



NATIONAL ICT POLICY & STRATEGY 2019-2024

POLICY BRIEF



Integrating EU Digital Principles into the Next National ICT Policy

Prepared by Somalia Non-State Actors (SONSA)
under the ReCIPE project led by Oxfam
and co-funded by the European Union (EU)

December 2024

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I. Executive Summary

Somalia's National ICT Policy and Strategy (2019-2024) established a solid basis for the country's digital transformation, setting strategic goals aligned with broader development objectives. This policy initiated major improvements in ICT infrastructure and governance, paving the way for increased digital inclusivity and international alignment. Notwithstanding these accomplishments, there are still significant gaps in digital literacy, data protection, and rural connectivity that limit the potential for wider developmental effects. These challenges highlight the need for a revised approach that incorporates international standards such as the EU Digital Principles in the next ICT Strategy (2025–2030). This policy brief provides actionable recommendations gathered from extensive local consultations, advocating for a comprehensive approach to ensure an inclusive, secure, and rights-based digital ecosystem in Somalia.

II. Introduction

A significant turning point in Somalia's digitalization efforts was reached with the National ICT Policy and Strategy (2019–2024), which addressed important ICT infrastructure concerns and established a course for digital inclusiveness. It is crucial to consider the policy's achievements and shortcomings as its period concludes. The 2019–2024 strategy is critically examined in this policy brief, which also identifies key areas that require improvement while emphasizing the strategy's contribution to crucial progress. Somalia can successfully fill the gaps found by bringing itself closer to international standards such as the EU Digital Principles throughout the succeeding policy (2025–2030). In order to ensure a robust digital future for Somalia, this policy brief examines these factors and promotes strategic alignments that satisfy national interests and follow international standards.

III. The gaps in the Somali National ICT Policy and Strategy (2019-2024)

Despite its achievements, Somalia's National ICT Policy (2019–2024) contains several shortcomings that hinder the country's ability to meet its goals for digital transformation. These disparities are particularly noticeable in areas like digital inclusion, where the policy lacks specific mechanisms to ensure connectivity in rural areas. Additionally, the policy's approach to data protection is marked by a lack of public accountability and insufficient enforcement, as evidenced by the ineffective reporting and rectification of violations and the low level of public awareness of data rights. These deficiencies represent areas where the policy falls short in meeting the needs of Somalia's citizens and aligning with international standards.

1. Access and Inclusion

- **Key Gap:** The policy lacks specific mechanisms to reduce the digital divide, especially in rural regions, and does not incorporate affordability frameworks or subsidies for marginalized groups.
- **Deficiency:** The policy acknowledges the low internet penetration and infrastructure gaps but does not provide practical or actionable steps to address last-mile connectivity challenges or affordability issues for underserved populations.
 - *"Internet uptake in Somalia is relatively low, at about 10% of the population, partly because of the country's historic security situation, as well as lack of stable energy sources which has hindered the development of the ICT sector..."* (Section 3.1.1, Last Mile Connectivity, Page 11). This highlights the limited infrastructure in rural areas, which restricts access to digital services for significant portions of the population, including underserved and isolated regions. It confirms the existence of a digital divide but does not specify mechanisms to close it.
 - *"A Universal Access Strategy needs to be developed to ensure that voice and Internet access is available to every Somali citizen, including through the provision of affordable public access through Wifi hotspots and public access facilities where needed, especially in rural areas"* (Section 6.3, Universal Access, Page 27). This acknowledges the necessity of addressing connectivity issues but lacks the actionable measures, such as affordability frameworks or rural subsidies, that would ensure practical implementation. The mention of *"affordable public access"* remains aspirational without concrete plans.

2. Privacy and Data Protection

- **Key Gap:** The policy's approach to data protection lacks enforceable mechanisms and public accountability.
- **Deficiency:** The policy lacks robust enforcement mechanisms to safeguard data privacy and fails to create widespread public awareness or provide simple mechanisms for reporting data breaches.
 - *"Citizens are well protected and have trust in using public networks and services, supported by privacy policies & regulation for general data protection, freedom of information and freedom of expression"* (Section 6.1.1, Policy Objectives, Page 23). This objective shows intent but does not address the absence of enforcement mechanisms.
 - *"Secure the rights and privacy of citizens online by establishing rules for ensuring privacy of information held by government and the private sector"* (Section 6.4.1, Policy Objectives, Page 29). While this calls for secure

frameworks, it does not specify measures to ensure transparency or accountability in enforcing these rules.

3. Secure and Safe Digital Environment

- **Key Gap:** Inadequate Legal and Operational Framework for the Computer Security Incident Response Team CSIRT.

Deficiency: Although the CSIRT is established, the policy does not provide comprehensive legal authority, operational guidelines, or mechanisms for integrating it into broader national security strategies.

- *"Critical ICT infrastructure is well protected and effective response mechanisms are in place to deal with cybersecurity issues..."* (Section 6.1.1, Policy Objectives, Page 23). This points to a need for stronger protection but lacks detail on integration with national strategies.
- *"Establish a national cybersecurity strategy and national multi-stakeholder cybersecurity advisory committee"* (Section 6.4.1, Policy Objectives, Page 29). While this indicates intent, it lacks detailed operational guidance for CSIRT.

4. Digital Literacy and Skills

- **Key Gap:** Efforts to improve digital literacy are narrowly focused on formal education and neglects informal learning opportunities to address broader societal needs.
- **Deficiency:** The policy's digital literacy efforts are narrowly targeted at formal education systems, leaving gaps in lifelong learning, community-based training, and tailored programs for women and marginalized groups.
 - *"Human resource development and digital literacy are essential to leveraging the maximum potential from ICTs"* (Section 2.2, Key Principles, Page 10). This principle emphasizes literacy without addressing broader inclusion or informal learning.
 - *"Internet access in all secondary schools... All secondary schools offer at least 1 ICT-related course or program... All secondary school teachers trained in use of ICT to support learning"* (Section 6.3, Education Strategies, Page 19). This approach neglects informal and lifelong learning programs needed for broader societal impact.

5. Ethical Use of Technology

- **Key Gap:** Lack of accountability mechanisms and ethical guidelines for AI and digital technologies.
- **Deficiency:** Emerging technologies such as AI and digital identification systems are not accompanied by frameworks to ensure ethical usage or accountability for misuse.

- *"Considering the importance of ICTs and related infrastructure as a means of achieving national development goals, it is crucial that the security of the infrastructure is ensured..."* (Section 6.4, Information Safety and Cyber-Security, Page 28). While security is addressed, ethical usage of emerging technologies is omitted.
- The policy acknowledges fast-moving technologies like AI but lacks specific ethical frameworks for their governance: *"This Policy also acknowledges the need to take into account fast-moving technology developments in the ICT space, such as the emerging areas of the Internet of Things (IoT), Artificial Intelligence, Robotics, and Machine to Machine (M2M) services, Net Neutrality, Big Data, Blockchain Technologies and Cryptocurrencies. As these evolve the Policy will need to be reviewed and adjusted accordingly"* (Section 1.2, Alignment with Global Commitments, Page 9).

6. Governance and Collaboration

- **Key Gap:** Governance structures lack transparency and participatory decision-making processes.
- **Deficiency:** The policy does not adequately involve civil society, nor does it ensure adherence to international governance best practices or include clear mechanisms for public participation.
 - *"MPTT sets the policy agenda of the sector, coordinating with other government institutions, private sector, civil society organizations and other stakeholders, while consulting the public in developing sector policies and strategies"* (Section 5.1, Institutional Structures & Responsibilities, Page 20). This indicates intent but lacks specific measures to ensure meaningful participation.
 - *"It is recognized there are many key issues that need to be addressed to achieve an optimal ICT ecosystem able to foster progress towards the SDG connectivity targets"* (Section 1.2, Alignment with Global Commitments, Page 9)

7. Sustainability and Environmental Impact

- **Key Gap:** The environmental effects of ICT development are not taken into account by the policy.
- **Deficiencies:** The policy does not prioritize integrating green ICT initiatives or measures for reducing e-waste and energy consumption.
 - *"Develop a general information management and decision support system... Champion the rapid deployment of affordable reliable energy supplies, critical for the ICT industry"* (Section 6.2.10, Supporting Strategies, Page 27). This calls for energy solutions but does not emphasize sustainability.

- *"Efforts to address the limited availability and high cost of ICT infrastructure include... measures for minimizing e-waste and promoting sustainable practices"* (Section 6.2, ICT Infrastructure, Page 24). This statement lacks actionable strategies for sustainability.

IV. Contextualizing the Gaps within the EU Digital Principles

To strategically enhance Somalia's National ICT Policy and Strategy, it is imperative to align the upcoming strategy with the EU Digital Principles. These principles offer solutions tailored to the particular shortcomings found in the current policy framework in addition to serving as an international standard for digital ecosystems. A thorough alignment of each EU principle with the related gaps may be found below:

1. Universal Connectivity.

- Gap Addressed: Access and Inclusion
- The current policy lacks concrete mechanisms for achieving last-mile connectivity in rural and remote regions and does not provide subsidies or affordability frameworks for marginalized communities. Aligning with this principle ensures high-quality and affordable digital connectivity for all, directly tackling these deficiencies.

2. Digital Skills and Education.

- Gap Addressed: Digital Literacy and Skills
- Current efforts in digital literacy are overly focused on formal education systems and neglect informal learning opportunities and gender-specific barriers. This principle advocates for comprehensive digital education that is accessible and inclusive, directly addressing these shortcomings.

3. A Secure Digital Environment:

- Gap Addressed: Insufficient Cybersecurity Framework
- Despite the establishment of CSIRT, the national ICT policy lacks comprehensive legal and operational support, leaving critical infrastructure vulnerable. Addressing this will enhance protections, capacity, and trust in Somalia's digital ecosystem.

4. Data Protection and Privacy:

- Gap Addressed: Privacy and Data Protection
- The policy's approach to data protection features weak enforcement and limited public education on data rights. This principle emphasizes strong legal and technical safeguards, ensuring individuals have control over their personal data.

5. Ethical AI and Technologies:

- Gap Addressed: Ethical Use of Technology
- There is a lack of accountability mechanisms and ethical guidelines for the use of AI. This principle ensures that emerging technologies respect human rights and democratic values, addressing these critical ethical concerns.

6. Sustainability:

- Gap Addressed: Environmental Impact and Sustainability.
- E-waste management and the integration of energy-efficient systems in ICT development is overlooked in the current policy. By promoting environmentally responsible practices, this principle helps mitigate the environmental impact of digital infrastructure.

7. Transparency and Inclusivity in Governance:

- Gap Addressed: Governance and Collaboration
- Specific Issues: Governance structures lack transparency and participatory decision-making, with insufficient engagement of civil society. This principle fosters open governance and ensures that digital policy decisions are made inclusively and transparently.

Aligning Somalia's ICT Strategy with the EU Digital Principles addresses these specific gaps effectively and positions the country to meet international standards. This strategic approach not only enhances digital inclusivity and sustainability but also strengthens Somalia's potential for global collaboration and competitiveness, paving the way for a robust, rights-based digital ecosystem.

V. Findings and Recommendations

The following enhanced recommendations, derived from insights shared **on Exploring Digital Rights and ICT Policies and Transformative Technologies in Somalia** that align with the identified gaps in Somalia's ICT Policy and Strategy (2019-2024), ensuring they address deficiencies in the policy framework while also aligning with international standards such as the EU Digital Principles while advancing the Sustainable Development Goals (SDGs):-

1. Enhance Digital Inclusion and Accessibility

- Set measurable affordability targets for broadband and mobile data, implement public-private partnerships to subsidize costs for underserved populations, and provide targeted programs to address rural and marginalized groups.
- Facilitation access to affordable ICT services, particularly for low-income and marginalized communities, particularly for low-income and marginalized communities. Aligns with the EU principle of Universal Connectivity and supports

SDG 1 (End poverty in all its forms everywhere) SDG 10 (Reduce inequality within and among countries) and SDG 5 (Achieve gender equality and empower all women and girls) and SDG 9 (Industry, innovation and infrastructure).

2. Strengthen Data Protection Mechanisms

- Establish and enforce robust regulatory frameworks for data protection, including mechanisms for public awareness and user-friendly reporting of data breaches.

Builds public trust in digital platforms and ensures the protection of personal data, fostering accountability and transparency. This aligns with the EU principle of Data Protection and Privacy and ensures the protection of personal data, fostering accountability and transparency. Aligns with SDG 16 (Promote peaceful and inclusive societies, provide access to justice, and build effective institutions).

3. Strengthening Legal and Operational Frameworks for Enhanced Cybersecurity

- Revise the national ICT policy to the legal statutes for CSIRT, which defines operational roles and responsibilities and Integrating CSIRT operations into national security frameworks.

Enhancing legal and operational support for CSIRT will improve national cybersecurity resilience, fostering a secure digital environment. This aligns with the EU Principle of a Secure Digital Environment and supports SDG 16 (Peace, Justice, and Strong Institutions).

4. Expand Digital Literacy Campaigns

- Launch large-scale, multi-sectoral digital literacy initiatives targeting women, youth, and rural populations, focusing on practical skills for navigating digital spaces securely and productively.

This empowers marginalized groups to participate in the digital economy, reduces digital inequalities, and builds capacity for inclusive innovation. This aligns the EU principle of Digital Skills and Education. Supports SDG 4 (Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all) and SDG 10. This ensures inclusive and equitable quality education and promote lifelong learning opportunities for all and supports SDG 10 (Reduce Inequalities).

5. Introduce Ethical Oversight for Emerging Technologies

- Create regulatory frameworks for ethical governance of emerging technologies, such as AI, ensuring they respect human rights and democratic values.

This ensures responsible innovation and reduces the risk of misuse of emerging technologies. Emerging challenges and opportunities in healthcare and reduces

the risk of misuse of emerging technologies. This aligns the EU principle of Ethical AI and Technologies and with SDG 16 by fostering justice and accountability in technology deployment.

6. Promote Sustainability in ICT

- Integrate green ICT initiatives by incentivizing the adoption of energy-efficient technologies, reducing e-waste, and promoting sustainable supply chains for ICT infrastructure.

This minimizes the environmental footprint of digital transformation, contributing to sustainable development of digital transformation, and contributing to sustainable development. Aligns with the EU principle of Sustainability and supports SDG 13 (Take urgent action to combat climate change and its impacts) and SDG 12 (Ensure sustainable consumption and production patterns).

7. Foster Civil Society and International Collaboration

- Strengthen partnerships with civil society, private sector, and global organizations to enhance knowledge sharing, secure funding, and align local policies with international standards.

Promotes inclusive policymaking and transparency, ensuring diverse perspectives are integrated into digital governance. This aligns with EU principle of Transparency and Inclusivity in Governance and supports SDG 17 (Strengthen the means of implementation and revitalize the global partnership for sustainable development).

VI. Conclusion

In ICT awareness and infrastructure development areas, the current ICT framework has established a solid foundation. However, ongoing issues with cybersecurity, data security, digital inclusiveness, and governance necessitate a long-term, comprehensive policy.

Adhering to international standards such as the EU Digital Principles will be necessary as Somalia moves into the next stages of its digitalization process. These principles offer a path forward for tackling important concerns such as sustainability, privacy, ethical technology use, and universal connectivity. Actionable improvements that not only fill up the gaps in the current ICT policy but also create strong frameworks for new issues in the digital era, like artificial intelligence governance, must also be Somalia's top priority.

The recommendations drawn from the **Focus Group Discussion on Exploring Digital Rights Issues** highlight the need for a participatory and inclusive policymaking processes. By integrating diverse perspectives, including civil society and the private sector, Somalia can develop ICT strategy that are more transparent, adaptable and effective.

Finally, the 2025–2030 ICT Policy must build on the successes of the preceding policy while embracing reforms that are transformative. This entails supporting digital literacy, strengthening cybersecurity infrastructure, cultivating public-private partnerships, and coordinating with sustainable development goals. By doing this, Somalia may position itself as a regional pioneer, ensuring its digital future is inclusive, based on rights, and robust in the face of evolving technological developments.