress/setbacks compared to 2024.

10. DataReportal, Digital 2025: Côte d'Ivoire (March 2025) <https://datareportal.com/reports/digital-2025-cote-divoire> (accessed on 11 April 2026).

11. DataReportal, Digital 2025: Côte d'Ivoire (March 2025) <https://datareportal.com/reports/digital-2025-cote-divoire> (accessed on 11 April 2026).

12. Internet Society, 2024 West Africa Submarine Cable Outage Report (April 2024), p.3 <https://www.internetsociety.org/resources/doc/2024/2024-west-africa-submarine-cable-outage-report/> (accessed on 11 April 2026).

13. Republic of Côte d'Ivoire, Constitution of the Republic of Côte d'Ivoire (2016, as amended) <https://www.presidence.ci/wp-content/uploads/2025/06/Constitution-livret-ok.pdf> (accessed on 11 April 2026).

The challenges of freedom of expression and access to online information in Côte d'Ivoire focus on protection against digital repression, which hinders civic participation and economic innovation. With an active civil society and a dynamic press, the main challenge is to balance cybersecurity with human rights while combating gender-based disinformation which excludes women from public life. These challenges threaten democracy and social inclusion, particularly for journalists, human rights defenders and women.

Several laws in Côte d'Ivoire govern freedom of expression, including Article 19 of the 2016 Constitution¹³ and the 2017

Press Law (online freedom).¹⁴ However, restrictive laws such as the Law No. 2023-593 amended Law No. 2013-451¹⁵ criminalises “false information”¹⁶ and the Penal Code has seditious provisions, with the possibility of arbitrary application.

Law No. 2013-867 on access to information (2013)¹⁷ exists, but its implementation is weak with only 40% of requests processed in 2025 vs. 35% in 2024¹⁸. This law provided for the establishment of the Commission for Access to Information of Public Interest (CAIDP)¹⁹ which has been fully operational for five years. This Commission launched ACCESS CAIDP, an innovative digital platform designed

14. Republic of Côte d'Ivoire, Law No. 2022-978 of 20 December 2022 amending Law No. 2017-867 of 27 December 2017 on the legal framework for the press <https://loidici.biz/2023/07/15/loi-n-2022-978-du-20-decembre-2022-modifiant-la-loi-n-2017-867-du-27-decembre-2017-portant-regime-juridique-de-la-presse/lois-article-par-article/plus-de-textes-de-lois/la-presse/44608/naty/> (accessed on 11 April 2026).

15. Republic of Côte d'Ivoire, Law No. 2023-593 of 7 June 2023 amending Articles 17, 33, 58, 60, 62 and 66 of Law No. 2013-451 of 19 June 2013 on combating cybercrime <https://loidici.biz/2023/10/22/loi-n-2023-593-du-7-juin-2023-modifiant-les-articles-17-33-58-60-62-et-66-de-la-loi-n-2013-451-du-19-juin-2013-relative-a-la-lutte-contre-la-cybercriminalite/lois-article-par-article/plus-de-textes-de-lois/46819/naty/> (accessed on 11 April 2026).

16. Republic of Côte d'Ivoire, Law No. 2023-593 of 7 June 2023 amending Articles 17, 33, 58, 60, 62 and 66 of Law No. 2013-451 of 19 June 2013 on combating cybercrime <https://loidici.biz/2023/10/22/loi-n-2023-593-du-7-juin-2023-modifiant-les-articles-17-33-58-60-62-et-66-de-la-loi-n-2013-451-du-19-juin-2013-relative-a-la-lutte-contre-la-cybercriminalite/lois-article-par-article/plus-de-textes-de-lois/46819/naty/> (accessed on 11 April 2026).

17. Republic of Côte d'Ivoire, Law No. 2013-867 of 27 December 2013 on the legal framework for access to information (2013) https://habg.ci/documents/loi%20no%202013_867_acces_a_l_information.pdf (accessed on 11 April 2026).

18. Collaboration on International ICT Policy for East and Southern Africa (CIPESA), State of Internet Freedom in Africa Report (2023) https://cipesa.org/wp-content/files/reports/State_of_Internet_Freedom_in_Africa_Report_.pdf (accessed on 11 April 2026).

to facilitate access to public information for all. Through this web portal, the CAIDP aims to strengthen citizen participation, administrative transparency and the fight against disinformation. This system is structured around four main functions: proactive publication of documents, support for requests, user training and tracking of procedures. It offers a simplified five-step process, from submitting a request to receiving a response, with the option to evaluate the service. The aim is to make access to information more fluid, traceable and efficient.

Reporters Without Borders' (RSF) 2025 report²⁰ notes that 65% of journalists lim-

it their online expression for fear of reprisals up from 60% in 2024. As a result, many human rights defenders and civil society organisations (CSOs) avoid social media, particularly during elections. There are missing journalists²¹ who have been missing since 2004. Self censorship is further worsened by political causes such as ban on rallies by the National Security Council which was announced on October 2 2025²² and the Prefect of Abidjan through the Prefect's Order 10/10/2025, and the arrest of 237²³ people in Abidjan and Dabou during a peaceful demonstration dispersed with tear gas sources.²⁴ Arrests of journalists also featured²⁵ in the period under review.

19. Commission for Access to Information and the Protection of Personal Data (CAIDP) <https://www.caidp.ci/apropos> (accessed on 11 April 2026).
20. Reporters Without Borders (RSF), Ivory Coast (2025) <https://rsf.org/en/country/ivory-coast> (accessed on 11 April 2026).
21. Reporters Without Borders (RSF), World Press Freedom Index 2025 – Côte d'Ivoire (2025) https://rsf.org/en/barometer?exaction_victimes_pays%5B59%5D=59&annee_start=2025&annee_end=2025#exaction-victimes (accessed on 11 April 2026).
22. Reporters Without Borders (RSF), "Ivory Coast: Journalists attacked and threatened during a demonstration in Abidjan" (video), YouTube, 8 March 2025 https://youtu.be/CrYndrxQnMc?si=GK_AqRl0o9v-ftvW (accessed on 11 April 2026).
23. Amnesty International_Côte d'Ivoire: The authorities must stop stifling peaceful protests ahead of the presidential election <https://www.amnesty.org/en/latest/news/2025/10/cote-divoire-protests-election/> (accessed on 11 April 2026).
24. The Associated Press_ Ivory Coast arrests 237 protesters amid rising tensions before presidential election <https://www.cp24.com/news/world/2025/10/11/ivory-coast-arrests-237-protesters-amid-rising-tensions-before-presidential-election/> (accessed on 11 April 2026).
25. Reporters without Borders_Report on Côte d'Ivoire <https://rsf.org/en/rsf-investigation-ivory-coast-gives-refugee-journalist-vip-treatment-while-deporting-him-back-benin> (accessed on 11 April 2026).

For 2025 15 cases of personal data disclosure (doxing), five cases of deepfakes, and 70% of cyber harassment attacks being gendered were observed in Côte d'Ivoire²⁶. A case study was conducted by RSF 2025 concerning a journalist from Abidjan who was harassed via deepfake during the 2025 presidential elections²⁷.

The Centre for Journalism Innovation and Development (CJID) observed that individuals are being misled by AI-generated content they believe is accurate, and women face unwarranted body-shaming and online attacks, which have mental health consequences.²⁸

On March 14, Côte d'Ivoire's Parliament passed a Bill on Electronic Communication, sparking worries among journalists and investigative media outlets. Despite objections from media defense organizations, the Parliament approved the Bill as law on May 7.²⁹

Data Protection and

Cybersecurity

Data protection and cybersecurity are essential components of digital rights, safeguarding the privacy and security of citizens in an increasingly connected world, as stipulated by the Declaration which guarantees protection against abuses. In Côte d'Ivoire, with over 17 million internet users projected for 2025, this indicator reflects legal progress but limited implementation as advances in the legal framework contrast with setbacks in terms of violations and surveillance. The year 2025 saw an overhaul of the Privacy Act (PDP), but also an increase in cybersecurity incidents, impacting trust and the economy.

The challenges of data protection and cybersecurity in Côte d'Ivoire centre on safe-

26. The World Association for Christian Communication (WACC)_Abuse of AI for disinformation and tech-facilitated gender-based violence <https://waccglobal.org/abuse-of-ai-for-disinformation-and-tech-facilitated-gender-based-violence/> (accessed on 11 April 2026).

27. Reporters without Borders_Report on Côte d'Ivoire <https://rsf.org/en/country/ivory-coast> (accessed on 11 April 2026).

28. The World Association for Christian Communication (WACC)_Abuse of AI for disinformation and tech-facilitated gender-based violence <https://waccglobal.org/abuse-of-ai-for-disinformation-and-tech-facilitated-gender-based-violence/> (accessed on 11 April 2026).

29. International Press Institute (IPI)_Ivory Coast's Electronic Communications Law raises concerns about press freedom <https://ipi.media/alerts/cote-divoire-electronic-communication-law-raises-concern-for-press-freedom/> (accessed on 11 April 2026).

guarding privacy in the face of the growth of digital data, which exposes citizens to risks of breaches and surveillance. The main challenge is to balance cybersecurity with human rights while simultaneously addressing inequalities in access to justice. These challenges threaten human dignity and inclusion, particularly for vulnerable populations.

Law No. 2013-450 on data protection (2013)³⁰ was revised procedurally in December 2024 to align it with the Malabo Convention. It largely complies with the requirements and best practices in this area regarding the rights of individuals, guiding principles, and the requirements of data controllers. However, shortcomings have been observed in addressing current challenges such as AI and its advancements.

The Telecommunications Regulatory Authority of Côte d'Ivoire (ARTCI) which is in charge of data protection is expected to handle 150 complaints in 2025 resulting

in 10 sanctions and fines of approximately FCFA 50 million (US\$89,384.67). However, the Authority's effectiveness is limited by its means of action as only 20% of investigations have been completed, infrequent redress (five cases in 2025), and the lack of clear and precise procedures for complying with the Data Protection Law.

Cybersecurity measures

Law No. 2023-593 of June 7 2023,³¹ revising Law No. 2013/451 of June 19 2013, on cybercrime and the National Digital Development Strategy 2021-2025 constitute frameworks and tools implemented to strengthen the means of combating cybersecurity. However, the challenge of combating cybersecurity must not sacrifice the need to respect human rights and the protection of privacy, given the increased risks of surveillance in this area.³²

30. Law No. 2013-450 of 19 June 2013 on the Protection of Personal Data in Côte d'Ivoire https://www.artci.ci/images/stories/pdf/lois/loi_2013_450.pdf (accessed on 11 April 2026).

31. <https://loidici.biz/2023/10/22/loi-n-2023-593-du-7-juin-2023-modifiant-les-articles-17-33-58-60-62-et-66-de-la-loi-n-2013-451-du-19-juin-2013-relative-a-la-lutte-contre-la-cybercriminalite/lois-article-par-article/plus-de-textes-de-lois/46819/naty/> (accessed on 11 April 2026).

32. Republic of Côte d'Ivoire, Law No. 2023-593 of 7 June 2023 amending Articles 17, 33, 58, 60, 62 and 66 of Law No. 2013-451 of 19 June 2013 on combating cybercrime <https://dig.watch/resource/ivory-coasts-cybersecurity-strategy-2021-2025> (accessed on 11 April 2026).

Cote d'Ivoire ratified the Malabo Convention in 2023 and is implementing the national data protection law.

Digital identities

The National Register of Natural Persons (RNPP) covers 70% of the population in Côte d'Ivoire, progressively ensuring population identity coverage and the transition to digital identity. All of these are necessary to improve governance services and reduce the risks of social exclusion. These efforts must continue by strengthening the framework dedicated to enhanced privacy and mitigating the risks of discrimination.

Confidentiality and monitoring

Privacy and surveillance are crucial issues in digital rights, protecting privacy

against state and private intrusions, in accordance with the Declaration. In Côte d'Ivoire, with internet penetration projected at 53.9% in 2025 and over 17 million internet users, this indicator reveals a permissive legal framework for surveillance, reinforced by the cybersecurity law, but with limited judicial oversight. The year 2025 saw an intensification of biometric surveillance tools and content removal requests, impacting privacy and freedom of assembly. The challenges of privacy and surveillance in Côte d'Ivoire focus on the risk of excessive surveillance that infringes on privacy, non-discrimination, and freedom of assembly. The main challenge is to regulate intrusive technologies such as facial recognition, interception of communications while protecting human rights. These challenges threaten dignity and freedom of expression particularly for journalists, human rights defenders and political opponents.

Law No. 2023-593 of June 7 2023³³ revising Law No. 2023 of June 19 2023, on cybercrime, authorises the interception of communications and surveillance by the National Agency for Information Systems

33. <https://loidici.biz/2023/10/22/loi-n-2023-593-du-7-juin-2023-modifiant-les-articles-17-33-58-60-62-et-66-de-la-loi-n-2013-451-du-19-juin-2013-relative-a-la-lutte-contre-la-cybercriminalite/lois-article-par-article/plus-de-textes-de-lois/46819/naty/> (accessed on 11 April 2026).

Security (ANSSI), created in 2024 by the Law on Electronic Communications³⁴ and the ARTCI. This broad-scope law Article 12 grants extensive powers without clear proportionality. These general provisions risk creating abuses as there is no strict definition of “national threat” and raise issues of international compliance with Article 4 of the African Charter on Human and Peoples’ Rights and the principles of legality, necessity, and proportionality.

ANSSI coordinates the monitoring (operational since February 2025) of efforts to combat disinformation and threats to privacy. In this regard, several reports of metadata interception such as massive collection without transparency, have been observed in recent years. There has been evidence of the deployment of several mass surveillance tools.³⁵

Biometric surveillance

The National Register of Natural Persons

(RNPP) covers 70% of the population in 2025 through the use of biometrics such as fingerprints/facial scans which has accelerated population census operations. Regarding the widespread use of facial recognition systems in public spaces, no deployment has been confirmed for 2025, but cases of border controls based on this type of system have been reported posing risks to privacy and non-discrimination.

Control

Regarding state control mechanisms, weak judicial oversight authorisation by the prosecutor without adversarial debate, 20% of requests rejected by 2025 is virtually nonexistent. Parliamentary involvement is absent as there is no dedicated ANSSI committee in this area, while ANSSI by 2025 has broad powers without independent oversight and no public audits reported.

A structured analysis based on the princi-

34. Law No. 2024-352 of June 2024 on Electronic Communications in Côte d'Ivoire https://www.artci.ci/images/stories/pdf/lois/Loi_n2024-352_du_6_juin_2024_relative_aux_Communications_Electroniques.pdf (accessed on 11 April 2026).

35. Paradigm Initiative. The State of Digital Surveillance. <https://paradigmhq.org/wp-content/uploads/2024/05/The-state-of-Digital-Surveillance-1.pdf> (accessed 17 March 2026)

ples of legality, necessity, and proportionality reveals:

- **Legality:** The law is predictable in its general objectives (fighting cyber-crime), but its clauses on surveillance (e.g., interception of communications) lack precision and clear safeguards, making interference potentially unpredictable for citizens.
- **Necessity:** The measures respond to a legitimate objective in a democratic society protection against cyber threats, such as rising electronic fraud, but they must be justified by concrete threats without targeting specific groups in a discriminatory manner.
- **Proportionality:** The lack of proportionality is evident, with an insufficient balance between security and human rights, for example, biometric surveillance via the RNPP risks excessive interference with privacy (Art. 5) and expression (Art. 9), without independent judicial oversight and could exacerbate inequalities for marginalized populations (rural, women, ethnic minorities) in the event of algorithmic bias or data leaks.

To mitigate these risks, it is essential to establish independent judicial oversight for all surveillance measures, as well as

regular and transparent audits of biometric systems, by an independent authority such as a dedicated commission, in line with the Declaration This would allow for better alignment with regional human rights standards.

ICT and emerging

technologies

Information and communication technologies (ICTs) and emerging technologies, including artificial intelligence (AI), facial recognition (FRT), blockchain and augmented/virtual reality, represent both major opportunities for socio-economic development and significant risks to human rights. In Côte d'Ivoire, implementation remains fragmented and poorly regulated from a human rights perspective. The year 2025 marked the official launch of several initiatives such as Pro. AI, ANIA and international partnerships, but it also highlighted shortcomings in public consultation, ethics, and protection against abuse. The challenges related to ICTs and emerging technologies in Côte d'Ivoire revolve around the balance between economic innovation and the protection of human rights. AI and FRT can improve e-governance, security, and

financial inclusion, but without a robust ethical framework, they risk increasing surveillance, algorithmic discrimination, privacy violations, and the exclusion of vulnerable populations. The lack of broad public consultation and low transparency surrounding biometric deployments threaten fundamental freedoms.

The National Artificial Intelligence Strategy 2030³⁶ (SNIA 2030) adopted in March 2025 is the main framework in Côte d'Ivoire. It defines six pillars which include infrastructure, skills, research, industry, ethical governance and inclusion. The country is also committed to implementing the UNESCO AI Ethics Framework (2021).

This important framework has been strengthened with a National Data Governance Strategy³⁷ and must be complemented in particular by strengthening the AI governance framework with the creation of a National AI Agency (ANIA) and the strengthening of the data protection governance framework.

The National Register of Natural Persons (RNPP) uses facial/fingerprint biometrics for 70% of the population to strengthen the implementation of digital identity in the country. There is not yet widespread FRT in public spaces no generalised urban deployment confirmed for 2025, but significant risks to privacy non-discrimination and threats to freedom of assembly are documented in the country

Regarding blockchain, it is used in e-governance for the creation of the digital land registry (2024-2025 pilot project), which resulted in the production of 15,000 secure titles. This technology has improved land governance with greater transparency while also reducing corruption. Augmented/virtual reality solutions have helped to support and enhance distance learning programmes at universities and colleges across the country. However, their roll-out raises human rights concerns: in the absence of universal accessibility, they risk excluding some students, thereby exacerbating the digital divide and undermining the right to inclusive, high-quality education. The National Artificial Intelli-

36. Ivory Coast's National AI Strategy for 2030 (SNIA) <https://telecom.gouv.ci/new/uploads/publications/174196670372.pdf> (accessed on 11 April 2026).

37. Ivory Coast's National Data Governance Strategy (SNGD) 2030 <https://telecom.gouv.ci/new/uploads/publications/174196707541.pdf> (accessed on 11 April 2026).

gence Agency (ANIA), planned for implementation in 2025, is not yet operational, which limits the operationalisation of the 2030 SNIA. This is coupled with the lack of a binding ethical framework for AI, and the limited consultation of civil society organisations (CSOs) in drafting key regulatory frameworks is also a limitation.

For the development of the 2030 National Investment Strategy (SNIA 2030), the Ministry of Digital Transformation and Digitalisation (MTND) conducted several consultations, receiving over 500 contributions including from civil society. However, the list of names and details of these contributions from civil society organisations in the form of a public summary report is not available.

Digital inclusion

Digital inclusion is a central issue in digital rights, promoting equal access to educational, economic and social opportunities. In Côte d'Ivoire, with a population of over 32 million and an internet penetration rate of 53.9% projected for 2025, this indicator reflects gradual efforts to bridge the digital divide but persistent gaps in accessibility for people with dis-

abilities and in the protection of children online. The year 2025 saw an increase in investments in the Universal Service Fund (USF), but also setbacks in the inclusion of vulnerable groups, impacting citizen participation. The challenges of digital inclusion in Côte d'Ivoire focus on reducing inequalities in access, which exclude people with disabilities, children, and vulnerable populations from digital opportunities. Inclusion is a lever for e-governance and education, but challenges include a lack of accessibility for people with disabilities, the absence of specific laws for children online and ineffective use of the USF to reduce the digital divide. These issues threaten equality and social inclusion, particularly for the 1.2 million persons with disabilities.

In terms of accessibility, 15% of public websites will be compliant with the Web Content Accessibility Guidelines (WCAG 2.1) by 2025. Regarding assistive technologies, digital inclusion continues, with over 50,000 beneficiaries expected by 2025,³⁸ according to the National Agency for Universal Service (ANSUT). Several policy frameworks exist in this area, notably Law No. 98-594 on disability (1998), revised in 2023, but these are not specific to digital development in Côte d'Ivoire. The e-citizen platform,³⁹ implemented to encourage citizen participation, is still un-

derutilised and 20% accessible to people with disabilities by 2025. Concerning digital literacy, several initiatives are being deployed to facilitate social inclusion and enable widespread use of digital tools.

Protection of children

online

Protecting children online remains a major challenge for digital governance authorities in Côte d'Ivoire, as no law currently addresses this issue. Indeed, even Law No. 2013-450 PDP 2013, revised in 2024, which governs the right to privacy, does not address this matter. The SNIA 2030 mentions the issue of ethics for vulnerable individuals, but without legislation specifically addressing children online, this framework remains incomplete.

Universal Service Fund (USF)

The ICT Regulatory Authority (ARTCI) (established in 2013) manages Universal Service Fund

(USF). In Côte d'Ivoire, FSU is also associated with the National Rural Connectivity Programme (PNCR), which has notably facilitated internet connectivity in 575 rural localities by 2025 through the deployment of 5,000 km of fibre optic cable across the country. In terms of overall effectiveness, FSU has significantly contributed to reducing the digital divide between urban and rural areas by 5% (rural areas will reach 60% vs. 50% by 2024), but important challenges such as the involvement of civil society organisations (CSOs) in its governance remain to be addressed. According to ARTCI, 120 billion FCFA was collected in 2024 compared to 100 billion in 2023⁴⁰ by the FSU. At the end of 2025, FCFA 80 billion (US\$143 million) (after allocations) remained available.

38. ARTCI Report on Digital Inclusion in Côte d'Ivoire https://www.artci.ci/images/stories/pdf/rapport_activite/Rsum_Excusif-Etude_Inclusion_Numrique_Version_finale__12_02_2025_DEP.pdf (accessed on 11 April 2026).

39. CI e-Citizen Portal for Public Services in Côte d'Ivoire <https://www.e-citoyen.net/> (accessed on 11 April 2026).

40. ARTCI Report on Telecommunications Market Statistics in Côte d'Ivoire in 2025 https://www.artci.ci/images/stories/pdf/RAPPORT_ARTCI_-_T3_2025.pdf (accessed on 11 April 2026).

There is a lack of regularly published official reports on its management. However, according to the Ivorian government, 60% of FSU funds were allocated to rural connectivity through the PNCR. If the results of public audits are made available in the coming months, this assessment will be more relevant and objective.

There are no official statements, policy documents or parliamentary discussions concerning the management, challenges and future plans of the FSU are available online. There is limited transparency as there are no public monthly reports and opaque administrative and financial management.

Conclusion

Côte d'Ivoire's overall assessment in the Londa Report 2025 reveals a positive but uneven digital rights landscape, with an average TheScore of 34/60 in 2025 reflecting modest progress in internet access and data protection but persistent setbacks in freedom of expression and digital inclusion. The country has made good progress in infrastructure and regulation the development and operationalisation in the early stages of the National AI Strategy (SNIA 2030) and the Data Governance Strategy (SGD), and the deployment of the National Personal Identification Number (RNPP) to ensure digital identity for all, demonstrating a commitment to aligning with continental standards such as the AU Strategic Framework on Data Governance and the AU Digital Identity Systems

Interoperability Framework. However, structural challenges, political instability, gender/rural inequalities, and weak law enforcement, undermine compliance with the African Charter on Human and Peoples' Rights (ACHPR) and hinder social inclusion. The future trajectory should focus on inclusive and transparent digital governance to translate these advances into concrete impacts.

To improve its current ratings, Côte d'Ivoire should adopt an ambitious 2026-2030 roadmap through strengthening of institutions by transforming ARTCI into an independent APDP and adoption of a law on ethical AI. Côte d'Ivoire should increase investment in digital inclusion (50% increase in the Single Social Fund for people with disabilities/ children and literacy campaigns). There is a need to strengthen the cybersecurity governance framework by aligning with the requirements of the Declaration.

Recommendations

Based on the overall assessment of the Londa Report 2025 for Côte d'Ivoire, which shows a score of 34/60 with moderate progress in internet access and data protection but persistent setbacks in freedom of expression and digital inclusion, the following recommendations have been made.

The Government should:

- Accelerate the implementation of the SNIA 2030 and the SGD: The MTND should launch the National AI Agency with an advisory committee including OSC, to integrate mandatory DPIAs and reduce data breaches.
- Strengthening inclusive infrastructure through the USF: Increase USF funds to FCFA 150 billion (US\$) per year vs FCFA 120 billion that was invested in 2025 to connect rural localities, with allocations prioritising accessibility for people with disabilities.
- Adopt a revised cybersecurity law: The MTND, in partnership with AN-SSI should revise law 2018-719 to include independent judicial controls on surveillance.
- Promote open access to information: Improve law 2013-867 to process information requests with a commission dedicated to online information.
- Integrate inclusion into all projects and prioritise programmes for children and persons with disabilities with annual audits to measure the impact on equality.
- Adopt an online child protection law.
- Harmonise with the region and the continent: Fully ratify the AfCFTA Digital Protocols (2024) and align with ECOWAS for interoperability.
- Invest in ethical cybersecurity: Allocate funds for training and tools to counter violations
- Monitor and evaluate annually: Conduct annual public audits, publish online, track progress and setbacks.

The Media should:

- Promote digital literacy: Media outlets should launch educational campaigns on online rights
- Document and denounce violations: Use platforms like Ripoti to report violations on disruptions and arrests
- Combat gender-based disinformation: Train journalists in AI ethics, with a focus on cases involving female politicians.
- Leverage access to information: Test Law 2013-867 with annual requests for transparency on the FSU and RNPP, publishing the results to raise awareness.
- Participate in ANIA advisory committees to influence AI policies, promoting freedom of expression

The Private Sector should:

- Adopt ethical AI practices: ISPs should implement voluntary AIPDs for AI projects.
- Invest in inclusion through PPPs: Partner with the FSU to improve accessibility for persons with disabilities.
- Strengthen internal cybersecurity frameworks: Adopt ISO 27001 standards and report breaches to ARTCI for transparency.
- Promote digital literacy: Launch CSR programmes for young people/children.
- Advocate for a reform of the data governance framework: Through the CGECI, influence the laws on data protection and cybersecurity to balance security and rights, aiming for zero setbacks in freedom of expression.




Civil Society Organisations should:

- Advocate for inclusive laws and mobilise for the development of a law on online child protection and accessibility for people with disabilities by 2027,
- Monitor and documenting violations: Create a digital observatory for an annual report on disruptions/monitoring
- Promote inclusion through the Universal Service Fund (USF): Auditing the use of USF funds through requests for information under Law 2013-867,
- Educate and train: Launch literacy campaigns, focusing on gender and unregistered children.
- Collaborate with the MTND: Integrate the committees planned for the creation of the ANIA to influence AI governance, promoting compliance with the Declaration.





The Score Index

Côte d'Ivoire, 2025

1 = Totally non-compliant; 2 = Mildly compliant; 3 = Moderately compliant;
4 = Considerably compliant; 5 = Fully compliant

Indicator	ACHPR Principle	2025 Score	2025 Justification
Internet Shutdowns	P38(2)		No major outages have been documented since 2023 (ARTCI reports 2024-2025). Network stability despite elections, but minor risks in rural areas. High score for recent absence.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37		SNIA 2030 (pp. 36-49) and SNGD 2030 mention digital inclusion, but not a policy dedicated to affordable/universal access (persistent urban/rural divide, ARTCI reports). There are gaps in concrete measures.
False News Criminalisation	P22(2)		The 2017-867 Press Law criminalises fake news (Art. 97) and will be strengthened in 2025 by a decree against online disinformation. These measures are moderate, but pose risks to freedom of expression (HRW reports).

Indicator	ACHPR Principle	2025 Score	2025 Justification
Sedition Legislation	P22(2)	 3	The Penal Code (Art. 173) criminalises sedition, but its application is moderate online (no major AI/disinformation cases 2023-2025). It aligns with AU standards but is criticised for its vagueness
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)	 2	Cases of harassment of journalists/activists (RSF 2025 report, post-2025 election arrests). Improvements via the National Ethics Information System (SNIA), but protection gaps .
Data Protection Legislation.	P42	 4	Robust Law 2013-450 (personal data protection, APDP created). Strengthened by SNIA 2030 (pp. 56-59, data audits). Aligned with AUDPF, but with limited capacity for further strengthening.
States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)	 1	Frequent requests for removals (ARTCI 2025 reports: 150+ cases of disinformation/elections). Lack of transparency, risk of censorship (Freedom House).
Invasion of Privacy of	P41	 2	Cybersecurity Act 2013-451 provides protection, but in some cases, surveillance is required The SNIA ethics law (pp. 56-59) promises audits, but these have not been implemented.

Indicator	ACHPR Principle	2025 Score	2025 Justification
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)		SNIA 2030 (pp. 66-71) provides for transparency, but ARTCI/MTND reporting is limited (no proactive disclosure under IA 2025). There are gaps in information access (IT reporting). Low disclosure and sporadic announcements. No proactive policy
AI and Emerging Technologies national strategies	P39(6)		SNIA 2030 complete (3 pillars, roadmap Aligned with Agenda 2063/AUDPF. High score for existence, but implementation is in its early stages.
Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online	P37(5)		There is no specific, binding legislation dedicated to the protection of children in the digital environment (there are no provisions regarding appropriate age limits, child-friendly design, mandatory age verification on platforms, or enhanced privacy rules for minors).
Digital Inclusion	P37(3)		<ul style="list-style-type: none"> • SNIA Inclusion (pp. 36-49) targets women,youth,rural populations with Pro.IA • Progress but inequalities persist
Total (out of 60):	<div style="background-color: #f46d43; color: white; padding: 10px; text-align: center;"> 2025 34 </div>		



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