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## POLICY SUBMISSION

BY

UNWANTED WITNESS

### On the Development of Uganda's National Emerging Technologies Strategy (with a Focus on Artificial Intelligence)

**Submitted to:**

Ministry of ICT and National Guidance  
Republic of Uganda

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#### 1. EXECUTIVE SUMMARY

Uganda is at a critical inflection point in its digital transformation journey, where the rapid adoption of emerging technologies particularly Artificial Intelligence (AI), is beginning to shape governance, economic activity, and democratic processes. Across sectors such as fintech, digital identity, elections, and public service delivery, data-driven systems are already influencing how decisions are made, services are delivered, and citizens engage with the state.

However, evidence from Uganda's recent digital ecosystem developments, including the 2026 electoral cycle, highlights growing risks associated with:

- i. Large-scale processing of personal data
- ii. Weak enforcement of existing data protection and privacy safeguards
- iii. Increasing reliance on opaque and unaccountable digital systems

These trends underscore an urgent need for Uganda's *National Emerging Technologies Strategy* to move beyond a purely innovation-driven approach and adopt a governance-first framework that anticipates and mitigates systemic risks.



Global and regional benchmarks reinforce this approach. For instance, the Mauritius AI Strategy<sup>1</sup> emphasizes the importance of aligning AI development with national economic priorities while simultaneously establishing robust regulatory, data protection, and institutional coordination frameworks. Similarly, the African Union Continental AI Strategy (2024)<sup>2</sup> underscores a people-centred, rights-based approach, prioritizing inclusion, human dignity, and the mitigation of risks such as surveillance, bias, and disinformation. At a global level, the Singapore National AI<sup>3</sup> Strategy demonstrates that successful AI ecosystems are built not only on innovation and investment, but also on trusted governance environments, strong institutional coordination, and public confidence in digital systems.

Drawing from Unwanted Witness's work<sup>4</sup> in *data protection, digital rights, and election monitoring*, this submission underscores that Uganda's trajectory on artificial intelligence and emerging technologies must be firmly anchored in accountability, enforceable oversight, and robust data governance frameworks. It emphasizes the need for strong safeguards to protect democratic processes and electoral integrity, alongside ensuring transparency and explainability in automated systems.

In the absence of these foundational protections, the rapid adoption of AI risks deepening existing vulnerabilities. It could facilitate expanded surveillance and function creep, enable political manipulation and voter profiling, exacerbate digital exclusion through algorithmic bias, and ultimately erode public trust in both state institutions and digital systems.

Conversely, if governed responsibly, AI presents a significant opportunity for national development. A well-regulated ecosystem can strengthen public service delivery, drive financial inclusion and digital innovation, enhance evidence-based policymaking, and position Uganda as a regional leader in ethical and accountable AI governance.

### **Core Message:**

Uganda's *National Emerging Technologies Strategy* must deliberately balance innovation with governance by embedding human rights, accountability, and democratic safeguards as foundational pillars ensuring that AI serves not only

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<sup>1</sup> [Government of Mauritius](#), *Mauritius Artificial Intelligence Strategy* (2018)

<sup>2</sup> African Union Executive Council, [Continental Artificial Intelligence Strategy](#), adopted at the 45th Ordinary Session, Accra, Ghana, 18–19 July 2024

<sup>3</sup> Government of Singapore, [National AI Strategy 2.0: AI for the Public Good, for Singapore and the World](#) (2023)

<sup>4</sup> Unwanted Witness, "[Resources](#),"



economic growth, but also *public trust, institutional integrity, and the protection of citizens' rights.*

## 2. VISION FOR EMERGING TECHNOLOGIES IN UGANDA (5-10 YEARS)

Over the next 5-10 years, Uganda's approach to emerging technologies particularly Artificial Intelligence, should move beyond aspirational digital transformation and instead deliberately position the country within a *people-centered, development-oriented, and accountable digital ecosystem*. This vision must be grounded in Uganda's socio-economic realities, including its expanding digital economy, evolving electoral processes, and increasing reliance on data-driven systems.

Drawing from global and regional benchmarks, Uganda should adopt a *dual-track vision*: one that accelerates economic growth through innovation while simultaneously embedding strong governance safeguards to protect rights and public trust.

First, Uganda must consolidate its trajectory towards a digitally enabled economy, where AI, fintech, and data-driven systems are strategically deployed to address structural economic challenges such as financial exclusion, inefficiencies in public service delivery, and limited market access. Similar to the Mauritius strategy<sup>5</sup>, which identifies AI as a new pillar of economic transformation and sector revitalization, Uganda should prioritize sector-specific AI applications in areas such as financial services, agriculture, and public administration to drive measurable productivity gains and inclusive growth.

Second, this transformation must be anchored in the development of a *rights-respecting digital society*, where trust becomes a central enabler of technological adoption. As emphasized in the African Union's Continental AI Strategy<sup>6</sup>, the legitimacy and sustainability of AI systems depend on their alignment with human rights, inclusion, and ethical safeguards, particularly in contexts where data systems intersect with vulnerable populations. In Uganda, this is especially critical given the growing use of biometric systems, digital identity infrastructure, and data-driven governance tools, which if left unchecked, risk reinforcing *surveillance, exclusion, and misuse of personal data*.

<sup>5</sup> Government of Mauritius, *Mauritius Artificial Intelligence Strategy*, supra

<sup>6</sup> African Union, *Continental Artificial Intelligence Strategy* (2024)



Third, Uganda must build a trusted digital governance environment, where public sector deployment of AI systems is transparent, accountable, and subject to clear oversight. Lessons from Singapore's National AI Strategy<sup>7</sup> demonstrate that trust is not incidental but engineered through deliberate investments in *governance frameworks, auditability, and explainability mechanisms*. For Uganda, this is particularly urgent in high-risk domains such as elections, where emerging technologies can both enhance integrity and, if misused, enable manipulation, profiling, and disinformation.

Finally, Uganda should position itself as a *regional leader in responsible and context-aware AI*, not by replicating global models wholesale, but by adapting them to local realities. This includes aligning with continental priorities under the African Union strategy such as inclusive development, capacity building, and risk mitigation, while leveraging Uganda's strengths in mobile money, digital platforms, and civic engagement ecosystems.

In essence, Uganda's vision for emerging technologies should not be limited to technological adoption, but should reflect a broader national ambition: *to harness AI and emerging technologies as tools for inclusive development, democratic resilience, and accountable governance while safeguarding the rights and dignity of all citizens*.

### **3. KEY CHALLENGES AND LIMITATIONS (RECAST & STRENGTHENED)**

Uganda's adoption of emerging technologies particularly Artificial Intelligence (AI), is not only constrained by capacity limitations but also by deeper systemic challenges relating to governance, infrastructure, and public trust. This gap presents both a risk and an opportunity: without deliberate intervention, AI may deepen existing inequalities and governance deficits; however, with the right policy direction, Uganda can still position itself on a responsible and competitive trajectory.

#### **3.1 Data Governance Challenges**

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<sup>7</sup> Government of Singapore, *National AI Strategy 2.0*, 2023.



The deployment of AI systems in Uganda is taking place within a context of weak and fragmented data governance, despite data being the foundational input for AI systems. There is limited transparency in how data is collected, shared, and reused across both public and private sector systems. This creates heightened risks of profiling, political targeting, surveillance, and the misuse of sensitive and biometric data.

Evidence from Uganda's 2026 electoral cycle underscores these concerns<sup>8</sup>. The large-scale processing of voter data occurred alongside low levels of compliance with data protection safeguards, raising serious questions about accountability and oversight.

By comparison, the African Union's Continental AI Strategy emphasizes the importance of trusted datasets, robust data governance frameworks, and ethical safeguards as foundational pillars for AI adoption. Uganda's current gaps in this area significantly undermine both trust and the safe scaling of AI systems.

### 3.2 Digital Infrastructure Constraints

AI development and deployment are heavily dependent on robust digital infrastructure, including reliable connectivity, data storage systems, and computational capacity. However, Uganda continues to face structural limitations in this regard.

Broadband connectivity remains uneven, particularly in rural and underserved areas, limiting inclusive access to digital services<sup>9</sup>. National investment in critical infrastructure such as data centres and high-performance computing remains limited, constraining the country's ability to develop and host advanced AI systems locally<sup>10</sup>. Furthermore, there is a growing reliance on centralized and often opaque digital systems, which raises concerns around transparency, resilience, and control.

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<sup>8</sup> Unwanted Witness, [Position Statement](#) (January 2026)

<sup>9</sup> "Broadband Reach Widens, but Digital Uptake Is Still Low," [Daily Monitor](#) (Uganda), 1 December 2025

<sup>10</sup> "Raw Data, Refined Elsewhere", [The Independent](#) (Kampala, 23 February 2026)



The African Union AI Strategy<sup>11</sup> identifies infrastructure including *data systems, compute capacity, and connectivity*, as a core enabler of AI readiness. Uganda's current infrastructure gaps therefore represent a significant barrier to meaningful participation in the AI ecosystem.

### 3.3 Skills and Institutional Capacity Gaps

Effective AI governance requires not only technical expertise but also regulatory, legal, and policy capacity<sup>12</sup>. Uganda currently lacks a critical mass of skilled professionals across these domains.

There is limited expertise in AI governance and ethics, data protection compliance, and algorithmic auditing. This constrains the ability of institutions to design, implement, and enforce appropriate safeguards. It also limits the country's ability to engage meaningfully in global AI governance discussions.

In contrast, countries such as Singapore have made deliberate and sustained investments in AI talent development, research ecosystems, and workforce readiness<sup>13</sup>. Without similar investments, Uganda risks falling further behind in both innovation and governance capacity.

### 3.4 Trust, Ethics, and Democratic Integrity Risks

The rapid adoption of emerging technologies in Uganda is outpacing the development of trust and accountability mechanisms. This imbalance creates significant risks, particularly in relation to democratic processes and public discourse.

There is increasing exposure to AI-driven disinformation, including the use of deepfakes and synthetic media. The potential for electoral manipulation through micro-targeting and data-driven political campaigning is also growing. At the same time, the use of opaque automated decision-making systems in both public and private sectors raises concerns about fairness, accountability, and due process.

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<sup>11</sup> African Union, *Continental Artificial Intelligence Strategy* (2024)

<sup>12</sup> [United Nations Development Programme \(UNDP\)](#), *Global Approaches to AI Governance: Policy, Legal, and Regulatory Perspectives* (UNDP, November 2025)

<sup>13</sup> [Ministry of Digital Development and Information \(Singapore\)](#), "Singapore Invests Over S\$1 Billion in National AI Research and Development Plan to Strengthen AI Research Capabilities and Our Position as Global AI Hub,"



The African Union AI Strategy explicitly identifies information integrity, human rights, and democratic risks as central policy concerns. Uganda must therefore address these risks proactively to safeguard both public trust and democratic stability.

### 3.5 Financing and Innovation Ecosystem Constraints

Finally, Uganda's AI ecosystem is constrained by limited and fragmented investment in innovation. Unlike countries such as Mauritius and Singapore, which have developed structured ecosystems supported by public-private partnerships, targeted incentives, and innovation funding<sup>14</sup>, Uganda lacks a coordinated approach to financing AI development.

Funding for ethical and rights-respecting AI solutions remains limited, as does support for research and development. Additionally, there are no established regulatory sandboxes or targeted incentives to support experimentation and responsible innovation.

This weak ecosystem not only limits the growth of local AI solutions but also reduces Uganda's attractiveness as a destination for technology investment. Without deliberate efforts to stimulate innovation, Uganda risks becoming a passive consumer rather than an active shaper of emerging technologies.

## 4. RECOMMENDATIONS TO ACCELERATE ADOPTION

Uganda's approach to accelerating the adoption of emerging technologies particularly Artificial Intelligence (AI), must move beyond general policy aspirations toward a coordinated, systems-based national strategy. Evidence from Uganda's digital ecosystem, including the 2026 *electoral cycle, digital identity systems, and fintech expansion*, demonstrates both the transformative potential of AI and the real risks of weak governance, opaque systems, and data misuse.

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<sup>14</sup> Khanal, Shaleen, Hongzhou Zhang, and Araz Taeihagh. "[Building an AI Ecosystem in a Small Nation: Lessons from Singapore's Journey to the Forefront of AI.](#)" *Humanities and Social Sciences Communications*



Benchmarking against global and regional strategies shows a clear pattern: countries that succeed in AI adoption do so by *combining strong governance, targeted sector deployment, institutional coordination, and investment in capabilities*. For example, Mauritius prioritizes *sector-specific AI deployment and institutional leadership through an AI Council*, while the African Union Strategy emphasizes capabilities, governance, and risk mitigation as parallel priorities. Similarly, Singapore adopts a whole-of-system approach combining infrastructure, talent, and trusted governance environments. Uganda must adopt a similarly integrated and context-driven model, grounded in its governance realities.

#### 4.1 A rights-anchored National Ai Policy Framework

Uganda must urgently transition from fragmented digital policy efforts to a coherent *National AI Governance Framework* that reflects its constitutional order, electoral context, and data governance realities.

Unlike many global strategies that emphasize economic competitiveness alone, Uganda's framework must explicitly address *state power, data centralization, and democratic risks*, particularly in light of the increasing use of:

- a) biometric identity systems
- b) voter verification technologies
- c) data-driven political communication

Drawing from the AU Strategy's emphasis on human rights, inclusion, and risk mitigation, Uganda should adopt a people-centered AI governance model that embeds safeguards at the design stage.

A risk-based classification model as adopted in leading jurisdictions should be introduced, with high-risk systems (elections, surveillance, digital identity, financial profiling) subject to strict pre-deployment scrutiny.

Crucially, Uganda must institutionalize *mandatory AI Impact Assessments (DPIA + HRIA)*. This moves the country from reactive compliance to preventive governance, ensuring that harms are identified before systems are deployed.

#### 4.2 A phased and Practical Regulatory Pathway

Uganda's approach to regulating Artificial Intelligence should be deliberately *phased and adaptive*, rather than delayed by the pursuit of a single, comprehensive law. Given the speed at which emerging



technologies are evolving and the fact that AI systems are already being deployed across critical sectors there is an urgent need for *immediate, practical regulatory guidance*.

In the short term, the Ministry of ICT should issue *interim AI governance guidelines* to provide clarity and direction to both public and private sector actors. This approach has proven effective in jurisdictions such as Singapore, where early governance frameworks have enabled innovation to proceed alongside safeguards, without waiting for lengthy legislative processes.

Over the medium term, Uganda should move toward *targeted, sector-specific regulation*, focusing on areas where AI-related risks are already evident and consequential. These include *elections and political communication*, where AI can influence democratic processes; *fintech and digital lending*, where automated decision-making affects financial inclusion and consumer protection; *digital identity systems*, which involve sensitive biometric data; and *surveillance technologies*, which raise significant concerns around privacy and state power. This phased prioritization reflects lessons from countries such as Mauritius, where AI strategy is closely tied to sectoral priorities and economic relevance.

In the long term, Uganda should consolidate these efforts into a *comprehensive AI legal framework* that provides legal certainty and institutional coherence. Such a framework should clearly define the rights of individuals in relation to AI systems, establish the obligations of developers and deploying entities, and set out robust liability and enforcement mechanisms. This progressive pathway ensures that Uganda builds a regulatory system that is both *responsive in the present and sustainable for the future*.

#### **4.3 Data Governance as the Foundation of AI**

Data governance is the most critical enabler and at the same time the most significant risk factor for the responsible development and deployment of Artificial Intelligence in Uganda. Uganda's recent experience, particularly during the 2026 electoral cycle, exposes systemic vulnerabilities that cannot be ignored<sup>15</sup>. These include the

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<sup>15</sup> Unwanted Witness, [Position Statement](#) (2026).



large-scale processing of biometric and identity data, weak enforcement of data protection obligations, and limited transparency in how data is collected, shared, and utilized across public and private systems. As AI systems are increasingly integrated into governance, finance, and electoral processes, these existing weaknesses will not only persist but will be amplified, potentially entrenching risks of profiling, surveillance, exclusion, and misuse of sensitive personal data.

Comparative experience from other jurisdictions underscores the urgency of addressing these gaps. The African Union's Continental AI Strategy emphasizes that access to high-quality datasets must be balanced with strong safeguards to mitigate risks such as bias, discrimination, and privacy violations, while also investing in trusted data infrastructures and governance systems. Similarly, Mauritius's AI Strategy highlights that data availability and governance are foundational to unlocking AI's economic potential, but must be supported by robust regulatory, ethical, and data protection frameworks to ensure trust and sustainability. Singapore's National AI Strategy further demonstrates that a "trusted data environment" is a core pillar of AI development, requiring strong governance mechanisms, transparency, and accountability to maintain public confidence and enable innovation.

In this context, Uganda must move beyond policy commitments to enforceable data governance. This requires prioritizing strict and proactive enforcement of *the Data Protection and Privacy Act*,<sup>16</sup> ensuring that all AI systems are grounded in a clear and lawful basis for data use, and that data processing practices are transparent, auditable, and subject to independent oversight. Particular attention must be given to sensitive categories of data including biometric, political, and behavioral data, which should be subject to heightened safeguards given their potential to influence rights, freedoms, and democratic processes.

At the same time, Uganda should invest in building a secure and trusted data ecosystem that supports both innovation and protection. This includes the development of structured data-sharing

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<sup>16</sup> Data Protection and Privacy Act, 2019 (Act 9 of 2019), Laws of Uganda



frameworks, trusted digital and data infrastructure, and governance mechanisms that ensure data quality, integrity, and inclusivity. Such systems must be deliberately designed to prevent bias, exclusion, and inequitable outcomes, in line with emerging continental and global standards.

Ultimately, without a strong data governance foundation, Uganda's ambitions for AI-driven growth and innovation will be undermined by risks to public trust, institutional legitimacy, and fundamental rights. Strengthening data governance is therefore not only a regulatory necessity but a strategic imperative for Uganda's digital future.

#### 4.4 From Policy to Implementation: A Systems Approach

Global experience demonstrates that successful AI strategies are not driven by isolated policy interventions, but by *coordinated, whole-of-system approaches* that align institutions, infrastructure, talent, and governance frameworks. As seen in Singapore's National AI Strategy, effective implementation requires the deliberate integration of *government, industry, and research ecosystems*, supported by enabling infrastructure such as data, compute capacity, and a trusted regulatory environment. Similarly, Mauritius has emphasized the establishment of a *central coordinating AI body* to oversee implementation, align stakeholders, and drive priority projects across sectors<sup>17</sup>, while the African Union strategy underscores the importance of *multi-level coordination, capability building, and sustained investment* across public and private actors.

For Uganda, this systems approach is not optional, it is essential. The country's digital governance landscape is currently characterized by institutional fragmentation, with multiple actors including the *Ministry of ICT, NITA-U, UCC, and the Personal Data Protection Office (PDPO)* exercising overlapping mandates in policy, infrastructure, and regulation. This has already resulted in coordination gaps, particularly evident in areas such as data governance, digital identity systems, and election-related technologies, where inconsistent oversight and enforcement have weakened accountability.

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<sup>17</sup> [Ecofin Agency](#), 'Mauritius Creates National Unit to Oversee AI Development' (10 December 2025)



To avoid replicating these challenges in AI deployment, Uganda must adopt a *whole-of-government and multi-stakeholder implementation model* that ensures policy coherence, clearly defined institutional roles, and continuous engagement with the private sector, academia, and civil society. This should include the establishment of a *central AI coordination mechanism or taskforce*, responsible for aligning national priorities, overseeing implementation, and ensuring that AI systems are deployed in a manner that is both innovative and accountable.

Ultimately, moving from policy to implementation in Uganda will depend on the country's ability to transition from *fragmented digital governance structures to an integrated AI ecosystem*, where coordination, trust, and accountability are embedded by design rather than treated as afterthoughts.

## 5. Use Cases And Opportunities

Uganda is already experiencing the early but significant integration of emerging technologies particularly data-driven systems and elements of artificial intelligence across key sectors of the economy and governance. As observed in Unwanted Witness's work on digital rights, data protection, and election monitoring, these technologies are no longer theoretical; they are actively shaping financial systems, identity infrastructure, and democratic processes<sup>18</sup>.

At present, the most prominent applications of data-driven and AI-enabled systems in Uganda are evident in the fintech and mobile money ecosystem<sup>19</sup>, which has become a backbone of financial inclusion, as well as in national digital identity systems, particularly the integration and use of biometric data under the National Identification and Registration Authority (NIRA). Additionally, digital voter verification systems deployed during electoral processes and the increasing use of data-driven political communication tools demonstrate that emerging technologies are already embedded in Uganda's governance and democratic landscape.

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<sup>18</sup> Electoral Commission of Uganda, [Statement](#) by the Chairperson on the Progress of Implementation of Activities under the Roadmap for General Elections 2026, 27 November 2025

<sup>19</sup> [ICT Clubs Uganda](#), "Everyday Applications of AI in Uganda – From Mobile Money to Agriculture" (1 September 2025)



However, unlike more advanced AI ecosystems such as those outlined in the Mauritius AI Strategy and Singapore National AI Strategy, Uganda's current use cases remain largely *uncoordinated, weakly regulated, and insufficiently governed*, particularly in relation to data protection, accountability, and ethical oversight. In both Mauritius and Singapore, AI adoption is deliberately tied to *sector-specific transformation* (e.g., *healthcare, finance, public services*) and supported by structured governance mechanisms, including dedicated AI councils, regulatory frameworks, and innovation ecosystems. By contrast, Uganda's adoption is largely *market-driven and fragmented*, with limited policy coherence.

This gap becomes more pronounced when considering the barriers to scaling these use cases. The absence of a comprehensive AI or emerging technologies governance framework creates regulatory uncertainty, while weak enforcement of existing data protection laws undermines trust in digital systems. As highlighted in the African Union's Continental AI Strategy, trust, data governance, and institutional capacity are foundational to scaling AI systems across sectors, particularly in contexts where digital inequalities and governance gaps persist. In Uganda, these challenges are further compounded by infrastructural limitations, uneven connectivity, and limited technical capacity in AI governance and oversight.

Despite these constraints, the opportunity landscape remains significant. International experience demonstrates that the most successful AI strategies prioritize *high-impact, sector-driven use cases* aligned with national development priorities. For Uganda, three areas present the most immediate and transformative potential.

First, the application of AI in public service delivery including health, education, and administrative systems, offers an opportunity to improve efficiency, targeting, and service accessibility. As seen in Singapore's approach to "*AI for the Public Good*," the integration of AI into public systems can significantly enhance service delivery outcomes when supported by strong governance and infrastructure.

Second, AI-enabled financial services, particularly in credit scoring and digital lending, present opportunities to deepen financial inclusion. However, without safeguards, these systems risk reinforcing exclusion through opaque decision-making and discriminatory profiling an issue already emerging in Uganda's digital lending ecosystem.



Third, and most critically within the Ugandan context, is the application of AI and data-driven systems in elections and governance. The 2026 electoral cycle has already demonstrated the central role of digital systems in voter verification, identity management, and political communication. While these technologies offer opportunities for improved transparency and efficiency, they also introduce significant risks related to manipulation, disinformation, and voter profiling. This aligns with continental concerns highlighted by the African Union, particularly around AI-driven disinformation and threats to democratic systems.

Across all these use cases, the risks are not incidental, they are structural. The use of large-scale data systems without adequate safeguards creates conditions for political profiling, misuse of personal and biometric data, and algorithmic bias. Furthermore, the opacity of automated systems limits accountability and undermines public trust. These risks are amplified in contexts such as Uganda, where institutional oversight mechanisms remain underdeveloped.

In contrast, global best practice demonstrates that these risks can be mitigated through deliberate policy design. For instance, Mauritius explicitly integrates regulatory frameworks, incentives, and institutional coordination into its AI strategy, while Singapore emphasizes the creation of a "*trusted environment*" as a core pillar of its AI ecosystem. Uganda's strategy must similarly move beyond identifying opportunities to *structuring their governance*.

In this regard, the central policy challenge for Uganda is not whether to adopt emerging technologies, but how to ensure that their deployment is *coordinated, rights-respecting, and aligned with national development priorities*. Without this, the same technologies that promise efficiency and innovation risk entrenching inequality, undermining democratic integrity, and eroding public trust.

## **6. Specific Actions Requested From The Ministry**

To ensure that Uganda's National Emerging Technologies Strategy is both actionable and globally competitive, it is critical that the Ministry moves beyond high-level commitments and establishes clear institutional, regulatory, and implementation foundations for Artificial Intelligence governance.



Drawing from Uganda's current realities particularly the increasing deployment of data-driven systems in public services, digital identity infrastructure, and electoral processes and informed by international best practices, we recommend that the Ministry take immediate steps to establish a *coordinated national AI governance architecture*. Comparable jurisdictions such as Mauritius have demonstrated the importance of creating a central coordinating body (e.g., an AI Council) to drive implementation, align stakeholders, and oversee priority use cases across sectors. In the Ugandan context, this should take the form of a *National AI Taskforce or Council*, mandated to coordinate policy, oversee implementation, and ensure alignment across institutions including the *Ministry of ICT, NITA-U, the Personal Data Protection Office (PDPO)*, and sector regulators.

In the short term, there is an urgent need for the Ministry to issue *interim AI governance guidelines* to address immediate risks associated with ongoing deployments of AI and data-driven systems. Evidence from Uganda's 2026 electoral cycle points to growing concerns around data use, profiling, and system opacity, underscoring the need for clear rules even before a comprehensive legal framework is enacted. Countries such as Singapore have demonstrated the value of early-stage governance instruments, including *model AI governance frameworks and testing tools*, which help guide both public and private sector actors while enabling innovation.

At a strategic level, the National Emerging Technologies Strategy must explicitly integrate *human rights, data protection, and ethical safeguards as core pillars of AI governance*, rather than treating them as peripheral considerations. The African Union's Continental AI Strategy underscores that AI governance in African contexts must be *people-centred, rights-based, and aligned with societal values*, with deliberate efforts to mitigate risks such as surveillance, discrimination, and disinformation. For Uganda, this is particularly critical given existing concerns around biometric data systems, digital surveillance, and the integrity of democratic processes.

Furthermore, the Ministry should prioritize the development of *sector-specific AI governance frameworks*, especially in high-risk and high-impact areas such as elections, digital identity systems, financial services, and public sector service delivery. International experience shows that



effective AI strategies are not purely horizontal; they are grounded in priority sector use cases and tailored regulatory approaches, as seen in Mauritius' sector-driven AI roadmap and Singapore's domain-focused deployment strategy. In Uganda, particular attention should be given to *AI in electoral processes*, where risks of political profiling, misinformation, and data misuse are both immediate and consequential.

Finally, the Ministry should institutionalize *multi-stakeholder governance and participation mechanisms* as a central pillar of implementation. The African Union strategy emphasizes that effective AI governance requires *collaboration between government, private sector, academia, and civil society*, both to maximize innovation and to mitigate risks. For Uganda, this is not only a best practice but a necessity, given the cross-cutting nature of emerging technologies and the need to build public trust in their deployment.

In practical terms, this requires the Ministry to establish structured and continuous engagement platforms, including advisory groups, technical working committees, and public consultation mechanisms, to ensure that AI governance remains inclusive, adaptive, and responsive to emerging risks.

## 7. Conclusion

Emerging technologies, particularly Artificial Intelligence, are not neutral tools they are shaping how power is exercised, how data is controlled, and how rights are experienced in Uganda's digital ecosystem. As evidenced in Uganda's 2026 electoral cycle, the increasing reliance on data-driven systems, biometric infrastructures, and digital platforms has already exposed critical gaps in governance, accountability, and rights protection.

Global and regional experiences demonstrate that countries that are successfully leveraging AI such as those reflected in the Mauritius AI Strategy, the African Union Continental AI Strategy, and Singapore's National AI Strategy are doing so through *deliberate, coordinated, and well-governed approaches* that integrate economic ambition with strong institutional safeguards. These strategies emphasize not only innovation and competitiveness, but also the need for robust governance systems, investment in capabilities, and clear accountability frameworks.



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For Uganda, the opportunity is not merely to adopt emerging technologies, but to define *how they are governed, who they benefit, and how risks are mitigated*. This requires moving beyond broad policy intentions to establishing enforceable safeguards that address Uganda's specific realities including electoral integrity risks, data governance weaknesses, and uneven institutional capacity.

A credible and future-facing strategy must therefore strike a deliberate balance: enabling innovation and economic growth, while simultaneously safeguarding privacy, strengthening democratic processes, and building public trust in digital systems. Without this balance, emerging technologies risk deepening existing inequalities, enabling unchecked surveillance, and undermining confidence in public institutions.

Uganda has the opportunity to position itself not only as a participant in the global digital economy, but as a leader in *responsible, inclusive, and accountable AI governance in Africa*. Achieving this will depend on embedding human rights, transparency, and oversight at the center of its national strategy, supported by clear implementation mechanisms and sustained multi-stakeholder engagement.

Unwanted Witness remains committed to supporting the Government of Uganda in advancing a strategy that ensures emerging technologies serve the public interest, protect fundamental rights, and strengthen democratic governance.