

LONDA 2025

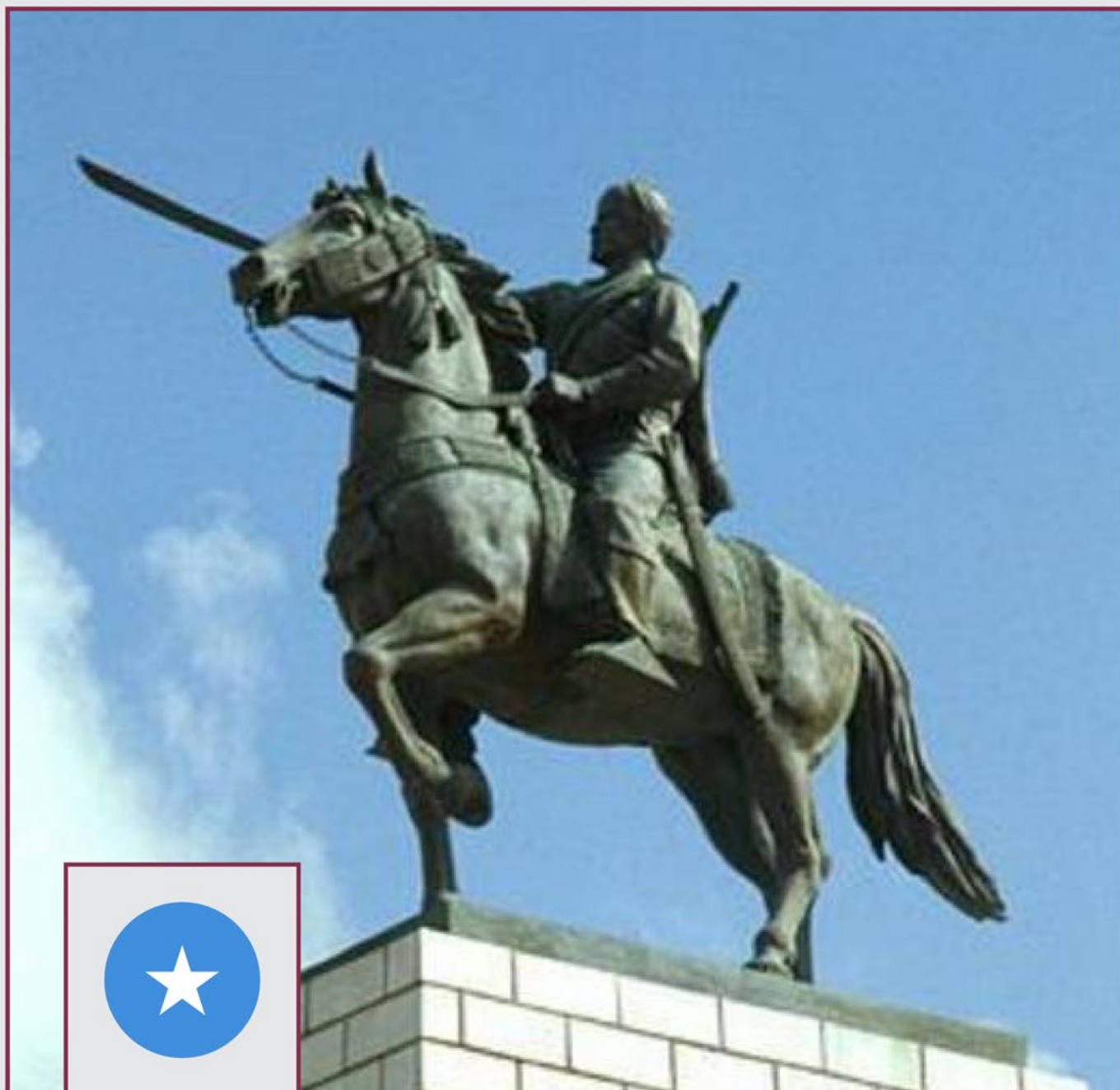
DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Somalia

Country Report



PARADIGM
INITIATIVE



LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

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Somalia

By Ayaan Khalif and Abdifatah Ali

Executive Summary

In 2025, Somalia's digital ecosystem was shaped by rapid expansion and growing complexity, with significant developments across key thematic areas including internet access; freedom of expression and access to information; data protection and cybersecurity; privacy and surveillance; censorship and content moderation; digital inclusion and AI; and emerging technologies. Internet connectivity has expanded at an unprecedented pace, driven largely by mobile broadband

growth and the introduction of satellite internet services, accelerating Somalia's transition toward mass connectivity. However, governance frameworks, institutional oversight, and rights protections have not evolved at the same rate. Using The Score Index¹, developed by Paradigm Initiative and grounded in the principles described in the African Commission on Human and Peoples' Rights' Declaration of Principles on Freedom of Expression and Access to Information.² Somalia scores

32 out of 60 in 2025, reflecting modest progress from the previous assessment while highlighting persistent gaps in enforcement, accountability, and equitable access. Key challenges remain in data protection implementation, platform governance, surveillance safeguards, and meaningful digital inclusion. Alongside emerging risks linked to AI adoption in the absence of finalized regulatory frameworks. The report recommends strengthened enforcement of existing digital laws, finalization of the National AI Strategy with human rights safeguards, integration of digital inclusion targets into national development planning, enhanced platform accountability and transparency, expanded public–private partnerships for connectivity, and a stronger role for civil society and the media in monitoring rights violations, promoting access to information, and advancing digital literacy and public-interest advocacy.

1. The Score Index framework: <https://paradigmhq.org/londa-score-index/>
2. The principles described in the African Commission on Human and Peoples' Rights Declaration of Principles on Freedom of Expression and Access to Information: <https://achpr.au.int/en/node/902>

Introduction

Since 2016, Somalia's digital landscape has undergone a profound transformation. At that time, internet access was extremely limited, largely confined to major urban centers, with weak infrastructure, minimal regulatory oversight, and low levels of digital adoption. Over the years, sustained private-sector investment and increased demand for mobile services have driven rapid expansion, making mobile internet and mobile money central to everyday communication, commerce, and service delivery. By 2025, Somalia had moved from fragmented connectivity toward mass internet adoption. A notable shift in this trajectory occurred in 2025 when Starlink³ received regulatory approval to operate in Somalia, introducing satellite-based internet services that were non-existent in previous years. While satellite internet remains unaffordable for most households and is not yet a widespread solution, its entry into the market signals a diversification of connectivity options and a new phase in Somalia's dig-

ital infrastructure development.

At the governance level, Somalia has articulated growing policy ambition, including the adoption of national digital strategies and sectoral regulations. Yet enforcement remains inconsistent, and institutional capacity continues to lag behind the expanding influence of global technology platforms and domestic telecom operators. Issues such as data protection, cybersecurity, content moderation and surveillance are increasingly salient, particularly as digital tools become embedded in governance, elections, service delivery, and public debate. This report moves beyond access metrics to examine the structural conditions shaping online freedoms, inclusion, and accountability. By doing so, it seeks to contribute to evidence-based discussions on how Somalia can balance rapid digital growth with the protection of fundamental rights in 2025 and beyond.

3. Starlink in Somalia: <https://spaceinafrica.com/2025/04/13/somalia-grants-operational-license-to-starlink-expanding-internet-access-across-the-nation/>

Internet Access

And Disruptions

Somalia's digital ecosystem in 2025 was defined by speed. Internet access has expanded at an unprecedented rate, reshaping how citizens communicate, access services, participate in civic life and engage with the state. National internet penetration has doubled, from 27.6% in early 2024⁴ to approximately 55% in 2025. Over the past year, connectivity shifted from being a privilege for urban populations to an increasingly mainstream service, although deep inequalities persist. Internet access is now central to civic participation, economic activity, access to information and the broader digital rights landscape in the country.

As of early 2025, Somalia has an estimated 10.7 million internet users.⁵ Representing approximately 55% of the population, this growth has been largely driven by the wide-

spread availability of mobile broadband, with most users accessing the Internet through smartphones using 3G and 4G LTE networks. With 11.3 million cellular mobile connections⁶ in a population of 19.3 million, mobile usage is extensive. Fixed broadband remains limited, meaning that mobile internet continues to serve as the primary gateway to the digital space for most Somalis. Infrastructure developments have also shaped this expansion. Local telecommunications companies have continued to invest in network coverage, particularly in major urban centers such as Mogadishu, Hargeisa, and Garowe.

Despite these gains, digital literacy gaps, unreliable electricity supply and limited regulatory enforcement further constrain meaningful access.⁷ Recognising these challenges, the Federal Government of Somalia has articulated a Digital Transformation Strategy (2025–2030), emphasising expanded infrastructure, digital public services and inclusive access as pillars of national development.⁸ How these com-

4. Internet penetration in 2024: <https://datareportal.com/reports/digital-2024-somalia>

5. Number of internet users in Somalia: <https://datareportal.com/reports/digital-2025-somalia>

6. Mobile connections in Somalia 2025: <https://datareportal.com/reports/digital-2025-somalia>

7. Digital literacy and inclusion gaps – Hivos Somalia Country Focus Report: <https://eusee.hivos.org/assets/2025/11/Somalia-Country-Focus-Report.pdf>

8. Digital Inclusion Policy: https://moct.gov.so/en/wp-content/uploads/2025/08/Somalia-Digital-Inclusion-Policy_High-Level-Policy-document.pdf

mitments translate into equitable rights respecting internet access remains a critical issue for governance and accountability in 2025 and beyond. Similar to 2024, Somalia did not experience any nationwide, government-imposed internet shutdowns in 2025. While earlier periods were marked by instability and infrastructure related connectivity disruptions, these were not the result of deliberate nationwide shutdowns. However, there have been targeted platform restrictions, such as the 2023 bans⁹ on Telegram, TikTok, and 1xBet, which illustrate selective censorship that could disrupt certain forms of digital engagement and civic communication.

Freedom of Expression

and Access to

Information in Somalia

Freedom of expression remained under sustained pressure in 2025, affecting both

physical and digital spaces. While the Provisional Constitution¹⁰ guarantees the right to freedom of expression and access to information, the practical exercise of these rights continues to be constrained by restrictive legal frameworks, security driven enforcement practices, and weak institutional safeguards for media independence.

2025 saw notable institutional developments with potential implications for the protection of human rights, including freedom of expression. On July 3 2025, the Somali Cabinet approved nine members of the National Independent Human Rights Commission (NIHRC)¹¹, advancing the long delayed operationalisation of a constitutional oversight body. This process was further consolidated on December 10 2025, when the President of Somalia signed into law the establishment of the Independent National Human Rights Commission, formally granting it a legal mandate¹². The presidential endorsement

9. The 2023 Somalia platforms ban: <https://www.aljazeera.com/news/2023/8/26/outcry-in-somalia-over-government-decision-to-ban-tiktok-telegram>

10. The Provisional Constitution of the Federal Republic of Somalia 2012: <https://www.wipo.int/wipolex/en/legislation/details/14305>

11. National Independent Human Rights Commission (NIHRC): <https://sonna.so/en/somali-cabinet-approves-nine-candidates-for-national-independent-human-rights-commission/>

12. Signing the law of the Independent National Human Rights Commission: <https://www.hiiraan.com/news4/2025/>

coincided with Somalia's commemoration of International Human Rights Day, situating the enactment within the broader context of national human rights observances. While these steps represent progress compared to previous years, the extent to which the NIHRC will meaningfully protect freedom of expression and access to information will depend on its independence, resourcing, and ability to act without political interference.

The legal and regulatory environment governing media practice continues to shape the operating conditions for journalists. Somalia's Media Law of 2019, amended in 2020¹³, remains the principal framework regulating broadcast and print media. However, the law has consistently failed to comply with international standards on freedom of expression, and the amended version did little to address these shortcomings. Key concerns include provisions that criminalise expression and aspects of the journalism profession itself, restrictive criteria determining who may

practice journalism, and the imposition of state-dictated ethical guidelines. The law also raises serious questions regarding the independence and composition of the Somali Media Council, as well as the judicial prosecution of vaguely defined media offences. Provisions relating to the issuance of press cards and the imposition of undetermined fines on journalists and media organisations further entrench state control.¹⁴

In 2025, journalists continued to face arbitrary interference in the performance of their professional duties. Monitoring reports produced by Safe Reporters of Somalia (SRS) documented multiple incidents throughout the year involving intimidation, short-term detention, obstruction, and the confiscation of journalists' electronic devices by security agencies and local authorities.¹⁵ These incidents were recorded across several months, indicating a recurring pattern rather than isolated events. Such practices, often implemented without formal charges or ju-

[Dec/203885/somali_president_signs_law_establishing_independent_national_human_rights_commission.aspx](https://sonna.so/en/the-president-of-fgs-signs-into-law-somalia-media-law/)
13. Amended Somalia's Media Law: <https://sonna.so/en/the-president-of-fgs-signs-into-law-somalia-media-law/> (Accessed on

14. Statement on the amended media law: <https://nuso.org/2020/08/26/statement-on-the-amended-media-law-signed-by-the-president-of-somalia/>

15. Monitoring reports produced by Safe Reporters of Somalia (SRS): <https://srssomalia.org/wp-content/uploads/2025/11/SRS-QUARTERLY-REPORT-2.pdf>

dicial oversight, contribute to self-censorship and undermine journalists' ability to report freely, particularly on governance, security, and accountability issues.

Media institutions, especially community and regional outlets, also remained vulnerable to administrative restrictions. In 2025, Radio Marka, a local radio station serving communities in Lower Shabelle, announced a temporary suspension of operations¹⁶ following pressure and restrictions imposed by authorities. The suspension illustrates the fragile operating environment for independent media at the subnational level, where radio remains a primary source of information for the public. Actions against media outlets are frequently carried out without transparent procedures or effective avenues for appeal, thereby undermining media pluralism and limiting access to diverse viewpoints.

The Official Information Bill (OIB), approved by the Council of Ministers in

2024¹⁷, remained pending parliamentary consideration throughout 2025. As a result, Somalia continues to lack a dedicated legal framework governing access to public information. The prolonged delay has sustained uncertainty around information governance and limited opportunities for public scrutiny of state action. In the absence of parliamentary debate and approval, constitutional provisions have not been translated into operational mechanisms accessible to journalists, civil society organisations, or the wider public.

Public debate on the Bill continued during the year, including reflections from policy actors involved in its early development. In a public commentary published after leaving office, a former National Security Advisor underscored the importance of passing an access to information law while cautioning against provisions that could undermine transparency or expand discretionary secrecy.¹⁸ These perspectives echo broader concerns raised by media and civil society actors regarding vague exemptions, weak safeguards

16. Temporary suspension of Radio Marka: <https://en.kaabtv.com/marka-fm-somalia-announces-temporary-suspension-of-operations/>

17. Criticism on the Information Bill: <https://shabellemedia.com/somalias-democracy-at-risk-global-outcry-over-official-information-bill/>

18. Commentary published after leaving office, a former National Security Advisor: <https://husseinsheikhali.substack.com/p/why-somalia-must-pass-the-official>

against abuse, and the risk of discouraging legitimate information-seeking.

The developments observed in 2025 indicate limited progress in strengthening freedom of expression in Somalia. The persistence of restrictive legal provisions, combined with documented patterns of arbitrary enforcement and insufficient safeguards for journalists' physical and digital security, underscores enduring gaps between constitutional guarantees and lived realities. Without reforms to ensure independent regulation, due process, and alignment with regional and international human rights standards, freedom of expression remains fragile and unevenly protected nationwide.

Data Protection and

Cybersecurity

In 2025, Somalia's data protection and privacy landscape reflected measured legal and institutional progress alongside persistent implementation challenges. The Data Protection Act, enacted in March 2023¹⁹ remains the country's primary le-

gal framework governing the collection, processing, and protection of personal data across public, private, and non-profit sectors. The Act establishes core rights for data subjects, including the rights to access, rectify, delete, and object to the processing of personal data, as well as safeguards against certain forms of automated decision making. It also imposes obligations on data controllers and processors to implement appropriate security measures, conduct risk assessments, and notify the relevant authorities of data breaches. The Data Protection Authority continued its institutional establishment phase. Efforts focused on developing and implementing regulations, engaging legal and technical expertise, and initiating awareness activities aimed at public and private institutions. While these steps demonstrate progress toward operationalisation, enforcement capacity remains limited. In practice, institutions continue to face challenges in interpreting and applying the law, compounded by limited access to practical guidance and regulatory materials necessary for compliance.

Alongside these challenges, steps have

19. 2023 Data Protection Act: <https://moct.gov.so/en/wp-content/uploads/2023/07/Somalia-Data-Protection-Act-2.pdf>

been taken to strengthen technical capacity related to data security and cyber resilience. The National Communications Authority (NCA) is actively working on strengthening national cybersecurity and launched the Global ACE Cybersecurity Certification with SIMAD University and CyberSecurity Malaysia²⁰ which aligns the establishment of SomCIRT²¹, a national Computer Emergency Response Team, to improve incident response and coordination. While these initiatives contribute positively to the broader data protection ecosystem, their effectiveness will depend on coordination with the Data Protection Authority, transparency, and the development of accessible compliance guidance.

Privacy and Surveil- lance

In late 2025, a serious security breach of Somalia's newly launched e-visa platform exposed the personal data of thousands of visa applicants, with at least 35,000 records compromised²². This breach raised questions about governance, accountability and the protection of sensitive personal information collected through digital public services. Concerns about data privacy also extended to the rollout of Somalia's national ID system. Public debate in 2025 highlighted fears over the storage and handling of personal information associated with the new National Identification and Registration Authority (NIRA) IDs²³, including uncertainty about who manages, accesses, and stores personal data. Some members of the public expressed distrust over the lack of transparency around data management practices, especial

20. Launch of Global ACE certification: <https://nca.gov.so/nca-and-simad-university-launch-global-ace-cybersecurity-certification-in-somalia/>

21. SomCIRT: <https://somicirt.gov.so/>

22. The 2025 E-Visa breach: <https://www.aljazeera.com/news/2025/12/18/new-somalia-evisa-security-puts-passport-details-of-thousands-at-risk>

23. Concerns on the new National Identification system: <https://garoweonline.com/en/news/somalia/somalia-s-new-national-id-system-raises-data-privacy-fears>

ly where data might be stored abroad.

While comprehensive data on formal state surveillance powers in 2025 are sparse, civil society reporting indicates that digital harassment and interference with journalists' communications were serious issues. Women journalists and media workers faced online attacks and content censorship, these cases reflect how content moderation and account management can have the effect of silencing journalists' digital expression, intersecting with privacy implications for individuals who rely on online platforms for their work.²⁴

Censorship and Content Moderation

Censorship and content moderation practices in Somalia continued to pose challenges to freedom of expression, particularly for journalists and media workers. Evidence documented by the Nation-

al Union of Somali Journalists (NUSOJ) shows that authorities repeatedly interfered with journalistic content through intimidation, arrests, and pressure to censor or remove reporting²⁵. These actions contributed to a restrictive environment in which journalists faced reprisals for publishing critical content, reinforcing widespread self censorship. NUSOJ noted that such measures were often justified on national security grounds, yet were implemented without adequate transparency or judicial safeguards, raising concerns about compliance with international standards on freedom of expression.

Content moderation on digital platforms also emerged as a growing concern, especially for women journalists. The Somali Media Women Association (SOMWA) reported an increase in censorship and online restrictions targeting women journalists²⁶, including the suspension or disabling of social media accounts used for professional reporting and public engagement. These actions directly limited journalists' ability to disseminate information, engage audiences, and maintain visibility in public discourse. SOMWA

24. Content censorship on media workers: <https://allafrica.com/stories/202509160087.html>

25. National Union of Somali Journalists: <https://nuso.org/2025/09/15/no-democracy-without-media-freedom-in-somalia-nuso-j-says/>

26. Censorship and online restrictions targeting women journalists: <https://somwa.org/the-somwa-report-warns-of-rising-attacks-censorship-and-discrimination-against-women-journalists-in-somalia/>

highlighted that the lack of clarity around content removal or restricted accounts intensified fear and uncertainty, further discouraging free expression online.

Available evidence indicates that censorship in Somalia during 2025 was characterised not by nationwide internet shut-downs, but by targeted and inconsistent practices affecting media content and online expression. The combined impact of state pressure on journalistic content and opaque platform level moderation continued to restrict civic space, particularly for journalists who rely on digital platforms as primary tools for reporting and communication.

AI and Emerging

Technologies

Somalia's engagement with artificial intelligence (AI) and emerging technologies has progressed significantly from informal experimentation toward institutional development and strategic planning, moving from early AI exploration toward structured ecosystems supported by government institutions, strategy

development, academic engagement, and international involvement. These developments mark a significant shift from earlier years when AI discussion was largely academic or ad hoc, but realising the full socio-economic and governance potential of emerging technologies will require stronger regulatory mechanisms, ethical safeguards, and implementation strategies. In 2025, Somalia advanced this momentum with the development of a National AI Strategy (2025–2030) intended to guide implementation, regulation, and cross sector AI adoption, although the final strategy document is still being formalised within broader digital policy frameworks, such as the Digital Transformation Strategy (2025–2030)²⁷. Consultations on national digital policy, supported by the Ministry of Communications and Technology (MoCT) and the National Communications Authority (NCA) in collaboration with the International Telecommunication Union (ITU), reflect increased alignment of AI planning with national development priorities.

On the global stage, Somalia has actively participated in international discussions on AI ethics, including the 3rd Global Fo

27. Digital Transformation Strategy (2025–2030): <https://nca.gov.so/somalia-launches-national-consultation-on-the-digital-transformation-strategy-2025-2030/>

rum on the Ethics of Artificial Intelligence co-hosted by UNESCO²⁸, where Somali officials engaged in dialogues on ethical AI governance and readiness assessments, noting Somalia's selection among countries to pilot UNESCO's AI governance readiness tools, a significant step toward aligning national efforts with global ethics frameworks. Additionally, UNESCO's call for a Lead National Expert to support implementation of the UNESCO Recommendation on the Ethics of AI²⁹ signals early movement toward integrating ethical principles into national AI governance structures.

Alongside the institutional growth is the establishment of the Somalia National AI Center (SNAIC)³⁰, a government-affiliated body dedicated to AI research, innovation, capacity building, and policy advisory functions. Local ecosystem development is further supported by community initiatives like AI Somalia³¹, which champions AI training, workshops, and talent devel-

opment in collaboration with universities and industry partners. Academic engagement is also expanding, with the SIMAD AI Institute³² at SIMAD University becoming a national hub for AI research and education, a development that was not present in prior years.

Emerging technologies beyond AI, such as blockchain, virtual reality (VR), facial recognition technologies (FRTs), and similar innovations, are not yet widely deployed or regulated in national policy, though discussions around technology cooperation including a collaboration framework with Saudi Arabia on AI and space technologies indicate an expanding scope for future technology governance and infrastructure cooperation.³³

28. Somalia's selection among countries to pilot UNESCO's AI governance readiness tools: <https://sonna.so/en/somalia-participates-in-3rd-global-forum-on-the-ethics-of-artificial-intelligence/>

29. UNESCO'S call for Lead National Expert for Somalia: <https://www.unesco.org/en/articles/call-expression-interest-lead-national-expert-somalia-unesco-regional-office-eastern-africa-social>

30. Somalia National AI Center: <https://snaic.gov.so/>

31. AI Somalia Community: <https://aisomalia.ai/>

32. SIMAD AI Institute: <https://ai.simad.edu.so/>

33. Somalia and Saudi Arabia Partner to Advance AI and Space Technology: <https://sonna.so/en/somalia-and-saudi-arabia-partner-to-advance-ai-and-space-technology/>

Digital Inclusion

In 2025, Somalia's digital inclusion agenda gained significant policy traction and multi-stakeholder engagement, yet persistent gaps continue to shape how equitably people can participate in the digital society. A major milestone early in the year was the formal approval of the Somalia Digital Inclusion Policy and the Accelerated Governance Strategy by the Federal Government's Council of Ministers.³⁴ This landmark policy explicitly targets long-standing barriers to equitable ICT access, focusing on affordability, infrastructure expansion, digital literacy, and targeted outreach to marginalised groups, including women, youth, rural populations, and persons with disabilities. Its objectives include improving access to affordable and reliable internet services, enhancing digital skills development, and ensuring that underserved communities can benefit from digital tools and services.

Complementing this policy, the National Communications Authority (NCA) has undertaken outreach and capacity-building initiatives to promote digital inclusion in concrete ways. NCA hosted Universal Acceptance Day 2025 in Mogadishu, a multi-stakeholder event aimed at ensuring that all valid domain names and email addresses are usable across internet-enabled systems.³⁵ This technical focus on inclusivity highlights the importance not just of connectivity but of an internet environment that is accessible, locally relevant, and linguistically diverse.

Digital inclusion efforts are also reflected in Somalia's broader digital governance landscape. The Digital Transformation Strategy (2025–2030), currently under national consultation with partners like the International Telecommunication Union (ITU) underscores inclusive growth and capacity development as strategic pillars.³⁶ These consultations emphasise the need for coordinated policies to expand infrastructure, build hu-

34. Digital Policy and the Accelerated Governance Strategy: <https://moct.gov.so/en/the-council-of-ministers-approves-the-inclusive-digital-policy-and-the-accelerated-governance-strategy-mogadishu-somalia-23rd-january-2025>

35. Universal Acceptance Day: <https://nca.gov.so/nca-hosts-universal-acceptance-day-to-promote-digital-inclusion/>

36. Consultation Workshop to validate Somalia's Digital Transformation Strategy (2025–2030): <https://nca.gov.so/somalia-launches-national-consultation-on-the-digital-transformation-strategy-2025-2030/>

man capital, and foster public–private partnerships that support participation in the digital economy.

On the ground, partnerships between private sector actors and humanitarian organisations are helping to extend inclusion beyond traditional access metrics. A notable example is the strategic collaboration between Hormuud Telecom and Save the Children Somalia, which aims to increase digital literacy and connectivity for children and their families in underserved areas.³⁷ The initiative focuses on using mobile technologies to improve education, health messaging, emergency communication, and youth empowerment.

Somalia does not currently have a stand-alone child online protection law that explicitly criminalises child exploitation, cyberbullying, online abuse, or other child-specific harmful conduct in the digital environment. However, earlier ICT policy frameworks such as the Na-

tional ICT Policy Strategy (2019–2024)³⁸ recognised the need for child online protection measures, though these were largely aspirational and not codified into law. The government has committed to drafting a new, comprehensive ICT policy within the next two years, which is expected to explicitly address consumer and child protection policy.³⁹ However, this commitment, which was set out in a policy document whose term ended in 2024, has not been implemented.

Despite these advances, structural barriers remain. Independent assessments note that rural communities, women, persons with disabilities, and linguistic minorities still experience lower levels of meaningful access due to infrastructure gaps, high data costs, and limited digital skills. While connectivity has improved, the utility and impact of access are uneven, and many citizens lack the training and capacity to use digital tools effectively for education, employment, and civic engagement.⁴⁰

37. Hormuud Telecom and Save the Children Somalia MoU: <https://hormuud.com/blog/hormuud-telecom-partners-with-save-the-children-somalia-to-bridge-digital-divide>

38. National ICT Policy Strategy: <https://moct.gov.so/en/wp-content/uploads/2019/11/National-ICT-Policy-Strategy-2019-2024.pdf>

39. Strategic goals on consumer and child protection policy on page 17: <https://moct.gov.so/en/wp-content/uploads/2019/11/National-ICT-Policy-Strategy-2019-2024.pdf>

40. Independent assessments: <https://eusee.hivos.org/assets/2025/07/Somalia-EE-baseline-snapshot-1.pdf>

Universal Service Fund

Somalia does not yet have an operational Universal Service Fund (USF) or a formally established Universal Access Fund dedicated to subsidising connectivity in underserved and rural areas, a mechanism that many countries use to bridge digital access gaps. The principle of universal service appears in Somalia's his-

torical ICT policy frameworks and regulatory strategy documents, which outline the need for ensuring broadband and voice services reach underserved populations.⁴¹ These policy documents define a Universal Access Fund (UAF) concept intended to support ICT access in rural and underserved areas, but they do not indicate that an active fund has been operationalised or financed.

Conclusion

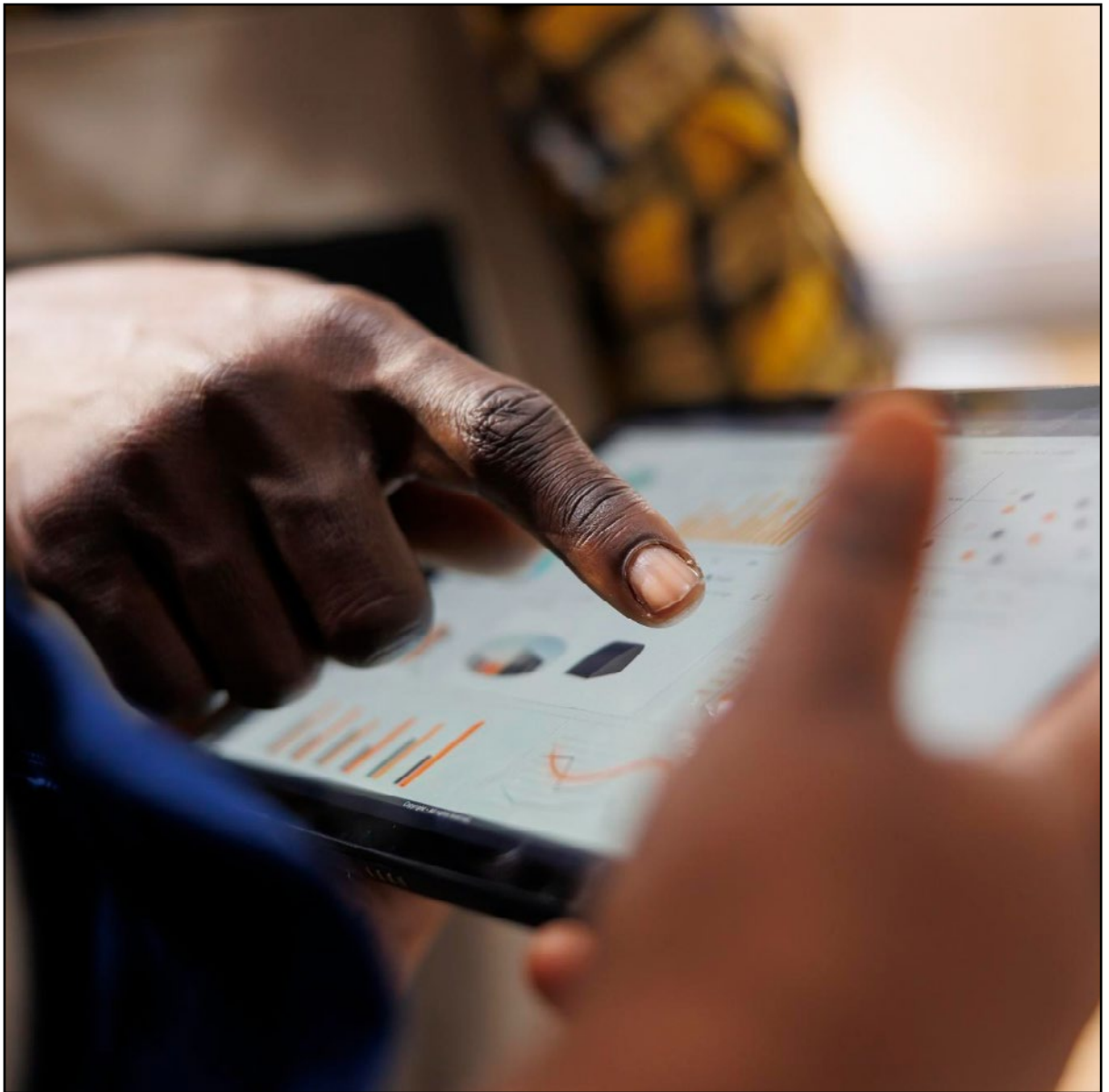
Somalia's digital trajectory in 2025 reflects meaningful progress alongside persistent structural challenges. Rapid growth in internet access, emerging frameworks for AI and other technologies, and a rise in the Score Index to 32 out of 60 highlight the potential of aligned policy, market innovation, and multi-stakeholder engagement. Yet, progress remains uneven, connectivity has outpaced governance, leaving gaps

in enforcement, accountability, and rights protection, while digital inclusion for women, rural communities, persons with disabilities, and other marginalised groups remains inconsistent. Institutional developments such as the Somalia National AI Centre, the Digital Transformation Strategy (2025–2030) and the drafting of the National AI Strategy (2025–2030) show ambition, but their impact will depend

41. The principle of universal service: https://moct.gov.so/en/wp-content/uploads/2025/08/Somalia-Digital-Inclusion-Policy_High-Level-Policy-document.pdf

on embedding ethical safeguards, data protection, and human rights from the outset. Somalia's digital future will hinge on bridging policy and practice, investing in inclusive infrastructure and skills, and establishing enforceable rights-based frameworks, with

sustained collaboration between government, regulators, civil society, the private sector, and international partners essential to ensure a resilient, equitable, and democratic digital ecosystem.



Recommendations

The Government should:



- Strengthen enforcement of existing digital laws, particularly data protection and cybersecurity frameworks, by allocating resources to regulatory bodies and establishing independent oversight mechanisms.
- Finalise and implement the National AI Strategy (2025–2030) with explicit human rights safeguards, including principles on transparency, accountability, non-discrimination, and responsible data use.
- Integrate digital inclusion indicators into national development and ICT policies, ensuring women, youth, persons with disabilities and displaced communities are explicitly targeted.
- Develop a national framework for platform accountability, including transparency reporting requirements for content moderation requests made to social media and digital platforms.
- Ensure that emerging technology and AI policies incorporate freedom of expression and privacy-by-design principles, preventing surveillance-driven or discriminatory deployment.
- Promote access to information by enforcing transparency obligations for public institutions, digitising public records, and ensuring online access to government information in accessible formats and local languages.
- Adopt a dedicated child online protection law that criminalises online exploitation, abuse, and harmful content targeting children, complemented by regulatory mechanisms to ensure enforcement, platform accountability, and nationwide digital literacy programs for children, parents, and educators.

The Private Sector should:



- Publish regular transparency reports detailing content moderation actions, data requests, and network disruptions affecting users in Somalia.
- Expand network coverage beyond commercially viable urban centres by partnering with government and development actors through public–private partnerships.
- Support local innovation ecosystems by investing in skills development, research, and incubation programs, particularly in AI, digital services, and content creation.
- Engage constructively in policy dialogue and regulatory processes to ensure commercial innovation aligns with public interest and human rights obligations.

Civil Society Organisations should:



- Invest in research and storytelling that centres local realities and lived experiences, amplifying Somali voices in regional and global digital policy spaces.
- Advocate for inclusive implementation of national ICT and AI policies, ensuring affected communities are meaningfully involved in decision-making processes.
- Promote access to information initiatives, including open data advocacy, digital archiving, and public-interest technology projects.
- Build digital rights literacy among journalists, activists, women, and youth to strengthen safe, informed participation in online civic spaces.

The Media:













- Monitor, document, and publicly report violations of freedom of expression, including arrests for on-line speech, content takedowns, and platform restrictions.
- Strengthen investigative and independent reporting while adhering to ethical standards, ensuring transparency and accountability in news coverage.
- Engage in public awareness campaigns to educate citizens about their digital rights, access to information, and safe online practices.







The Score Index







Somalia, 2025



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

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
Internet Shutdowns	P38(2)	 3	 4	Somalia has not experienced government imposed nationwide internet shutdown in 2025 and 2024. Past connectivity challenges in the country were largely driven by political instability and fragile telecommunications infrastructure, rather than deliberate state mandated restrictions on internet access.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37	 2	 3	Somalia has made progress by adopting legal and policy frameworks such as the Digital Inclusion Policy (2025), the Digital Transformation Strategy (2025–2030), these measures are still in early stages of implementation and enforcement remains limited

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
False News Criminalisation	P22(2)			False news criminalisation remains a concern due to legal provisions that criminalise expression under vaguely defined offences and are enforced through security driven practices. The absence of clear definitions and safeguards enables discretionary application, contributing to self-censorship among journalists and media actors.
Sedition Legislation	P22(2)			The Somali Penal Code contains specific provisions that criminalise sedition, which the report identifies as a significant restriction on freedom of expression. While these laws are intended to maintain public order, their wording is often “vague,” which frequently leads to misuse by authorities.
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)			Monitoring reports from Safe Reporters of Somalia (SRS) in 2025 documented multiple incidents of intimidation, detention, and obstruction by security agencies and local authorities. Security forces frequently targeted journalists through the confiscation of their electronic devices which were carried out without formal charges or judicial oversight.

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Data Protection Legislation.	P42			<p>Somalia enacted the Data Protection Act and established a dedicated Data Protection Authority (DPA) to safeguard individual privacy. In 2025 these foundational legal achievements are being integrated as core pillars of the country’s 2025–2030 Digital Transformation and National AI strategies to ensure a rights based technological future.</p>
Online Content Removal by Government	P38 and P39(4)			<p>Somalia is refining its approach to digital governance, while the government has actively enforced content take-downs in politically sensitive situations, these actions are now being integrated into the broader Digital Transformation Strategy (2025–2030) and the National AI Strategy.</p>
Invasion of Privacy of Communications	P41			<p>The ongoing use of surveillance cameras without clear oversight mechanisms has impacted public trust and while the government aims for a rights based future, the current lack of specific, comprehensive surveillance laws means there are still no strong legal safeguards against unauthorised monitoring</p>

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)			Government disclosure remained limited in 2025 due to the continued absence of an operational access to information framework. Although the Official Information Bill was approved by the Council of Ministers in 2024, it remained pending before Parliament throughout 2025, leaving Article 32 of the Provisional Constitution unimplemented and restricting access to state held information, including on digital matters.
AI and Emerging Technologies national strategies	P39(6)			Somalia has taken important steps with the development of the National AI Strategy (2025–2030) and the establishment of the Somalia National AI Center (SNAIC) to coordinate AI research, innovation, and capacity building. While these frameworks mark progress toward a structured approach, the strategy is still in progress, gaps remain in implementation, ethical oversight, and sector specific adoption, meaning that the full potential of AI for economic growth, public service improvement, and societal benefit is still emerging.
Adoption of specific child laws, policies and measures promoting children's	P39(6)			Child online protection remains insufficiently addressed within Somalia's digital policy and regulatory landscape. Despite growing internet use among children, there is no comprehensive, child specific legal or policy framework to safeguard them online.

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
digital safety and privacy online				Existing commitments have not been operationalised, and government led measures to address risks and exposure to harmful content remain limited. While civil society actors have played a role in raising awareness around child digital safety, these efforts have yet to translate into coordinated government action or a national child online protection framework.
Digital Inclusion	P37(3)			Somalia has made notable progress in digital inclusion, marked by the adoption of the Digital Inclusion Policy (2025), steps toward the Digital Transformation Strategy (2025–2030), establishment of the Somalia National AI Center (SNAIC) to coordinate research and innovation and targeted programs to expand connectivity, digital literacy, and access, reflecting a more systematic approach to equitable access. However, challenges remain in infrastructure, implementation, rural coverage, access for persons with disabilities and meaningful utilisation of digital services, highlighting areas for continued investment and implementation.

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
				50 major towns. Furthermore, the move challenged the longstanding duopoly of the state-owned Mobile Telecommunications Company (MTC) and Telecom Namibia, introducing new competitive dynamics that could benefit coverage expansion and service quality.
Total (out of 60):	2024: 27	2025 32		

Somalia's total score for 2025 stands at 32 out of 60, reflecting measurable progress in the digital rights landscape compared to the previous year. The increase points to gradual improvements in policy direction and institutional developments. However, despite this upward trend, gaps remain, highlighting the need to build on current gains through stronger implementation and accountability.



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