

# LONDA 2025

## DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

### Zambia

Country Report



PARADIGM  
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# Zambia

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## Executive Summary

The Londa Zambia report for 2025 provides an analysis of key developments and events within the country's Information and Communications Technology (ICT) and human rights landscape. It addresses thematic domains, including online freedom of expression, data protection, cybersecurity, digital inclusion, and the administration of the Universal Access and Service Fund. The methodology comprises a synthesis of desktop research, quantitative analysis, and consultations with subject-matter experts.

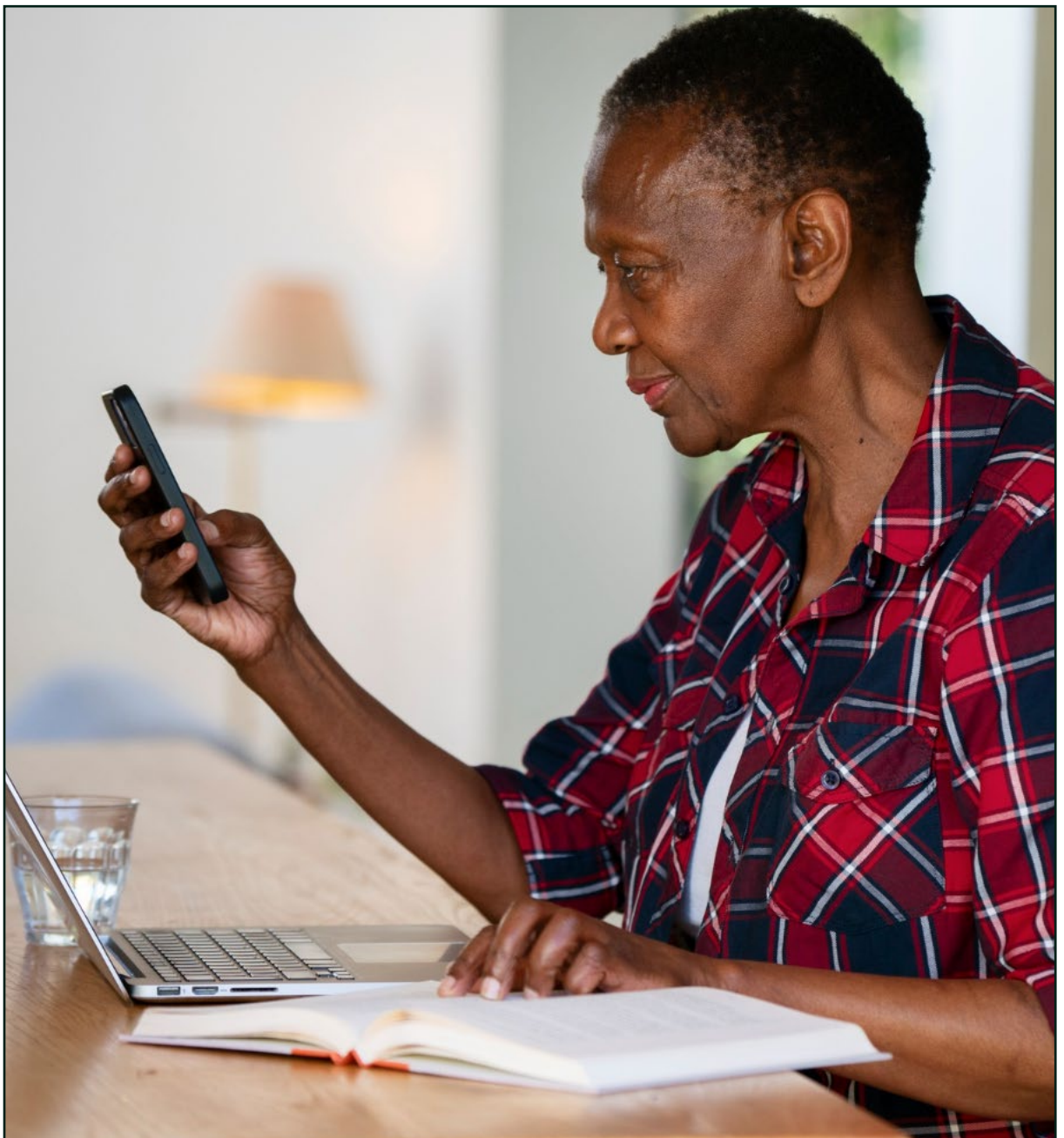
Zambia scores 39 out of 60 on Paradigm Initiative's TheScore Index, which evaluates compliance with key human rights elements, guided by the African Commission on Human and Peoples' Rights' Declaration of Principles on Freedom of Expression and Access to Information.

In 2025, the proliferation of connectivity services continued, supporting increased access for the Zambian population. Additionally, the National Artificial Intelligence Strategy was operationalised while the country launched the National Child Online Protection Strategy.

However, digital inclusion was hampered

by quality of service and access challenges, driven by an acute energy crisis and high taxes towards the sector. The trend of the harassment and arrests of groups, such as opposition leaders and journal-

ists, also continued. Policymakers also passed cyber legislation containing provisions that risk human rights violations and proposed a controversial Zambia Institute of Journalism Bill.



## Introduction

Zambia is a landlocked Southern African country, whose economy and employment are heavily reliant on the mining and agricultural sectors. Zambia benefits from a stable democracy. The current president, Hakainde Hichilema, and his United Party for National Development (UPND), entered into power in August 2021.<sup>1</sup> This win was primarily driven by the youth, who spurred Hichilema's popularity on social media.

In 2025, Zambia experienced a slow but positive economic recovery, although many still live in poverty. Growing citizen dissatisfaction is increasingly expressed online, and there is also an increasingly charged atmosphere between the incumbent and opposition parties ahead of the August 2026 presidential elections.<sup>2</sup>

Zambia's eighth National Development Plan identifies Information and Commu-

nication Technologies (ICTs) as a vital part of the country's economic transformation. However, it notes that challenges such as limited infrastructure, low digital skills, and access to ICT devices exist.<sup>3</sup>

Several institutions play a role in Zambia's ICT sector; the Ministry of Technology and Science oversees ICT policy development and implementation, while the Zambia Information and Communications Authority (ZICTA) regulates the industry. The Electronic Government Division's SMART Zambia Institute manages and promotes electronic government services and processes to improve public service delivery.<sup>4</sup> The sector is also guided by the National Electronic Government Plan 2023-2026, which lays the foundation for enhanced service delivery, accessibility, transparency, and efficiency among the government, citizens, and the private sector. The Independent Broadcasting Authority reg-

1. BBC 'Zambia election: Hakainde Hichilema beats President Edgar Lungu' (2021) <https://www.bbc.com/news/world-africa-58226695> (accessed on 30 October 2024).
2. Bulawayo 24 News 'Edgar Lungu, the Tonse Coalition, and Zambia's political landscape: A clash of visions ahead of the 2026 elections' (2024), (accessed on 27 November 2024).
3. Ministry of Finance and National Planning '8NDP (2022-2026)' <https://www.mofnp.gov.zm/?wpdm-pro=8ndp-2022-2026>
4. Smart Zambia Institute <https://www.szi.gov.zm/> (accessed on 21 November 2024)

ulates radio and television services.<sup>5</sup>

Zambia's ICT landscape is also shaped by frameworks including the National ICT Policy 2023, the National Digital Transformation Strategy 2023-2027, the Strategic Plan 2022-2026, and the Information and Communications Technologies Act of 2009.<sup>6</sup>

### Internet access

Zambia's mobile market hosts four mobile network operators: Airtel Zambia, MTN, Zed Mobile, and the state-owned Zamtel. The latter is focused on 4G and eventual 5G coverage for data and voice. However, its services are currently concentrated in urban centres in the capital, Lusaka.<sup>7</sup> At the end of June 2025, Zambia had 24.5 million active mobile network

subscriptions, a year-on-year growth of 12.1% and a penetration rate of 119.1%. Internet subscriptions also grew by 4.7% year-on-year, to 13.1 million.<sup>8</sup> Despite this, Zambia's data costs remain relatively prohibitive. According to the latest available data, Cable.co.uk's Worldwide Mobile Data Pricing 2022 report found that the average price of one gigabyte of data is US\$8.01.<sup>9</sup>

### Freedom of Expression

### and Access to Information

Zambia's National Constitution 2016<sup>10</sup> affirms the right to freedom of expression<sup>11</sup>, assembly and association<sup>12</sup>, access to information<sup>13</sup>, and privacy.<sup>14</sup> It is also a signatory to regional and global human

5. Independent Broadcasting Authority Act (amended in 2010).

6. Kalemba 'Mutati launches ICT policy, digital transformation strategiis served byc plan' (2023) <https://kalemba.news/business/2023/10/14/mutati-launches-ict-policy-digital-transformation-strategic-plan/> (accessed on 11 November 2024).

7. Fourth MNO (Zedmobile) services only available in Lusaka, <https://zambianbusinessstimes.com/fourth-mno-zed-mobile-services-only-available-in-lusaka/> (accessed on 19 November 2025)

8. ZICTA 'ICT Sector 2025 Mid-Year Market Report' (2025) [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.zicta.zm/uploads/9a0a836b-4e06-4fb2-b31b-6485ae3f4bea.pdf](https://www.zicta.zm/uploads/9a0a836b-4e06-4fb2-b31b-6485ae3f4bea.pdf) (accessed on 3 December 2025)

9. Cable.co.uk 'Worldwide Mobile Data Pricing 2022' (2023) <https://www.cable.co.uk/mobiles/worldwide-data-pricing/> (accessed on 12 January 2024)

10. Constitution of Zambia Act 18 of 2016.

11. Constitution of Zambia Act 18 of 2016 art 20 n13 above.

12. n 13 above above, art 29.

13. n 13 art 21.

14. n 13, art 17.

15. African Commission on Human and People's Rights (ACHPR) Declaration on Freedom of Expression and Access to Information, <https://www.achpr.org/legalinstruments/detail?id=69> (accessed 9 November 2025).

rights instruments, affirming the same, including the African Charter on Human and Peoples Rights (ACHPR)<sup>15</sup>, the Windhoek Declaration for the Development of a Free, Independent and Pluralistic Press<sup>16</sup>, the African Platform on Access to Information (APAI) Declaration<sup>17</sup> and the African Union Convention on Cybersecurity and Personal Data Protection (Malabo Convention)<sup>18</sup>, among others.

Regarding online freedoms, for 2025, Zambia retained its rating as “partly free” with a score of 62 on Freedom House’s Freedom On The Net Index.<sup>19</sup> However, recent developments dimmed the government’s commitment to freedom of speech and expression, particularly regarding citizens’ use of social media platforms to express their opinions on socio-economic issues. 2025 also saw a ramping up of arrests of citizens, journalists, and opposition leaders for posts online, including those questioning the state or state-linked actors.

In October 2025, authorities arrested Chishimba Kambwili, a former Member of Parliament and outspoken critic of the UPND. He was charged with failure to present himself before an immigration officer before leaving the country for medical treatment.<sup>20</sup> This came days before he was due to be released from prison for a previous conviction of hate speech, for which he was sentenced to five months’ imprisonment with hard labour.<sup>21</sup> The state also continued to use, still in effect, sedition laws to charge opposition leaders. In May 2025, Munir Zulu, an independent Member of Parliament, was sentenced to 18 months in prison with hard labour after being found guilty of seditious practices.<sup>22</sup>

Journalists have also been arrested in the course of their public-interest work. For example, in September 2025, a Zambian newspaper, The Mast, condemned the arrest of its journalist, Thandizo Banda, in

16. Universal Declaration of Human Rights (UDHR), <https://www.un.org/en/aboutus/universal-declaration-of-human-rights> (accessed on 9 November 2025).

17. African Platform on Access to Information <https://www.africanplatform.org/> (accessed on 9 November 2025).

18. African Union Convention on Cyber Security and Personal Data Protection <https://au.int/en/treaties/african-union-convention-cyber-security-and-personal-data-protection> (accessed on 12 November 2025).

19. Freedom On The Net 2025, Zambia, <https://freedomhouse.org/country/zambia/freedom-net/2025> (accessed on 2 December 2025)

20. Lusaka Times, ‘Kambwili re-arrested Days before expected release’ (2025) <https://www.lusakatimes.com/2025/10/22/kambwili-re-arrested-days-before-expected-release/> (accessed on 28 October 2025).

21. High Court Upholds Sentence, Sends Kambwili to Prison for Hate Speech’ (2025) <https://zambianobserver.com/high-court-upholds-sentence-sends-kambwili-to-prison-for-hat-speech/> (accessed on 14 November 2025).

22. ‘Munir Zulu Sentenced 18 Months in Jail’ (2025) <https://zambianobserver.com/munir-zulu-sentenced-18-months-in-jail/> (accessed on 14 November 2025).

the Copperbelt province. Banda was on assignment on a story about the murder charge of Maria Zaloumis, the daughter of Mwangala Zaloumis, the chairperson of the Electoral Commission of Zambia. The newspaper alleges that after Banda took pictures of Maria Zaloumis' entourage, he was physically attacked by the latter and police officers, who confiscated his cellphone.<sup>23</sup> In the same month, police services assaulted and seized the cellphone of Christopher Bazilio Banda, a reporter for Prime TV Eastern Province, covering a joint operation between the Road Traffic and Safety Agency and police for the impounding of unregistered motorbikes. The Eastern Province Police Command later apologised for this incident.<sup>24</sup>

Zambia has long been a signatory to the African Platform on Access to Information.<sup>25</sup> In December 2023, President Hakainde Hichilema enacted the long-awaited Access to Information law, and it came into

effect in June 2024. However, stakeholders note that while the current law meets acceptable international standards, it still requires further refinement. They lament the placement of responsibility for monitoring compliance with the Act on the government through the Information Ministry, rather than an oversight body like the Human Rights Commission.<sup>26</sup> In August 2025, the government gazetted a Statutory Instrument, The Access to Information (General) Regulations, 2025, to operationalise the Act. It outlines procedures for submitting requests, timelines for responses to requests as well as the documentation required from requesters of the information.<sup>27</sup>

In 2025, the government also introduced the Zambia Institute of Journalism Bill, which aims to impose statutory media regulation through the establishment of the Council of the Zambia Institute of Journalism tasked with the licensing of journalists and regulating conduct

23. The Mast, 'Arrest of our journalist unacceptable, regrettable', <https://mastmediazm.com/2025/08/arrest-of-our-journalist-unacceptable-regrettable/> (accessed on 2 December 2025)

24. Zambia Reports, 'Police Allegedly Assault Prime Tv Reporter During Combined Operation With Rtsa In Chipata', <https://zambiareports.news/2025/09/18/police-allegedly-assault-prime-tv-reporter-during-combined-operation-with-rtsa-in-chipata/> (accessed on 2 December 2025)

25. African Platform on Access to Information available at <https://www.africanplatform.org/> (accessed 20 November 2025).

26. News Diggers 'Access to Information A Pandora's Box' (2023) <https://diggers.news/guest-diggers/2023/12/19/access-to-information-bill-a-pandoras-box/> (accessed 20 November 2025).

27. The Access to Information (General) Regulations, 2025, <https://zambialii.org/akn/zm/act/si/2025/56/eng@2025-08-29> (accessed 20 November 2025).

in the sector.<sup>28</sup> Stakeholders, including journalists and civil society, rejected the bill in its current form, arguing that it risks stifling the media’s freedom of speech and its ability to report freely on public-interest stories.

According to Meta’s data, between January and June 2025, the platform received eight requests for user data from the government of Zambia: five were legal process requests, and three were emergency disclosure requests. Meanwhile, the state also requested information for nine user accounts. Meta declined all of the requests.<sup>29</sup>

## Data Protection and Privacy

The government enacted the Data Protection

Act in 2021 and established a Data Protection Office and Commissioner.<sup>30</sup> It also introduced the Cyber Security Act, 2024<sup>31</sup>, and the Cyber Crime Act, 2024.<sup>32</sup> These replace the Cyber Security and Cyber Crimes Act No. 2 of 2021, which was repealed in 2024. The Cyber Security Act, 2024, establishes the Zambia Cyber Security Agency and safeguards critical information and its infrastructure, among other objectives. The Cyber Crimes Act, 2024, criminalises unlawful activities associated with computer systems and information and communication technologies, while also ensuring the protection of individuals from cybercrimes and enhancing online safety for children.<sup>33</sup> This is set to be supported by the introduction of the National Child Online Protection Strategy (2025-2029) launched in November 2025. The Strategy clearly sets out actionable goals such as reducing child online abuse by 50% during the period. It also earmarked a \$1.8 billion budget for the Strategy.<sup>34</sup>

28. The Zambian Observer, ‘Zambia Institute of Journalism Bill of 2025-End of the Practice of Independent Journalism in Zambia- Amb. Emmanuel Mwamba’ (2025) (accessed 20 November 2025), <https://zambianobserver.com/zambia-institute-of-journalism-bill-of-2025-end-of-the-practice-of-independent-journalism-in-zambia-amb-emmanuel-mwamba/>
29. Meta, ‘Government Requests for User Data’ <https://transparency.meta.com/reports/government-data-requests/country/ZM/> (accessed 20 November 2025).
30. Zambia National Broadcasting Corporation (ZNBC) ‘Office of the data protection Commissioner coming’ (2023) <https://www.znbc.co.zm/news/office-of-the-data-protection-commissioner-coming/> (accessed 15 November 2025).
31. The Cyber Security Act ,2025 <https://www.parliament.gov.zm/node/12319>
32. The Cyber Crime Act , 2025 <https://www.parliament.gov.zm/node/12320>.
33. Zambian Monitor, ‘Zambia’s cabinet endorses new cyber security, cyber crimes legislation’, (2024), [https://www.zambiamonitor.com/zambias-cabinet-endorses-new-cyber-security-cyber-crimes-legislation/#google\\_vignette](https://www.zambiamonitor.com/zambias-cabinet-endorses-new-cyber-security-cyber-crimes-legislation/#google_vignette), (accessed on 20 November 2025).

However, stakeholders are concerned that elements of the cyber legislation give the authorities undue power over citizens' internet use, unjustified access to their private communications, extensive surveillance powers, vaguely defined crimes with highly punitive consequences, and power to suppress freedom of expression and dissent.<sup>35</sup> The laws were enacted with concerns largely left unaddressed.<sup>36</sup> However, the laws are not yet in force, and in 2025, individuals were charged under the Cyber Security and Cyber Crimes Act No. 2 of 2021. In December 2025, Ethel Chisono Edwards, an influencer and vlogger, was sentenced to 18 months in prison after pleading guilty to charges under the Act, for comments she made about President Hichilema.<sup>37</sup>

In March 2025, the Zambian Cabinet approved the Closed-Circuit Television Public Protection Bill No. 1 of 2025. The proposed legislation aims to regulate the

use of CCTV systems in public and private spaces. Its stated goals include boosting crime prevention, strengthening community safety, making investigations more effective, and ensuring Zambia keeps pace with regional and global standards.<sup>38</sup> Although these are valid aims, the development of the Bill lacked transparency and sufficient stakeholder engagement to ensure the necessary safeguards, independent oversight, and strict limitations on access to the data, and on the processing, use, and storage thereof by authorities. This raises concerns about the law enabling surveillance of citizens and undue access to their personal data by authorities.

Zambia has not experienced a state-compelled internet shutdown since August 2021, the first of its kind in the country and coinciding with the presidential elections, for a change in power from the then-ruling Patriotic Front (PF), to Hichilema's UPND

34. 'National Child Online Protection Strategy (2025-2029)', Zambia Information and Communications Technology Authority, <https://www.zicta.zm/media/publications> (accessed on 1 January 2026)
35. News Diggers 'Govt Defers Cyber Security and Cyber Crime Bills' (2024) <https://diggers.news/local/2024/12/06/laz-media-owners-other-csos-reject-enactment-of-cyber-laws/> (accessed on 13 November 2025).
36. Zambia's cybersecurity and cybercrimes laws raise digital rights concerns (2025) <https://www.africafex.org/country-highlights/zambias-cybersecurity-athe-surveillance-of-citizens-and-the-authorities-undue-access-to-their-personal-data-and-cybercrimes-laws-raise-digital-rights-concerns#:~:text=In%20April%202025%2C%20the%20Zambian%20Parliament%20enacted%20two,digital%20rights%20and%20civil%20liberties%20in%20the%20country> (accessed on 1 December 2025).
37. Zambian-American influencer sentenced to 18 months for hate speech (2025) <https://www.bbc.com/news/articles/cvgqnlqge7o> (accessed on 14 November 2025).
38. Press Reader, 'Cabinet approves Closed-Circuit Television Public Protection Bill 2025' (2025) <https://www.press-reader.com/zambia/zambia-daily-mail-798j/20250312/281535116758974> (accessed on 14 November 2025).

party.<sup>39</sup> The upcoming elections will also be a test of the government's commitment to upholding rights to consistent connectivity despite a tense election period, with flare-ups of political violence already being reported.<sup>40</sup>

Meanwhile, cybercrime continues to threaten Zambia's security, economy, and population. Zambia achieved a score of 92.56 on the International Telecommunications Union's Global Cybersecurity Index.<sup>41</sup> However, it continues to face vulnerabilities and cyber threats. Cyber-related crimes between January 1 and June 30 2025, resulted in a loss of over ZMW111 million (US\$5.86 million).<sup>42</sup> The Zambia Police Service also recorded 874 cyber-related cases in the period. In March 2025, Interpol announced that combined efforts from authorities in seven African countries, including Zambia,

had resulted in the arrest of 306 suspects and the seizure of 1,842 devices.<sup>43</sup>

## AI and Emerging

## Technologies

The government of Zambia is currently implementing its National Artificial Intelligence Strategy (2024-2026).<sup>44</sup> Only a small group of African countries have a dedicated artificial intelligence (AI) strategy, including Benin, Egypt, Mauritius, Morocco, and Senegal, among others.<sup>45</sup> The strategy comprises five focus areas: (i) Digital Trees to enhance connectivity, (ii) Reliable Data for efficiency and sustainability, (iii) Trust and Confidence to safeguard cyberspace, (iv) fostering inno-

39. The Verge 'WhatsApp, Twitter, and Facebook are reportedly blocked in Zambia during its presidential election' (2021) <https://www.theverge.com/2021/8/12/22621875/whatsapp-twitter-facebook-blocked-zambia-presidential-election> (accessed on 22 November 2025).

40. CAJ News, 'Concern over Zambia pre-election violence' <https://cajnewsafrica.com/2025/09/08/concern-over-zambia-pre-election-violence/> (accessed on 2 December 2025)

41. International Telecommunications Union, Global Cybersecurity Index, (2025) [https://www.itu.int/en/ITU-D/Cybersecurity/Documents/GCIv5/2401416\\_1b\\_Global-Cybersecurity-Index-E.pdf](https://www.itu.int/en/ITU-D/Cybersecurity/Documents/GCIv5/2401416_1b_Global-Cybersecurity-Index-E.pdf)

42. 'Press Reader, Over K111m lost to cyberrelated crimes since Jan' <https://www.pressreader.com/zambia/zambia-daily-mail-798j/20250710/281582361644535> (accessed on 22 November 2025).

43. 'More than 300 arrests as African countries clamp down on cyber threats' (2025) <https://www.interpol.int/en/News-and-Events/News/2025/More-than-300-arrests-as-African-countries-clamp-down-on-cyber-threats>

44. Government of Zambia, 'Artificial Intelligence strategy launched, a stepping stone to wealth and job creation' <https://www.mots.gov.zm/?p=4492> (accessed on 10 November 2025).

45. M Musoni, "Envisioning Africa's AI governance landscape in 2024" (2024) <https://ecdpm.org/work/envisioning-africas-ai-governance-landscape-2024#:~:text=Currently%2C%20less%20than%2010%20African%20countries%20have%20national,Egypt%2C%20Morocco%2C%20Mauritius%2C%20Tunisia%2C%20Sierra%20Leone%2C%20and%20Senegal.> (accessed on 4 November 2025).

vation and entrepreneurship, and (v) creating partnerships.<sup>46</sup>

Implementation has been slow; however, positive developments include the partnership between the Ministry of Technology and Science, Ministry of Health, 73 Health Global and Pentatech, to implement a nationwide pilot testing remote health diagnostics and AI-based pharmacological analysis tools across the country.<sup>47</sup>

## Digital Inclusion

Zambia's mobile market continues to grapple with quality of service (QoS) issues. In 2025, Operators' QoS deteriorated, with access to connectivity becoming even more challenging for those outside

of the country's urban centres. In November 2025, the industry regulator noted that "the Zambian people deserve better", setting out instructions for providers to improve services.<sup>48</sup>

Zambia's acute electricity shortages, which began in 2024,<sup>49</sup> persisted in 2025, dampening digital inclusion efforts. The Zambia Electricity Supply Corporation Limited experienced periods when it could supply only three hours of power daily.<sup>50</sup> Operators lamented the high rollout costs for network infrastructure and the services they maintain due to this. They noted further impediments from high taxes, higher fuel prices to power generators, and a low smartphone penetration rate, weighing on the adoption of broadband services.<sup>51</sup> Thus, consumers have borne the brunt, struggling to remain connected.

46. Zambia Monitor 'Zambia launches artificial intelligence strategy to boost digital economy' (2024)[https://www.zambiamonitor.com/zambia-launches-artificial-intelligence-strategy-to-boost-digital-economy/#google\\_vignette](https://www.zambiamonitor.com/zambia-launches-artificial-intelligence-strategy-to-boost-digital-economy/#google_vignette) (accessed on 22 November 2025).
47. 'Zambia Deploys AI and Remote Diagnostics in 20 Facilities to Drive Nationwide Health Access', (2025), <https://techafricanews.com/2025/06/16/zambia-deploys-ai-and-remote-diagnostics-in-20-facilities-to-drive-nationwide-health-access/> (accessed on 10 November 2025).
48. ZICTA 'Press Statement By ZICTA Director General, Eng. Collins Mbulo On The State Of Mobile Telecommunications Quality Of Service And Zicta's Interventions' (2025) [https://www.zicta.zm:992/storage/uploads/zictaweb/a5ae4b64-a054-4d4e-90b3-ff8e54d584cd\\_1762324884.pdf](https://www.zicta.zm:992/storage/uploads/zictaweb/a5ae4b64-a054-4d4e-90b3-ff8e54d584cd_1762324884.pdf) (accessed on 3 December 2025)
49. International Growth Centre 'Lights out: Zambia's electricity crisis' (2024) <https://www.theigc.org/blogs/lights-out-zambias-electricity-crisis#:~:text=Low%20water-levels%20at%20the%20main%20reservoirs%20for%20hydroelectric,businesses%20unprepared%20and%20without%20back-up%20sources%20of%20energy.> (accessed on 10 November 2026)
50. Lusaka Times 'ZESCO Assures Minimum 3-Hour Power Supply Amidst Low Generation Capacity'<https://www.lusakatimes.com/2025/11/06/zesco-assures-minimum-3-hour-power-supply-amidst-low-generation-capacity/> (accessed on 18 November 2025)
51. ZICTA 'Annual Market Report for the ICT Sector' (2024) [chrome-extension://efaidnbmninnbpcjpcglclefindmkaj/https://zicta.zm/market-reports/2024\\_annual\\_market\\_report.pdf](chrome-extension://efaidnbmninnbpcjpcglclefindmkaj/https://zicta.zm/market-reports/2024_annual_market_report.pdf) [https://www.zicta.zm/market-reports/2023\\_mid\\_year\\_market\\_report.pdf](https://www.zicta.zm/market-reports/2023_mid_year_market_report.pdf) (accessed on 3 October 2025)

Since licensing SpaceX's Starlink in June 2023, the government has leveraged satellite technology to connect unserved and underserved areas. The SMART Zambia Institute is deploying Starlink to government institutions and public facilities.<sup>52</sup> Notably, in September 2025, the Institute deployed kits in one of Zambia's most remote areas, the Moomba Chiefdom, connecting a clinic and primary schools.<sup>53</sup>

The Ministry of Finance's 2026 Budget commits to constructing communications towers in underserved areas. The government also continued to roll out the Government Wide Area Network (GWAN) to public institutions. So far, 93 local authorities, 79 district administration offices and 29 schools have been connected to the GWAN, for a total of 438 sites. Additionally, to protect the installed equipment from power outages, the Government has installed solar energy in all 116 councils.<sup>54</sup>

The government has also strongly focused on boosting investment in ICT infrastructure. In September 2025, it announced a \$120 million World Bank grant to increase internet access and digital services for the population. It is planned to extend 4G and 5G networks to cover 90% of the population by the end of 2025.<sup>55</sup> In November 2025, the government and the United Nations Development Programme partnered to provide internet access to 751 Zambian health facilities. This is part of the Smart Health Systems project, focused on modernising Zambia's digital health infrastructure.<sup>56</sup>

## Digital IDs

In 2022, the government introduced the Integrated National Registration Information System project, a digital biometric

52. SMART Zambia Institute <https://www.szi.gov.zm/?p=5312>

53. 'Smart Zambia Brings Starlink Internet to Remote Moomba Chiefdom' (2025) <https://techafricanews.com/2025/09/29/smart-zambia-brings-starlink-internet-to-remote-moomba-chiefdom/> (accessed on 2 December 2025)

54. Government of Zambia, '2025 Budget Speech' (2024) <https://www.zra.org.zm/wp-content/uploads/2025/09/2026-Budget-Speech.pdf> (accessed on 30 October 2025).

55. TechAfrica News 'World Bank Grants Zambia \$120M to Expand Digital Infrastructure' <https://techafricanews.com/2025/09/19/world-bank-grants-zambia-120m-to-expand-digital-infrastructure/> (accessed on 18 October 2025).

56. Ecofin Agency, 'Zambia, UNDP To Expand Internet Access Across 751 Health Facilities' Zambia, UNDP To Expand Internet Access Across 751 Health Facilities - Ecofin Agency (accessed on 2 December 2025).

national identity management system. The government pledged to register 100% of the population over 16 years old for digital ID cards within six months of rollout.<sup>57</sup> However, uptake has fallen significantly short, with a 2024 report by the UNDP noting 1.5 million have enrolled with biometric data.<sup>58</sup> In January 2025, SMART Zambia issued a general procurement notice for digital ID and trust services. It aims to develop a framework to identify citizens and enable access to public and private-sector services.<sup>59</sup> The government also partnered with Ethiopia, a regional leader in biometric ID adoption, to collaborate on the development and implementation of national ID systems.<sup>60</sup>

## Universal Access and Service Fund

The Zambia Information and Communications Technology Authority (ZICTA) administers the country's Universal Access

and Service Fund (UASF). It has been consistent in collecting the UASF, 1.5% of operator revenues. The governance and administration of the Fund have improved over the years through institutional reforms. While the Fund alone may not be sufficient to meet the country's ICT deficits, its overall impact is evident.

ZICTA's 2023 annual report, the latest available, notes that nearly half of the 58 new tower installations in 2024 were deployed in underserved areas. In 2023, the UASF utilised the fund to provide 845 computers, 25 printers, five smartboards, and 21 projectors to 25 institutions nationwide. The regulator began a project to connect 15 tertiary institutions to the internet. The aim was to provide low-cost broadband services to educational institutions nationwide, connecting 63 learning institutions. The UASF also provided customised ICT equipment for persons with disabilities; introduced connectivity and provided ICT equipment; and developed an e-learning platform. The con

57. Presidential Delivery Unit, 'Digital ID' (2025) <https://www.pdu.gov.zm/digital-ids>

58. UNDP, 'DPI Safeguards Come Online In Zambia's Next Phase of Digital Integration' (2024) <https://www.undp.org/digital/blog/dpi-safeguards-come-online-zambias-next-phase-digital-integration> (accessed on 12 November 2026).

59. Biometric Update 'Zambia issues general procurement notice for digital ID, trust services project' (2025) <https://www.biometricupdate.com/202501/zambia-issues-general-procurement-notice-for-digital-id-trust-services-project> (accessed on 12 November 2026).

60. 'Zambia, Ethiopia sign MoU to advance digital identity systems' (2025) <https://apanews.net/zambia-ethiopia-sign-mou-to-advance-digital-identity-systems/> (accessed on 12 November 2026).

struction of 31 communication towers under the Communication Towers Program also began.<sup>61</sup>

## Conclusion

It is positive that despite significant operational and financial constraints faced by telecommunications operators, the uptake of telecommunications services continued. This report also lauds the positive strides taken toward operationalising the country's AI strategy. If the country continues on this trajectory, it will be well-placed to build an integrated, accelerated ICT ecosystem that promotes meaningful accessibility, innovation, entrepreneurship, and an inclusive, resilient digital economy. However, certain steps

taken by the government continue to raise concerns about the State's commitment to human rights principles, particularly freedom of speech. The enactment of the cyber legislation despite the reservations of stakeholders, as well as heightened arrests of journalists, civil rights defenders, and opposition leaders, is worrying, particularly as the country approaches general elections in 2026. Considering the gaps and concerns raised in this report, various recommendations are proposed to stakeholders.

61. ZICTA, "ICT Sector 2024 Mid-Year Market Report", (2024) (accessed on 12 November 2026).In light of

## Recommendations

### The Government should:

- To ensure transparency in the operationalisation of the cyber legislation, conduct public sensitisation, and commit to preventing abuses of power, which the laws are vulnerable to in their current state.
- As the country heads to a general election in August 2026, the government is encouraged to commit to not shutting down the internet during the electoral process and after.
- It is commendable that the government has repealed the law regarding criminal defamation of the president. However, it is urged to take greater steps to uphold freedom of speech and repeal laws such as sedition and hate speech.
- Adopt greater transparency and regular reporting around the use of UASF and the progress.
- Bolster the Data Protection Commission's capacity and raise awareness of data protection among the private sector and citizens, in light of the rollout of digital IDs and public security information systems.
- Commit to the collection of data and digital ID systems in an ethical and non-discriminatory manner, without perpetuating surveillance practices. Also, ensure adequate public sensitisation on the risks and opportunities of the process.
- More needs to be done to promote public participation in AI adoption, uphold ethics and enhance transparency and safety in AI use. We encourage greater collaboration among Ministries and other stakeholders to ensure the AI Strategy is implemented in a rights-respecting manner.

### The private sector should:

- Telecommunications companies should commit to maintaining connectivity and access to digital platforms during the upcoming general elections.
- Engage with stakeholders, such as civil society, to ensure alignment of policies, practices, and the deployment of digital technologies and products with rights-respecting principles and standards.
- Play an active role in digital literacy efforts to educate and sensitise citizens about technology developments and deployments in the country, to ensure equitable digital inclusion and benefit from

### The Media should:

- Contribute to monitoring and documenting developments in digital rights and inclusion in Zambia through in-depth investigative pieces.
- Closely collaborate with civil society organisations to amplify messaging around issues of journalist rights and public interest issues.







### Civil Society Organisations should:

- Increase focus on programmes to build the capacity of government, judiciary and state security institutions, especially as it relates to the impact of and use of emerging technologies such as AI and cyber legislation.
- Collaborate more to prevent bottlenecks and duplication of efforts.
- Continue to raise awareness of digital rights and digital inclusion in Zambia.









# The Score Index



Zambia, 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)          |  |  | Except for a single instance in 2021, internet shutdowns have not been the norm in Zambia. 2025 recorded no internet shutdowns.   |
| Laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet | P37             |  |  | Zambia's eighth National Development Plan prioritises connectivity for all citizens. This is also a Universal Access and Service Fund law. ZICTA sets annual targets for its use. There remains a significant challenge around transparency about the total funds allocated and spent each year, how well the targets are being met, and regular, traceable reporting back to the public. |
| False News Criminalisation  | P22(2)          |  |  | Zambia saw an increase in arrests for social media posts deemed false news.   |

| Indicator   | ACHPR Principle | 2024 Score  | 2025 Score  | 2025 Justification   |
|---|-----------------|---|---|--|
| Sedition Legislation  | P22(2)          |    |    | Increased reliance on sedition charges, particularly targeting opposition leaders.   |
| Arbitrary Arrests and Harassments of the Media, HRDs and Citizens                     | P20(1) & (2)    |    |    | Increased arrests and assaults, mainly of journalists reporting on government and governance issues.   |
| Data Protection Legislation.  | P42             |  |  | Data Protection legislation has been enacted. Implementation and enforcement have been weak, and the independence of the data protection commissioner from the president's office is in question; they are appointed by the President. |
| States interfere and require the removal of online content by internet intermediaries | P38 and P39(4)  |  |  | No instances reported in 2025; however, requests for information were made to social media platforms.  |

| Indicator   | ACHPR Principle | 2024 Score  | 2025 Score  | 2025 Justification   |
|---|-----------------|---|---|--|
| Invasion of Privacy of communications   | P41             |  3   |  2   | Not reported in 2025. However, the passing of the country's new cyber legislation may enable this.   |
| Failure by the government to proactively disclose and disseminate information digital technologies.           | P29(3)          |  4   |  3   | Access to Information legislation exists, and the government is relatively proactive through digital inclusion exercises and roadshows. However, it has not been as proactive in providing information about emerging technology adoption. |
| AI and Emerging Technologies national strategies  | P39(6)          |  4 |  3 | AI Strategy and a National Digital Transformation Strategy exist. However, implementation has been relatively weak.  |
| Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online | P37(5)          |  2 |  3 | No specific child online safety law exists, but there is a National Child Online Protection Strategy, and the cyber legislation focuses on child protection.   |

| Indicator         | ACHPR Principle | 2024 Score  | 2025 Score  | 2025 Justification  |
|-------------------|-----------------|---|---|---|
| Digital Inclusion | P37(3)          |  3 |  3 | A progressive rise in mobile and internet usage is evident in active investment to expand access. However, Quality of Service issues persisted in 2025. |

|                    |                    |                          |
|--------------------|--------------------|--------------------------|
| Total (out of 60): | 2024:<br><b>40</b> | <b>2025</b><br><b>39</b> |
|--------------------|--------------------|--------------------------|



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