

LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Zimbabwe

Country Report



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ZIMBABWE

By Bridgette Ndlovu

Executive Summary

This report highlights internet accessibility in Zimbabwe and assesses the regulatory landscape, providing information on available legislation related to internet access, data protection, freedom of expression, access to information, privacy and digital inclusion. The report provides recommendations to safeguard human rights by improving policies and practices in line with the African Commission on Human and Peoples' Rights' Declaration

on Freedom of Expression and Access to Information (the Declaration). The country assessment involved a comprehensive desk review of relevant documents, including country reports, legislation and media reports. The report relied on Paradigm Initiative's TheScore Index to assess the country's compliance with the Declaration. The report analyses the Universal Service Fund (USF) initiatives, including allocations and implementation gaps. In

2025, there was no internet shutdown in Zimbabwe, demonstrating compliance with Principle 38(2) of the Declaration, unlike in 2023, when the internet was shut down on the eve of the elections. Zimbabwe's overall score on TheScore Index is 34. The country achieved a moderate score in terms of compliance with the Declaration, as challenges remain in the arbitrary arrests of human rights defenders and journalists against Principle 20 (1)

& (2) of the Declaration. Infringement on freedom of expression through the existence and application of sedition legislation and the criminalisation of false news remains a major threat to the realisation of the provisions of Principle 22 (2). Technology-Facilitated Gender-Based Violence (TFGBV) also features in the report, limiting opportunities for free expression online and contravening the tenets set out in the ACHPR Resolution 522.



Introduction

Zimbabwe is situated in the Southern African region and has a population of 15,178,957.¹ Human rights are guaranteed by the Constitution of Zimbabwe Amendment (No. 20) Act, 2013 (the Constitution); however, despite robust constitutional protections, there is a glaring gap between constitutional guarantees and practice.

Since 2016, Zimbabwe has adopted several laws, including those that criminalise online expression, such as the contested² Criminal Law (Codification and Reform) Act, No 10 of 2023³ commonly known as the Patriotic Act, which in Chapter 3, Section 31 (a and b) makes it an offense to publish or communicate a statement that is wholly or materially false with the intent to undermine public confidence in law

enforcement agencies or the state. Violators can face penalties of up to 20 years in prison for such offences. The overly broad provisions threaten freedom of expression and silence dissenting voices. The Interception of Communications Act of 2007⁴ remains a key legal tool for government surveillance, requiring telecommunications providers in Chapter 3, Section 9 (1 and 2), to facilitate the interception and storage of communications and enabling real-time monitoring of online activities. The Act undermines Principle 41 of the Declaration, which emphasises the need for adequate safeguards in upholding the right to privacy, including prior authorisation by an independent and impartial judicial authority.

Although Zimbabwe is a signatory, it is

1. Zimbabwe National Statistics Agency (ZIMSTAT) 'Zimbabwe 2022 Housing and Census Report' https://www.zimstat.co.zw/wp-content/uploads/Demography/Census/2022_PHC_Report_27012023_Final.pdf (Accessed 27 October 2024).
2. Robert and Ethel Kennedy Human Rights Centre. Repeal the Patriotic Act to respect fundamental human rights <https://rfkhumanrights.org/our-voices/zimbabwe-repeal-the-patriotic-act-to-respect-fundamental-human-rights/> (Accessed 15 November 2026)
3. Veritas https://www.veritaszim.net/sites/veritas_d/files/Crimcode%20%28updated%20to%202023.09%29.pdf (Accessed 17 November 2025)
4. Judicial Services Commission <https://jsc.org.zw:8222/media/upload/Acts/2014/1120done.poffencesdf> (Accessed 19 November 2025)

among the 39 African countries that have not ratified the African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention), hindering the vision of a unified digital ecosystem in Africa. In 2021, Zimbabwe enacted the Cyber and Data Protection Act, which provides basic safeguards for personal data. The Criminal Law (Codification and Reform) Act was updated to cover electronic offences, such as cyberbullying, harassment and the transmission of information deemed 'false' by authorities, expanding state control and stifling free expression. To comply with the Declaration and international best practices, Zimbabwe needs to ensure improved access to information across government ministries and departments and desist from arbitrary arrests of the media. Zimbabwe has not revised its traditional gender-based violence policies to address online gender-based violence, despite a regional call for states to align with Resolution 522.

Internet Access and Disruptions

Guiding Policy

Zimbabwe launched the National ICT Policy (2022-2027), the National Broadband Plan (2023-2030), and the Smart Zimbabwe 2030 Master Plan in 2024 to accelerate digital transformation. Zimbabwe adopted a National Development Strategy (NDS1) in 2021, which sought to use ICT to improve the country's digital economy and entrench ICTs across all national development strategies to achieve universal access by 2030. The government set targets to increase internet penetration from 59.1% in 2020 to 75.4% by 2025 and to increase mobile penetration from 94.2% to 100% by 2025. NDS1 lapsed in 2025, and the government is in the process of formulating NDS2, with Parliament discussions already underway.⁵ NDS 2 will cover the period 2026-2030, and one of the key pillars will focus on Science, Technology, Innovation, Digitalisation and Human Capital Development.

5. <https://www.parlzim.gov.zw/download/national-assembly-hansard-11-november-2025-vol-52-no-2/> (Accessed 9 November 2025)

Government data shows that the internet penetration rate stood at 70.1% in 2023, 83.52%⁶ in 2024 and dropped to 81.83%⁷ at the end of the second quarter of 2025, reflecting a marginal dip in active internet or data subscriptions on a year-on-year basis. Despite the negative dip, the data depicts a positive progress towards achieving meaningful access. However, independent data shows that the internet penetration rate stood at 34.8%⁸ in 2023, dropped to 32.6 %⁹ in 2024 and rose to 38.4% in 2025¹⁰. Independent research data shows that Zimbabwe is far from reaching the goals set out in the NDS1. Figures from POTRAZ assess internet penetration relative to existing mobile penetration figures, while independent researchers assess internet penetration relative to the total population, making the independent researchers' figures an

accurate representation of internet connectivity/access in Zimbabwe. Subscribers of Econet - a telecommunications service provider - spend US\$1 for 1200 megabytes of data that lasts for one hour and US\$3 for 650mb of data that lasts for 24hours.¹¹ For low-income users in Zimbabwe, who live on less than US\$1.63 per day¹² (the minimum amount needed per day for individuals to not be deemed poor), meaningful access to the Internet is far from reach. Mobile network internet speed in Zimbabwe is 33Mbps.¹³ Recommended internet speeds should be at least 100 Mbps for download and 10 Mbps for upload. The internet speed for Starlink is 51 Mbps.

Internet Disruptions

In the year under review, Zimbabwe did not experience a government-imposed

6. TechZim 'Second Quarter Abridged Sector Performance Report' (2024) <https://www.potraz.gov.zw/wp-content/uploads/2025/02/Third-Quarter-2024-Abridged-Sector-Performance-Report-Hmed-final.pdf> (Accessed 10 February 2025).
7. Postal and Telecommunications Authority of Zimbabwe <https://www.potraz.gov.zw/wp-content/uploads/2025/09/2025-2nd-Quarter-Abridged-Sector-Performance-report-HM-final-ed.pdf> (Accessed 10 November 2025)
8. Paradigm Initiative 'Zimbabwe Country Report' (2023) <https://paradigmhq.org/wp-content/uploads/2024/06/Zimbabwe-Country-Report.pdf> (Accessed 30 October 2024).
9. Data Reportal 'Digital 2024-Zimbabwe' (2024) <https://datareportal.com/reports/digital-2024-zimbabwe?rq=zimbabwe> (Accessed 30 October 2024).
10. <https://datareportal.com/reports/digital-2025-zimbabwe> (Accessed 12 November 2025)
11. Econet 'USD data Bundles' <https://www.econet.co.zw/usd-data-bundles/> (Accessed 13 November 2025)
12. Zimstat 'Poverty Datum Line 2025' https://www.zimstat.co.zw/wp-content/uploads/Macro/Prices/PDL/2025/Poverty%20Datum%20Lines%20Front_%20Mar_%202025.pdf (Accessed on January 28, 2026)
13. Fast. <https://fast.com/> (Accessed 12 November 2025process)

internet shutdown. As a result of this development, Zimbabwe scored five points in 2025 under indicator 1 on internet shutdowns, depicting full compliance with Principle 38(2), which calls on states not to disrupt the internet. This demonstrates progress compared to 2023, when Zimbabwe experienced an internet disruption on the eve of the August 2023¹⁴ harmonised elections.

In 2025, Zimbabwe implemented key reforms to enhance online freedom of expression. Zimbabwe passed the Broadcast Services Amendment Act, Act No. 2 of 2025, on May 23 2025. The Act amends

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the 2001 Broadcasting Services Act to include digital-age reforms, such as inter-

net-based broadcasting. Zimbabwe also adopted a Media Policy¹⁵. The policy introduces co-regulation, an important aspect for a thriving media. In practice, state influence remains dominant as the state exerts control through restrictive laws and appointments. For example, while it is a Chapter 12 independent constitutional body, the Zimbabwe Media Commission's eight commissioners are appointed by the President from a list of 12 nominees provided (after an interview process) by the Committee on Standing Rules and Orders, which can lead to executive influence. Judicial and parliamentary oversight should be embedded in Zimbabwe's policy-making processes.

The Media Policy in Section 4.8 on penalties and disincentives highlights that, while co-regulation exists, media organisations and journalists can still face civil lawsuits for defamation, privacy violations and the spread of falsehoods. This goes against Principle 22 (2) of the Declaration, as the policy further strengthens criminalisation of false news. The pen

14. NetBlocks <https://x.com/netblocks/status/1693997476691558644?s=20> (accessed 17 February 2026)

15. Veritas Zim 'Media Policy' https://www.veritaszim.net/sites/veritas_d/files/Media%20Policy%202025.pdf (Accessed 11 November 2025)

found guilty, Zaba could face a fine of up to US\$300, imprisonment for up to a year, or both. Zaba was granted bail on July 4 2025. The application of sedition legislation remains a challenge in the Zimbabwe policy landscape, and such arrests limit free expression online and foster an atmosphere of self-censorship, directly impacting the achievement of Principles 20 (1) and (2).

The landscape in Zimbabwe is characterised by a tension between constitutional protections for free speech and the crackdown on dissent. Media freedom, protected in Section 61 of the Constitution, was under attack in the period under review. On February 24 2025, a senior journalist with Alpha Media Holdings and Head of News at HStv Blessed Mhlanga was detained by authorities after interviewing war veteran and ZANU-PF central committee member Blessed Geza, an outspoken critic of President Emmerson Mnangagwa's leadership. Mhlanga was charged with "transmitting data messages that incite violence or damage to property." On March 12, Mhlanga's case was

postponed in the Zimbabwe High Court, and his bail application was denied. Justice Gibson Mandaza stated that more time was needed to review the case. On May 7, Mhlanga was granted provisional release²⁰ after 72 days.

Access to

Information

Zimbabwe enacted the Freedom of Information Act in 2020 to repeal the Access to Information and Protection of Privacy Act (AIPPA) and empower interested stakeholders to have full and justified access to information. Under Article 5 of the Act, public and public commercial entities should have information disclosure policies and disclose information in the interests of public accountability or information that is required for the exercise or protection of a right. However, some entities are not compliant with the Act.²¹

16. Amnesty International <https://www.amnesty.org/en/documents/afr46/9385/2025/en/> (Accessed January 14 2026)

17. Newsday 'Government institutions violating freedom of information act' (2024) <https://www.newsday.co.zw/the-standard/news/article/200031734/govt-institutions-violating-freedom-of-information-act> (Accessed 2 November 2024).

Entities such as POTRAZ do not have up-to-date information on their website to reflect work done in the year. In 2024, the Section on the Universal Service Fund included information on the first, second and third phases of the USF, dating as far back as May 2013. As of 2025, this information remains unchanged. In this section, no other information is available. In addition, in the fourth quarter of the year, the only sector performance report available on the website was the second-quarter report. POTRAZ shares some updates on social media platforms. While this is not a representative sample, there is a general trend amongst government websites to not display full information despite the comprehensive website guidelines that are in existence.²² In this regard, Zimbabwe is mildly compliant with principle 29 (3) as government websites often carry outdated information.

Censorship and Content Removal

In 2025, no content removal cases were recorded. However, Meta and TikTok's

2024 transparency reports indicate that the government requested one content takedown. Reports for 2025 indicate that no cases²³ of content takedowns were recorded by social media platforms.

Data Protection and Privacy

Data protection and governance

Zimbabwe enacted the Cyber and Data Protection Act, 2021 (CDPA)²⁴ but has not ratified the African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention). The CDPA establishes baseline protections for personal information. In Part II, Section 6(2), the CDPA asserts the independence of the Postal and Telecommunications Regulatory Authority (POTRAZ) from “control by government or by political means.” The Data Protection Authority is the Postal

18. Veritas https://veritaszim.net/sites/veritas_d/files/Final_Draft_Zimbabwe_Govt_Web_Guidelines_3_April_2018.pdf (Accessed 16 November 2025)

19. <https://transparency.meta.com/reports/government-data-requests/country/SD/&sa=D&source=docs&ust=1771768464868635&usg=AOvVaw3AcPAdSA4tqWEbMYxNICQF>

and Telecommunications Regulatory Authority of Zimbabwe, established under section 5 of the Postal and Telecommunications Act [Chapter 12:05]. Under Part III, Section 6 of the Postal and Telecommunications Act, Chapter 12:05, the President of Zimbabwe has the authority to appoint the Board that governs POTRAZ. POTRAZ is also structurally linked to the Ministry of ICT, Postal and Courier Services, adding to the challenges to the DPA's independence and presenting a potential conflict of interest when data breaches involve state-owned entities. POTRAZ's dual role affects compliance with Principle 42 (8), which calls for oversight mechanisms to be independent entities.

In a move that operationalises the CDPA, Zimbabwe gazetted the Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations (the Regulations), which came into effect on September 13 2024. The regulations impose a mandatory registration requirement on entities that process personal information, based on three tiers and the appointment of a Data Protection Officer to oversee Data

Controllers' compliance with the Data Protection Act. The regulations outline breach notification expectations, compelling data controllers to notify the Data Protection Authority of any data breaches within 24 hours and requiring only that affected individuals be informed within 72 hours if there is a high risk to their rights. This poses a risk of harm to data subjects if a data breach remains unresolved within 72 hours, delaying transparency by data controllers. Zimbabwe should consider adopting best practices from South Africa's Protection of Personal Information Act Section 22(1, 2 and 3) and Section 49(3) of Zambia's Data Protection Act, which mandate notifying data subjects as soon as reasonably possible, in case of a breach. The gazetting of the regulations marks a significant step forward in Zimbabwe's implementation of the CDPA. However, effective enforcement is yet to be realised.

In alignment with the CDPA, following the launch²⁵ of the Data Protection Officer Training programme on June 6 2025, a total of 570 data controllers, including law firms, doctors' practices, health centres,

20. Postal and Telecommunications Regulatory Authority of Zimbabwe 'Data Protection Act' <https://www.potraz.gov.zw/wp-content/uploads/2022/02/Data-state-owned,state-ownedProtection-Act-5-of-2021.pdf> (Accessed 11 November 2024).

municipalities, schools, churches, small and medium enterprises, corporations and parastatals received certificates. POTRAZ reported that so far, 560 DPOs have been trained and 45 data breach reports have been received and addressed by the authority.²⁶ Zimbabwe established a new data centre and upgraded the National Data Centre to Tier IV standards, aiming for 99.99% uptime for government digital systems. So far, it has installed an AI-powered disaster recovery infrastructure, including servers, routers and storage. A clear governance gap exists in Zimbabwe as it has not yet enacted an AI Policy, despite AI initiatives already underway.

Cybersecurity measures

On October 27 2025, Zimbabwe signed the United Nations Convention against Cybercrime Strengthening International Cooperation for Combating Certain Crimes Committed by Means of Information and Communications Technology Systems and for the Sharing of Evidence in Electronic Form of Serious Crimes, (Hanoi Convention), joining more than

60 countries in a landmark commitment to strengthen international cooperation against cyber threats. Zimbabwe's statement focused on aligning national legislation with global standards and building capacity within law enforcement and justice institutions to effectively implement the Convention. The signing of the Convention reflects alignment with Principle 42, which calls on states to adopt legal frameworks on the protection of personal information in accordance with international standards.

Online Gender-Based Violence

Zimbabwe is a signatory to the Beijing Declaration and Platform for Action 1995, the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) 1991, Protocol to the African Charter on Human and People's Rights on the Rights of Women in 2007 and the SADC Protocol on Gender and Development 2009, all of which call on states to eliminate gender-based violence. The Cyber and Data Protection Act (2021) complements the aforementioned laws by

21. Harare Institute of Technology 'HIT enters into agreement with POTRAZ' <https://www.hit.ac.zw/2023/11/09/hit-enters-into-agreement-with-potraz/> (Accessed 10 November 2024).

22. Postal, Telecommunications and Regulatory Authority of Zimbabwe <https://www.potraz.gov.zw/?p=3120> (Accessed 15 November 2025)

being the country’s first law to criminalise online violence. Zimbabwe has existing laws such as the Domestic Violence Act,²⁷ whose scope is more focused on “domestic” violence, with limited mentions of addressing harassment that happens through sending and delivering messages through electronic mail. Despite the adoption of Resolution 522, which aims to address digital violence against women by the African Commission on Human and Peoples’ Rights (ACHPR) in 2022, TFGBV persists. A report²⁸ by Gender and Media Connect found that 63% of surveyed women journalists experienced TFGBV, with 436 incidents reported by 88 journalists. Hate speech was one of the most common violations, reported by 30%, along with misinformation and defamation and cyber harassment, reported at 18% and 16%, respectively, among other threats. While the resolution requires states to review or adopt laws that combat all forms of digital violence and expand the definition of gender-based violence to include digital violence against women, Zimbabwe has not yet updated

its policies to effectively address TFGBV. Given the above, gaps remain as TFGBV persists with low engagement with formal reporting channels by survivors²⁹ and laws such as the Domestic Violence Act require reform as they have a limited scope of addressing OGBV. Given the above, Zimbabwe is moderately compliant with the Declaration, as it has an existing CDPA, regulations, and has signed the Hanoi Convention on cybersecurity. However, TGFBV persists, and some laws still require reform

Privacy and

Surveillance

The CDPA established the Cyber Security and Monitoring of Interceptions of Communications Centre as a unit in the Office of the President. The guiding policy undermines the centre’s independence. The Centre is housed in the Office of the

23. Veritas [‘https://www.veritaszim.net/node/146](https://www.veritaszim.net/node/146) (Accessed 12 November 2024).

24. UNESCO. <https://unesdoc.unesco.org/ark:/48223/pf0000395151> (Accessed 12 February 2026)

25. Paradigm Initiative. Click That Hurt. <https://paradigmhq.org/wp-content/uploads/2025/12/Clicks-That-Hurt-Report.pdf?x72143> (Accessed 17 February 2026)

President and suggests a potential to target vulnerable groups, including activists, opposition actors and journalists, through targeted surveillance. This is problematic as it is likely to infringe on the rights to free expression and result in both state censorship and self-censorship. Section 6 of the Interception of Communication Act Section 6 (a,b and c) mandates the Minister to issue a warrant to authorised persons if there are reasonable grounds for the Minister to believe that the gathering of information concerning an actual threat to national security or to any compelling national economic interest is necessary or the gathering of information concerning a potential threat to public safety or national security is necessary. The above provisions are overly broad and expose individuals to the invasion of their private communications. The provisions give the Minister excessive power to issue warrants without judicial or parliamentary oversight. This could lead to targeted surveillance of journalists and activists. This directly affects compliance with Principle 41 as policies introduced to address national security weaken the

protection of private communications, thereby opening the door for arbitrary interference.

In March 2025, 95 demonstrators were arrested and charged with promoting “public violence” and disrupting peace.³⁰ Some protesters were identified through social media and WhatsApp, raising concerns about surveillance of protesters, monitoring of social media and the use of technology in policing. Such policing initiatives restrict free expression online, leading to self-censorship and heightened fear of participating in online discussions, thereby undermining digital democracy.

Digital IDs

and Smart City

Developments

In 2024, the Department of Immigration introduced an Online Border Management System (OBMS) that utilises fingerprint and iris recognition technology to facilitate automated self-service immi

26. BBC <https://www.bbc.com/news/articles/czx4g9ejjj9o> (Accessed 20 November 2025)

gration clearance and verify travellers' identities against a national immigration database.³¹ However, there has been no deliberate effort to unpack how individuals' data will be used, stored, and shared to prevent its misuse. The Senate Hansard highlights that the Ministry of Home Affairs is working towards digital IDs and digital birth certificates.³² There is currently no record of the government conducting data protection impact assessments to identify potential risks and biases emanating from the use of the OBMS and implementation of any Digital ID programmes. In May 2025, Zimbabwe also introduced online applications for e-visas, resident and work permits and electronic travel clearances.³³ Without impact assessments, the capabilities of digital ID and biometric systems to capture detailed data on individuals' activities and behaviours raise surveillance concerns and may infringe the right to privacy. The Government of Zimbabwe should conduct privacy impact assessments before implementing any biometric technologies. These assessments will

determine how each technology affects privacy rights and other fundamental freedoms.

AI and Emerging

Technologies

Since 2024, the Zimbabwean government has been developing a national artificial intelligence (AI) strategy to regulate the use of AI and related technologies across various sectors. The Minister of Information Communication Technology, Postal and Courier Services, Tatenda Mavetera³⁴ highlighted this initiative. The policy aims to create a governance framework that ensures ethical use, security, and the promotion of IoT and AI technologies in the country. Zimbabwe approved³⁵ the National AI Strategy in October 2025; however, as of the time of writing (December 2025), the strategy was not yet publicly available via government websites, although a copy shared during public con-

27. Sunday Mail 'Zim rolls out unmanned borders' (2024) <https://www.sundaymail.co.zw/zim-rolls-out-unmanned-borders> (Accessed 2 November 2024).

28. ParZim <https://www.parzim.gov.zw/download/senate-hansard-23-october-2025-vol-34-no-92/> (Accessed 1 November 2025)

29. Zimbabwe Department of Immigration <https://www.zimimmigration.gov.zw/> (Accessed 12 November 2025)

sultations was circulating. The strategy, seen by PIN, mentions human rights, ethics and human-centred AI, referenced as Ubuntu AI, providing a strong anchor for the AI strategy. The strategy also mentions grievance and redress mechanisms, as well as risk management and mitigation strategies, which are key to safeguarding human rights. However, the strategy falls short because it fails to draw clear red lines, which are necessary to prevent universally unacceptable risks.

In 2025, UNESCO published an Artificial Intelligence Readiness Assessment Report for Zimbabwe³⁶, which recommended that the multidisciplinary AI Ethics Think Tank, established in February 2025, oversee the implementation of the UNESCO Recommendation on the Ethics of AI. The think tank will develop and enforce ethical guidelines to ensure AI deployment aligns with Zimbabwe's priorities and create procedures for ongoing participation and engagement from key stakeholders.

Zimbabwe is mildly compliant with the

Declaration as it currently provides for automated decision-making in the CDPA. However, this does not amount to a comprehensive AI governance framework. As of December 2025, Zimbabwe's national AI Policy or strategy was not yet available despite public announcements that it was now in its final stages.

Digital Inclusion of persons with disabilities

Zimbabwe gazetted the Persons with Disabilities Bill (The Bill)³⁷ on February 9 2024, and the Act³⁸ on November 21 2025, replacing the Disabled Persons Act of 1992. The Act, in Section 47 (e), establishes a fund to subsidise assistive devices and technology for persons with disabilities. However, the fund is not yet

30. Zimbabwe Broadcasting Corporation 'Government to launch AI Policy' (2024) <https://www.zbcnews.co.zw/government-to-launch-ai-policy/> (Accessed 6 November 2024).

31. <https://www.parlzim.gov.zw/download/national-assembly-hansard-27-november-2025-vol-52-no-10/>

32. UNESCO <https://unesdoc.unesco.org/ark:/48223/pf0000394wastraining685> (Accessed 15 November 2025)

operationalised, as the Act has not yet come into force and will come into operation on a date to be fixed by the President by notice in the Government Gazette. This is an implementation gap that limits the immediate enforceability of policies.

The Act also mandates the “availability of information intended for the general public in accessible formats and technologies appropriate to different kinds of impairments in a timely manner and without additional cost.” So far, government websites such as the Ministries of ICT and of Education do not have accessibility built in. In May 2025, POTRAZ collaborated with the Internet Society Zimbabwe Chapter to train persons with disabilities from Mashonaland West on cybersecurity.³⁹ Further trainings of 100 persons with disabilities were conducted in Matabeleland South Province, focusing on digital skills.⁴⁰ While this demonstrates inclusion, there is no project data indicating wide coverage across all underserved communities. To ensure sustainability,

reports showing impact beyond the training should also be made available to the public domain for assessment.

Universal Service

Fund

Zimbabwe has existing legislation on the Universal Service Fund (USF), established by Section 73 of the Postal and Telecommunications Act, 2000 (Chapter 12:05). Annually, the Fund has implemented projects to support persons with disabilities and ICT support to various communities. However, universal coverage has not yet been achieved as infrastructure challenges, including access to electricity, contribute to the lack of internet access in some parts of the country. As of May 2025, the power utility has a backlog of 467,470 client connections due to high connection costs, leaving communities unconnected and unable to access the

33. Persons with Disabilities Bill https://www.veritaszim.net/sites/veritas_d/files/Persons%20with%20Disabilities%20Bill%20H.B.%202%2C%202023%20.pdf (Accessed 10 March 2025)

34. Veritas <https://www.veritaszim.net/node/7733> (Accessed on the implementation 11 November 2025)

35. Internet Society <https://isoc.org.zw/wp/digital-skills-literacy-workshops-persons-with-disabilities-kariba/> (Accessed 21 November 2025)

36. Nkomwa Trust <https://nkomwaftrust.org/potraz-nkomwa-foundation-trust-train-100-mat-south-pwds-in-digital-skills/> (Accessed 14 November 2025)

Internet.⁴¹ Holders of licences in terms of the Act, including telecommunications operators, pay licence fees that finance or assist in financing the extension of postal and telecommunication services to underserved areas and community centres within or outside such areas. The mechanism is not transparently administered, as limited information is available on the contributions made by the telecommunications companies. The POTRAZ website is not adequately updated to reflect the administration and collection of funds. This lack of proactive disclosure by the regulatory authority directly affects Principle 29(3) of the Declaration.

The Treasury committed⁴² to mobilising a total of ZiG594 million (approximately US\$22 758 620) through the Universal Services Fund, citing that the money will be allocated towards the construction of base stations and digital services centres, the deployment of tele-medicine at health centres, and the training of people with disabilities in the provinces in the use of ICT services. Of the ZiG594 mil-

lion committed for digital inclusion initiatives, available budget data indicates that ZiG54.3 million (approximately US\$2 080 459) was disbursed through the Universal Services Fund during the first half of 2025, with the remainder reflecting budgetary allocations and planned expenditure rather than fully realised disbursements. In the 2025 Mid-Term Budget Review, the Finance Minister indicated that ZiG436.9 million (US\$ 16 681 939) and ZiG54.3 million (US\$ 207 331) were spent from the Budget and the Universal Services Fund, respectively, towards digital infrastructure for various projects during the first half of the year. This is concerning as it reflects weak oversight over budgeted funds, as only 9% of the committed funds were disbursed. As a result, policy commitments did not translate into actual impact, weakening USF's governance in the country. The level of investment in USF falls short of what is required to fully support USF projects, creating a gap in achieving meaningful connectivity and inclusion across the country. Access to electricity remains a major stumbling block to in-

37. World Bank. Zimbabwe Energy Compact Mission. <https://thedocs.worldbank.org/en/doc/0c714e463c-17130c6415ac2ffeaff6d-0010012025/original/Zimbabwe-National-Energy-Compact-Mission-300.pdf> (Accessed on February 10, 2026)

38. Zim Treasury <https://zimtreasury.co.zw/wp-content/uploads/2024/11/2025-INFRASTRUCTURE-Development-Programme.pdf> (Accessed 08 November 2025)

ternet access. In the Mid-Term Review, the Treasury reported⁴³ that the Universal Services Fund allocated ZiG54.3 million to the E-Learning Programme, the USF Shared Sites Programme, the E-Government Programme, and the refurbishment of Community Information Centres (CICs). The Tower Relocation Programme, which aims to extend telecommunications services to 166 underserved and unserved areas, received ZiG13.5 million (US\$ 515 463). This funded the relocation of towers to eight sites across four out of 10 provinces. ZiG5 million (US\$ 190 912) was allocated to establishing and refurbishing Community Information Centres (CICs), to provide ICT access to marginalised communities, especially in areas lacking essential ICT infrastructure or where services are unavailable or unaffordable, thereby bridging the digital divide. At the regulatory authority level, project-level reports are not available as there is no transparency or proactive disclosure of income and expenditure on the USF. The Regulator’s website has information from the first three phases of the project in 2015,⁴⁴ a direct disregard of Principle 29(3).

Children’s Rights

Online

Zimbabwe’s Cyber and Data Protection Act (2021) protects and safeguards children’s rights online. Part three of the Act addresses offences against children and procedural law, criminalising the production, dissemination, possession or access to child sexual abuse material. This aligns with international best practices that criminalise cyber grooming, accessing such material, and exposing children to pornographic content. In October 2025, Zimbabwe joined 72 other countries in signing⁴⁵ the Convention against Cybercrime, reinforcing its call for the protection of the rights of children in line with Article 34 of the UNCRC.

The Government of Zimbabwe is a state party to and has ratified the United Convention on the Rights of the Child (UNCRC), the African Charter on the Rights and Welfare of the Child (ACRWC), and the United Nations Optional Protocol to

39. Zim Treasury <https://zimtreasury.co.zw/wp-content/uploads/2025/07/THE-2025-MID-TERM-BUDGET-AND-ECONOMIC-REVIEW.pdf> (Accessed 5 November 2025)

40. POTRAZ https://www.potraz.gov.zw/?page_id=411 (Accessed 4 January 2026)

the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography OPSC). However, gaps remain as Zimbabwe has not yet enacted specific legislation to safeguard children’s rights online. At the national level, Section 81 of Zimbabwe’s Constitution provides for children’s rights. Zimbabwe also has in place the Children’s Amendment Act No 8 of 2023,⁴⁶ which in Section 2(i) introduces definitions of “child grooming” and “child sexual abuse material,” in line with international standards. However, this Amended Act does not fully address digital developments or provide accessible, child-friendly mechanisms for reporting harm, removing harmful content, and seeking justice. In 2015, POTRAZ, inspired by the ITU Guidelines, developed child online protection guidelines to raise awareness of the issue and lay the foundation for protecting children’s rights. The guidelines are not binding. In 2025, the Ministry of ICT launched a nationwide consultation survey for children and adults and conducted public consultations to gather

input from children and interested stakeholders for the development of a National Child Online Protection Policy. There is no public information on whether the policy has been drafted.

On digital inclusion, Zimbabwe is moderately compliant with the Declaration’s Principle 37 (3), as the country has an existing and functional USF, is adopting international treaties and updating policies on children’s rights online. However, improving access for underserved communities, including persons with disabilities, should be a major priority to close the gaps in policy and practice.

41. United Nations Treaties. United Nations Convention on Cybercrime. https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-16&chapter=18&clang=_en (Accessed 2 February 2026)

42. Veriitas https://www.veritaszim.net/sites/veritas_d/files/Act%20No.%208%20of%202023%20Children%27s%20Amendment.pdf (Accessed on January 25 2025)

Conclusion

This report highlights both positive and negative developments. Zimbabwe's score of 36 demonstrates that the country is moderately compliant with the African Commission's Declaration. Policy and implementation gaps remain, as Zimbabwe has neither adopted legislation on emerging technologies and digital IDs, nor revised its traditional gender-based violence policies to address online gender-based violence. Despite comprehensive policies to improve digital access, at the implementation level, challenges persist in providing connectivity to under-

served communities due to recurring infrastructure issues and limited transparency around USF projects. The existence of sedition laws, false news criminalisation and the arrests of journalists is a major setback in compliance with the Declaration Principles 22(2) and 20 (1) and (2). Despite existing challenges, Zimbabwe has opportunities to improve its oversight mechanisms to strengthen the DPA's focus and ensure parliamentary oversight of surveillance systems and the appointment of independent commissioners.

Recommendations

The Government should:

- Amend GBV-related laws, such as the Domestic Violence Act, to recognise, prevent and combat Tech-Facilitated GBV, in line with Resolution 522
- Sign and ratify the African Union

Convention on Cyber Security and Personal Data Protection, to strengthen alignment with Principles 41 and 42 of the Declaration

- Conduct public consultations and human rights impact assessments before implementing surveillance initiatives.
- Repeal Sections 31 and 33 of the Criminal Law (Codification and Reform) Act that criminalise false news and sedition.
- POTRAZ should proactively disclose information on USF projects by keeping it up to date and making it readily available on government websites.
- Update the Children's Amendment Act 8 of 2023 to provide child-friendly reporting channels and provisions for the removal of harmful content.
- POTRAZ should promote regular proactive disclosures of information through official channels and publish regular reports on data breaches, enforcement of the CDPA, licensing and USF expenditure.

Civil Society Organisations should:



- Conduct public audits/assessments on the implementation of the CDPA
- Engage in litigation initiatives to address violations resulting from surveillance and arbitrary arrests.
- Conduct awareness campaigns on children's rights and the rights of persons with disabilities.
- Advocate for policy reform on false news criminalisation and sedition legislation

Media should:



- Investigate developments in the ICT sector to ensure policies protect and do not subject journalists to arbitrary arrests
- Collaborate with civil society organisations in educating the public on digital rights and inclusion.

The Private Sector should:















- Conduct human rights impact assessment and due diligence measures before deploying surveillance technologies, ensuring technology development and deployment are in line with the United Nations Guiding Principles on Business and Human Rights
- Conduct public consultations to engage citizens on the deployment of new technologies to ensure products are human rights compliant.
- Publish transparency reports on the use of surveillance technologies to ensure transparency and accountability, in line with global transparency standards.







The Score Index







Zimbabwe, 2025

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

| Indicator | ACHPR Principle | 2024 Score | 2025 Score | 2025 Justification |
|--|-----------------|---|---|--|
| Internet Shutdowns | P38(2) |  4 |  4 | Zimbabwe did not shut down the Internet in 2025. In 2019, after an internet shutdown, a court ruled that internet shutdowns are illegal. Since then, there has been internet shutdowns in 2022 and in 2023. |
| Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet | P37 |  4 |  4 | Policies such as the National Broadband Plan, the National ICT Policy, and NDS1, among others, exist. NDS2 is currently under development. However, universal, affordable, meaningful access to the Internet for all, including children and persons with disabilities, is still a work in progress. |
| False News Criminalisation | P22(2) |  1 |  1 | Under Section 31(a)(iii) of the Criminal Law (Codification and Reform) Act, it is an offence to publish or communicate a statement that is wholly or materially false with the intention of undermining public confidence in law enforcement |

| Indicator | ACHPR Principle | 2024 Score | 2025 Score | 2025 Justification |
|---|-----------------|---|---|---|
| | | | | agencies or the state. Violators can face penalties of up to 20 years in prison for such offences. |
| Sedition Legislation | P22(2) |  |  | Under Section 33 of the Criminal Law (Codification and Reform) Act, it is an offence to undermine the authority of or insult the President. Violators can face penalties of up to 20 years in prison. Journalists and citizens were arrested in the period under review. |
| Arbitrary Arrests and Harassments of the Media, HRDs and Citizens | P20(1) & (2) |  |  | During the reporting period, journalists and citizens were arrested in violation of their rights to freedom of expression and access to information online. |
| Data Protection Legislation. | P42 |  |  | Zimbabwe adopted the CDPA; however, the regulations do not require general data breach notification to data subjects. Despite the work underway, there are lingering concerns that the Data Protection Authority may not allocate sufficient time and resources to data protection, as the data protection mandate is an add-on to its primary mandate of regulating the telecommunications sector. Implementation of the CDPA and regulations began. |

| Indicator | ACHPR Principle | 2024 Score | 2025 Score | 2025 Justification |
|---|-----------------|---|---|---|
| States interfere and require the removal of online content by internet intermediaries | P38 and P39(4) |  |  | No cases were recorded. Meta and TikTok transparency reports for 2025 reflect that Zimbabwe did not make any content takedown requests. Google's transparency report has no information on Zimbabwe. |
| Invasion of Privacy of Communications | P41 |  |  | The Cyber Security and Monitoring of Interceptions of Communications Centre is housed in the Office of the President and suggests the potential to target vulnerable groups through targeted surveillance. Section 6 of the Interception of Communication Act Section 6 (a,b and c) mandates the Minister to issue a warrant to authorised persons if there are reasonable grounds for the Minister to believe that the gathering of information concerning an actual threat to national security or to any compelling national economic interest is necessary or the gathering of information concerning a potential threat to public safety or national security is necessary. The above provisions expose individuals to invasion of their private communications. |
| Failure by the government to proactively disclose and disseminate information | P29(3) |  |  | Government websites often carry outdated information. Zimbabwe has an existing Freedom of Information Act. Improvements were shown in the public disclosure of information on the USF. |

| Indicator | ACHPR Principle | 2024 Score | 2025 Score | 2025 Justification |
|---|--------------------|---|---|---|
| on digital technologies. | | | | |
| AI and Emerging Technologies national strategies | P39(6) |  |  | Despite being announced as complete, Zimbabwe's AI Policy was not yet publicly available on official government platforms as at December 31 2025. However, the CDPA in section 4 (1) provides for automated decision-making. |
| Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online | P37(5) |  |  | Zimbabwe adopted the CDPA, which has provisions protecting children's rights online. Public consultations on the child online protection framework were conducted. |
| Digital Inclusion | P37(3) |  |  | There are laws in place to support digital inclusion through the Universal Service Fund. The score improved due to the availability of information on the USF and the funds allocated. Zimbabwe gazetted the Persons with Disabilities Act, which seeks to ensure access to technology for persons with disabilities. However, challenges persist as the rural-urban divide exists and limited infrastructure, coupled with electricity supply challenges, hinders progress towards achieving meaningful inclusion. |
| Total (out of 60): | 2024: 34 | 2025 34 | | |



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