

# LONDA 2025

## DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

### Tunisia

Country Report



PARADIGM  
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# Tunisia

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## Executive Summary

Tunisia's digital landscape presents a complex interplay of progress and repression. The country has advanced digital infrastructure, but this progress is overshadowed by a growing crackdown on digital rights and freedoms. The government's increasing surveillance of online activities, coupled with the arbitrary arrest of journalists and activists, has created a climate of fear and self-censorship. Misuse of laws to target critical voices and the erosion of privacy rights are major concerns.

This report captures the evolving achieve-

ments and challenges that define Tunisia's digital landscape in 2025. It covers the dynamics of internet freedom, the right to privacy, data protection, access to information and digital inclusion. Additionally, the report assesses the country's score based on the TheScore Index developed by Paradigm Initiative to assess countries' compliance with the African Commission on Human and Peoples' Rights' Declaration of Principles on Freedom of Expression and Access to Information. The employed methodology involved a thorough review of government reports, media sources, and existing literature to comprehensively evaluate quantitative and qualitative aspects of digital rights and inclusion in the country.

## Introduction

Tunisia, a North African nation of approximately 12 million people, embarked on a democratic transition following the 2011 revolution.<sup>1</sup> However, since 2021, President Kais Saied's consolidation of power has led to a significant repression of human rights and freedoms as evidenced by the imprisonment of political dissidents, the crackdown on peaceful protests and the increasing prosecutions against social media users.<sup>2</sup>

Tunisia is a signatory to several international human rights treaties, including the International Covenant on Civil and Political Rights<sup>3</sup>. Regionally, Tunisia ratified the African Charter on Human and Peoples' Rights, which guarantees individuals the right to receive information and the right to express and disseminate information. While these commitments underscore the country's obligations to protect fundamental rights, recent developments have raised concerns about their implementation.

Despite constitutional provisions for the primacy of international treaties, the current political climate has created challenges in upholding these commitments. The tension between democratic principles and authoritarian tendencies has significant implications for Tunisia's digital rights landscape.

Tunisia's score suggests that it is moderately compliant with the Declaration of Principles of Freedom of Expression and Access to Information in Africa.

## Internet access and disruptions

According to the International Telecommunication Union's ICT Development Index 2025, 76.2% of the Tunisian population uses the Internet, while 68.6% of households have internet access at home. In 2025, the country had a robust

1. Al Jazeera, "Timeline: Tunisia's uprising", Jan 23, 2011, <https://www.aljazeera.com/news/2011/1/23/timeline-tunisia-uprising> (accessed on 29 January 2026).
2. Inkyda, "Kais Saied: jeopardizing rights and freedom", July 2023, <https://inkyfada.com/en/2023/07/27/threats-rights-freedom-kais-saied-tunisia/> (accessed on 29 January 2026).
3. United Nations Treaties Collection, "International Covenant on Civil and Political Rights", [https://treaties.un.org/doc/treaties/1976/03/19760323%2006-17%20am/ch\\_iv\\_04.pdf](https://treaties.un.org/doc/treaties/1976/03/19760323%2006-17%20am/ch_iv_04.pdf) (accessed on 29 January 2026).

mobile network infrastructure, with a high mobile broadband coverage rate of 97.2 per 100 inhabitants.<sup>4</sup>

Overall, Tunisia's internet penetration continued to grow, reaching 50.2% for broadband internet and 89.3% for mobile data.<sup>5</sup> In 2025, mobile traffic climbed from 301 in 2024 to 351 Petabytes (PB). Fixed data traffic escalated from 1,555 PB in 2024 to 1,989 PB.<sup>6</sup> This expansion was driven predominantly by strong subscriber adoption of fibre optic and data box technologies, alongside the phased decline of the adoption of Asymmetric Digital Subscriber Line (ADSL) technology.<sup>7</sup> This technological migration is directly evidenced by average monthly consumption rates, which stood at approximately 270 GB for ADSL and exceeded 700 GB for fibre connections.<sup>8</sup>

According to Ookla's Speedtest Global Index, Tunisia's average mobile download speed increased from 26.17 Mbps in 2024 to 64.08 in 2025, while the average upload speed increased from 14.60 Mbps in 2024 to 17.21 Mbps in 2025. For fixed broadband, both download and upload speeds saw significant improvements. Download speeds increased from 10.90 Mbps to 18.07 Mbps, while upload speeds jumped from 3.86 Mbps to 6.68 Mbps, ranking 146th globally.<sup>9</sup>

The commercial launch of 5G services in Tunisia in February 2025 served as the direct catalyst for the observed improvements in national internet speed metrics.<sup>10</sup> This milestone established Tunisia as the first North African nation to commercialise 5G technology, consequently positioning it as the regional leader in the

4. International Telecommunication Union (ITU), "Tunisia ICT Development Index 2025", <https://datahub.itu.int/dashboards/idi/?e=TUN&y=2025> (Accessed on 15 November 2025).
5. INTT, "Tableau de bord trimestriel TR2- 2025", <https://www.intt.tn/upload/files/TB-Trimestriel-TR2-2025.pdf> (Accessed on 15 November 2025).
6. Instance Nationale des Télécommunications (INTT), "Tableau de Bord Trimestriel, 3e Trimestre 2025" [Quarterly Dashboard, 3rd Quarter 2025], p. 1, [https://www.intt.tn/upload/files/TB%20Trimestriel-TR3-2025%20\(1\).pdf](https://www.intt.tn/upload/files/TB%20Trimestriel-TR3-2025%20(1).pdf) (accessed on 29 January 2026).
7. "Rapport du régulateur tunisien: la data tire la croissance au troisième trimestre 2025" [Report of the Tunisian regulator: Data drives growth in the third quarter of 2025], THD.tn, <https://www.thd.tn/rapport-du-regulateur-tunisien-la-data-tire-la-croissance-au-troisieme-trimestre-2025/> (accessed on 28 January 2026).
8. Instance Nationale des Télécommunications (INTT), "Tableau de Bord Trimestriel, 3e Trimestre 2025" [Quarterly Dashboard, 3rd Quarter 2025], p. 1, [https://www.intt.tn/upload/files/TB%20Trimestriel-TR3-2025%20\(1\).pdf](https://www.intt.tn/upload/files/TB%20Trimestriel-TR3-2025%20(1).pdf) (accessed on 29 January 2026).
9. Speedtest Global, "Tunisia," <https://www.speedtest.net/global-index/tunisia> (Accessed on 15 November 2025).
10. La Presse, "Tunisie, première en Afrique du Nord à lancer la 5G," La Presse de Tunisie, February 14, 2025, <https://www.lapresse.tn/2025/02/14/tunisie-premiere-en-afrique-du-nord-a-lancer-la-5g/> (accessed on 29 January 2026).

Speedtest Global Index.<sup>11</sup>

As part of the national digital transformation strategy, the Instance Nationale des Télécommunications has commissioned a study to evaluate the feasibility and potential deployment of Non-Geostationary Satellite fixed high-speed internet access.<sup>12</sup> This measure follows earlier service experiments, such as those with Starlink in October 2023.<sup>13</sup> Results from that study have not yet been released.

In November 2025, the Medusa submarine cable landed in the Tunisian coastal town of Bizerte, marking an important advancement in Tunisia's international connectivity infrastructure. This project positions Tunisia as the first African country to connect to this new generation network.<sup>14</sup> The fibre pair offers an initial capacity of

22Tbps (Terabytes per second), substantially augmenting the country's existing international bandwidth.<sup>15</sup>

Regarding affordability, Tunisia ranked 9th cheapest in Africa for mobile data in Q3 2025, with average monthly costs of US\$1.51 per GB.<sup>16</sup>

Following the 2024 census, the National Institute of Statistics (INS) recently published figures revealing a significant digital divide in Tunisia, driven by geographical, economic, and educational disparities. Internet usage among individuals is substantially higher in urban areas (81.4%) compared to rural areas (61%). This geographical disparity is closely mirrored in equipment access, with computer usage standing at 40.2% in cities versus only 19.4% in rural areas. Interestingly, INS

11. Karim Yaici, "5G Helped Egypt and Tunisia Uplift Mobile Performance to New Levels," Ookla Research, September 10, 2025, <https://www.ookla.com/articles/5g-north-africa-2025> (accessed on 28 January 2026).
12. Instance Nationale des Télécommunications (INTT), "Appel d'offres n°02/2025," March, 2025, <https://intt.tn/fr/index.php?typeactu=89&actu=1025> (accessed on 29 January 2026).
13. Adoni Conrad Quenum, "Tunisia tests satellite Internet in three cities," We Are Tech Africa, October 4, 2023, <https://www.wearetech.africa/en/fils-uk/news/telecom/tunisia-tests-satellite-internet-in-three-cities> (accessed on 29 January 2026).
14. Walid Naffati, "Medusa arrive à Bizerte : la Tunisie devient la première porte d'entrée de l'Afrique dans le nouveau réseau sous-marin Europe-Méditerranée," THD - Tunisie Haut Debit, November 3, 2025, <https://www.thd.tn/medusa-arrive-a-bizerte-la-tunisie-devient-la-premiere-porte-dentree-de-lafrique-dans-le-nouveau-reseau-sous-marin-europe-mediterranee/> (accessed on 29 January 2026).
15. La Presse, "Tunisie Telecom célèbre l'atterrissage du câble sous-marin Medusa à Bizerte : un tournant stratégique pour la connectivité nationale et internationale," La Presse de Tunisie, November 1, 2025, <https://www.lapresse.tn/2025/11/01/tunisie-telecom-celebre-latterrissage-du-cable-sous-marin-medusa-a-bizerte-un-tournant-strategique-pour-la-connectivite-nationale-et-regionale/> (accessed on 29 January 2026).
16. "RAMP Index Insights, Quarter 2, 2025," Research ICT Africa (RIA), July 24, 2025, <https://researchictafrica.net/2025/07/24/ramp-index-insights-quarter-2-2025/> (accessed on 29 January 2026).



code and specific decrees like Decree Law 2022-54.<sup>23,24</sup>

A severe demonstration of this escalation was the case of Saber Chouchen, who was sentenced to death in October 2025 for his social media posts under charges including “assault intended to change the form of the state” (Penal Code) and “dissemination of false information” (Decree 54).<sup>25</sup> This judgement, rendered purely for online expression, marked an extreme use of disproportionate judicial responses against online speech. However, following widespread public pressure, the President granted a pardon to Chouchen, leading to his release.<sup>26</sup>

The National Syndicate of Tunisian Journalists documented, between October 2024, and October 2025, 149 incidents of violence against journalists, including 46

technology-based attacks, 23 cases of incitement, 13 cases of publication-linked legal prosecution, five cases of harassment, two cases of verbal assault, two cases of censorship, and one case of publication ban. According to the unit, 13 gender-based attacks were also reported.<sup>27</sup>

In particular, Decree Law 2022-54 has been used to silence dissent, with several journalists and activists facing prosecution and imprisonment for their online activities. The decree prescribes prison terms of up to 10 years for disseminating false news, among other speech-related offences. A group of parliament members proposed a legislative initiative to amend several chapters of Decree 2022-54. After being stalled for months by the Parliament’s Bureau, the legislative proposal was referred to the General Legislation Committee for review and discussion in

23. Hivos, “Freedom of Expression in Tunisia: Legal Mapping”, <https://hivos.org/document/freedom-of-expression-in-tunisia-legal-mapping/> (accessed on 29 January 2026).

24. Decree-Law No. 2022-54 of September 13, 2022, relating to the fight against offenses relating to information and communication systems, <https://legislation-securite.tn/latest-laws/decret-loi-n-2022-54-du-13-septembre-2022-relatif-a-la-lutte-contre-les-infractions-se-rapportant-aux-systemes-dinformation-et-de-communication/> (accessed on 29 January 2026).

25. Intersection Association – Saber chouchane,” Intersection, October 6, 2025, <https://intersection.uno/freedom-faces/%D8%B5%D8%A7%D8%A8%D8%B1-%D8%B4%D9%88%D8%B4%D8%A7%D9%86/> (accessed on 29 January 2026).

26. Hume, Tim, AFP, and Reuters. “Tunisia pardons man sentenced to death over Facebook posts.” Al Jazeera. October 7, 2025. Accessed November 19, 2025. <https://www.aljazeera.com/news/2025/10/7/tunisia-pardons-man-sentenced-to-death-over-facebook-posts> (accessed on 29 January 2026).

27. SNJT, “98th Annual Report on the Safety of Journalists”, November 2025, <https://snjt.org/wp-content/uploads/2025/11/%D8%AA%D9%82%D8%B1%D9%8A%D8%B1.pdf> (accessed on 29 January 2026).



administrative regulations, characterised the one-month suspension as a “political decision” following a sustained period of official harassment, investigations, and financial oversight.<sup>35</sup> Concurrently, the youth-focused digital media outlet, Boubli also received an official notification to cease its activities.<sup>36</sup> These suspension notices triggered widespread local and international condemnation, with organisations including the National Union of Tunisian Journalists and the International Federation of Journalists characterising it as a significant escalation in the crackdown on free speech.<sup>37</sup>

Individuals with significant following on social media platforms, particularly women and members of the LGBTQIA+ community, became targets of online ha-

arrassment, defamation, and incitement campaigns.<sup>38</sup> In February 2025, a gender non-conforming content creator was sentenced to a two-year prison term and a TND1,000 (approximately US\$330) fine under Article 234 of the penal code for “violating morals by inciting minors to debauchery” over social media videos.<sup>39</sup>

## Data Protection and Cybersecurity

Tunisia’s legal framework includes provisions for privacy and data protection enshrined in the 2022 Constitution<sup>40</sup> and the 2004 Personal Data Protection Law.<sup>41</sup> Despite these legal safeguards, Tuni-

35. La rédaction. “Nawaat will not be silenced.” Nawaat. October 31, 2025. <https://nawaat.org/2025/10/31/nawaat-will-not-be-silenced/> (accessed on 29 January 2026).
36. Boubli, photo post, October 15, 2025, Facebook, <https://www.facebook.com/photo?fbid=826401253241605&set=a.199992262549177> (accessed on 22 November 2025).
37. International Federation of Journalists. “Tunisia: Government suspends investigative media platform amid crackdown on free speech.” IFJ. November 5, 2025. <https://www.ifj.org/media-centre/news/detail/category/press-releases/article/tunisia-government-suspends-investigative-media-platform-amid-crackdown-on-free-speech> (accessed on 29 January 2026).
38. Fédération internationale pour les droits humains, “Tunisie : nouvelles attaques et actes d’intimidation contre DAMJ et ses membres”, October 10, 2024, <https://www.fidh.org/fr/themes/defenseurs-des-droits-humains/tunisie-nouvelles-attaques-et-actes-d-intimidation-contre-damj-et-ses> (accessed on 29 January 2026).
39. Amnesty International, “Tunisia: Authorities Step Up Crackdown on LGBTI Individuals with Wave of Arrests,” February 6, 2025, <https://www.amnesty.org/en/latest/news/2025/02/tunisia-authorities-step-up-crackdown-on-lgbti-individuals-with-wave-of-arrests/> (accessed on 22 November 2025).
40. The Constitution of the Tunisian Republic of July 25, 2022, <https://legislation-securite.tn/latest-laws/decret-presidentiel-n-2022-691-du-17-aout-2022-portant-promulgation-de-la-constitution-de-la-republique-tunisienne> (accessed on 29 January 2026).
41. Law No. 2004-63 of July 27, 2004, relating to the protection of personal data, <https://legislation-securite.tn/latest-laws/loi-organique-n-2004-63-du-27-juillet-2004-portant-sur-la-protection-des-donnees-a-caractere-personnel/> (accessed on 29 January 2026).

sians' privacy rights still face vulnerabilities. The 2004 Personal Data Protection Law is outdated and does not effectively address the technological advancements and new challenges related to personal data, including the specificity of biometric data. Its numerous shortcomings, particularly in safeguarding privacy, grant the public authorities undue power over personal data, undermining citizens' fundamental rights.<sup>42</sup>

The prolonged state of emergency, renewed in January 2025,<sup>43</sup> grants government agencies extensive powers to access electronic devices without judicial oversight. This has raised concerns about monitoring those perceived as critical of the government.<sup>44</sup> Additionally, De-

cree-Law 2022-54 further eroded privacy rights. It allows law enforcement agencies to access personal data without a judicial warrant and mandates telecommunications providers to retain user data for extended periods.<sup>45</sup>

Civil society organisations have documented instances where the mobile phones of opposition politicians and activists have been seized and their communications monitored without proper legal authorisation.<sup>46, 47</sup> This has raised concerns about the extent of government surveillance to target individuals and suppress dissent.

The arbitrary arrest and prosecution of activists based on the content found on

42. Nawaat, 3Journée internationale de protection des données personnelles : En Tunisie, c'est toujours l'inertie!", Jan 2015, <https://nawaat.org/2015/01/29/journee-internationale-de-protection-des-donnees-personnelles-en-tunisie-cest-toujours-linertie/> (accessed on 29 January 2026).
43. "31-تاريخ-إلى-إير-أوت-إصلاح-ديدمت 2025 ربيع-ي 31 تاريخ-إلى-إير-أوت-إصلاح-ديدمت" (Extension of the state of emergency until December 31, 2025), Mosaïque FM, accessed November 22, 2025, <https://www.mosaïquefm.net/ar/1374694/تاريخ-إلى-إير-أوت-إصلاح-ديدمت-2025-ربيع-ي> (accessed on 29 January 2026).
44. Amnesty International, "Tunisia Repressive state of emergency bill a threat to human rights," March 15, 2019, <https://www.amnesty.org/en/latest/news/2019/03/tunisia-repressive-state-of-emergency-bill-a-threat-to-human-rights/> (accessed on 29 January 2026).
45. "Decree n° 2022-54 relating to the fight against crimes related to information and communication systems," <https://legislation-securite.tn/latest-laws/decret-loi-n-2022-54-du-13-septembre-2022-relatif-a-la-lutte-contre-les-infractions-se-rapportant-aux-systemes-dinformation-et-de-communication/> (accessed on 29 January 2026).
46. Kapitalis, "Tunisie : Qui a utilisé le smartphone de Chaima Issa", April 2023, <https://kapitalis.com/tunisie/2023/04/24/tunisie-qui-a-utilise-le-smartphone-de-chaima-issa-apres-sa-saisie/> and (accessed on 29 January 2026); Webso, "Ennahda met en garde contre l'utilisation du téléphone de Rached Ghannouchi", May 2023, <https://www.webdo.tn/fr/actualite/national/ennahda-met-en-garde-contre-l-utilisation-du-telephone-de-rached-ghannouchi/205704> (accessed on 29 January 2026).
47. Women Journalists without chains, 'Statement of Condemnation by Women Journalists Without Chains', December 12, 2024, <https://www.wjwc.org/news-en/statement-of-condemnation-by-women-journalists-without-chains/> (accessed on 29 January 2026).

their phones underscores the deterioration of digital rights. The cases of the two Tunisian students, Dhia Hamdi and Adam Hammami, exemplify how digital evidence can be used to silence critical voices. In September 2024, the two Tunisian students were arrested and their phones confiscated. The authorities subsequently charged them under Article 67 of the Penal Code for committing an obscene act against the President of the Republic, citing graffiti images found on their phones.<sup>48</sup> In October 2025, the case against them was dismissed, and their phones were returned.<sup>49</sup>

## Data Breaches and

## Misuse

As of October 2025, the National Cybersecurity Agency (ANCS) maintained the national cybersecurity alert level at “very high.”<sup>50</sup> ANCS specialists estimate that the period spanning 2024 to 2025 saw over 20,000 cyberattacks directed against Tunisian public and private institutions.<sup>51</sup> In a significant cybersecurity incident in July 2025, the National University Network and the infrastructure of the Al-Khawarizmi Computing Centre, operating under the Ministry of Higher Education and Scientific Research, were subject to a cyberattack.<sup>52</sup> While official sources confirmed the cyberattack, they did not disclose the breach’s scope. Unofficial reports, however, suggest the incident exposed sensitive personally identifiable information of thousands of students, including governmental identifiers (National Identity Cards), academic records, and

48. Committee for Justice, “Tunisia: CFJ observes trial of 2 Tunisian activists due to anti-normalization activities “; November 8, 2024, <https://www.cfjustice.org/tunisia-cfj-observes-trial-of-2-tunisian-activists-due-to-anti-normalization-activities/> (accessed on 29 January 2026).
49. Kashf Media, “ميمامه دداو يدمح وايض ن يباشلا قح يف يوخل اع امين مدع” [Dismissal of the Case Against the Two Young Men, Dhia Hamdi and Adam Hammami], October 3, 2025, <https://kashfmedia.com/2025/10/03/من-يباشلا-قح-يف-يوخل-اع-امين-مدع/> (accessed on 29 January 2026).
50. Agence Nationale de la Cybersécurité (ANCS) [Tunisia], “Graphe des Alertes Nationales” [Graph of National Alerts], <https://www.ancs.tn/fr/node/451/> (accessed November 24, 2025).
51. Mosaique FM, “2024 2025 20 ” [ Twenty thousand Cyberattacks Targeted Tunisian Institutions Between 2024 and 2025], October 8, 2025, <https://www.mosaiquefm.net/ar/سنوات-2024-2025-20> (accessed on 29 January 2026).
52. “Tunisia – Higher Education: Al Khawarizmi Centre Targeted by Cyberattack,” Tunisie Numérique, July 10, 2025, <https://news-tunisia.tunisienumerique.com/tunisia-higher-education-al-khawarizmi-center-targeted-by-cyberattack/#:~:text=A%20statement%20issued%20Thursday%20stated,Technologies%20and%20the%20National%20Cybersecurity> (accessed on 29 January 2026).





by public bodies without consequence, and key board positions were deliberately left vacant for extended periods, ultimately stripping the INAI of both its legal enforceability and moral authority.<sup>66</sup> International and local civil society organisations strongly condemned the move, viewing it as part of a broader trend since 2021 to dismantle the independence of key oversight institutions.<sup>67</sup>

While the Organic Law No. 22 of 2016 on Access to Information remains formally in force, its efficacy is compromised by the absence of an independent oversight body and a pervasive operational environment marked by increased government opacity and the imposition of unlawful barriers to information access. In recent years, media access to government information has declined. Authorities have

limited their interactions with the press, making it difficult for journalists to verify information from official sources.<sup>68</sup> In its annual report, the National Syndicate of Tunisian Journalists documented 16 incidents of information withholding, with the majority of cases originating from local governance and public relations roles.<sup>69</sup> As Gabes governorate witnessed large-scale demonstrations over the pollution crisis, civil society organisations criticised the delays in disclosing environmental data and called on authorities to ensure full transparency and access to environmental information.<sup>70</sup>

While Tunisia has previously made progress in establishing the legal and institutional foundations for access to information, the efficacy of the law is compromised by the dissolution of the

66. Legal Agenda, “إهانة إلاب جوتّي فإزانتسال نم ليوط راسم... إقمول عمل إىل إذافنلا إىي رّقم قال غإ” [Closing the Headquarters of the Access to Information Authority... A Long Path of Exhaustion Culminates in Termination], Legal Agenda, <https://legal-agenda.com/إس-م-قمول-عمل-إىل-إذافنلا-إىي-رّقم-قال-غإ/> (accessed on 29 January 2026).
67. Syndicat National des Journalistes Tunisiens (SNJT), “إىي رّقم قال غإ إىل إذافنلا إىي رّقم قال غإ” [Statement: The National Syndicate of Tunisian Journalists Condemns the Decision to Close the Headquarters of the Access to Information Authority], SNJT, August 20, 2025, <https://snjt.org/2025/08/20/27735/> (accessed on 29 January 2026).
68. Mosaïque FM, “Zied Dabbar: Les journalistes pris pour cibles par la magistrature”, March 2024, <https://www.mosaiquefm.net/fr/national-tunisie/1254101/zied-dabbar-les-journalistes-pris-pour-cibles-par-la-magistrature> (accessed on 29 January 2026).
69. Syndicat National des Journalistes Tunisiens (SNJT), “إىي رّقم قال غإ إىل إذافنلا إىي رّقم قال غإ” [SNJT Annual Report on the State of Press Freedom and Freedom of Expression], SNJT, 2025, <https://snjt.org/wp-content/uploads/2025/11/%D8%AA%D9%82%D8%B1%D9%8A%D8%B1.pdf> (accessed on 29 January 2026).
70. Tunisia: Uphold the right to protest and access to environmental information,” Article 19, October 20, 2025, <https://www.article19.org/resources/tunisia-uphold-the-right-to-protest-and-access-to-environmental-information/> (accessed on 29 January 2026).

independent oversight authority and a general environment characterised by increased government opacity, the imposition of unlawful administrative and legal barriers to access, and the concurrent decline of media freedom.

## AI and Emerging

## Technologies

Tunisia has demonstrated an interest in emerging technologies like artificial intelligence (AI), but its progress in this area has been relatively modest. Despite initiating discussions on AI governance in 2018, concrete policy advancements have been limited.<sup>71</sup> Tunisia's process toward a National Artificial Intelligence Strategy has been marked by several initiatives and is currently in the final stages

of drafting and consultation, though not yet formally adopted by the government.<sup>72</sup> The 2004 Personal Data Protection Law<sup>73</sup> applies to the automated processing and non-automated processing of personal data.

As reported in 2025, the government began deploying Artificial Intelligence (AI) tools for public policy development. The Development Planning Commission reportedly used AI to draft the 2026–2030 national development plan by deploying AI analysis of sector-specific indicators.<sup>74</sup>

In the Global Innovation Index, Tunisia ranked 76th out of 139 countries, moving up five spots from its 2024 position.<sup>75</sup> The country's performance is driven by strong areas like human capital, particularly its 2nd global ranking for science and engineering graduates, and knowledge and technology outputs. However, challenges

71. Agence Nationale de la Promotion de la Recherche Scientifique, "National AI Strategy: Unlocking Tunisia's Capabilities Potential," September 2018, <https://www.anpr.tn/national-ai-strategy-unlocking-tunisias-capabilities-potential/> (accessed on 29 January 2026).
72. "La Tunisie prépare sa stratégie nationale de l'intelligence artificielle" [Tunisia prepares its national artificial intelligence strategy], La Presse de Tunisie, November 5, 2025, <https://www.lapresse.tn/2025/11/05/la-tunisie-prepare-sa-strategie-nationale-de-lintelligence-artificielle/> (accessed on 29 January 2026).
73. Law No. 2004-63 of July 27, 2004, relating to the protection of personal data, <https://legislation-securite.tn/latest-laws/loi-organique-n-2004-63-du-27-juillet-2004-portant-sur-la-protection-des-donnees-a-caractere-personnel/> (accessed on 29 January 2026).
74. "Plan de développement 2026-2030 : L'intelligence artificielle utilisée pour définir les priorités stratégiques" [Development Plan 2026-2030: Artificial intelligence used to define strategic priorities], La Presse, July 9, 2025, <https://lapresse.tn/2025/07/09/plan-de-developpement-2026-2030-lintelligence-artificielle-utilise-pour-definir-les-priorites-strategiques/> (accessed on 29 January 2026).
75. Global Innovation Index, "Tunisia ranking in the Global Innovation Index 2024", <https://www.wipo.int/gii-ranking/en/tunisia> (accessed on 29 January 2026).

remain in its institutional, infrastructure, market, and business sophistication.<sup>76</sup>

Tunisia still faces challenges in fully harnessing the potential of emerging technologies. To accelerate its technological advancement, the country needs to invest in research and development and create a favourable regulatory environment for innovation.

## Digital Inclusion

In March 2025, the Ministry of Communication Technologies launched the “Universal Coverage with Communication Networks” project to address the digital divide by ensuring the provision of high-speed communication networks across the country, particularly targeting small

and remote settlements. The Minister of Communication Technologies publicly articulated the expectation that telecommunications operators must fulfil a social responsibility to provide this universal service, beyond their existing contractual duties.<sup>77</sup> In June 2025, the Ministry announced a tender specifically aimed at procuring high-speed internet and communication network coverage for 103 currently unconnected residential areas spanning 15 governorates.<sup>78</sup> This project is integrated within a broader 2025–2026 digital transformation program, which is defined by its 138 constituent projects across four primary areas: modernising administrative services, promoting the digital economy, strengthening cybersecurity, and advancing digital infrastructure.<sup>79</sup>

76. “Tunisia Climbs to 76th in Global Innovation Index: Ranked Among Top Overperformers,” TMO Mag, October 25, 2024, <https://tmo-mag.com.tn/tunisia-climbs-to-76th-in-global-innovation-index-ranked-among-top-overperformers/#:~:text=Tunisia%20has%20risen%20five%20places,held%20between%202018%20and%202023> (accessed on 29 January 2026).

77. Mosaique FM, “عيمي جليل في طغرتا ريفوتل تالاصتال ايل غشم وعدي ايجولونكتل اريزو” [Technology Minister Calls on Telecom Operators to Provide Coverage for All], March 26, 2025, <https://www.mosaiquefm.net/ar/سنوات-عيمي-جليل-في-طغرتل-اريفوتل-تالاصتال-ايل-غشم-وعدي-ايجولونكتل-اريزو/1395244/> (accessed on 29 January 2026).

78. Turess, “دع قدي افضل يال اعلا قفدتل تا ذتنرتن اال او لاصتال تالكب شب ةلم اشلا في طغرتل ني اتمل ضرورع بلط قاطا” 103 [Launch of a Tender to Ensure Comprehensive Coverage of Communication Networks and High-Speed Internet for 103 Regions], June 24, 2025, <https://www.turess.com/arrakmia/1849337> (accessed on 29 January 2026).

79. Presidency of the Government, “ترادال ليمقرلا لوتحتل اعيراشم دقت ةعباتم لوح يرازو سلجم” [Ministerial Council on Monitoring the Progress of Administrative Digital Transformation Projects], September 16, 2025, <https://pm.gov.tn/ar/article/mjls-wzary-hwl-mtabt-tqdw-mshary-althwwl-almqmy-lladart> (accessed on 29 January 2026).

## Child Online Safety

In November 2025, the Tunisian government formally adopted the National Charter for the Protection of Children Online, a joint initiative between the Ministry of Family, Women, Childhood & the Elderly and the Ministry of Communication Technologies.<sup>80</sup> This Charter primarily functions as a voluntary framework, focusing on reinforcing social responsibility rather than establishing immediate binding legal obligations. It is closely integrated with the National Action Plan (NAP) against online violence toward children, launched earlier, in partnership with UNICEF.<sup>81</sup> To support the Charter's implementation, the Ministry of Family, Women, Childhood & the Elderly reportedly conducted a legislative assessment in 2025 to identify shortcomings in existing laws regarding children's digital protection. The findings

will inform legislative reforms and facilitate the creation of practical guidance for key stakeholders.<sup>82</sup>

## Universal Service

### Fund (USF)

Tunisia's Universal Service Fund (USF), established in 2001 and subsequently amended, mandates telecom operators to contribute a portion of their revenue to support universal service initiatives, including internet access.<sup>83</sup>

Despite efforts to develop a comprehensive universal service policy, progress has been limited.<sup>84</sup> The government has collected a 1% telecoms fee for 'universal service development' since 2001, but has failed to provide consistent and transparent information on how these funds are

80. "Un pacte national pour protéger les enfants dans l'espace numérique" [A National Pact to Protect Children in the Digital Space], Mosaique FM, November 2025, <https://www.mosaiquefm.net/fr/national-tunisie/1481005/un-pacte-national-pour-protoger-les-enfants-dans-l-espace-numerique> (accessed on 29 January 2026).
81. UNICEF Tunisia, "National Action Plan (NAP) Against Violence Affecting Children (VAC) Online (2023-2025)," UNICEF, 2023, <https://www.unicef.org/tunisia/media/8121/file/PAN%20VAC%20online-ang.pdf> (accessed on 29 January 2026).
82. "Protection de l'enfance en ligne : la Tunisie adopte un Pacte national" [Online Child Protection: Tunisia Adopts a National Pact], Nessma TV, November 19, 2025, <https://www.nessma.tv/fr/nationale/actu/protection-de-l-enfance-en-ligne-la-tunisie-adopte-un-pacte-national/561798> (accessed on 29 January 2026).
83. Arrêté du ministre des technologies de l'information et de la communication du 30 décembre 2013, fixant la liste des services universels des télécommunications. [https://www.intt.tn/upload/txts/fr/arr%C3%AAt%C3%A9\\_du\\_ministre\\_des\\_technologies\\_du\\_30\\_d%C3%A8cembre\\_2013\\_fixant\\_la\\_liste\\_des\\_services\\_universels.pdf](https://www.intt.tn/upload/txts/fr/arr%C3%AAt%C3%A9_du_ministre_des_technologies_du_30_d%C3%A8cembre_2013_fixant_la_liste_des_services_universels.pdf) (accessed on 17 December 2025).
84. INT 'workshop «pour l'élaboration d'une politique de service universel des télécommunications en tunisie»' <http://www.intt.tn/fr/index.php?typeactu=89&actu=538> (accessed on 17 December 2025).

utilised.<sup>85</sup> To address the digital divide, the government has pursued alternative strategies, such as the “white zones” ini-

tiative to extend internet coverage to remote areas and the “Edunet 10” project to connect educational institutions.

## Conclusion

The findings presented in this report point to Tunisia’s commendable progress in enhancing internet connectivity, strengthening cybersecurity, and implementing innovative digital services. However, concerns raised by civil society regarding transparency, online freedoms and privacy underscore the need for a careful and balanced approach. While advancements in digital inclusion showcase Tunisia’s commitment to progress, challenges related to declining freedom of expression highlight the importance of safeguarding individual rights.

85. THD, “GSMA issues critical opinion on draft Digital Code”, October 2018, <https://www.thd.tn/la-gsma-donne-un-avis-critique-sur-le-projet-du-code-du-numerique/> (accessed on 17 December 2025).

## Recommendations

The Government should:

- **Strengthen Digital Rights Protection:** Prioritise legislative initiatives that uphold human rights principles and safeguard the freedoms enshrined in the Tunisian Constitution.
- **Enhance Transparency and Accountability:** Restore the institutional capacity of the Access to Information Authority. Implement an open communication plan that upholds citizens' right to access information. Publish comprehensive reports on the Universal Fund's activities and funded projects.
- **Cease Unjustified Prosecutions:** Refrain from referring journalists on state security charges outside the legal framework governing the profession.
- **Accountability for Assaults:** Conduct thorough investigations into incidents involving assaults on journalists by public agents and ensure accountability.
- **Reform Data Protection Laws:** Revise existing data protection laws.
- **Review Restrictive Laws:** Revise legal measures like Decree-Law No. 2022-54 to align with international standards for freedom of expression.
- **Establish robust governance frameworks:** Develop and implement clear regulations and guidelines for the development and use of AI, addressing risks and ensuring responsible innovation.
- **Commit to digital accessibility:** Guarantee the compliance of all public digital platforms and information systems with accessibility standards and ensure effective stakeholder engagement in designing and implementing inclusive digitisation policies.

### Civil Society Organisations should:

- **Advocate for Digital Rights:** Continue advocating against laws and decrees that threaten digital rights.
- **Promote Privacy Awareness:** Conduct public awareness campaigns to educate citizens about their right to privacy.
- **Demand Transparency:** Advocate for transparency in digital policies and project implementation.
- **Foster Digital Literacy:** Contribute to promoting digital literacy and cybersecurity awareness among the public.







### The private sector should:









- **Uphold Ethical Standards:** Adhere to data protection principles and human rights in all operations.
- **Ensure Data Privacy:** Implement robust data protection measures to safeguard user information.
- **Promote Digital Inclusion:** Contribute to initiatives that promote digital literacy and access for marginalised groups.



# The Score Index



Tunisia, 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)			No recorded disruption of access to the internet and other digital technologies
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37			While the promotion of universal, equitable, affordable and meaningful access to the internet is stated in some laws such as the telecommunication code and policies such as the National Strategic Plan for the ICT sector, there are still gaps such as the non-existence of a comprehensive universal service policy.
False News Criminalisation	P22(2)			Several legal texts including penal code and Decree 2022-54 do criminalise publication of false news with prison sentences and fines. Examples: Article 24 of Decree 2022-54 mandates up to ten-year prison terms to punish the use of communications networks to

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
				“produce, spread, disseminate... false news” or to “slander others, tarnish their reputation, financially or morally harm them.”
Sedition Legislation	P22(2)			Several legal texts including penal code and Decree 54 do criminalise sedition with prison sentences and fines
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)			In 2025, Tunisia witnessed a growing number of prosecutions and long prison sentences against journalists, Human Rights Defenders (HRDs) and citizens for online activity. Media outlets faced increasing pressure, including regulatory action against online media platforms and restrictions on journalist access.
Data Protection Legislation.	P42			The 2004 data protection law is considerably outdated.
States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)			Formal cases of content removal and blocking are mostly transparent, and the decisions can be appealed through the courts. Between January and June 2025, 26 government requests for 46 user/account data were made to META. All of which were made through a domestic legal process.

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
Invasion of Privacy of	P41			Current legal texts, such as Decree 54 and the state of emergency law, fail to comply with international human rights standards. Concerns include the absence of adequate procedural safeguards, such as notification of surveillance and the right to appeal.
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)			While most governmental agencies have websites and social media accounts, some of them do not update or disclose information regularly. see access to information section
AI and Emerging Technologies national strategies	P39(6)			While Tunisia has a data protection law, it is considered outdated and no specific policies have been communicated regarding emerging tech
Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online	P37(5)			Tunisia's laws, including the Personal Data Protection law and the Child Protection Code, aim to protect children online, but face implementation gaps. Efforts include the adoption of a National Charter for the Protection of Children Online,

Indicator	ACHPR Principle	2024 Score	2025 Score	2025 Justification
Digital Inclusion	P37(3)			<p>Tunisia deployed several initiatives in an effort to bridge the digital divide: including the “Universal Coverage” project targeting remote areas, and the “Edunet 10” project providing high-speed internet to schools. However, information regarding the use of the Universal Service Fund is not publicly nor transparently available.</p>
Total (out of 60):	2024: <b>34</b>	<div style="background-color: #f47b20; color: white; padding: 10px; text-align: center;"> <b>2025</b>  <span style="font-size: 2em; font-weight: bold;">34</span> </div>		



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