CAPSTONE BRIEF

Development of the National AI Strategy for Uganda

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Executive Summary

Artificial Intelligence (AI) is widely recognised as a transformative technology with immense potential to improve how governments, businesses, and societies operate. Across the world, there is genuine hope that AI can transform sectors such as agriculture, health, education, financial services, and governance. AI is becoming a strategic driver for transformation in governance, commerce, public service delivery, national security, and social development.

For Uganda, AI offers a strategic pathway to leapfrog developmental challenges and realise national ambitions articulated in Vision 2040, the Digital Uganda Vision, and the National Development Plan III & IV. The Government of Uganda has demonstrated foresight in embracing the digital economy and 4IR technologies, including through initiatives such as the National 4IR Strategy and the ongoing development of a Smart Uganda program.

Uganda's growing digital ecosystem, driven by aggressive broadband expansion, fintech innovation, mobile penetration, and emerging data governance reforms, positions the country on the right trajectory to harness the full potential of AI. However, the pace of AI development and deployment worldwide has outpaced Uganda's existing national policy, legal, and institutional frameworks. This has brought in several opportunities and risks. Moreover, AI adoption remains fragmented, with no national strategy to guide responsible, scalable deployment.

Whilst there is overwhelming recognition that AI applications could significantly enhance public service delivery, improve policy planning, and increase overall competitiveness, the lack of adequate safeguards may lead to ethical violations, discrimination, surveillance abuses, and exclusion of already marginalised populations.

Uganda, therefore, is currently at a crossroads, trying to deal with a dual imperative: the overarching strategic objective to harness the full potential of AI as a catalyst for socio-economic transformation of Uganda, and the need to establish robust governance mechanisms that will ensure transparency, accountability, equity, and alignment with national values. This proposal outlines a comprehensive framework for Uganda to develop a practical National AI Strategy that guides the country's actions and strategic interventions to facilitate the safe and responsible use of AI.

1.0 Problem Statement

The Government of Uganda is currently undertaking various processes to guide the country in maximising value from AI. A comprehensive thematic analysis of diverse AI use cases reveals several key functional and sectoral trends, as well as important socio-technical dynamics. Despite notable progress in digital transformation, Uganda lacks a coordinated AI policy, governance framework, or national investment roadmap.

This gap results in:

- Fragmented AI initiatives are lacking national alignment.
- Weak institutional readiness and limited technical capacity.
- Risks in privacy, ethics, data protection, cybersecurity, and algorithmic fairness.
- Limited investment in research, innovation, and AI infrastructure.
- Missed opportunities for economic transformation.

The above gaps in AI governance are largely attributable to the lack of a National AI strategy.

2.0 Purpose of the Project and Objectives

The general objective of this project is to develop a national strategic framework for AI governance, innovation, and deployment in Uganda.The specific objectives of the project are:

1. To review Uganda's current Policy, legal, and regulatory framework and assess whether Uganda needs a National AI strategy.
2. To analyse global, regional, and continental AI strategies for benchmarking.
3. To conduct stakeholder engagement and institutional mapping.
4. To identify legal, ethical, security, and governance issues.
5. To propose strategic pillars, priority sectors, and governance models.
6. Develop an implementation roadmap, M&E plan, and risk mitigation strategies.

3.0 Policy Review - Uganda

The governance of Artificial Intelligence (AI) in Uganda is a dynamic, evolving landscape that reflects broader trends across East Africa, Africa, and the global landscape.[1] While the full contours of a dedicated AI governance framework are yet to take shape, Uganda is actively engaging with the complexities and opportunities presented by AI, striving to balance innovation with ethical considerations and societal well-being.

Uganda is currently in the early to middle stages of developing a comprehensive AI governance framework. Unlike some more advanced economies, Uganda does not have a dedicated, standalone national AI strategy or a specific AI Act.[2] However, the Ministry of ICT and National Guidance, in collaboration with other stakeholders, is taking significant steps to develop an appropriate Policy, legal, and regulatory framework for AI. A National AI Task Force was recently established by the Minister of ICT and National Guidance to, among other things, evaluate whether Uganda should move forward with enacting a Policy or Law on AI or first develop a national strategy.

The ongoing deliberations highlight a pragmatic recognition of AI's rapid evolution, with some experts raising concerns that developing a rigid policy or law on AI could quickly become outdated. Some notable scholars,[3] however, are strong in their view that developing an adaptive AI strategy that allows for flexibility in implementation could be the best bet for Uganda, especially in view of the fact that even without a dedicated law or policy on AI, Uganda's existing digital governance landscape provides foundational elements that touch upon AI, as summarised below:

3.1 The 1995 Constitution of Uganda

Although the 1995 Constitution of Uganda does not explicitly mention artificial intelligence, it provides a strong legal foundation for AI governance. As the supreme law in Uganda, the constitution empowers Parliament and government institutions to enact laws and policies on emerging technologies, including AI.

1. Centre for intellectual property and Information Technology Law(CIPIT), Strathmore University, State of AI in Africa Report 2023, p.6; https://cipit.strathmore.edu/wp-content/uploads/2023/05/The-State-of-AI-in-Africa-Report-2023-min.pdf , Accessed on 30th December 2025.
2. Joseph Nsimbi, ' Ugandan Experts call for National AI strategy, budget' Uganda Standard, 23rd August 2025. https://www.ugstandard.com/ ugandan-experts-call-for-national-ai-strategy-budget/ ; Accessed on 30th December 2025.
3. Prof. Lawrence Muganga, A Comprehensive Review of the draft Report on scoping and Identification of use cases for Uganda's Artificial Intelligence governance framework, Dec 2025, Victoria University, Kampala,

The National Objectives and Directive Principles of State Policy encourage scientific and technological development, legitimising national AI strategies. The Bill of Rights in Chapter 4 of the Constitution is particularly relevant to AI governance, as it guarantees Constitutional protections for rights such as privacy, equality, non-discrimination, freedom of expression, and access to information, which are the key foundations of effective AI governance. By recognising and guaranteeing these rights, the Constitution of Uganda establishes mandatory legal safeguards that all AI system developers must adhere to, particularly those involving data processing, surveillance, and automated decision-making. These rights serve as constitutional limits on the harmful or unethical use of AI.

The Constitution also establishes institutional authority for ICT regulation and public policy development, which underpins existing laws such as the Data Protection and Privacy Act, 2019; the Uganda Communications Act, 2013; the Electronic Transactions Act, 2011; and the Computer Misuse Act, 2011, as amended in 2022. Overall, Uganda's Constitution indirectly supports AI governance by enabling innovation, mandating rights-based safeguards, and authorising regulatory frameworks necessary for the responsible and human-centred deployment of AI.

3.2 The Data Protection and Privacy Act (2019).

This Act is crucial as it establishes a legal framework for data protection and privacy, which are fundamental to ethical AI development and deployment. It governs the collection, processing, storage, and use of personal data, thereby implicitly affecting how AI systems handle sensitive information, manage consent, and ensure data security. Operational since 2022, the Personal Data Protection Office (PDPO) is responsible for enforcing the Data Protection and Privacy Act. Its role will be paramount in overseeing how AI systems process personal data, ensuring compliance with privacy rights, and addressing any potential algorithmic biases that might lead to discrimination.

3.3 The Computer Misuse Act Cap 96.

This law outlines regulations on unlawful computer use and digital security, providing a basis for addressing cyber threats that might arise from AI systems or their misuse. The provisions of this Act will inform the formulation of ethical standards for AI use.

3.4 The National Information Technology Authority (NITA-U) Act 2009

This Act establishes NITA-U as the regulatory body overseeing IT infrastructure and related policies, including AI-related developments. NITA-U's Digital Transformation Roadmap, now in its second year, is structured around five key pillars, including digital infrastructure, digital services, cybersecurity and data protection, digital skills development, and innovation and entrepreneurship. This roadmap signals Uganda's commitment to harnessing digital technologies, including AI, for socio-economic development.

3.5 The Uganda Communications Commission (UCC) Act cap 2013

The UCC Act establishes the Uganda Communications Commission as the regulator of the communications sector, including telecommunications, broadcasting, and postal services. While not specifically an AI Act, the UCC's mandate extends to regulating digital services and ensuring consumer protection within the communications landscape.

As AI becomes increasingly integrated into telecommunications and digital platforms (e.g., AI-powered customer service, network optimisation, and content recommendation), the UCC's regulatory oversight becomes relevant to service quality, fair competition, data handling by communication providers, and the prevention of harmful content spread via AI. The UCC is also involved in cybersecurity through the Uganda National Computer Emergency Response Team (CERT-UG), which addresses cyber threats that may involve AI. While the UCC may be part of an AI task force, there have been criticisms of its inclusivity and effectiveness in addressing AI-specific nuances, underscoring the need for greater capacity and a clearer mandate in AI governance.

3.6 The National Information Technology Authority (NITA-U) Act 2009

In September 2022, the Ministry of ICT and National Guidance launched The Digital Uganda Vision 20240, Uganda's overarching national policy and strategic framework, designed to review, integrate, consolidate, and improve all existing ICT strategies, policies, and plans into a unified digital vision for the country. Its primary aim is to align ICT investments across sectors to improve Uganda's global ICT indices, thereby attracting foreign investment and fostering socio-economic development.

The DUV envisions empowering citizens and achieving universal inclusion, sustainable development, economic progress, and poverty eradication through digital innovation.

It aims to electronically deliver a wide array of government and private services in fields such as education, health, agriculture, social security, banking, and justice. Recognising the rapid pace of technological change, the DUV is conceptualised as a flexible, "living document" that can adapt to new and emerging technologies such as AI, cloud computing, blockchain, IoT, big data analytics, augmented reality, and quantum computing. It sets out seven key objectives, including socio-economic transformation, increased competitiveness, human capital development, national guidance, and robust ICT governance and coordination, all aligned with Uganda's broader Vision 2040 and international commitments, such as the Sustainable Development Goals (SDGs) and Agenda 2063 for Africa.

3.7 The Digital Transformation Roadmap (2023/24-2027/28).

This was developed by the Ministry of ICT and National Guidance with support from the United Nations Development Programme (UNDP). The Digital Transformation Roadmap acts as the operational implementation tool for the Digital Uganda Vision. It translates the DUV's strategic aspirations into actionable plans and commitments over a five-year cycle. The roadmap's strategic vision is to accelerate Uganda's digital revolution by strengthening enabling policies and laws and providing a cohesive framework for a well-connected Uganda that capitalises on opportunities from various technologies, including AI.

It is structured around five key pillars: digital infrastructure and connectivity, aiming for reliable high-speed broadband, data centers, and cloud computing; digital services, focusing on developing and expanding e-services across government to improve efficiency and accessibility; cybersecurity, data protection, and privacy, building a robust framework for digital governance and safeguarding intellectual property; digital skills and literacy, promoting STEM education and bridging the digital divide through training; and innovation and entrepreneurship, fostering a conducive environment for research, development, and startup incubation. The roadmap highlights objectives to achieve 90% household connectivity, 90% broadband coverage by geography, and 90% of citizens accessing e-services online by 2040, demonstrating a clear commitment to widespread digital inclusion and improved service delivery.

3.8 National Development Plan IV (NDP IV).

As the overarching national planning framework, NDP IV (expected to cover 2025/26 to 2029/30) will serve as the guiding blueprint for Uganda's socio-economic development. Digital transformation and AI adoption are expected to be critical enablers of Uganda's aspiration to become a middle-income country by 2040. NDP IV is expected to provide strategic direction for leveraging emerging technologies, including AI, across key sectors such as agriculture, health, education, and public service delivery, thereby increasing productivity and efficiency and improving livelihoods. It will likely emphasise policies and investments in digital infrastructure, skills development, and innovation ecosystems that support the responsible growth and deployment of AI.

4.0 Stakeholder Mapping

To effectively deliver the project objectives, the following stakeholders have been identified as relevant:

- *Ministry of ICT and National Guidance*

The Ministry is responsible for developing policies for Uganda's ICT sector, where AI governance squarely falls. This Ministry recently established the National AI Task Force.

- *Uganda Communications Commission (UCC)*

UCC is responsible for regulating Uganda's communications sector. UCC also manages the Universal Access Fund, which is used to extend ICT services to the underserved and unserved areas in Uganda. UCC is a strategic stakeholder in Uganda's AI governance.

- *The National Information Technology Authority of Uganda(NITA-U)*

This is the government agency responsible for managing ICT services for all government units and agencies in Uganda, including the central and local governments. NITA-U also manages Uganda’s national IT backbone infrastructure and is also responsible for registering ICT innovations and professionals in Uganda.

- *The Data Protection Office*

DPO is the government of Uganda agency responsible for overseeing the implementation and enforcement of the Data Protection and Privacy Act 2019. Given that AI largely depends on data, some of which is personal, it is important to ensure that all AI governance processes are properly aligned with the DPO's mandate and expectations.

- *Academia and research institutions.*

Uganda has numerous academic and research institutions, including Makerere University, Islamic University in Uganda, and Gulu University, among others.
These institutions play a critical role in nurturing talent and innovation in the ICT sector.

- *Other Government Ministries, Departments and Agencies.*

Private sector, including Telecoms, FinTechs, AgriTech firms, etc.) Parliament & Judiciary

- *Civil Society & Media*

Development Partners (World Bank, UN agencies, AU bodies) and Media.

5.0 Significance

While AI is recognised as a transformative driver for governance, public service delivery, and national security, its development globally has outpaced Uganda's existing safeguards. Consequently, this project is analytically significant because it addresses a governance vacuum: AI adoption remains fragmented, with no coordinated national strategy to guide responsible, scalable deployment.

Critically, the project serves as a safeguard against systemic risks that emerge when powerful technologies are deployed without oversight. Without the comprehensive framework proposed in this study, the use of AI in Uganda risks ethical violations, state surveillance abuses, and further exclusion of marginalised populations.

By identifying legal, ethical, and security issues, the project aims to move Uganda from weak institutional readiness to a structured environment in which AI is aligned with national values. It acts as a necessary check to ensure that the drive for efficiency does not override fundamental constitutional protections, such as the rights to privacy, equality, and non-discrimination.

Furthermore, the project is analytically vital as a strategic catalyst for socio-economic leapfrogging. It aligns AI governance with the country's long-term ambitions, including Vision 2040 and National Development Plan IV, positioning AI as a tool to increase productivity in key sectors such as agriculture, health, and education. By proposing an adaptive AI strategy rather than a rigid law, the project recognises the rapid evolution of the technology, offering a flexible, living roadmap that can adapt to emerging innovations such as blockchain and big data while maintaining a human-centred approach.

Finally, the project's significance is rooted in its ability to harmonise a fragmented digital ecosystem. It brings together diverse stakeholders across the Ministry of ICT and the Data Protection Office, academia, and the private sector, ensuring AI governance is not siloed but is integrated into the broader Digital Uganda Vision. Ultimately, the project provides the foundational blueprint for a safe and responsible digital revolution, ensuring that Uganda's transition into a middle-income country is supported by a technological landscape that is transparent, accountable, and legally sound

The Artificial Intelligence (AI) Policy Fellowship: Foundations and Governance for Policy Makers is an initiative of the East African artificial intelligence (AI) Policy Hub, designed to strengthen policy capacity on AI governance across the public sector. To date, the Fellowship has successfully equipped two cohorts of policymakers and regulators with the knowledge and tools required to engage with AI policy and governance challenges.

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