

LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Rwanda

Country Report



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Rwanda

By Louis Gitinywa

Executive Summary

The Rwandan government has placed ICT not only as a central tool for its transformation to facilitate its service delivery across all sectors but also as a driving force to develop a knowledge-based economy by investing in infrastructure

and digital services. Today, the ICT sector has significantly contributed to the country's GDP by over 4%¹. The country has achieved significant strides in terms of digital infrastructure towards universal mobile coverage. Amongst the many

1. Law no 60/2013 of 22/08/2013 regulating the interception of communications, available at file:///C:/Users/Kigali%20Attorneys/Downloads/Law%20governing%20Information%20and%20Communication%20Technologies%20(1).pdf

examples of the materialisation of this ambitious vision are the implementation of “Irembo”, which is Rwanda’s e-government services portal, where Rwandan citizens can easily access services ranging from birth certificates, death certificates, land title transfers, and “Sophia”, the notorious smart traffic cameras.

In addition, Rwanda has rolled out ambitious initiatives in the health sector, such as the National Health Intelligence Center, an online AI platform designed to collect, process, and consolidate data from across the healthcare system in order to monitor real-time pandemics or major public health crisis incidents and strengthen the decision-making process. Further, the country is a proof of concept for hubs that have enabled the development of transformative services and applications such as drone-based and AI-driven health services. However, despite Rwanda’s ICT success, high level of policy and regulatory agility, several key issues are unresolved as digitisation is not just about access and connectivity. It is also important for the state to address critical governance issues based on public transparency and accountability.

President Kagame’s administration has been in the spotlight and criticised for the use of surveillance, especially in a context where telecommunications operators have been making user location available to state security services², as well as reported cases of serious restrictions on free speech and censorship against journalists, political dissidents and civil society actors in the country.

This report draws on desk-based research analysing international legal instruments ratified by Rwanda, alongside national legislation, policy papers, human rights reports, and media sources. It also incorporates insights from unstructured in-person interviews with civil society actors and leaders of indigenous and grassroots communities, based on their expertise and experience.

2. Key Figures: 5th Rwanda Population and Housing Census; available at <https://www.statistics.gov.rw/publication/key-figures-5th-rwanda-population-and-housing-census-phc> (Accessed on 14th October, 2025)

Introduction

Located in East Africa, Rwanda is a landlocked country, estimated to occupy 26,338 Sq Km. It is a landlocked country with a population of 13,8 million in 2022³, bordered by Uganda, Tanzania, Burundi and the far larger Democratic Republic of Congo. Kinyarwanda is the principal and national language, with English, French and Swahili serving as additional official languages.

Rwanda is a country with few natural resources, and emerging from the shadows of the 1994 genocide against the Tutsi. The country has maintained peace and relative stability, while achieving significant economic growth over the last three decades. The country's GDP growth was projected to average 7.6% in the 2024-2025 fiscal year⁴. The growth is mostly driven by private investments, tourism and improved agricultural conditions. Besides challenges from inflation and a

weakening currency, Rwanda's economy demonstrated resilience in 2025. The service sector also performed well, growing by 11%. Notably, the ICT sector saw a significant 35% growth. According to a World Bank report⁵, the mobile and digital services grew by 34.9%.

Today, Rwanda's digital transformation is not merely a modernisation programme. It is a highly calculated exercise in nation-building through technology. From fintech and artificial intelligence (AI) to education and healthcare, the state is placing innovation into the foundations of its governance.

However, as the country continues its journey toward digital innovation, the current governance framework has very few independent institutions capable of raising questions about accountability in an increasingly digitised environment. Freedom of opinion, freedom of the me-

3. <https://police.gov.rw/media/news-detail/news/inside-rwanda-polices-high-tech-shift-to-safer-smarter-policing/>

4. Rwanda Economic Update: April, 2025, Modernizing Agriculture to Accelerate Structural Transformation, available at : <https://openknowledge.worldbank.org/entities/publication/b59bb50d-4765-43c8-a566-3e09bb22765c> (accessed on 14th october 2025)

5. <https://data.worldbank.org/indicator/IT.NET.USER.ZS?locations=RW> (Accessed on 14th november, 2025)

dia, and freedom of association are still severely restricted; the civic space for civil society and parliamentary opposition is limited. Digital activism on political and social issues is still nonexistent. Overall, the country's democratic development has so far not kept pace with its socio-economic development.

Access To

Internet And Digital

Infrastructure

Despite its small size, Rwanda has distinguished itself as a country that has bet big on digitisation as a means to acceler-

ate economic growth and reduce poverty. The country's expansion in terms of digital infrastructure has been impressive, especially with the rollout and expansion of the national fibre optic backbone network. On the other hand, Rwanda's internet penetration remains bullish as the fastest growing market⁶, and for 2025, the momentum has garnered continuous double-digit growth rates which pushed the national penetration rate to 52%⁷. Rwanda now has 38% of its population⁸ online as of mid-2025, with 5.5 million active internet users⁹ out of an estimated population of 14.6 million. As the country is betting on digital inclusion, the road ahead remains steep; millions of citizens are still locked out, access and affordability remain as critical challenges, especially in rural communities. In urban areas, internet usage stands at 57%, but in rural areas, it drops to just 19%¹⁰. Further, only 20% of Rwandans currently use mobile internet, and just 34%¹¹ households own

6. <https://alpha.statistics.gov.rw/statistical-publications/ict-water-sanitation-energy-tourism-and-transport/ict>
7. ITU Datahub Report; available at <https://datahub.itu.int/data/?e=RWA> (Accessed on 14th november, 2025)
8. <https://www.newtimes.co.rw/article/27079/news/technology/rwandas-overall-household-internet-usage-reaches-30>
9. <https://www.newtimes.co.rw/article/25736/news/technology/34-rwandan-households-own-smartphones-survey#:~:text=34%25%20Rwandan%20households%20own%20smartphones,X> (Accessed on 14th november, 2025)
10. https://www.rura.rw/fileadmin/user_upload/RURA/Documents/Sectors/ICT/Statistics/Quarterly_publication/ICT_Sector_Statistics_Report_as_of_second_Quarter_of_the_year_2025-R.pdf (Accessed on 14th november, 2025)
11. The Constitution of the Republic of Rwanda of 2003 as revised in 2015 available at <https://www.constitutionproj->

a smartphone.

In 2025, the typical smartphone in Rwanda costs US\$160, a price that remains out of reach for many, particularly in rural communities and for the poorest of Rwandans. Buying a basic smartphone and 1GB of data will consume up to 60% of their monthly income.

Online freedom of expression

Internet freedom

The Constitution of Rwanda provides for freedom of expression, including for the press: “in conditions prescribed by the law¹²”; however, the local media ecosystem has been curtailed by decades of restrictions, due to excessively stringent

regulations controlling the financing or functioning of media outlets. More recently, the Rwandan judicial authorities rearrested Ingabire Victoire and charged her with inciting public disorder¹³ and creating a criminal organisation. She previously spent nearly eight years in prison, following a politically motivated trial. In addition, censorship, threats of arrests and unlawful detention of bloggers are among the factors impeding the growth and development of the media landscape.

In January 2025, Uwimana Liliane, a journalist and blogger was briefly arrested after she posted on her private YouTube channel content criticising state policies and calling out corrupt and incompetent public officials¹⁴. Further the case of Ngendahimana Jean de Dieu a journalist affiliate to IwacuPress¹⁵, an online media outlet was arrested and currently in detention on charges publication of false news, blackmail and corruption after he

ect.org/constitution/Rwanda-2015.pdf?lang=en (accessed on 12 December, 2025)

12. <https://www.reuters.com/world/africa/rwanda-arrests-opposition-leader-says-investigative-body-2025-06-20/> (accessed on 09th November 2025)

13. <https://mobile.igihe.com/amakuru/article/rmc-yishimiye-irekurwa-ry-umunyamakuru-uwineza-liliane-wari-wa-funzwe-na-rib> (accessed on 12th November 2025)

14. <https://x.com/i/status/1900149421913903268> (accessed on 14th November 2025)

published an investigative report pointing out allegations of medical negligence, poor hygiene and poor public service delivery by public officials in charge of Kisaró health centre, in Gicumbi district¹⁶.

Further, there is the case of Etienne Gatanazi, who was also a YouTube political commentator who left the country after being threatened with prosecution¹⁷. In addition, during the tense campaign preceding the 2024 elections, the use of AI-manipulated content was used to portray the then RPF's candidate, President Kagame, in a positive light, showing him participating in popular dance trends on TikTok¹⁸. There were also systematic and coordinated attacks on social media against political dissidents and opponents. For instance, the case of Diane Rwigara, who was harassed with hateful comments on X (former Twitter), by pro-government accounts known as #TeamPK. The virulent attacks against her continued until she was barred from competing in the elections by the national electoral commission.

However, it is clear that the ongoing repression of the media in the country has greatly limited the diversity and reliability of the media landscape, both online and offline.

Privacy and

surveillance

Digital technologies have ushered in an era of unprecedented mass and individualised surveillance. Further, we observe the lines between government and corporate surveillance are increasingly blurred as their operation frameworks and infrastructures interact, yet they tend to differ on the aspirations and motives behind this surveillance policy.

15. <https://thraets.org/synthetic-media-in-rwandas-2024-elections/> (accessed on 16th November2025)

16. <https://www.youtube.com/watch?v=WwbnK3fyuhQ> (accessed on 16th November2025)

17. <https://www.tiktok.com/@newtimesrwanda/video/7391098429373566214> (accessed on 16th November2025)

18. <https://advox.globalvoices.org/2020/08/07/the-chilling-tale-of-mass-surveillance-and-spying-in-rwanda/><https://www.amnesty.org/en/latest/press-release/2021/07/rwandan-authorities-chose-thousands-of-activists-journal->

The Rwandan government is known to collect¹⁹ and analyse private communication data, legally or covertly, and it is often justified with concerns of national security. Human rights activists and political dissidents are often targeted for surveillance and for reasons including the control of public dissent, political discourse, and monitoring online civic space and their activities.

Despite the Constitution providing citizens with the right to privacy, the reality and practice violate the letter and the spirit of the law. Article 23 of the Constitution guarantees privacy protections to Rwandan citizens in their homes, correspondence and telephone conversations. However, public surveillance in Rwanda takes the form of telecommunications backdoor requirements, based on the provisions of Article 7 of the law no 60/2013 regulating the interception of communications. Telecommunications corporations are required to grant

access to national security agencies. Additionally, under the provisions of the Law no 73/2013 determining the powers, mission, organisation and functioning of the national intelligence and security services (NISS), the NISS is authorised to receive and collect information for the purpose of carrying out its missions, including the protection of state security. Therefore, based on the mandate given by the law, the NISS has sweeping access to all communications in Rwanda, without even the need to seek approval from the public prosecutor.²⁰

Additionally, in 2025, the authorities deployed an advanced aero-mapping technology to monitor illegal construction. With such technology, the city of Kigali²¹ will have unfiltered access to data on all houses.

Last but not least, the Rwanda national police has announced plans to use drone technology to monitor road safety and

[ists-and-politicians-to-target-with-nso-spyware/](#) (accessed on 12th October 2025)

19. Article 09 of the law no60/2013 provides: if required by “urgent public security interests” the interception warrant can be issued by the national prosecutor verbally but this must be followed by a written warrant within 24 hours or the interception will be presumed illegal.

20. <https://www.newtimes.co.rw/article/23131/news/rwanda/city-of-kigali-deploys-satellite-to-monitor-construction-works> (Accessed on 16th november, 2025)

21. <https://en.igihe.com/news/article/rwanda-police-to-deploy-drones-for-road-safety-monitoring> (Accessed on

traffic violations²² and all of these measures have been implemented without a proper guideline or framework complying with the standards established under the Rwanda Data Protection and Privacy law, especially under the provisions of Articles 19,20,21,23.

On a positive note, Rwanda is a signatory to the African Union Malabo Convention on Cybersecurity and Personal Data Protection, and it has also domesticated the convention, as the country passed a new data protection legislation in October 2021. The Law no 058/2021 relating to the protection of personal data and privacy allows individuals and institutions to implement processes that ensure personal data is handled in a trusted and secure way. Additionally, this legal framework outlines the guidelines for notifying personal data breaches and facilitating cross-border data transfers. Moreover, the law also provides exemptions where personal data is processed for the purposes of national security. The personal data and privacy law establishes the office of the data supervisory authority to oversee the enforcement of the country's data protection legal framework. Further-

more, since its establishment in 2022, the national data protection office regularly issues guidelines on data portability, and about the role of data controllers and processors. However, there are currently no public records of enforcement action by the data protection office.

Regarding biometric technologies, the recent proliferation of biometrics and other data collection in everyday life for accessing essential such as banking services, access to work places, or cell phones may also have a corrosive effect on privacy, especially due to the sensitivity of data collected without proper control or oversight, especially in this era of disruptive technologies such as AI or digital spyware, in a context where we witnessed a significant shrinking of civic rights and public freedoms as well as the incessant violations of human rights.

While the right to privacy is not absolute, it may be interfered with in order to advance legitimate state and public interests, such as national security or to combat terrorism. However, this interference must be lawful, necessary and proportionate. There is a critical need for legal reform as

the current Rwandan legal framework regulating the NISS surveillance activities fail to satisfy the legality and the proportionality standards established under international law, especially under the tripartite test to assess the permissibility of the restriction under the right to privacy.

Gendered

disinformation

Rwanda has made significant progress in governance, particularly in promoting gender equality and combating gender-based violence. The country has scored highly in terms of the number of female members of parliament, with women holding 61%²³ of parliamentary seats and labour force participation within the global gender equality indices.²⁴

In Rwanda, gendered disinformation has

been mostly used as a deterrent factor for young women who consider having a political career. For instance, in 2017, a few days after Diane Rwigara made a public announcement that she would contest for the highest office of the land, photo-shopped nudes of her became viral on social media to discredit her.

The modus operandi is simple: women politicians are targets of image-based disinformation, as these images are used to sexualise them and to create a false narrative in order to shift the public focus from the main political discourse.

In 2025, there were no notable incidents of online gender based violence recorded.

Data protection

and privacy

22. <https://etp-global.org/resources/gender-equality-rwanda-factsheet/> (Accessed on 16th november, 2025)

23. World Economic Forum: Global Gender Gap Report 2023, available at <https://www.weforum.org/publications/global-gender-gap-report-2023/> (Accessed on 16th november, 2025)

24. MICT Press Release : "Rwanda Passes new law Protecting personal data", October 21,2021 available at <https://www.minict.gov.rw/index.php?eID=dumpFile&t-f=30553&token=d44bb5a417c65872b4b0ece892e5d->

The data protection law is the latest step taken by Rwanda to achieve a knowledge-based economy, and it is within the framework of digital-related policies. This law makes Rwanda the 35th African country to have a data policy law. The Constitution and other relevant laws like the Law no 04/2013 relating to access to information, the Organic Law Instituting the Penal Code of Rwanda (June 14 2012) and the Law No. 18/2010 of 12/05/2010 relating to Electronic Messages, Electronic Signatures and Electronic Transactions ('the Telecommunications Law') recognise and provide for guidelines regarding the protection of privacy and personal data information.

The Law is modelled after the EU General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR'), and it aims to protect fundamental rights and liberties of natural persons that may be jeopardised during the processing of personal data by both the public and private bodies. The law is applicable to both manual and electronic processing of personal data. The law, which is expected to help boost consumer confidence in Rwanda, also applies to data handlers and processors residing inside or outside of the Republic of Rwanda.

Today, the law provides Rwandans with the strongest safeguards of their right to privacy as provided for in Article 23 of the Constitution, as the law sets out the norms and the standards by which the State and private actors must provide for the protection and sovereignty of the personal data of persons. More importantly, the Law imposed a positive obligation on the State to establish adequate safeguards for the right to privacy, including where justifiable targeted surveillance has been undertaken for the purpose of crime prevention and the investigation and enforcement of laws for a legitimate aim.

In addition, the law provides certainty to the rights of the data subject, their duties and obligations and also highlights the duties and obligations of data collectors, controllers, and processors. This will help to ensure that all decisions and actions taken in relation to personal data are done within the confines of the Law.

The law buttresses privacy as a fundamental human right for Rwandans. It is very instructive on data protection principles, as it spells out the various rights of the data subject and provides certainty on the enforcement of data and privacy rights by outlining the duties and obligations of

the respective parties. Nevertheless, the law falls short in certain aspects, such as individual autonomy over personal data, as it is more concerned with regulation than the rights and their enforcement by the data subject.

Article 27 of the Law no. 058/2021 relating to the protection of personal data and privacy provides for a supervisory authority with the power:

- to monitor compliance and sanction data protection law violations,
- to create further regulations for implementation
- to receive complaints and claims relating to the processing of personal data of citizens
- to authorise processing operations that involve high risk to rights and freedoms of individuals.

However, the Law doesn't make elaborate provisions for the organisation and the operational structure of the supervisory

authority. In October 2021, the Ministry of Information Communication and Innovation announced²⁵ and designated the National Cyber Security Authority (NCSA) as the supervisory authority in charge of the enforcement of the law. More recently, on March 31 2022, the Government of Rwanda, through the national Cyber Security Agency²⁶, officially launched the data protection supervisory office, an implementation aimed at effective personal data governance.

The NCSA data protection office oversees data governance and regularly issues guidelines. Most significantly, the Data Protection Office published guidance on data protection principles²⁷, data portability and the role of data controllers and processors. However, there are no public records on enforcement action by the NCSA DPO.

On May 26, 2025, the Rwandan government officially approved the National Data Sharing Policy²⁸, an initiative aimed at creating a secure, efficient and legally

8ba34c8c91 (accessed on 12 December, 2025)

25. <https://www.cyber.gov.rw/about/>

26. <https://digitalpolicyalert.org/event/26706-national-cyber-security-authority-published-guidance-titled-what-are-the-key-principles-for-processing-personal-data> (Accessed on 19th December, 2025)

27. The National Data Sharing Policy available at <https://www.minict.gov.rw/index.php?eID=dump-File&t=f&f=130290&token=2f207763665aa480e65386c025175bf4330b9a5c> (Accessed on 19th december, 2025)

28. <https://en.igihe.com/news/article/rwanda-moves-to-curb-children-s-exposure-to-pornographic-content>

compliant framework for data exchange across public institutions. In addition, the implementation of the policy will be overseen by the ministry in charge of innovation and ICT (MINICT), which will provide the overall direction and coordination. Further, the policy explicitly recognises Law n° 058/2021 governing Data Protection and Privacy Law as the primary regulatory framework, alongside other relevant laws and regulations such as:

- Law N° 05/2013/OL (Organisation and regulation of Statistical Activities);
- Law N° 24/2016 governing ICT Law;
- Law N° 04/2013 regulating Access to Information;
- Law N° 60/2018 (Prevention and Punishment of Cybercrimes);
- Cybersecurity Regulation N° 010/R/CR-CSI/RURA/020 of 29/05/2020

Upon analysis of this landmark policy, it's critical to point out that some of the violations of the national legislation governing data protection and privacy. Basically, the policy significantly underemphasizes data subject rights guaranteed under the law, such as:

- No explicit mechanisms for citizens to access information about when their data is shared between government agencies

- Limited to no provisions for data subjects to exercise rights to rectification, erasure, or restriction of processing
- Absence of clear notification requirements to data subjects when their personal information is shared
- No clear timeline and limitations on how long shared data can be retained beyond the original purpose

Overall, Rwanda's National Data Sharing Policy represents an ambitious effort to leverage government data for national development goals. However, its current formulation prioritises data utility over individual rights protection and lacks robust independent oversight mechanisms essential for trustworthy data governance

Censorship and

content moderation

In October 2025, Rwanda rolled out a policy designed to protect children from online risks and harms²⁹. The child online protection policy, aimed at ensuring a safer digital environment for chil-

dren, provides for a close collaboration between government institutions and internet service providers to detect and block harmful content before it reaches children. This policy framework seeks to discourage the production and consumption of pornographic material .

According to Meta’s content restriction report for 2025, there has been no request for content restriction, filtering or blocking coming from the government of Rwanda³⁰. Overall, based on the information available in the public transparency dashboards of Google³¹ and TikTok; there is no public case of government-ordered removals for Rwanda in 2025.

Digital and

biometric identity

This section of the report examines the Rwandan Smart Digital Identity (SDID)

system through the lens of data-protection law, constitutional rights, and comparative Human rights standards. It argues that the absence of publicly released Data Protection Impact Assessments (DPIAs), opaque security-agency access, historical misuse of advanced surveillance tools (e.g., Pegasus spyware), and the lack of independently audited privacy-by-design safeguards collectively place citizens’ personal and biometric data at significant risk. Our analysis was drawn on empirical work by Research ICT Africa³² and the Centre for Internet and Society (CIS), as well as investigative findings by Amnesty International and Forbidden Stories.

Rwanda has recently started rolling out its smart digital identity, officially known as the Single Digital ID (SDID)³³. The introduction of the biometric-enhanced SDID represents the high point of this strategy, enabling seamless interactions with pub

29. <https://transparency.meta.com/reports/government-data-requests/country/RW/> (Accessed on 20th november, 2025)

30. <https://transparencyreport.google.com/> (Accessed on 20th november, 2025)

31. <https://researchictafrica.net/research/digital-identity-in-rwanda-case-study-conducted-as-part-of-a-ten-country-exploration-of-socio-digital-id-systems-in-parts-of-africa/> (Accessed on 19th December, 2025)

32. <https://en.igihe.com/news/article/rwanda-nears-rollout-of-digital-id-first-issuance-expected-in-10-months> (Accessed on 19th december, 2025)

33. <https://www.amnesty.org/en/latest/press-release/2021/07/rwandan-authorities-chose-thousands-of-activists-journalists-and-politicians-to-target-with-nso-spyware/> (Accessed on 10th December, 2025)

lic services, financial platforms, and private-sector institutions.

This new flagship national digital identity project is anchored in a centralised biometric database, which is managed by the National Identification Agency (NIDA). Besides that, state officials have been full of praise for its efficiency, digital governance vision, and rapid adoption. Yet beneath this progress lie structural legal and human-rights challenges.

Digital identity systems, particularly those involving highly sensitive biometric data, require stringent governance frameworks to prevent abuse, exclusion, and rights violations. The stakes are especially high in states with strong security apparatuses and limited transparency in data governance.

Rwanda's SDID system is built around a highly centralised database linking the National Identification Number (NIN) with individuals' biometric identifiers, fingerprints, iris scans, and facial images. Centralised biometric databases present a single point of failure: once breached, the compromise is irreversible, because biometrics cannot be replaced like passwords or ID numbers. This makes centralisation inherently incompatible with privacy-by-design principles unless ac-

companied by robust architectural safeguards, public oversight, and independent audits.

Article 47 of the law no 058/2021 governing personal data and privacy provides for a Data Protection Impact Assessment (DPIA) as a mandatory safeguard for any processing involving: sensitive data (including biometrics), large-scale profiling, or high-risk technological systems.

Despite SDID managing one of Rwanda's largest and most sensitive datasets, no publicly available DPIA exists, and this absence undermines accountability and legality in multiple ways. The proportionality and necessity for SDID processing cannot be evaluated, but also there is a flagrant lack of citizen's data security risk assessment. On the other side, the lack of a public and civil society for an oversight framework makes public accountability and transparency almost impossible. More importantly, the cross-border and third-party vendor compliance cannot be verified. Overall, it is clear that the absence of a DPIA is not merely a procedural omission; it is a substantive legal failure under the statute, and this is very concerning, especially with regard to the state security services' poor record and opaque misuse of advanced surveillance tools³⁴

Universal Service

Fund and digital

inclusion

The National Universal Service and Access Fund has existed in Rwanda since 2004 as a funding mechanism to incentivise the expansion of internet services in remote and underserved locations of Rwanda.³⁵ It is an independent and autonomous administrative body which was previously managed by the Rwanda Utilities Regulatory Authority (RURA) before the legislative amendments made to the law governing the fund.³⁶ The national universal service and access fund is financed through mandatory contribu-

tions from telecommunications companies. The law provides that all telecommunication service providers operating in Rwanda should pay a 2.5%³⁷ levy on their gross annual revenues, and on the interconnection fee between licensed telecommunications operators. In addition, the legislation enables the USAF to raise funds through donations and grants from international donors and development partners, and these funds are allocated through a competitive bidding process.

In 2025, the Universal Service and Access Fund (USAF) in Rwanda achieved significant milestones³⁸ in digital inclusion, including the deployment of 7,000 agents to provide last-mile support for digital service access³⁹ and the expansion of digital literacy through the digital ambassadors program. All these efforts aimed to strengthen service access points.

34. Presidential Order no 05/01/ of 15/03/2004 determining the functioning of the universal access fund and public operator's contributions available at <https://www.rura.rw/fileadmin/documents/docs/pl05.pdf> (accessed on 24 December, 2025)

35. Presidential order no 025/01 of 12/05/2023 governing universal funds available at <https://www.minijust.gov.rw/index.php?eID=dumpFile&t=f&f=68425&token=81ce3dba53d7971109768f42004ca74470789f9d> (Accessed on 10th november, 2025)

36. Article 7: Every licensee referred to in Article 3 of this Order pays to the Fund an annual contribution which must not exceed 2.5% of the turnover of each category of regulated service

37. <https://www.ictd.ac/blog/bridging-the-divide-rwandas-quest-for-equitable-digital-governance/#:~:text=To%20further%20promote%20digital%20inclusion,skills%2C%20interact%20with%20public%20services.>

38. <https://www.risa.gov.rw/news-detail/digital-literacy-day-2025-celebrating-rwandas-journey-toward-universal-digital-empowerment#:~:text=Looking%20ahead%2C%20RISA%20and%20MINICT,thrive%20in%20the%20digital%20age.> (Accessed on 19th December, 2025)

CHILD ONLINE

PROTECTION

More recently the Rwanda cabinet has rolled out a national policy designed to protect children from online risks and harms as ICT development brings children both benefits and potential risks. Having come into force in July 2025,⁴⁰ The Rwanda Child Online Protection Policy is in response to risks of minors being exposed to unsuitable content on the internet such as indecent images, adult pornography, violence, risks of human trafficking and unwanted sexual advance.

Rwanda has observed a rapid economic growth, where many citizens have now access to the Internet and this growth inevitably comes with general risks to children related to cyber bullying, online sexual exploitation, child trafficking, radicalisation, blackmail and sexting.

According to this new policy brief, busi-

nesses are required to show procedures and special considerations undertaken to ensure child safety and respect for children's rights as they extend their online services into Rwanda. It also requires service providers to put in place mechanisms to identify and report upsetting or unsuitable content by having transparent and robust monitoring systems for all online services.

Under this policy, the Government should establish high level data protection, having specific provisions for children with world-class reporting and takedown mechanisms. The takedown procedures shall apply to internet service providers (ISPs), communication service providers, entertainment and media industry, and deliberate effort shall be made to conduct surveillance of the Internet to detect content that is harmful to children.

39. <https://www.newtimes.co.rw/article/32109/news/featured/mtn-rwanda-strengthens-digital-safety-with-child-online-protection-initiative> (Accessed on 19th December, 2025)

40. How Rwanda AI Policy helps to shape the evolving AI ecosystem available at <https://www.digicenter.rw> (accessed on 17/12/2025)

ARTIFICIAL

INTELLIGENCE &

EMERGING

TECHNOLOGIES

The government of Rwanda, in coordination with key stakeholders, has launched the National AI policy, which defines six priority areas for effective AI policy in Rwanda.⁴¹ The policy framework has identified priority sectors:

Creating an open data ecosystem as an enabler of the AI revolution by increasing storage infrastructure and high-performance computer resources.

Driving Public sector transformation to fuel AI adoption

Accelerating responsible AI adoption in the private sector in order to accelerate

the application of AI to boost productivity and efficiency in key sectors of the economy.

Building AI literacy and 21st-century skills with the objective to position Rwanda as the number one destination for AI higher education and research in Africa.

In addition, the policy advocates the creation of open public-sector data to reduce entry barriers. Recently, officials of the Ministry of Education disclosed that they are actively working to incorporate artificial intelligence and digital literacy into the national curriculum⁴².

Furthermore, the future of AI in Rwanda looks very promising as the country has succeeded to attract world class universities such as the Carnegie-Mellon University and the African Institute of Mathematical Studies, which have their campuses in Kigali. At the same time, they have at

41. <https://www.newtimes.co.rw/article/20802/news/technology/rwanda-to-integrate-artificial-intelligence-in-school-curriculum>

42. <https://www.brookings.edu/articles/advancing-tech-innovation-and-ai-governance-in-africa/> (Accessed on 21th november, 2025)

tracted with them a substantive number of regional and global talents, thus positioning the country as a leader⁴³ for IT and AI education. Additionally, the country has recently launched the Centre of the Fourth Industrial Revolution (C4IR)⁴⁴. The project is a partnership between the government of Rwanda, through the Ministry of Innovation and ICT, and the World Economic Forum⁴⁵.

More importantly, there was an increase in the use of artificial intelligence for surveillance and security purposes. Several AI-powered systems were deployed in Rwanda by both public and private actors. Facial recognition technology integrated into CCTV cameras in Kigali's public spaces enhances security and crowd management⁴⁶, enabling quick identification of individuals involved in incidents or investigations.

Nonetheless, these systems raise significant privacy concerns due to the large-scale collection, storage, and processing of biometric data, which must adhere to strict standards to prevent abuses. Additionally, concerns about online monitoring systems⁴⁷ analysing social media content with AI tools are also employed to identify harmful or subversive speech, further intensifying concerns about excessive state surveillance. These practices can infringe on citizens' privacy, limit freedom of expression, and reduce civic space, especially when used to silence dissent or critical voices.

43. Ingabire, P: How can Rwanda leverage the fourth Industrial Revolution to strengthen post-covid-19 resilience available at <https://www.weforum.org/agenda/2022/03/rwanda-leveraging-the-fourth-industrial-revolution-to-strengthen-post-covid-resilience/> (accessed on 14/12/2025)

44. <https://www.c4ir.rw> (Accessed on 14th December, 2025)

45. How IT is shaping Rwanda National Police policing landscape available at [https://www.police.gov.rw/media/news-detail/news/how-it-is-shaping-rnps-policing-landscape/](https://www.police.gov.rw/media/news-detail/news/how-it-is-shaping-rnps-policing-landscape/?tx_news_pi1%5Bcontroller%5D=News&tx_news_pi1%5Baction%5D=detail&cHash=777f929e429ea9693a04238b1b7fa23e)

(Accessed on 16th november, 2025)

46. https://www.rura.rw/fileadmin/user_upload/RURA/Documents/Sectors/ICT/Regulatory_Instruments/Policies_Laws_and_Orders/Official_Gazette_on_Presidential_Order_Governing_Universal_Access_Fund.pdf (accessed on 19/12/2025)

47. <https://www.google.com/url?q=https://transparency.meta.com/reports/government-data-requests/country/RW/&sa=D&source=docs&ust=1772815257216613&usg=AOvVaw1DeXkhAJYkGLJ-jxI282zr>

Conclusion

Rwanda positions itself as a market that fosters innovation, especially in terms of embracing digital transformation. Meanwhile, the actions of the government clearly contradict the progressive thoughtfulness of the digital policies promoted by the same state. The government is still rightly criticised for online censorship and encouraging self-censorship. During and after the coronavirus pandemic, the Rwandan government, through its proxies and law enforcement entities, aggressively harassed journalists, dissidents or bloggers and their media outlets,

and this situation has dramatically forced many independent outlets to close down.

This situation, coupled with the use of mass surveillance of telephone metadata and through acquisition of spyware, has substantially enhanced the climate of fear and self-censorship among the public. In the current social and political context of Rwanda, the deployment and use of AI must adhere to a human rights-based approach, tailored to local, cultural, economic and development contexts .

Recommendations

Parliament should:

- Establish a national legal framework for the State and private sector accountability: there is a need for the Rwandan government to roll out clear policies and guidelines on the limits of the use of

- AI technologies for surveillance purposes.
- Information and Transparency: the deployment and use of an AI system in any decision making process that has a meaningful impact on the citizens needs to be identifiable. The use of an AI system must be made public in clear and accessible terms, such as through Kinyarwanda, which is widely spoken across the country, so individuals can be able to understand how decisions are reached and those decisions have been verified.
- Establish an independent oversight body for the sake of promoting public trust and accountability, with a mandate of effective oversight over the human rights compliance of the development, deployment and use of AI systems by public authorities and private entities.
- Promote AI literacy for the population, through mass communication and public campaigns of awareness about AI, in all official spoken languages, but also about the AI use and deployment impact on constitutional and human rights of the citizens.
- Should hold public consultations on the use of AI and promote the ethical use of AI to provide a platform for all stakeholders, especially the media, members of academia, and representatives of civil society, to provide their input on the procurement processes.
- Create a conducive environment for the free flow of information in the country
- Review past convictions of journalists and bloggers that have been convicted on vague charges such as “inciting public disorder or spreading rumours to cause unrest among the population”, “disposing of or degrading evidence or information relating to genocide” and “publication of rumours”
- Reform the training of the Rwanda Investigation Bureau staff and public

prosecutors on how to investigate accusations so that freedom of expression is protected both on paper and in practice.

- Refrain from state security agencies relying on mass surveillance for intelligence purposes, which clearly constitutes a violation of the principle of legality, necessity and proportionality under International law.
- Review all laws and regulations to ensure that they do not impose blanket, indiscriminate retention of communications data on telecommunications and Internet service providers operating in Rwanda.
- Ensure the USAF invests at least 50% of funds in projects targeting

gender inclusion and women's internet use.

- Increase the transparency of the USAF, especially in regard to disbursements and operations, as the current legal framework lacks clear rules of operations of the allocations of USAF funds between the bidders and the USAF
- Reform and strengthen the policy and legal mechanisms for the independent authorisation and oversight of the state surveillance in order to ensure that those mechanisms are competent and adequately resourced to monitor the legality of surveillance measures

Civil Society Organisations should:

















- Coordinate their actions in order to create awareness and the monitoring of the violations of human rights, both online and offline, happening in the country.
- Streamline the flow of information between the different community grassroots organisations




The Score Index


Rwanda, 2025

1. Totally non-compliant; 2. Mildly compliant - which is a mild attempt at compliance with critical gaps; 3. Moderately compliant - where there are areas of improvement; 4. Considerably compliant - Minimal areas of reform; 5. Fully Compliant - No concerns

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
Internet Shutdowns	P38(2)			The country has so far not yet experienced an internet shutdown.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37			The country has consistently made great achievements in order to reduce the gender or the rural-cities gap in providing inclusivity to all the stakeholders to get internet access in the country with the implementation policies and measures such as the nationwide fiber backbone and the sustainable budget allocated to the Universal Internet Service Fund, the main piece of the legislation is the Presidential order no 025/021 of 12/05/2023 governing Universal Access Fund
False News Criminalisation	P22(2)			Rwanda has not passed neither has been using a specific false news law against bloggers, civil society activists or member of the political opposition in order to crackdown on public dissent, the attempts which have been made

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
				by the state to censor public dissent is mostly through genocide denial law or provisions of conspiracy and sedition against the national security.
Sedition Legislation	P22(2)			State security and the public prosecution office has been using often penal code provision on sedition to charge political dissidents in courts of law because of their political activities as a way to shut down public and political dissent in the country.
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)			Rwanda has a poor record in terms of arbitrary arrests and harassment of the media, Human rights Defenders or citizens mostly for having expressed a divergent opinion or for public criticism of state policies and actions.
Data Protection Legislation.	P42			In October 2021, Rwanda enacted the Data Protection and Privacy and later on the Data Protection regulatory office, however the ability of the office to independently conduct its mandate is not guaranteed. There's still a lot of work to do in order to make the data protection supervisory office truly impartial and independent.
States interfere and require	P38 and P39(4)			Although Rwanda does not hold liable internet intermediaries or made formal request to remove online contents pub

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
the removal of online content by internet intermediaries				lished on their websites, the state has tendency of using censorship through blocking access to those websites , especially websites affiliated to the political opposition operating outside of the country.Based on the Meta Report 2025 there were no state request by the government of Rwanda or affiliated entinties to remove contents online
Invasion of Privacy of Communications	P41			There have been many established cases where the state security services have been tapping phone communications of citizens illegally or without a court 's warrant.
Failure by the government to proactively disclose and disseminate information on digital technologies.	P29(3)			Although Rwanda has established itself as the frontrunner in Africa in leveraging and disseminating digital technologies for the welfare of its citizens. However, there is lack of accountability and transparency by the state on policy implementation, and failure to disclose on the policy shortcomings especially regarding taxpayer's value for money or cost of implementation on the taxpayers.
AI and Emerging Technologies national strategies	P39(6)			Rwanda is considered amongst the few African pioneers of AI, as the country has been one of the first to enact a national AI Policy framework, besides that the country is actively attracting international corporations through investment-friendly policies, but also by nur-

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
				turing talent by attracting world class universities, positioning the country as Africa’s AI Lab.
Adoption of specific child laws, policies and measures promoting children’s digital safety and privacy online	P37(5)			Rwanda has recently reformed and implemented a comprehensive child online protection policy to safeguard children from digital risks, like sexual exploitation, cyberbullying, and harmful content. However it is still premature to monitor its impact on the ground.
Digital Inclusion	P37(3)			The country has so far made some good achievements in terms of implementing policies promoting digital inclusion, however Rwanda is still lagging behind in terms of funding the same policies.
Total (out of 60):	2024: 36	2025 36		



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