

DIGITAL GOVERNANCE AND SECURITY IN THE HORN OF AFRICA

Peter Chonka

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Rift Valley Institute
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XCEPT
CROSS-BORDER CONFLICT
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THE AUTHOR

Peter Chonka is a Senior Lecturer in Global Digital Cultures at King's College London and the lead author of this report. He conducted several of the interviews for the research, with others being done by three partner researchers in Ethiopia, Kenya and Somalia who wish to remain anonymous. The author is extremely grateful for their contributions to the research and their feedback during drafting. The author also wishes to thank the interviewees who gave their time and insights to the researchers, as well as Ken Barlow, Jason Mosley and Hannah Stogdon for their support and reviews of the report.

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This report is a product of the Cross-Border Conflict Evidence, Policy and Trends (XCEPT) research programme. XCEPT brings together leading local and international experts to examine conflict-affected borderlands, how conflicts connect across borders, and the factors that shape violent and peaceful behaviour. The programme carries out research to better understand the causes and impacts of conflict in border areas and their international dimensions. Funded by UK International Development, XCEPT offers actionable research to inform policies and programmes that support peace, and builds the skills of local partners. The views expressed do not necessarily reflect the UK government's official policies.

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SUMMARY

- While digital finance—including mobile money—has developed unevenly across Somalia, Ethiopia and Kenya, such technologies are nevertheless transforming everyday economic activities.
- In some cases, borderlands and cross-border financial flows are central to these digital developments and are driving further innovation.
- From the perspective of states affected by institutional weakness and/or security threats, digital financial technologies represent a ‘double-edged sword’. On one hand, having new ways of transferring financial resources within and across borders gives conflict actors the opportunity to evade state scrutiny and controls. On the other hand, digital finance leaves data trails that can potentially be utilized for governance, accountability, security and revenue-generation purposes.
- Social media similarly presents both pros and cons for governance. Although such platforms enhance connectivity, they also fuel polarization and amplify misinformation and disinformation, particularly via non-state actors, diaspora networks and local social media influencers seeking engagement by spreading harmful content.
- In different ways, the Somali, Ethiopian and Kenyan and telecoms sectors have become increasingly embedded in financial flows, making them central to governance across the region.
- On paper, the regulation of digital finance and data security is increasing. In practice, however, the wider institutional, political and security landscape creates significant gaps in the development and enforcement of relevant legislation—whether at the centre or in borderland settings.
- It is often already marginalized populations in borderland and/or conflict-affected settings who suffer the most from intentional or unintentional disruptions of network connectivity. Having to rely on digital finance in contexts where physical cash may not be accessible adds another layer of vulnerability to those affected by conflict and displacement.
- Digital finance and connectivity through social media are becoming increasingly intertwined, for instance through the use of different digital platforms to solicit and source new types of finance (e.g. encrypted messaging and cross-border cryptocurrency flows).
- Overall, it is unclear whether the increased emphasis on digital finance governance within wider counter-terrorism efforts in the Somali context is having a tangible impact on the diverse revenue-generation tactics and technologies of armed groups such as al-Shabaab.

- State authorities in the Horn of Africa have different levels of engagement and contact with external social media platforms. While large amounts of content created within the region is being ‘moderated’ and removed from platforms, it remains unclear whether automated content moderation for conflict-related material is effective. At the same time, human-led content moderation remains difficult and under-resourced.

MAP



INTRODUCTION

Since the mid-2000s, mobile phone and internet penetration has advanced rapidly across the Horn of Africa (HoA). Not simply a recipient of externally produced technologies, the region has pioneered globally significant digital innovations, such as the development and popularization of SMS-based mobile money.

Governments, international organizations, development partners and commercial actors in the region frequently emphasize that digital technologies have the potential to enable new types of economic activity, greater productivity and opportunities for ‘e-government’. On the other hand, state responses to security threats in the HoA—a region disproportionately affected by armed conflict—are increasingly focused on how digital platforms are used in contexts of insecurity.

Issues of concern include the use of digital financial technologies by non-state armed groups to generate and move domestic and international revenue, as well as the influence of transnational social media use on conflict dynamics. In response, states in the region are undertaking a range of digital governance initiatives. These include further regulating the telecoms sector; exerting greater control over internet connectivity (ostensibly) for security purposes; and engaging with global social media platforms over content moderation. Government efforts and influence in these areas vary across the HoA depending on an individual state’s institutional capacity and relationship with tech companies. Peacebuilders are also urging social media platforms to moderate content that may cause harm, particularly in regions such as the HoA where states have limited capacity to regulate such material.

Security concerns around popular digital media use have important cross-border dimensions in the HoA, partly because much of the armed conflict seen in the region traverses national borders. At the same time, increased digital connectivity is enabling new forms of connection in borderland areas that have frequently lacked a strong state presence, and where boundaries may be porous and historically contested. Digital technologies enable ever more intensified cross-border flows of ideas and resources. While the Horn of Africa is not digitally ‘borderless’, digital technologies are reshaping people’s everyday experiences of borders. This reshaping occurs in borderlands themselves (for example in terms of access/non-access of telecommunications networks on either side of a national boundary), or in cities away from the border (for example in the terms of the opportunities or limitations someone faces in making a digital financial transaction to an individual in a neighbouring capital city).

The telecommunications sectors of the HoA’s various states vary considerably in terms of

infrastructure, ownership and regulation. These differences reflect the contrasting political histories, governance experiments and commercial strategies of the respective countries, as well as the region's broader ethnic, cultural, linguistic and religious diversity. Citizens therefore experience digital media (and digital borders) differently depending on which state they belong to, including significant disparities in connectivity arising from security, social and economic factors.

Against the above backdrop, this report explores the digital governance landscape in Somalia, Ethiopia and Kenya, with a particular focus on the cross-border implications for (in)security. The focus on these three countries is partly related to the report's intention to build on previous RVI/XCEPT research that has explored Somali cross-border trade networks and digital financial innovation that operate in their connected borderlands.¹

METHODOLOGY AND STRUCTURE

The report draws on 20 key informant interviews undertaken in late 2024 with government, telecoms sector, civil society, media and security sector analysts in (or connected with) Somalia, Ethiopia and Kenya. The study's researchers also attempted to interview representatives of Meta, arguably the most important global social media company in the region, given its ownership of Facebook, Instagram and WhatsApp. Despite initial indications that interviews might be granted, the company's representatives eventually declined to participate. The possible reasons for this are discussed later in the report.

In addition, the analysis draws on an extensive review of secondary sources, including policy reports, local media sources and "transparency" data released by Meta and TikTok. Content analysis was also applied to the social media/online material produced by conflict actors.

The report proceeds as follows. The first section provides an overview of the HoA's digital landscape, including the widespread use of mobile money, the expanding telecoms sector and the digital regulation existent in the case study countries. Having done so, the following section hones in on Somalia (and de facto independent Somaliland), analysing how digital finance, global social media platforms and digital conflict diasporas have impacted local and cross-border insecurity. Given al-Shabaab's status as the preeminent armed group in Somalia and the wider region, emphasis is placed on analysing the role it plays in these dynamics. Next, the third section turns the spotlight to digital governance and insecurity in and across the borders of Ethiopia and Kenya. Finally, the conclusion sums up the report's key themes and offers some relevant policy considerations.

1 Ahmed Musa, 'Transborder Mobile Money Platforms in the Greater Somali Economic Space', Nairobi: Rift Valley Institute, 2024. Accessed 25 March 2025, https://riftvalley.net/wp-content/uploads/2024/06/Transborder-Mobile-Money_FINAL-2.pdf.

CONNECTIVITY, DIGITAL DIVIDES AND REGULATION IN THE HORN OF AFRICA

In order to unpack the relationship between digital governance and the HoA's (cross-border) security dynamics, it is necessary first to assess the region's broader digital technology landscape. This section details the respective digital contexts of Somalia, Kenya and Ethiopia as it pertains to mobile phone penetration, mobile money, access to technology, the telecoms sector and regulation.

MOBILE PHONE PENETRATION

Following similar trends across the continent, mobile phone use began proliferating among HoA populations from the late 1990s onwards. As of 2024, aggregate estimates suggest that around 55 per cent of Somalia's adult population and 60 per cent of Ethiopia's adult population own a mobile phone.² Kenya, meanwhile, has long reported that the country's number of mobile subscriptions is higher than its total adult population.³ By comparison, mobile phone penetration in the UK is estimated at around 98 per cent of adults,⁴ although these statistics are increasingly based on *smartphone* ownership—in the HoA, basic handsets still account for a large proportion of the mobile phone market. While the latter devices are often sufficient for the purposes of mobile money, they do not offer internet access.

A higher proportion Somalia's adult population are believed to be internet users compared to Ethiopia (27 per cent vs. 19 per cent).⁵ Kenya, again, has a higher rate than either, at around 41 per cent.⁶ Given the absence of (reliable) census data, however, the extent to which such figures provide an accurate picture of connectivity is questionable, with anecdotal insights suggesting

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- 2 Based on numbers of cellular subscriptions. Data Reportal, 'Digital Somalia: 2024', 23 February 2024. Accessed 1 November 2024, <https://datareportal.com/reports/digital-2024-somalia>; Data Reportal, 'Digital Ethiopia: 2024', 23 February 2024. Accessed 1 November 2024, <https://datareportal.com/reports/digital-2024-ethiopia>.
 - 3 Data Reportal, 'Digital Kenya: 2024', 23 February 2024. Accessed 1 November 2024, <https://datareportal.com/reports/digital-2024-kenya>.
 - 4 USwitch, 'UK mobile phone user statistics, 2024', 7 February 2024. Accessed 1 November 2024, <https://www.uswitch.com/mobiles/studies/mobile-statistics/>.
 - 5 Data Reportal, 'Digital Somalia: 2024'; Data Reportal, 'Digital Ethiopia: 2024'.
 - 6 Data Reportal, 'Digital Kenya: 2024'.

mobile and internet use in Somalia's cities is significantly higher than the proportion cited above. Nonetheless, such figures give a baseline sense of digital connection levels in the HoA and the upward trend in digital technology use over the past decade.

MOBILE MONEY

Far from being a mere recipient of externally produced digital technology, the HoA has played an important global role in digital innovation, particularly when it comes to finance. For instance, it was the first region in the world to achieve critical mass in the popular usage of short messaging system (SMS)-based mobile money. Launched in 2007, Kenya's MPesa system (developed as a collaboration between Safaricom, Vodaphone and UK development assistance) swiftly transformed people's everyday social and economic experiences of monetary transactions. The model has since been emulated elsewhere on the continent and beyond.

Somalia's own mobile money market took off with the popularization of Telesom's ZAAD system in Somaliland from 2008–09 onwards. Unlike MPesa, ZAAD (and the other Somali mobile money systems that have come to prominence in its wake) do not charge fees on individual user-to-user transfers. This accelerated uptake has partly been driven by Somalia's challenging security conditions, which mean people often prefer to transport money using a PIN-protected mobile phone account rather than carry hard cash. World Bank figures from the late 2010s indicate that over 70 per cent of Somalia's adult population regularly make use of mobile money.⁷ A similar outlook can be found in north-eastern Kenya and Ethiopia's Somali Regional State (SRS).⁸

In many places in Somalia, local physical cash (Somali Shillings) has become increasingly scarce.⁹ While this is partly due to hard cash being superseded by mobile money, it is also reflective of the state's limited capacity or incentive to print new banknotes. The situation is different in Somaliland, which—as a means of asserting its claim to independence—has long printed its own currency (the Somaliland Shilling).

The popularization of mobile money systems in Somalia and the wider HoA region predates the spread of more advanced devices with internet access. As such, they were designed to be accessible to non-smartphone users. This remains the case today, allowing the majority of the Somali population to access mobile money and particularly benefiting marginalized users who lack access to formal bank accounts. Nevertheless, concerns remain about the limitations of digital finance being the only available option for poor populations,¹⁰ as well as

7 Altai Consulting, 'Mobile Money Ecosystem in Somalia: Summary', World Bank, June 2017. Accessed 1 December 2024, <https://www.altaiconsulting.com/insights/mobile-money-ecosystem-in-somalia->.

8 Ahmed Musa, 'Transborder Mobile Money Platforms'.

9 Mahad Wasuge, 'Re-introducing the Somali Shilling in Beledweyne', Somali Public Agenda, 14 January 2024. Accessed 28 February 2025, <https://somalipublicagenda.org/re-introducing-the-somali-shilling-in-beledweyne/>.

10 Peter Chonka and Jutta Bakonyi, 'Precarious technoscapes: forced mobility and mobile connections at the urban margins', *Journal of the British Academy* 9/11 (2021).

the vested commercial interests promoting full ‘cashlessness’ in the Somali context.¹¹ Where physical cash is inaccessible, people are forced to rely on mobile phones, which have their own associated costs. Moreover, mobile networks can be disrupted by insecurity, with the relevant infrastructure often targeted by armed actors for the purposes of either physical destruction or temporary shutdowns during military operations.

DIGITAL DIVIDES

Overall, a majority of those living across the HoA engage with and are affected by digital technologies, whether in terms of phone connectivity, mobile money or social media. Despite this, there is great diversity in how people interact with technologies, and what types of device or platform they can access. The result is often deepening digital divides. For instance, while reliable national-level data on gendered access to digital technologies is scarce, research indicates that compared to other, more connected, groups in society, women’s relative levels of education, literacy, free time and disposable income—especially in rural areas—frequently impede how they make use of mobile phones.¹² Elderly populations and people with disabilities may struggle in similar ways.

Although the availability of cheap smartphones in the region—primarily from Chinese manufacturers—has undoubtedly increased mobile internet access, such devices are often beyond the reach of those in remote rural areas; displaced by conflict and ecological shocks; and/or living on extremely small daily incomes. On the other hand, social support networks (e.g. support within the clan system from family members) may enable someone without a stable income to obtain a smartphone. Here, social connections are an important factor in accessing technology, potentially putting minoritized clans (who make up a large proportion of Somalia’s displaced populations) at a disadvantage.

THE TELECOMMUNICATIONS SECTOR

The rapid expansion of mobile network access in Somalia since the turn of the millennium has been enabled by some of the lowest airtime (and later, mobile data) rates on the African continent.¹³ Somali telecommunication companies emerged in the 1990s out of wider business networks involved in the vital remittance sector. In the absence of state regulation or taxation, these companies rapidly expanded their mobile networks. A highly competitive market duly emerged, driving down consumer costs. This market has become increasingly consolidated,

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- 11 Peter Chonka, Gayatri Sahgal and Mahad Wasuge, ‘Mobile money, (dis)empowerment and state reconstruction in Somalia’s conflicted digital economy’, *International Affairs* 101/1 (2025).
 - 12 Marije Geldof, ‘Earphones are not for women: Gendered ICT use among youths in Ethiopia and Malawi’, *Information Technologies & International Development* 7/4 (2011): 69; Susan Wyche and Jennifer Olson, ‘Gender, mobile, and mobile internet| Kenyan women’s rural realities, mobile internet access, and “Africa rising”’, *Information Technologies & International Development* 14 (2018): 35.
 - 13 Greg Collins, ‘Connected: exploring the extraordinary demand for telecoms services in post-collapse Somalia’, *Mobilities* 4/2 (2009).

with one major conglomerate (the HTG group) owning the leading companies in Somaliland, Puntland and South-Central Somalia (Telesom, Golis and Hormuud, respectively). These companies have expanded into the formal banking sector, creating increased linkages between finance, remittances and mobile money.¹⁴

With wider investment portfolios in energy, real estate, construction and commercial agriculture, Hormuud is arguably the most powerful economic actor in southern Somalia. Mobile money has been crucial to this commercial expansion. During the first decade of mobile money development, companies in Somalia were subject to minimal regulation. This allowed Hormuud and similar companies to cross-invest large floats of digital currency in other enterprises, leading to commercial consolidation across the telecoms–remittances–banking–digital finance landscape.¹⁵ Even so, Hormuud continues to operate in an extremely complex digital financial environment (see Box 1).

BOX 1. TELECOMS AND CONFLICT IN SOMALIA

In January 2024, Somalia's National Intelligence and Security Agency (NISA) launched a high-profile raid on Hormuud's Trebiano office in Mogadishu, demanding the company release customer data on mobile money accounts. Hormuud publicly refused, citing the recent National Intelligence and Security Agency Law and the National Telecommunications Law. NISA responded by ordering the closure of further Hormuud offices and offices of Salaam Bank, which Hormuud owns. These closures were short-lived and the dispute soon resolved, likely through the involvement of President Hassan Sheikh Mohamoud, who has close links with Hormuud. It remains unclear, however, whether customer data was obtained by NISA, or whether protocols were agreed for future data sharing. Rumours were rife in Mogadishu about possible motivations behind the confrontation, with two separate interviewees (from civil society and the security sector) referring to speculation that commercial factors may have been at play.¹⁶ Here, links were drawn with the head of NISA's alleged interests in a competitor to Salaam Bank.

Some analysts depict Hormuud and companies like it as being caught between the opposing interests (and periodic attacks) of al-Shabaab and various government-associated actors, all of which are attempting—alongside military and security

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- 14 Jos Meester, Ana Uzelac and Claire Elder, 'Transnational capital in Somalia: Blue desert strategy', Clingendael, 2019. Accessed 1 December 2024, <https://www.clingendael.org/publication/transnational-capital-somalia>.
- 15 Gayatri Sahgal, 'Deals, Exchanges and Obligations: Interrogating Tax Morale in Somalia', PhD thesis, University of Oxford.
- 16 Interview, civil society representative, Mogadishu, 18 November 2024; Interview, security sector representative, Mogadishu, 29 November 2024.

objectives—to extract licit and illicit revenue.¹⁷

Telecommunications infrastructure and personnel have been directly targeted by various armed actors. For example, in June and July 2023, government forces and allied militias in Hirshabelle and Galmudug regions are alleged to have intentionally destroyed eight Hormuud transmitter towers during anti-al-Shabaab manoeuvres.¹⁸ Moreover, in late 2023, a significant number of bombings in and around Mogadishu appeared to target Hormuud, killing at least three employees and damaging offices, transmitters and vehicles. Some commentators have speculated that this was al-Shabaab's response to Hormuud's refusal to pay the group taxes.¹⁹ Others, however, have pointed to al-Shabaab suspicions that some of the company's staff were collaborating with foreign intelligence agencies.²⁰

Nevertheless, while Hormuud undoubtedly faces significant operating challenges, its telecoms and mobile money quasi-monopoly is not under any immediate threat.

In Kenya, Safaricom dominates the national telecoms market, with a customer market share of 65.9 per cent.²¹ The Government of Kenya—whose ambitious e-governance agenda has been buoyed by MPesa's success and Kenya's national branding as a regional hub for technological development—holds a 30 per cent stake in Safaricom.²² It should come as little surprise, then that there is a close relationship between the company and the Kenyan state.

If Somalia's mobile market is characterized by the close entanglement of telecoms, remittances and nascent formal banking, Kenya's market is heavily influenced by what Donovan and Park describe as a data-driven micro-lending industry, which serves Safaricom's own financial interests as well as the 'fiscal imperatives of a Kenyan state that is, like its citizens, groaning

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- 17 Hiraal Institute, *The Price of Progress: Effects of the Clearing Operations on Businesses*, February 2024. Accessed 1 February 2025, <https://hiraalinstitute.org/wp-content/uploads/2024/02/The-Price-of-Progress-Hiraal-Institute-Report.pdf>.
- 18 Hiraal Institute, *The Price of Progress*, 8.
- 19 'Dismantling al-Shabaab Finances a Tough Task For Somalia', *Africa Defence Forum*, 6 February 2024. Accessed 1 December 2024, <https://adf-magazine.com/2024/02/dismantling-al-shabaab-finances-a-tough-task-for-somalia/>.
- 20 Nick Kochan, 'Somalia: Battle for Al-Shabaab's \$150m', *The Africa Report*, 16 January 2024. Accessed 11 December 2024, <https://www.theafricareport.com/333417/somalia-battle-for-al-shabaabs-150m/>.
- 21 Akim Benamara, 'Safaricom Kenya's Market Share Hits 65.9%, Leaving Airtel at 29%', *TechAfricaNews*, 12 July 2024. Accessed 28 February 2025, <https://techafricanews.com/2024/07/12/safaricom-kenyas-market-share-hits-65-9-leaving-airtel-at-29/>.
- 22 'Safaricom PLC', *Marketscreener.com*. Accessed 28 February 2025, <https://uk.marketscreener.com/quote/stock/SAFARICOM-PLC-6500172/company/>.

under untenable debt'.²³

Until recently, Ethiopia's mobile phone market was dominated by the largest state telecoms monopoly on the African continent, Ethio Telecom.²⁴ Writing just before the deregulation and privatization process began in 2019, Workneh noted that:

for EPRDF's veterans, Ethiopia's uncompromising stance on state monopoly of telecommunications stems from the belief that the sector is too crucial for the country's economic development programme to be run by a privatized, profit-driven model. This line of thinking, state officials for long contended, is a natural upshot of the developmental state model.²⁵

Since then, Prime Minister Abiy Ahmed's drive for increased foreign investment has led to Ethiopia's telecoms market being (partially) opened up to foreign companies. In October 2024, the government sold a 10 per cent stake in Ethio Telecom, thereby initiating the privatization process. Meanwhile, Safaricom Telecommunications Ethiopia (a subsidiary of Kenya-based Safaricom), which entered the Ethiopian market in 2021, is the only new mobile network operator to have been granted a licence to compete with Ethio Telecom. The company has faced a difficult operating environment, with some commentators questioning the Ethiopian government's commitment to a fully open market. It was not until 2023 that Safaricom launched its domestic Ethiopian Mpesa mobile money system, followed in October 2024 by Mpesa Global, which allows wallet transactions between Ethiopia and Kenya.

Although mobile money development and uptake in Ethiopia has long lagged behind Kenya and Somalia, the establishment of Ethio Telecom's Telebirr service in 2021 has begun to change this. Mobile money access and uptake varies across Ethiopia, partly due to network restrictions during the civil war in the north and continued instability affecting the ethnic federal system. Nevertheless, certain areas—especially SRS—have emerged as centres of digital financial innovation.²⁶

DIGITAL REGULATION AND INTEGRATION

The three countries are engaged in various policy frameworks and developmental initiatives—both domestic and international—focused on digital technology promotion, integration and

23 Kevin P. Donovan and Emma Park, 'Knowledge/seizure: Debt and data in Kenya's zero balance economy', *Antipode* 54/4 (2022): 1063.

24 In 'Transborder Mobile Money', Ahmed Musa highlights the proliferation of mobile money and other fintech platforms in the east of Ethiopia, drawing on cross-border (ethno-linguistic and business) links with Somalia and Somaliland, where the mobile money ecosystem has a longer history.

25 Têwodros W. Workneh, 'State monopoly of telecommunications in Ethiopia: origins, debates, and the way forward', *Review of African Political Economy* 45/158 (2018): 595.

26 Ahmed Musa, 'Transborder Mobile Money'.

regulation. None of the HoA states, however, have ratified the African Union’s 2014 Malabo Convention, which seeks to establish a comprehensive legal framework for electronic commerce, data protection, and cybercrime and cybersecurity on the continent.²⁷ This speaks to wider challenges concerning the harmonization of domestic digital regulation and agreeing a unified stance on African digital sovereignty. Concerns persist that this sovereignty is being compromised by the relative power of external technology companies, particularly in terms of data extractivism. Some scholars have referred to such processes as ‘digital/data colonialism’.²⁸ At a regional level, the World Bank and the East African Community (EAC) are engaged in the East Africa Regional Digital Integration Project. The project aims to support the ‘development of a dynamic, seamless “single digital market”, including cross-border services and ecommerce in-line with the African Union’s Digital Transformation Strategy 2020–2023’.²⁹ Although Ethiopia—in contrast to Kenya and (since 2024) Somalia—is not an EAC member, it is included in some of the project’s activities, many of which are focused on improving infrastructure and increasing cross-border broadband connectivity and dataflows. Benchmarks have been set for these activities, which cover the 2023–2028 period, but no results have yet been published.³⁰

At the same time, European donors are supporting projects aimed at developing domestic digital governance and e-government services for citizens, such as the Initiative for Digital Government and Cybersecurity (IDGC) in the Horn of Africa.³¹ The IDGC is facilitating the regional implementation (in Djibouti, Kenya and Somalia) of GovStack public service infrastructure digitization initiatives.³² Intersecting with national digitization targets (e.g. the Kenya Digital Masterplan covering 2022–2032), the GovStack projects aim to identify and experiment with various areas of digital service provision, while taking into account existing capacity levels. The HoA’s shared GovStack approach involves evaluation of the strategic, technical and regulatory prerequisites for introducing government e-services; service design of e-government use cases (in Somalia, this translates to the ongoing digitization of high school records); and related capacity building.³³

In Somalia, legal and regulatory frameworks for digital governance have developed rapidly

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- 27 Djibouti has signed but not yet ratified the convention. Data Protection Africa, ‘Africa: AU’s Malabo Convention set to enter force after nine years’, 19 May 2023. Accessed 28 February 2025, <https://dataprotection.africa/malabo-convention-set-to-enter-force/>.
 - 28 Michael Kwet, ‘Digital colonialism: US empire and the new imperialism in the Global South’, *Race & Class* 60/4 (2019): 3–26; Nick Couldry and Ulises A. Mejias, *The Costs of Connection*, Stanford University Press, 2019.
 - 29 East Africa Community, ‘Eastern Africa Regional Digital Integration Project’. Accessed 28 February 2025, <https://www.eac.int/infrastructure/eardip>.
 - 30 World Bank, ‘Eastern Africa Regional Digital Integration Project’. Accessed 28 February 2025, <https://projects.worldbank.org/en/projects-operations/project-detail/P176181>.
 - 31 The IDGC is a Team Europe Approach involving Germany, France and Spain, co-financed by the European Union and the Federal Ministry for Economic Cooperation and Development (BMZ).
 - 32 See the ‘Global Showcase’ area of the Govstack website: <https://www.govstack.global/global-showcase/>.
 - 33 Govstack, ‘Digital Leaders Spotlight: Somalia’, 29 September 2024. Accessed 28 February 2025, <https://www.govstack.global/showcase/digital-leaders-spotlight-rwanda/>.

over recent years. Having passed a set Mobile Money Regulations in 2019, the Central Bank of Somalia launched a national payment system in 2021. More recently, Somalia's Data Protection Authority (DPA)—established in 2024—has been tasked with protecting personal privacy and ensuring organizations are compliant with the Data Protection Act (passed in March 2023). These policy initiatives arose in part from the Federal Government of Somalia (FGS)'s first cross-cutting National ICT Policy and Strategy, which covered the 2019–2024 period.³⁴ Although a recent review of the strategy's results conducted by Somalia Non-State Actors (SONSA)—with support from Oxfam—acknowledges a number of accomplishments related to regulatory frameworks, it also highlights significant gaps in terms of digital literacy, data protection and rural connectivity, limiting the potential for wider developmental effects.³⁵

Somaliland, having published its own 2020–2024 E-Government Strategy,³⁶ has received support from donors and partners such as Taiwan to—among other things—establish a data exchange platform for government institutions; engage in capacity and institution building; and improve government network management.³⁷ E-governance support has been an important element in Somaliland strengthening ties with Taiwan, which similarly lacks full global diplomatic status.

The view from Addis Ababa is shaped by the 2020–2030 'Digital Ethiopia 2025' masterplan, which focuses on digital innovation as a means of 'unleashing value from agriculture' and enhancing 'global value chains in manufacturing'; 'Building the IT enabled services'; and 'Digital as the driver of tourism competitiveness'.³⁸ State actors—such as Prime Minister Abiy—have framed significant recent changes to the Ethiopian telecoms market and digital financial service sector in relation to this wider vision.³⁹

Overall, the policy and regulatory frameworks being developed in Somalia, Ethiopia and Kenya put considerable emphasis on the opportunities and challenges thrown up by ongoing digital transformations. Often, however, such national visions for digital state-building and economic growth are driven by the political centre, with potentially limited impacts for borderland areas

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- 34 Federal Republic of Somalia, Ministry of Posts, Telecommunications and Technology, 'National ICT Policy and Strategy 2019–2024'. Accessed 28 February 2025, <https://moct.gov.so/en/wp-content/uploads/2019/11/National-ICT-Policy-Strategy-2019-2024.pdf>.
 - 35 SONSA, 'Integrating EU Digital Principles into the Next National ICT Policy', December 2024. Accessed 28 February 2025, <https://sonsaplatform.org/integrating-eu-digital-principles-into-the-next-national-ict-policy/>.
 - 36 Republic of Somaliland, Ministry of Information and Communication Technology, 'Somaliland E-government strategy 2020–2024', October 2019. Accessed 28 February 2025, <https://www.govsomaliland.org/uploads/fl/es/2020/09/2020-09-21-07-26-58-284-1600673218.pdf>.
 - 37 Taiwan International Development and Cooperation Fund, 'Somaliland E-government Capability Enhancement Project'. Accessed 28 February 2025, <https://www.icdf.org.tw/wSite/ct?xItem=62522&ctNode=31626&mp=2>.
 - 38 Federal Democratic Republic of Ethiopia, 'Digital Ethiopia 2025: A Digital Strategy For Ethiopia Inclusive Prosperity'. Accessed 28 February 2025, https://www.lawethiopia.com/images/Policy_documents/Digital-Ethiopia-2025-Strategy-english.pdf.
 - 39 'Liberalization of telecoms in Ethiopia: The dawn of a new era [Interview with PM Abiy Ahmed]', *Telecom Review Africa*, 8 April 2021. Accessed 21 March 2025, <https://www.telecomreviewafrica.com/articles/exclusive-interviews/2240-liberalization-of-telecoms-in-ethiopia/>.

affected by instability and political fragmentation. Here, a key theme touched on by interviewees across the three countries concerns the perceived disconnect between the development of regulatory frameworks and their effective enforcement nationwide. It is to the on-the-ground realities of digital governance in contexts of conflict that this report now turns.

DIGITAL GOVERNANCE AND CROSS-BORDER INSECURITY IN SOMALIA

Digital technologies such as social media and mobile money have become important areas of contestation in relation to conflict and insecurity across the Horn of Africa. Nowhere is this more apparent than in Somalia and the de facto independent state of Somaliland, especially the borderlands between the two. Against the above backdrop, this section explores the impacts of mobile money, social media and digital diasporas both within Somalia and across its borders.

MOBILE MONEY

In 2016, the FGS implemented an Anti-Money-Laundering and Countering the Financing of Terrorism Act, requiring financial institutions to report transactions exceeding USD 10,000. Although compliance was initially limited, likely due to threats of al-Shabaab retaliation, the government and the telecoms industry have since 2020 made a concerted attempt to restrict the use of mobile money and banking services by armed groups.⁴⁰ This has taken place amid wider government efforts to regulate the telecoms sector, which had previously operated largely without oversight.

The Central Bank of Somalia began licensing mobile money operators in early 2020, setting out various criteria that companies need to comply with. However, the sheer scale of mobile money transactions makes Central Bank monitoring and enforcement of the regulations highly challenging. For instance, managing ‘know-your-customer’ (KYC) standards for the mobile money industry is difficult, opening up numerous opportunities for circumvention. Mobile money services are available to anyone with a SIM card, which have long been obtainable through giving a name and date of birth.⁴¹ This lack of oversight capacity is compounded by the absence of a national ID system, although the groundwork for such a system is currently being

40 Wendy Williams, ‘Reclaiming Al Shabaab’s Revenue’, Africa Center for Strategic Studies, 27 March 2023. Accessed 25 February 2025, <https://africacenter.org/spotlight/reclaiming-al-shabaabs-revenue/>.

41 UN Security Council, ‘Letter dated 10 October 2022 from the Chair of the Security Council Committee pursuant to resolution 751 (1992) concerning Somalia addressed to the President of the Security Council’, S/2022/754, 10 October 2022, 21. <https://documents.un.org/doc/undoc/gen/n22/638/44/pdf/n2263844.pdf>.

undertaken by the FGS.⁴²

On the industry side, mobile money operators have taken steps to impose transfer limits based on a user's level of verification, with those registered using name-and-date-of-birth SIM cards restricted to smaller amounts.⁴³ Such differentiation between low-risk and high-risk customers has consequences for cross-border digital transactions, as more stringent ID requirements are needed to link mobile money accounts with bank accounts or digital wallets capable of transferring funds to or from Ethiopia and Kenya. When it comes to al-Shabaab, however, such measures appear to have had only a relatively limited impact on the groups' operations (see Box 2).

BOX 2. AL-SHABAAB AND MOBILE MONEY

In 2018, some sources estimated al-Shabaab's annual tax revenue at around USD 27 million.⁴⁴ Five years later, in 2023, the armed group's total income was estimated to be around USD 150 million.⁴⁵ Although accurate quantification is challenging, these figures indicate that al-Shabaab's financial capacity has continued to increase.⁴⁶ Historically, the group has used Somalia's mobile phone and mobile money network to undertake tax collection. Threatening text messages or phone calls instruct businesses to pay, with funds then often transferred by mobile money.⁴⁷ Here, remote payments allow al-Shabaab to extract money from business in areas it does not formally control, including major cities.

Despite FGS and industry efforts, al-Shabaab is still able to conduct limited-amount transactions on mobile money networks from potentially anonymous/untraceable accounts, as well as put pressure on verified users to use their accounts on the group's behalf. In 2024, a high-profile trial in Mogadishu cast light on how al-Shabaab has been able to move money through the formal banking system. A land broker and financier stood accused of opening multiple bank accounts using his and his family's credentials, which over a period of seven months were allegedly used to launder USD 12.6 million of al-Shabaab's extortion money into the formal economy. It was speculated that the tiny payment made to the financier for each account opened was indicative of al-Shabaab's

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- 42 UN Security Council, 'Letter dated 15 October 2024 from the Chair of the Security Council Committee pursuant to resolution 2713 (2023) concerning Al-Shabaab addressed to the President of the Security Council', S/2024/748, 28 October 2024, 3. Accessed 25 March 2025, <https://digitallibrary.un.org/record/4066421?v=pdf>.
- 43 Interview, telecoms company staff member, Hargeisa, 2 December 2024.
- 44 Hiraal Institute, 'The AS Finance System', July 2018, 7. Accessed 12 February 2025, <https://hiraalinstitute.org/wp-content/uploads/2018/07/AS-Finance-System.pdf>.
- 45 UN Security Council, 'Letter dated 15 October 2024', 3.
- 46 Hiraal Institute, 'A Losing Game: Countering Al-Shabab's Financial System', October 2020. Accessed 18 November 2024, <https://hiraalinstitute.org/a-losing-game-countering-al-shababs-financial-system/>.
- 47 Hiraal Institute, 'A Losing Game', 4.

power to threaten people into compliance.⁴⁸

The FGS has also made direct attempts to restrict al-Shabaab's access to banking services and mobile money. In late 2022 and early 2023, government authorities froze 320 bank and mobile accounts believed to be linked with group, together containing around USD 320,000.⁴⁹ Given the far greater sums being laundered—as illustrated by the court case—this could be seen to reinforce the view that this is merely a 'drop in the ocean' of al-Shabaab's wider financial capacity.⁵⁰

The increasing predominance of mobile money in Somalia arguably disincentivizes the state from printing physical currency. Moreover, mobile money offers an attractive means for increasing domestic revenue generation through taxation—a perennial problem for Somali administrations long reliant on external budgetary support and port revenues.⁵¹

In August 2024, the FGS introduced a new 5 per cent sales tax. The relevant amount is automatically added to all mobile money payments for goods and services, then transferred to a Central Bank account.⁵² Given there is no mechanism for applying this tax on cash purchases, it is effectively a digital levy. Although the tax is currently only being applied in certain central districts of Mogadishu (due to limited state authority in the outskirts), and is not being rolled out elsewhere (due to fragmentation and lack of FGS influence among the Federal Member States), it does point to a potentially important shift towards digital finance as a means of revenue generation. In addition, if hard cash is indeed becoming more important for al-Shabaab due to digital restrictions, the state may be further inclined to promote mobile money over physical currency (see Box 3).

BOX 3. AL-SHABAAB AND CASH

Since around 2022, al-Shabaab has reportedly been shifting its revenue collection and transactions towards physical cash (that is, US dollars circulating in the country, rather than Somali shillings).⁵³ Indeed, a Mogadishu-based civil society organization

48 'Al-Shabab Network Moved \$12.6 Million Through Mogadishu's Banking System', *The Somali Digest*, 4 September 2024. Accessed 15 January 2025, <https://thesomalidigest.com/al-shabab-network-moved-12-6-million-through-mogadishus-banking-system/>.

49 UN Security Council, 'Letter dated 15 October 2024', 17.

50 Kochan, 'Somalia: Battle for Al-Shabaab's \$150m'.

51 Farhia Mohamud, 'Review of the Federal Government of Somalia's First Billion-dollar Budget for 2024', Somali Public Agenda, April 2024. Accessed 20 December 2024, <https://somalipublicagenda.org/review-of-the-federal-government-of-somalias-first-billion-dollar-budget-for-2024/>.

52 Farhia Mohamud and Ibrahim Jibril, 'Examining Somalia's New Sales Tax', Somali Public Agenda, November 2024. Accessed 1 February 2025, <https://somalipublicagenda.org/examining-somalias-new-sales-tax/>.

53 UN Security Council, 'Letter dated 10 October 2022', 16.

representative noted there had been increased security searches at the airport looking for cash, an indication of heightened government concern about al-Shabaab's shift to physical currency.⁵⁴

To some degree, this move on al-Shabaab's part can be ascribed to the increased scrutiny on mobile money, including the possibility that data on its operatives might be accessed for counter-terrorism purposes. Al-Shabaab has also reportedly banned the use of mobile money in at least some of the areas it directly controls, apparently in retaliation against Salaam Bank's refusal to comply with the group's order to stop providing the Somali National Army with digital payroll services.⁵⁵ At the same time, should the government decide to print new Somali shillings (a longstanding but unfulfilled promise), al-Shabaab would almost certainly try to restrict their use and circulation in areas it controls, signalling the group's rejection of the FGS's legitimacy.

Together, these factors may further contribute to an environment in which the most marginalized lack access to physical Somali shillings, putting them in the position of being reliant on a mobile money network vulnerable to conflict-linked disruptions.

CROSS-BORDER DIGITAL FINANCE

Recent RVI/XCEPT research indicates that the different mobile network ecosystems found in Ethiopia and Kenya limit certain types of international cross-border transfers.⁵⁶ Nevertheless, with digital finance platforms continuing to proliferate—particularly in eastern Ethiopia—greater opportunities for cross-border interoperability and exchange are emerging, including circumventing controls on access to foreign currency. Here, a distinction needs to be made between mobile money (which requires a basic network connection and uses Unstructured Supplementary Service Data—USSD—codes) and mobile wallets (which use apps and require internet connections). People using the former can leverage shared network access across a border to make transfers in the same way they would domestically, while the latter often require formal bank accounts, access to which is regulated by identification requirements.

Although industry figures interviewed in the above-mentioned RVI/XCEPT research emphasize that their companies comply with regulations concerning the monitoring of international transactions, and that no specific incidences of cross-border financing for armed groups have been uncovered, their knowledge of and willingness to discuss such security issues may be limited. In addition, the research shows that when it comes to moving money across borders, Somali business and kinship networks (hugely important for trade in the wider region) have

54 Interview, civil society organization representative, Mogadishu, 12 November 2024.

55 'Al-Shabaab imposes ban on Hormuud mobile money service in areas controlled by the group', *The Somali Digest*, 9 August 2023. Accessed 25 March 2025, <https://thesomalidigest.com/hormuud-mobile-money/>.

56 Ahmed Musa, 'Transborder Mobile Money'.

access to a variety of digital platforms and exchange mediums. It is entirely conceivable that armed groups utilize similar methods, especially if they can deceive or threaten intermediaries and facilitators.

Domestically, enduring—and arguably widening—political divisions within Somalia are a major factor limiting the effectiveness of digital governance over financial transactions. Despite political relations between Somalia and Somaliland coming under increasing strain in recent years (following the failure of talks and the controversy generated by the latter government’s memorandum of understanding with Ethiopia), the economies of Hargeisa and Mogadishu remain closely intertwined, with funds flowing seamlessly within the *hawala* (international remittance), mobile money and banking networks. This is partly down to the integration of the HTG telecommunications conglomerate, which integrates banking and mobile networks across its constituent companies (i.e. Hormuud in Somalia and Telesom in Somaliland).

Despite these economic connections, Somaliland operates under entirely different monetary and currency policies from the FGS; has its own ID identification system and anti-money-laundering act protocols (which are not publicly available); and deploys a separate financial intelligence unit under the auspices its own Central Bank (which also licences financial operators).⁵⁷ Cross-border coordination between Somalia and Somaliland on digital/financial governance is currently non-existent, potentially offering al-Shabaab and other armed groups significant leeway to move and launder money between these jurisdictions.

Effectively, the digital governance of domestic financial flows for counter-terrorism purposes is largely contingent on wider Somalia–Somaliland political relations, not to mention institutional coordination within the Federal Member State (FMS) system. The latter, however, is characterized by an increasingly conflictual relationship between the FGS and the FMS administrations in Puntland and Jubbaland. Moreover, there is little evidence to suggest the other FMSs are undertaking coordinated oversight over digital financial transactions.

Cryptocurrencies offer another possible means of undertaking international cross-border financial transfers. Cryptocurrencies are based on blockchain technology: digital ledgers of transactions (or other data) that are maintained by distributed computing networks, as opposed to a central intermediary such as a national bank. The basic premise of a blockchain is that nodes in this distributed network are incentivized to participate in verifying transactions—that is, expending their computing power competing with other nodes to solve a purposefully challenging equation that verifies a transaction. In return, they receive units of the cryptocurrency in question, a process known as ‘mining’.

The hundreds of cryptocurrencies currently being used and traded on global marketplaces operate in different ways—for example, they may be pegged to a fiat currency (a ‘stablecoin’). In this respect, it is the potential for anonymous transactions offered by some cryptocurrencies

57 UN Security Council, ‘Letter dated 15 October 2024’, 19.

that attracts internationally sanctioned terrorist groups such as Islamic State (IS), which uses cryptocurrencies to move resources through global networks. IS Somalia has emerged as an important financial hub for the wider IS organization: in 2024, the UN's Analytical Support and Sanctions Monitoring Team described IS Somalia as 'the top revenue source for the organization overall',⁵⁸ raising funds through extortion and taxation practices similar to those of al-Shabaab.⁵⁹

IS Somalia is also known as the 'al-Karrar office', operating as a financial conduit for the transfer of money to other African IS affiliates and Afghanistan. In January 2023, US special forces launched a high-profile raid on an IS cave complex in Puntland, killing Bilal Al Sudani, a key operative overseeing these financial operations.⁶⁰ Around that time, UN member states were reporting to UN investigators that the al-Karrar office had been financially supporting ISIL-K (in Afghanistan) by sending USD 25,000 worth of cryptocurrency every month.⁶¹ While the specific cryptocurrency used in these transactions was not specified, evidence points to the wider IS usage of a variety of 'privacy coins', including Monero, which has come under increasing regulatory scrutiny worldwide.⁶²

Although Al Sudani was undoubtedly a highly influential operative, his killing did not precipitate the demise of IS Somalia's presence in Puntland. On the contrary, there have been reports of increases in both the recruitment of fighters and the amount revenue generated in Puntland since his death.⁶³ Given the late 2024–early 2025 escalation in Puntland and international military pressure on IS Somalia, the continued status of the group within IS's global financial network is uncertain. If the group can maintain its presence in Puntland, cryptocurrencies (alongside physical cash couriering) may continue to be used.

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- 58 UN Security Council, 'Letter dated 19 July 2024 from the Chair of the Security Council Committee pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities addressed to the President of the Security Council', S/2024/556, 22 July 2024, 20. Accessed 25 March 2025, <https://digitallibrary.un.org/record/4055363?v=pdf#files>.
- 59 IS Somalia was officially formed in 2015, at the high-point of the group's global notoriety and spread of influence in Syria and Iraq. The Somalia affiliate was established by defectors from al-Shabaab and continues to be led by (erstwhile British citizen) Abdul Qadir Mumin.
- 60 Tricia Bacon and Austin Doctor, 'The Death of Bilal al-Sudani and Its Impact on Islamic State Operations', *Nexus*, March 2023. Accessed 28 February 2025, https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-03/bacon-doctor_death-of-bilal-al-sudani_march-2023.pdf.
- 61 UN Security Council, 'Letter dated 13 February 2023 from the Chair of the Security Council Committee pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities addressed to the President of the Security Council', S/2023/95, 13 February 2023, 8. Accessed 25 March 2025, <https://digitallibrary.un.org/record/4002636?ln=en&v=pdf>.
- 62 Animesh Roul, 'The Rise of Monero: ISKP's Preferred Cryptocurrency for Terror Financing', *Global Network on Extremism and Technology*, 4 October 2024. Accessed 25 February 2025, <https://gnet-research.org/2024/10/04/the-rise-of-monero-iskps-preferred-cryptocurrency-for-terror-financing/>.
- 63 UN Security Council, 'Letter dated 19 July 2024', 10.

When it comes to the cryptocurrency options available to Islamist armed groups such as IS Somalia, the development of digital tools and platforms highlighting the extent to which different coins/tokens are Shariah compliant is notable. In this context, tools such as CryptoHalal and Umma Crypto have allegedly been promoted on Jihadi-affiliated social media/messaging platforms (e.g. Telegram) ‘to permit channel moderators to control supporters’ acquisition of specific liquid currencies and receive information on funds in their possession’.⁶⁴

Overall, the wider, popular use of cryptocurrencies in Somalia is limited (in part due to the ubiquity and utility of the mobile money system and *hawala* remittance networks) and there is no current evidence that al-Shabaab is using this technology in a similar way to IS Somalia. However, there is little to suggest that local security actors have developed an effective strategy for dealing with regional security threats arising from such cross-border transactions.

SOCIAL MEDIA AND PLATFORM GOVERNANCE

The previous example of cryptocurrency fundraising via Telegram is indicative of the connections between the financing of conflict and social media. Beyond this, the evolving global social media platform landscape has important implications for (cross-border) communication and conflict dynamics in Somalia and the wider HoA. While Facebook is still preeminent in the HoA’s digital ecosystem, platforms such as TikTok and Telegram have rapidly gained traction in recent years.

Facebook remains the most widely used platform in Somalia for interpersonal communication, entertainment, contact with businesses, access to news media, and political communications. TikTok’s powerful content curation algorithm amplifies viral content and learns from user preferences, keeping users scrolling through an endless stream of video content. Telegram is a private messenger app similar in functionality to WhatsApp, but with no limits on the size of group chats and—reputedly—a more relaxed content moderation policy. As such, the platform has been subject to criticism for hosting criminal and militant or terrorist content.⁶⁵ Each of these three platforms—as well as others present in the HoA digital ecosystem—present their own challenges in relation to the region’s governance and security issues. In particular, al-Shabaab’s online presence presents a key security challenge to the Somali government (see Box 4).

BOX 4. AL-SHABAAB, SOCIAL MEDIA AND ONLINE PROPAGANDA

Al-Shabaab has always maintained a sophisticated online and social media presence, drawing on in-house media production (Al Kata’ib, producing Arabic, English and Somali content, often concerning the group’s military campaign) and affiliated broadcasters

64 UN Security Council, ‘Letter dated 19 July 2024’, 19.

65 Paul Mozur, Adam Satariano, Aaron Krolik and Steven Lee Myers, ‘How Telegram Became a Playground for Criminals, Extremists and Terrorists’, *New York Times*, 10 September 2024. Accessed 12 November 2024, <https://www.nytimes.com/2024/09/07/technology/telegram-crime-terrorism.html>.

(such as Radio Al Furqaan, publishing mainly Somali content focused on domestic issues and positive portrayals of Islamist governance).⁶⁶ The group and its affiliated journalists operate a number of news websites that cross-promote this content, as well as social media accounts on all the major platforms. For al-Shabaab, Telegram has emerged as a particularly important channel on which to share propaganda, especially graphic conflict footage that is less likely to be removed from this platform as opposed to Facebook.

During the past decade, FGS authorities have made attempts to restrict access to pro-al-Shabaab websites, although local internet service providers have sometimes been reluctant to block access due to fear of reprisals and a lack of state protection.⁶⁷ Nevertheless, there are indications the FGS is becoming more proactive in countering online content perceived to promote al-Shabaab propaganda or recruitment, with a July 2024 UN report stating the government had managed to block 25 al-Shabaab websites, 1,000 Facebook profiles and 500 TikTok accounts.⁶⁸

Towards the end of 2024, NISA itself stated that over the preceding six months up to 12,010 accounts linked to al-Shabaab across multiple social media platforms had been closed.⁶⁹ No further details of how this was achieved were given, although the suspension of social media accounts would require collaboration with externally-based platforms.

According to publicly available transparency data going back to 2017 provided by Meta (which operates Facebook, Instagram and WhatsApp),⁷⁰ the FGS only made an extremely limited number of direct content restriction requests and user data requests to the platform. It is unclear, however, whether the closing of user accounts (e.g. for violating platform policies by promoting terrorism) would be captured in this data, or whether the Somali government has a different mechanism for engaging with Meta to remove specific users (5,648 al-Shabaab-linked accounts reported by NISA for July–December 2024).⁷¹ This was a question the author of this report had intended to ask a senior Meta representative in Nairobi, but the request for an

66 Peter Chonka, 'Spies, stonework, and the suuq: Somali nationalism and the narrative politics of pro-Harakat al-Shabaab Al Mujaahidiin online propaganda', *Journal of Eastern African Studies* 10/2 (2016): 247–265.

67 Peter Chonka, 'New media, performative violence, and state reconstruction in Mogadishu', *African Affairs* 117/468 (2018): 392–414.

68 UN Security Council, 'Letter dated 19 July 2024', 10.

69 National Intelligence and Security Agency, Somalia, '@HSNQ_NISA oo xirtay in ka badan 12 kun oo Akoon' [NISA closed more than 12 thousand accounts], X post, 15 December 2024. Accessed 1 February 2024, https://x.com/HSNQ_NISA/status/1868346824547041460.

70 Meta, 'Transparency reports'. Accessed 1 December 2024, <https://transparency.meta.com/reports/>.

71 National Intelligence and Security Agency, Somalia, '@HSNQ_NISA oo xirtay'.

interview was eventually declined.

This tentative contact with Meta, which took place in late 2024, coincided with renewed negative publicity about a legal case brought by outsourced content moderators in Nairobi concerning poor working conditions and mass exposure to harmful content.⁷² Shortly thereafter, Meta announced it was doing away with fact checkers and instead increasing its reliance on its community notes feature to flag problematic content. This new policy was, however, put forward in the US context of the incoming Trump administration. As such, it is unclear whether or how this policy shift will affect the outsourced content moderation system currently in operation in the HoA.⁷³

Meta's transparency data listed Somaliland separately from Somalia at one point in 2017. This does not reoccur, suggesting the data on the (small number) of content restriction and user data requests covers both Somalia and Somaliland (or only the former). Based on this, it is unclear whether the Somaliland government has any direct contact with Meta. Ethiopian government requests to Meta in this dataset are very similar in scale to Somalia (in most years the number of requests does not reach double digits), whereas the Kenyan government has made significantly more requests. This may be linked to the presence of Meta and its content moderation operations in Nairobi.

TikTok's publicly available transparency data quantifies the amount of content that it has removed from the platform for the top 10 (2019–2022), top 30 (first half of 2022) or top 50 (second half of 2022 onwards) countries where this has occurred (in terms of volume).⁷⁴ In the fourth quarter of 2022, Somalia entered the top 50 countries for content removal, with 280,132 cases. In the second quarter of 2024 (the most recent data available), almost 1.4 million pieces of content in Somalia were removed, presumably mostly through automated detection. This 393 per cent increase is indicative of TikTok's growth in Somalia, with the country ranking fourth among African countries for quantity of removed content (after Egypt, Nigeria and Algeria).

TikTok's rising popularity in Somalia is somewhat ironic given the fact it is officially banned. In August 2023, Somalia's minister of communications announced a ban on both TikTok and Telegram, along with betting app 1XBet, instructing Somali telecoms companies to block user access. In doing so, the ministry cited 'immoral' behaviour, the circulation of indecent images, and the use of the platforms by terrorist groups, particularly al-Shabaab (see Box 5).

72 Robert Booth, 'More than 140 Kenya Facebook moderators diagnosed with severe PTSD', *The Guardian*, 18 December 2024. Accessed 13 January 2025, <https://www.theguardian.com/media/2024/dec/18/kenya-facebook-moderators-sue-after-diagnoses-of-severe-ptsd>.

73 David Gilbert, 'Meta Ditches Fact-Checkers Ahead of Trump's Second Term', *Wired*, 7 January 2025. Accessed 7 January 2025, <https://www.wired.com/story/meta-ditches-fact-checkers-in-favor-of-x-style-community-notes/>.

74 TikTok, 'Community Guidelines Enforcement Report', 26 September 2024. Accessed 1 December 2024, <https://www.tiktok.com/transparency/en/community-guidelines-enforcement-2024-9>.

BOX 5. AL-SHABAAB AND TIKTOK

It is difficult to assess the extent to which al-Shabaab uses TikTok for propaganda, as is not a platform its official or affiliated media producers have explicitly promoted. Systematic research is complicated by the wider methodological challenges of studying the platform—content is much less easily searchable than on Facebook or X/Twitter, while live-streamed content is difficult to access after broadcast. Nevertheless, sympathizers of the group have undoubtedly made use of the platform.⁷⁵

A Mogadishu-based security analyst indicated the FGS strategy around TikTok was less concerned with official al-Shabaab content itself, but rather wider citizen and journalist reporting of the state’s ongoing conflict with the group. More specifically, it was implied that the current administration is putting pressure on journalists not to report al-Shabaab activities—for instance, videos/reports quantifying or showing casualties of attacks or targeted assassinations, either in cities or as a result of military operations in the hinterlands.⁷⁶ According to this reading, the FGS is eager to reduce the perception that al-Shabaab remains active and dangerous, while bolstering its own narrative of state-building progress.

Further TikTok transparency data paints an interesting picture of the period around the ban. Between July and September 2023, the FGS made 123 requests to remove accounts or content—by far the highest number of requests to TikTok on the African continent (no other country made more than ten requests during this period).⁷⁷ The FGS had not made any requests prior to this. This suggests the Somali government made a conscious decision at this point to focus on the platform, although it is unclear if TikTok’s response to the requests prompted the ban, or whether other factors were at play.

Regardless, TikTok’s subsequent data re-affirms that Somalia’s TikTok ban exists only on paper, and serious enforcement has not taken place through internet service providers. In the wake of the ban being announced, the FGS has continued to make extremely high numbers of requests to TikTok compared to every other African country with the exception of Ethiopia (which began in early 2024 to make similar numbers of content and account removal requests). Kenya, by contrast, has never been in the top 50 countries for content removal or government requests, meaning no data for the country is publicly available.

Somalia has long been a difficult and dangerous place to be a journalist. In this respect, the previous administration of President Farmaajo was implicated in digital attempts to manipulate

75 Interview, journalist, Mogadishu, 29 November 2024.

76 Interview, security analyst, Mogadishu, 18 November 2024; Interview, civil society organization representative, 29 November 2024.

77 TikTok, ‘Community Guidelines Enforcement Report’.

the social media environment and intimidate journalists.⁷⁸ Whereas Farmaajo’s administration was alleged to have used paid “trolls” (often described in Somali as ‘insects of social media’) for such purposes, interviewees voiced suspicions that supporters of (or figures associated with) Hassan Sheikh Mohamoud’s current administration are using different tactics to suppress dissenting voices. For instance, several cases were noted in which prominent commentators found their accounts reclassified as ‘memorialized’ (i.e. malicious reporting to a social media platform that the account holder is deceased, an act of intimidation that also leads to the individual being locked out of their account).⁷⁹ Civil society and journalist interviewees both noted that a lack of social media company presence on the ground in Somalia has negative implications in this regard, as it makes it easier for political actors to manipulate distant company representatives and harder for the platforms involved to undertake content moderation.⁸⁰

Several Somali interviewees spoke about the sheer volume of problematic content that young people in particular were exposed to, linking excessive social media use (and risks of digital harms) to youth unemployment and boredom. A civil society interviewee in Hargeisa described how young men are frequently attracted to Telegram or TikTok groups by content promising sexually explicit content, for instance the non-consensual sharing of sexual imagery (often referred to in English as revenge porn; sometimes known in Somali as *qarxis*, or the explosion of someone’s reputation, usually a woman). The interviewee noted that such content could be used by political or armed actors to increase online engagement before pivoting to terrorist recruitment or graphic conflict material.⁸¹

External content moderation for Somali language content is challenging given the limited availability of moderators capable of dealing with the volume of content and the linguistic nuance required to identify hate speech in the absence of explicit imagery. Added to this, the algorithmic features of platforms often promote certain types of sensationalist or already-viral content, whether through video or newsfeed curation or through search term predictions. While in Addis Ababa preparing for this research, the author was unexpectedly confronted with exactly the type of content described by the interviewee above. Undertaking a search on Google for ‘new Somali [shilling]’, the search engine autocompleted this query with the phrase ‘*wasmo telegram*’ (‘fuck telegram’, indicating pornographic or non-consensual sexual image-sharing on that platform, see Figure 1).

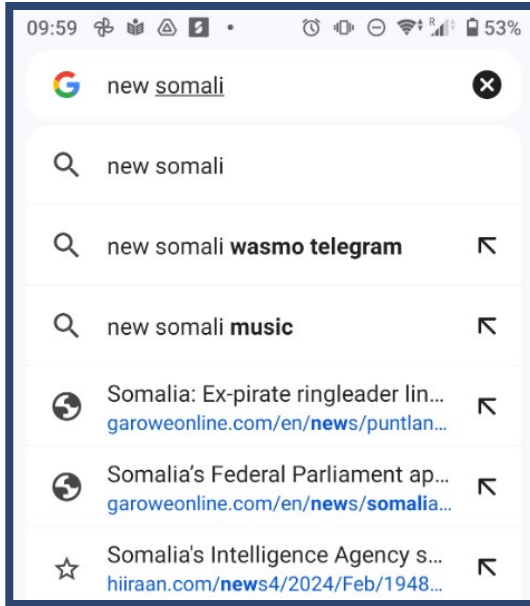
78 ‘Somalia: “We live in perpetual fear”: Violations and Abuses of Freedom of Expression in Somalia’, Amnesty International, 13 February 2020. Accessed 25 March 2025, <https://www.amnesty.org/en/documents/afr52/1442/2020/en/>.

79 Interview, journalist, Mogadishu, 29 November 2024; see also Yasin Isse, ‘Somalia: Facebook “Remembering” activists while still alive’, *SMEX*, 3 March 2024. Accessed 18 October 2024, <https://smex.org/somalia-facebook-remembering-activists-while-still-alive/>.

80 Interview, journalist, Mogadishu, 29 November 2024; Interview, civil society activists, Mogadishu, 12 November 2024.

81 Interview, civil society organization, 29 November 2024.

FIGURE 1. GOOGLE SEARCH SHOWING 'NEW SOMALI WASMO TELEGRAM'



Source: Author's screenshot, 4 December 2024

This Google prediction was not based on the user's past search behaviour. Rather, not only does it reflect the prevalence of such content (since it is based on past search behaviours of global users), but also a lack of Somali language autocomplete filtering by Google—similar results would have been removed from English-language searches. Previous research by the author (and colleagues) highlights similar problems with autocomplete functions for Amharic search terms.⁸² This has wider implications for the growing influence of predictive text technologies (e.g. generative AI) in conflict-affected digital spaces.

ONLINE MIS/DISINFORMATION AND DIGITAL CONFLICT DIASPORAS

The highest-profile armed conflict in the global Somali media space in recent years has arguably been the struggle for the city of Las Anod, located in what Somaliland authorities would describe as the east of their self-declared independent state, close to the border with the FMS of Puntland. Of relevance here is the fact that inhabitants of eastern Somaliland have historically

82 Peter Chonka, Stephanie Diepeveen and Yidnekachew Haile, 'Algorithmic power and African indigenous languages: search engine autocomplete and the global multilingual Internet', *Media, Culture & Society* 45/2 (2023).

held closer clan ties with communities across the disputed border with Puntland.

In late 2022, longstanding grievances in Somaliland's eastern periphery, coupled with the fallout from a series of assassinations in Las Anod, prompted large-scale protests. The violent repression that met these protests led to the situation escalating into an armed uprising against Somaliland authorities in early 2023. In response, the Somaliland military launched an artillery bombardment of Las Anod, resulting in significant civilian casualties.⁸³ Nevertheless, by August of that year the Somaliland military had been forced out of its bases. Currently, the territory is held by an emergent SSC-Khatumo administration that aspires to be integrated into Somalia's (nascent and contested) federal system.

The conflict over Las Anod quickly became a touchstone for broader debates over the legitimacy of Somaliland's independence project. This was characterized by polarization between supporters of the unrecognized state, who emphasized Somaliland's recent history of stability and democratic political development, and pan-Somali nationalists calling for greater regional unity (alongside wider Daarood/Harti clan solidarities). One consequence of this was the proliferation of online clan-related hate speech and mis/disinformation.⁸⁴ Digital platforms were also used to mobilize militias, particularly on the SSC side, with the Somaliland government alleging that fighters were being recruited from across the border in Ethiopia's SRS (accusations the SRS administration denies).⁸⁵

Both sides used social media to advance a (rather tenuous) narrative that al-Shabaab were involved in the conflict, primarily in an attempt to draw international attention and support for their opposing positions. This was more important for the Somaliland government, which, along with its supporters on social media, tried to portray the uprising in Las Anod as an effective takeover by al-Shabaab, claiming the group had a clandestine role within the SSC-Khatumo and allied clan militias. In doing so, they aimed to delegitimize their opponents in the eyes of international policymakers, arguing the territory's independence would create a northern safe haven for the terrorist group.⁸⁶

Scholars of diaspora media studies have long highlighted the transnational role of social

83 'Somaliland: Urgent investigation needed as fighting takes heavy toll on civilians in Las Anod', Amnesty International, 20 April 2023. Accessed 1 December 2024, <https://www.amnesty.org/en/latest/news/2023/04/somaliland-conflict/>.

84 Misinformation is understood as the unintentional spreading of false information; disinformation as the purposeful creation or sharing of 'fake news'.

85 Mustafe M. Abdi, 'The Crisis in Lasanod: Implications for Trade and Livelihoods in Ethiopia's Somali Region', Nairobi: Rift Valley Institute, 2023. Accessed 11 December 2024, <https://riftvalley.net/publication/the-crisis-in-lasanod-implications-for-trade-and-livelihoods-in-ethiopia-s-somali-region/>.

86 For their part, some SSC-Khatumo activists drew on long-standing conspiracy theories about connections between Somaliland and al-Shabaab, based on the background of some of the latter's key leaders. See Peter Chonka, 'Algorithmic power in a contested digital public: cryptopolitics and identity in the Somali conflict'. In *Cryptopolitics: Exposure, Concealment and Digital Media*, edited by Victoria Bernal, Katrien Pype and Daivi Rodima-Taylor, 129–155. Berghahn Books, 2022.

media content entering ‘homeland’ conflict zones.⁸⁷ While emerging research points to the complex, multifaceted role played by social media platforms in cross-border and global kinship networks (e.g. supporting families; organizing charitable and ‘vernacular humanitarian’ activities),⁸⁸ content-focused platforms such as TikTok are increasingly being used in armed conflict situations, either by battlefield combatants or by local or international mobilizers and propagandists.

This aspect of social media was influential in the Las Anod conflict. In November 2023, a YouTube video was uploaded of a demonstration in Puntland celebrating the success of fighters aligned with the newly formed SSC-Khatumo administration, which had recently installed itself in Las Anod. This occurred three months after the Somaliland military was expelled from their base at Goojacade (from where it had been launching attacks on Las Anod). This expulsion effectively meant Somaliland had lost control over a large part of its eastern territory. In the video, participants of street celebrations are seen holding a banner welcoming ‘*Jamahiirta social media*’. Derived from the Arabic for ‘masses’ or ‘congregation’, *jamahiir* was a prominent phrase in the SSC-Khatumo conflict narrative, referring to youth mobilization, whether through armed conflict or online activism.

Highlighting the imagined importance of social media in the conflict, the YouTube video’s title quotes a speaker at the rally embarking on a visit from Puntland into the former battlefield: ‘we are taking Captain Ayuub to Goojacade’. ‘Captain Ayuub’ is a prominent influencer with a large TikTok following (more than 500,000 followers and over 8 million video likes). Allegedly a former pirate leader, this influencer often wears military uniform in his videos. Based in Germany, Ayuub’s videos made frequent reference to the conflict in Las Anod, usually described in relation to regional clan politics. The content was explicitly intended to mobilize sub-clans from Puntland’s dominant clan families, encouraging them to send militiamen in support of the SSC-Khatumo forces with whom they share clan ties—in contrast to Somaliland’s dominant clan family, which is represented in the centre of the territory but not, historically, in the borderland areas being fought over.

While public discussion of specific clan names and conflicts in mainstream Somali language media is taboo, social media platforms such as TikTok are filled with explicit clan discourse. Captain Ayuub’s content, for instance, frequently addressed specific clans, either attacking the opposing side in the conflict with (often using derogatory clan nicknames), or appealing to other clans for political, military and charitable mobilization. On TikTok, his content is interspersed with a bizarre selection of pop song lip-syncing and duet videos featuring conflict footage, or videos of his engagements with various Somali diaspora communities.

87 Idil Osman, *Media, Diaspora and the Somali Conflict*, Springer International Publishing, 2017.

88 Jethro Norman, ‘Platform kinship and the reshaping of political order in the Somali territories’, *International Affairs* 100 (2024); Nauja Kleist et al., ‘Diaspora aid is crucial for emergency relief in the Somali regions’, DIIS Policy Brief, 19 August 2024. Accessed 25 March 2025, <https://www.diis.dk/en/research/diaspora-aid-is-crucial-emergency-relief-in-the-somali-regions>.

On returning to Puntland, Ayuub became embroiled in local politics, lending controversial support to Puntland's president at a time of significant internal political tension in Puntland, which led to an armed confrontation in the regional capital Garowe. Ayuub's TikTok profile went on to describe him as a media adviser to Puntland State House, and there are signs he is attempting to position himself as a more formal politician. Most recently, a TikTok search for Ayuub presented the author with an AI-generated platform description, inviting them to 'discover the impactful journey of Captain Ayub, a key figure in Somali culture and media'.⁸⁹ This illustrates the rapid, ongoing integration of generative AI into platform information-retrieval systems, and it is concerning that such a conflict-influencer is being described and amplified in reference to 'Somali culture'.

Ayuub's case also points to the possible growth (in reach and intensity) of clan-related incitements to violence being produced in the diaspora and then consumed within the region. Here, it is worth noting a TikTok 'live battle' trend known as the 'Big Tribal Game', which has received international media coverage.⁹⁰ These 'battles' involve diaspora influencers—who claim to represent their respective clans—taking part in live adversarial verbal sparring in which they solicit money from viewers. The influencer awarded the highest value of gifts claims victory. The use of this live battle feature on TikTok has been associated with the extortion of Somali fans—often young women who have become addicted to participating and then blackmailed into contributing more through the threatened release of sexualized images (possibly generated through AI).

Reports on the phenomenon suggest that while the Big Tribal Game is a major topic of conversation in Mogadishu and other Somali cities, the influencers who compete are almost all in the diaspora. The implication is that local influencers are more scared for their personal safety in Somalia's febrile and unpredictable security environment. Also relevant is the fact—highlighted by an interviewee—that different platform policies make it easier for influencers outside Somalia to monetize their content (i.e. this feature is restricted for users based in Somalia).⁹¹ While people do find ways to circumvent this restriction (for example, by asking relatives abroad to set up accounts), there remain clear disparities that may be intensifying the influence (and virulence) of diaspora conflict content. In this respect, it is well documented that sensationalist content has a greater capacity to go algorithmically 'viral' on platforms like TikTok.

The ongoing shift in the political economy of media production necessitates further research

89 Captain Ayuub's TikTok videos can, as of 18 March 2025, be found here: <https://www.tiktok.com/discover/captain-ayub?lang=en>.

90 'The cost of an addiction to Somali TikTok battles' [podcast], *BBC Trending*, 30 October 2024. Accessed 1 November 2024, <https://www.bbc.co.uk/programmes/p0koyk2y>.

91 Interview, journalist, Mogadishu, 29 November 2024.

on how cross-border clan discourse impacts political identities.⁹² One Mogadishu-based interviewee referred to clan-motivated fights between women in the city linked to similar TikTok confrontations.⁹³

Although a significant amount of TikTok content from Somalia is being removed through both automated and manual content moderation, for the most part this does not apply to the types of examples highlighted above. This is because such content does not necessarily feature explicit battlefield or sexual imagery, nor obvious support for terrorist groups. Rather, it involves vernacular, often coded forms of hate speech that require nuanced knowledge of the cultural and political context to understand. This is beyond the current capacity of automated flagging or filtering systems, while the sheer volume of content precludes effective manual moderation. The latter is difficult and often dangerous work, undertaken by insufficient numbers of staff largely based across the border in Kenya.

92 Nicole Stremlau, Emanuele Fantini and Ridwan M. Osman, 'The political economy of the media in the Somali conflict', *Review of African Political Economy* 43/147 (2016).

93 Interview, security analyst, Mogadishu, 18 November 2024.

DIGITAL GOVERNANCE AND CROSS-BORDER INSECURITY IN ETHIOPIA AND KENYA

Having explored the digital governance, security and finance landscape in Somalia and its borderlands, the report now turns to the corresponding settings found in two of its neighbours: Ethiopia and Kenya. While some of the dynamics at play are directly relevant to the borderlands these states share with Somalia (and Somaliland), others concern the different ways in which digital governance is playing out at the political and economic centre, allowing for a comparative review of such trajectories in the wider HoA.

ETHIOPIA

Digital financial technologies (especially the introduction of mobile money) have proven to be an important development in Ethiopia over recent years. This raises the prospect of Ethiopia, together with Kenya and Somalia, joining a block of neighbouring countries in which mobile money is ubiquitous, interoperable and transferable across borders. Ethiopia's recent digital financial shifts have gone hand-in-hand with the wider telecoms liberalization described above, as well as the introduction of digital innovations from beyond its borders.

Ethiopia's SRS is emblematic of such trends, having emerged as a hub for the spread of digital finance services and providers inspired (and invested in) by cross-border Somali business and kinship networks.⁹⁴ Here, the embedded cross-border linkages of certain borderlands mean they are not peripheral to technological innovation and change, but rather centres of connection, experimentation and development. Tech diffusion from neighbouring countries often reaches borderlands first. Moreover, uptake may be less restricted by the central state, whose bureaucratic surveillance is more limited in these peripheries.⁹⁵

In many other parts of Ethiopia, however, the uptake of tools such as mobile money is thought to be slower. This is the result of longstanding regional digital divides, the war in Tigray, and instability and violence in other federal regions, which the state has frequently responded to with blanket shutdowns of mobile and internet connectivity. Some interviewees spoke of a

94 Ahmed Musa, 'Transborder Mobile Money'.

95 Email correspondence, Ethiopian media sector civil society actor, 8 November 2024.

significant disparity in the digital financial ambitions and developments found in Addis Ababa (and certain borderland zones such as SRS) compared to northern and central regions such as Tigray, Amhara and Oromia.⁹⁶

Notwithstanding partial market liberalization, the Ethiopian government's historical influence over Ethio Telecom is one of the reasons that sustained blanket network shutdowns have become a go-to response to security issues.⁹⁷ The federal government views this measure as a means of restricting the circulation of digital information, misinformation or disinformation that might incite or exacerbate conflict. Several interviewees noted that in Ethiopia social media has spread rapidly among a population with limited digital literacy skills, and therefore high vulnerability to political misinformation and financial scams.⁹⁸ The increased penetration of social media into Ethiopia coincided with the early part of Prime Minister Abiy's tenure, when there appeared to be a greater openness to freedom of political expression.⁹⁹ This new digital public sphere, however, soon exhibited increased ethnic polarization and hate speech, exacerbating (while being reinforced by) conflicts in the north and the wider destabilization of Ethiopia's ethnic federalist political system.¹⁰⁰

Similar to Somalia, transnational political or conflict actors have had a significant impact on Ethiopia's unstable social media environment. Research has revealed coordinated information operations concerning the war in the north between the government and the TPLF, mainly organized outside Ethiopia by partisan diaspora actors on both sides.¹⁰¹ To a large extent, these operations (e.g. the mass use of automated bot accounts on platforms such as Twitter/X) have been orientated towards external audiences in an attempt to influence the global narrative about the Tigray war.

In 2021, Meta reported it had removed 62 Facebook accounts, 49 pages, 26 groups and 32 Instagram accounts (which together had over 1.1 million followers) after an internal

96 Interview, Ethiopian media sector civil society actor, 18 February 2025.

97 Interview, digital security analyst, media and information literacy consultancy, Addis Ababa, 25 December 2024.

98 Interview, Ethio Telecom customer service representative, Addis Ababa, 23 December 2024; Interview, open-source fact checker, Addis Ababa, 26 December 2024.

99 Steven Feldstein, *The Rise of Digital Repression: How Technology is Reshaping Power, Politics, and Resistance*, Oxford University Press, 2021.

100 Muluken Asegidew Chekol, Mulatu Alemayehu Moges and Biset Ayalew Nigatu, 'Social media hate speech in the walk of Ethiopian political reform: analysis of hate speech prevalence, severity, and natures', *Information, Communication & Society* 26/1 (2023).

101 Yirgalem A. Haile, 'The theoretical wedding of computational propaganda and information operations: Unraveling digital manipulation in conflict zones', *New Media & Society* (2024); Claire Wilmot, Ellen Tveteraas and Alexi Drew, 'Dueling Information Campaigns: The War Over the Narrative in Tigray', *The Media Manipulation Casebook*, 20 August 2021. Accessed 2 February 2025, <https://mediamanipulation.org/case-studies/dueling-information-campaigns-war-over-narrative-tigray/>.

investigation into ‘coordinated inauthentic behaviour’ in the region.¹⁰² The investigation reported links between the accounts in question (posting pro-government, anti-TPLF material) and individuals associated with the Information Network Security Agency (INSA) in Ethiopia. Overall, it is clear that social media influencing operations are being undertaken by multiple actors within and outside the country. In terms of the repeated use of prolonged network shutdowns, particularly in Tigray, the cross-border nature of anti-government communication campaigns is likely another motivating factor for the federal government. The authorities have also apparently used network shutdowns to disrupt the communications capacity of armed groups (e.g. the TPLF), which are often reliant on mobile phones for operational coordination.¹⁰³ Critics of the government argue that shutdowns also provide an effective digital blackout for their military operations (including mass violence against civilians), restricting the extent to which conflict footage can be circulated and amplified by opposition networks.¹⁰⁴

As touched on above, the government’s ‘shutdown’ approach has substantial implications for the uneven development of digital finance in Ethiopia. Interviewees noted that obstacles to mobile and internet connectivity in conflict- or instability-affected parts of country have hindered the spread and uptake of digital financial services such as mobile money.¹⁰⁵ As a result, a divide has opened up between the rapid moves towards financial digitization seen in the capital (and connected regions such as the SRS), and the equivalent progress seen in large parts of Oromia and Amhara regions.¹⁰⁶

In a move that has important implications for the Somali borderlands, the Ethiopian government has demonstrated an apparent willingness to use network shutdowns as a means of dealing with financial issues (rather than just security and conflict concerns). An interviewee in Jigjiga reported (confirmed by media sources) that communication networks in and around the town of Tog Wajaale—Ethiopia’s main official trade border crossing with Somaliland—were shut down for at least a week in November 2024.¹⁰⁷ This was widely understood as a government response to black market forex trading using mobile money applications.

102 Nathaniel Gleicher, ‘Removing Coordinated Inauthentic Behavior From Ethiopia’, Meta, 16 June 2021. <https://about.fb.com/news/2021/06/removing-coordinated-inauthentic-behavior-from-ethiopia/>.

103 Feldstein, *The Rise of Digital*.

104 T. G. Gebreslassie et al., ‘Life in darkness: The communication blockade during the Tigray Siege’, in *Tigray: War in a Digital Black Hole, Book 3*, edited by Mirjam Van Reisen, Araya Abraha Medhanyie and Munyaradzi Mawere, 103–144, Bamenda, Cameroon: Langaa RPCIG, 2024.

105 Interview, Ethiopian media sector civil society actor, 8 November 2024.

106 Gelmo Dawit, ‘Residents in Ethiopia’s Oromia region report network disruptions as government forces fight rebels’, VOA, 31 October 2024. Accessed 1 November 2024, <https://www.voanews.com/a/residents-in-ethiopia-s-oromia-region-report-network-disruptions-as-government-forces-fight-rebels/7846799.html>; ‘News: Internet services resume across Amhara region after near year-long shutdown’, *Addis Standard*, 15 July 2024. Accessed 25 October 2024, <https://addisstandard.com/internet-services-resume-across-amhara-region-after-near-year-long-shutdown/>.

107 ‘Saameyn ka dhalatay isgaarsiinta Wajaale dhinaca Itoobiya oo go’an’ [Impacts of communications shutdown on Ethiopia side of Wajaale], *BBC Somali*, 3 November 2024. Accessed 3 November 2024, <https://www.bbc.com/somali/articles/c170529zqyro>.

A July 2024 RVI/XCEPT report highlighted the perceived (although unquantifiable) use of mobile money services on both sides of the Ethiopian–Somaliland border for the purposes of circumventing stringent Ethiopian limits on access to foreign currency.¹⁰⁸ Shortly after the report was published, the federal administration announced a major policy shift, reversing its longstanding policy of fixing exchange rates. Allowing rates to be set by an open domestic forex market was a macroeconomic condition set by the IMF and World Bank for the Ethiopian government to secure a USD 10.7 billion loan.¹⁰⁹ Although the value of the birr against the dollar subsequently fell, the black market for currency exchange continues to operate.

It remains unclear whether temporary mobile network shutdowns in important border areas such as Tog Wajaale enabled effective government action against unlicensed currency traders. What is clear, however, is that such network shutdowns have extremely broad impacts on the wider population, with communities unable to access calls or mobile internet. The fact that the government appears willing to expand its use of network shutdowns to enforce financial policy is therefore a worrying development, especially for marginalized communities in a context where mobile money is being promoted as the future of transactions and e-governance engagement with the state.

An INSA analyst interviewed for this report interpreted many of the questions posed about how digital media and finance intersect with Ethiopia’s security dynamics in terms of everyday cybersecurity; the increase in scams that have accompanied mobile money developments; and the vulnerability of recently connected populations with limited digital literacy skills.¹¹⁰ Some of this financial fraud, the interviewee noted, is instigated across borders and emanates from neighbouring Kenya and Somalia. The interviewee did not know (or perhaps wish to divulge information) about the use of digital financial technologies for fundraising or operational purposes by armed groups. While their apparent lack of knowledge may be due to the sensitivity of these issues, it could also be relate to the uneven, often constrained, expansion of mobile money technologies within Ethiopia, and their frequent inaccessibility due to network shutdowns. In other words, it is not currently seen as a major problem.

There is no evidence, for instance, that al-Shabaab has yet been able to use mobile money for such purposes within Ethiopia (in contrast to its activity in Somalia). This is partly a consequence of Ethiopian security forces’ historical capacity to generally limit al-Shabaab’s operations and attacks within its borders.¹¹¹ The INSA interviewee indicated that digital finance

108 Ahmed Musa, ‘Transborder Mobile Money’.

109 Kalkidan Yibeltal, ‘Ethiopian currency falls sharply after big policy change’, *BBC News*, 29 July 2024. Accessed 25 October 2024, <https://www.bbc.co.uk/news/articles/cxr2k24z9xo>.

110 Interview with INSA analyst, Addis Ababa, 24 December 2024.

111 Al-Shabaab’s July 2022 cross-border incursion into Ethiopia was a notable but rare occurrence. See Caleb Weiss and Ryan O’Farrell, ‘Analysis: Shabaab’s multi-day incursion into Ethiopia’, *Long War Journal*, 25 July 2022, Accessed 18 November 2024, <https://www.longwarjournal.org/archives/2022/07/analysis-shabaabs-multi-day-incursion-into-ethiopia.php>.

falls partly under the purview of the Ethiopia Communications Authority (ECA), with liaison between the state and telecoms companies to restrict conflict-related finance occurring through this channel. Unfortunately, an interview with an ECA representative was not possible.

KENYA

Kenya's governance of cross-border security concerns is shaped by the country's self-positioning as a regional and continental hub for technology innovation. This 'silicon savannah' brand image has been bolstered by the Kenyan origins of mobile money, with MPesa providing a model for digital financial innovation elsewhere on the continent (including through Safaricom's recent expansion into the partially liberalized Ethiopian telecoms market). The Kenyan government has sought to leverage the country's relatively high levels of digital connectivity and digital infrastructure, together with Nairobi's status as a regional diplomatic and humanitarian hub, to promote the capital city as an important centre for start-up tech innovation, particularly when it comes to the aid sector and donor financing. Nairobi is also a regional and continental hub for global tech players, such as Meta, which has a corporate presence—and outsourced content moderation operations—in the country.

The regional, cross-border spread of digital financial technologies is also linked to Kenya's historical relationship with Somalia, including the economic role played by post-1991 Somali investment in Nairobi and other Kenyan cities. Academic research over the past decade has made much of the economic dynamism of Eastleigh—a predominantly Somali-inhabited Nairobi suburb—and its role in regional trade connecting the Gulf to East Africa.¹¹² This trend has arguably accelerated in recent years, as evidenced by the growing high-rises and huge, increasingly upmarket malls being developed in this part of Nairobi, alongside significant Somali investment in real estate elsewhere in the city.

While the investment of Somali capital in Kenya can be traced back through longstanding Kenyan–Somali trading communities, such flows increased exponentially in the wake of Somalia's state collapse in the early 1990s. The ensuing decades have seen rapidly expanding human mobility, capital flight from conflict, and cross-border investment.¹¹³ All this has been facilitated by the longstanding remittance sector, the increasing power of a formalized Somali banking industry entering the Kenyan market, and greater digital financial interoperability between Somali and Kenyan platforms.¹¹⁴ For example, digital wallets such as DahabPlus (owned by Dahabshiil Bank) can be used in Somalia to transfer funds directly to Kenya through MPesa. Somali economic activities (and digital capital flows more broadly) also need to be understood in the context of the Kenyan government's wider attempts to position the country as a global hub for international finance. The passing of the 2017 Nairobi International Financial Services

112 Neil Carrier, *Little Mogadishu: Eastleigh, Nairobi's Global Somali Hub*, New York: Oxford University Press, 2017.

113 Farah Abdulsamed, 'Somali Investment in Kenya', London: Chatham House, March 2011.

114 Interview, cross-border forex operator, Nairobi, 24 December 2024.

Act and the 2022 opening of the Nairobi International Financial Centre are just two examples of measures designed to create a tax and transparency regime favourable to foreign direct investment. Critics, on the other hand, point to the blurred distinction between such financial hubs and tax havens.¹¹⁵

In terms of the security and conflict implications of cross-border digital transactions, however, interviewees in Nairobi and Addis Ababa saw Kenya as having a more stringent regulatory regime than Ethiopia (a late arrival to the HoA's mobile money revolution) or Somalia (affected by institutional weakness and a long history of political fragmentation). Here, it was noted that, compared to the weak compliance standards in Somalia, Safaricom in Kenya adheres to stricter KYC requirements when registering users for services such as MPesa.¹¹⁶

On the other hand, a money exchange vendor in Eastleigh suggested various financial intermediaries are enabling cross-border transactions that are very difficult for Kenyan (or Somali) state authorities to trace.¹¹⁷ More specifically, he noted digital wallet systems can operate independently of formal financial institutions, enabling transactions that are invisible to regulatory authorities. He also explained that intermediaries conduct processes within the Somali financial ecosystem, which is tailored to the needs of the diaspora. Such companies maintain a network of accounts across platforms in different countries.

Certain telecoms and finance companies have integrated their systems to enable direct transactions between platforms (e.g. Dahab Plus and MPesa). When telecom platforms are not interlinked, however, intermediaries (such as the above-mentioned interviewee) offer their services. Clients transfer money to the intermediary company's account on one platform, with the intermediary then sending on the exchanged amount to the intended recipient using another platform. Therefore, someone can transfer funds to an account in Somalia and receive cash in Nairobi without the Kenyan authorities being aware of the transaction. The interviewee candidly described this as a loophole—one that poses risks for money laundering and the financing of armed groups.

Another service offered by intermediaries relevant to wider cross-border dynamics is temporary money deposits for conditional transactions. The Eastleigh money exchange vendor explained that this service may serve as a guarantee for clients engaged in high-risk or volatile transactions. For example, migration brokers may require payment guarantees from clients (e.g. a migrant or their family). Such clients deposit money with the intermediary (potentially as a

115 Tax Justice Network, 'Nairobi International Financial Centre or Nairobi Tax Haven? A review of the Nairobi International Financial Centre Bill', 2017. <https://taxjusticeafrica.net/sites/default/files/publications/EATGN-NIFC-Report-20172-1.pdf>; Laureen Kaburu Kamau, 'A possible tax haven in Kenya: An analysis of the Nairobi International Financial Centre Act and its implications on base erosion and profit shifting', BA Law thesis, Strathmore University, Kenya. <https://su-plus.strathmore.edu/server/api/core/bitstreams/cdo96c27-8ed4-49ee-8871-fcd60419c681/content>.

116 Interview, cross-border forex operator, Nairobi, 24 December 2024.

117 Interview, money exchange vendor in Eastleigh, Nairobi, 23 December 2024.

cross-border transaction), which is only released to the broker once the agreed conditions are met—for instance, when the migrant arrives at their destination. It is unclear whether the use of conditional deposits is increasing, and if so whether this reflects increased understanding by potential migrants and their families of the high risks of abuse, extortion or scamming when engaging in undocumented migration out of the HoA.¹¹⁸ Although beyond the scope of the present study, the evolving cross-border financial architecture of undocumented migration warrants further research.

These types of transactions resemble the longstanding role played by the remittance sector, which predates the mobile money revolution. In the past, customers would only be able to bring cash to offices, which would then be exchanged or transferred across a border to the recipient office (which would then pay out in cash). Now, the integration of mobile money on both sides of a border increases the opacity of a financial exchange, as clients may not need to physically present themselves to intermediaries. On the other hand, such transactions may leave a digital data trail for regulatory authorities that is difficult to tamper with. The potential for transparency in the latter case is, however, offset by the proliferation of platforms and intermediaries on both sides of a border, and the lack of harmonization—and uneven enforcement—of KYC regulations.

Given the ubiquity of MPesa use in Kenya (between 2023 and 2024, USD 312 billion was transferred on the system),¹¹⁹ it is unsurprising that the platform has been utilized by non-state armed actors such as al-Shabaab. State anti-terror police have accessed phone records and MPesa statements from suspects in borderland areas, such as Mandera.¹²⁰ Furthermore, al-Shabaab's preparations for its 2019 DusitD2 complex attack in Nairobi allegedly involved the transfer of funds from South Africa to Kenya and their onward transfer to Somalia—a process that apparently utilized MPesa, a network of agents registering multiple SIMs, and formal banks in Nairobi.¹²¹ Reports from court proceedings include conflicting accounts of how transactions were facilitated and authorized: Some suggest the alleged lead financing agent had his MPesa agent account closed by Safaricom before the Dusit attack (having been flagged as a possible terrorist),¹²² whereas a bank employee on trial for releasing funds to suspects claimed she had

118 Peter Chonka, 'Social media, youth (im)mobilities, and the risks of connectivity in urban Somaliland', *Mobilities* 19/1 (2024).

119 *RegTech Africa*, 'Kenyan Lawmakers Renew Push for Safaricom and M-PESA Separation', 10 October 2024. Accessed 15 November 2024, <https://regtechafrika.com/kenyan-lawmakers-renew-push-for-safaricom-and-m-pesa-separation/>.

120 'Police To Retrieve Phone Records, M-Pesa Statements From Suspected Terrorist's Phone', *Shahidi News*, 12 November 2021. Accessed 28 November 2024, <https://shahidinews.co.ke/2021/11/12/police-to-retrieve-phone-records-m-pesa-statements-from-suspected-terrorists-phone/>.

121 'Revealed! Dusit terror suspect received Sh9m on M-Pesa', *Mustaqbal Media*, 24 January 2019. Accessed 28 November 2024, <https://mustaqbalmedia.net/so/revealed-dusit-terror-suspect-received-sh9m-on-m-pesa/>.

122 Maureen Kakah, 'Safaricom had closed Nairobi terror suspect's M-Pesa', *The East African*, 30 January 2019. Accessed 28 November 2024, <https://www.theeastafrican.co.ke/tea/news/east-africa/safaricom-had-closed-nairobi-terror-suspect-s-m-pesa-1411372>.

done so after receiving authorization from the telecoms company.¹²³ Either way, reports abound of MPesa playing a role in al-Shabaab operations in Kenya, and of law enforcement/judicial requests for MPesa data as part of investigations or preventative security operations (which in the DusitD2 case failed to stop the attack).

The extent to which state authorities can access digital financial transaction data is dependent on their relationship with service providers. In Kenya's case, the state maintains close ties with MPesa's operator Safaricom. Parliamentarians and the Central Bank of Kenya have recently made renewed calls for Safaricom to spin off MPesa as a separate business, on the basis that this would enhance the regulatory framework for monitoring and overseeing mobile money transactions.¹²⁴ Safaricom has so far resisted such calls, but nevertheless remains interwoven with the fabric of the Kenyan state.¹²⁵

Investigative journalists in Kenya have recently revealed the apparently unfettered access security services have long had to Safaricom's call and location data. Such practices allegedly fail to follow due legal process, and have been facilitated by the embedding of foreign (British) data management software within the company's systems, enabling real-time tracking of persons of interest.¹²⁶ These revelations emerged amid the 2024 wave of 'gen Z' activism and protests against President Ruto's draft finance bill—which proposed tax hikes on essential items—as well as wider discontent at the political elite.¹²⁷

In mid-2024, sources connected to activist groups spoke out about prominent figures in their ranks being abducted or arrested by security forces, with mobile phone location data speculated to have played a role in this.¹²⁸ There were, for example, stories of people turning their phones off for prolonged periods and then being detained shortly after switching them back on. This turbulent political context affected data collection for this report, preventing the researchers from speaking to security-focused state or non-state actors, and making interviewees reluctant to speak openly about digital surveillance or governance.

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- 123 Maureen Kakah, 'Nairobi attack suspect shifts M-Pesa cash queries to Safaricom', *The East African*, 25 January 2019. Accessed 28 November 2024, <https://www.theeastafrican.co.ke/tea/news/east-africa/nairobi-attack-suspect-shifts-m-pesa-cash-queries-to-safaricom-1411040>.
- 124 Osamu Ekhatior, 'Kenyan lawmakers renew call for Safaricom and M-PESA separation', *Techpoint.africa*, 8 October 2024. Accessed 28 November 2024, <https://techpoint.africa/news/lawmakers-renew-safaricom-mpesa-split/>.
- 125 Matthew Tyce, 'Beyond the neoliberal-statist divide on the drivers of innovation: A political settlements reading of Kenya's M-Pesa success story', *World Development* 125 (2020).
- 126 Namir Shabibi and Claire Lauterbach, 'Exclusive: How Kenyan police use mobile phones to track, capture suspects', *The Nation*, 29 October 2024. Accessed 28 November 2024, <https://nation.africa/kenya/news/exclusive-how-kenyan-police-use-mobile-phones-to-track-capture-suspects-4804416#story>.
- 127 Nesrine Malik, 'The Long Wave: 'How do you teargas a baddie?': Kenya's gen Z revolutionaries', *The Guardian*, 15 January 2025. Accessed 15 January 2025, www.theguardian.com/news/2025/jan/14/how-do-you-teargas-a-baddie-kenya-gen-z-revolutionaries.
- 128 'Kenya abductions: Dozens missing since protests started in June 2024', *Al Jazeera*, 12 January 2025. Accessed 15 January 2025, <https://www.youtube.com/watch?v=qXGnFEyWWjI>.

Commentators have noted the innovative, evolving use of social media platforms by activists involved in the ‘gen Z’ protests. Historically, Kenya has not been subject to mass internet shutdowns—including as a government security measure—to the same extent as Ethiopia or Somalia. For example, public data from Meta on internet disruptions between 2017 and 2022 does not list any such instances in Kenya (in comparison to 12 shutdowns in Ethiopia and 4 in Somalia during this period).¹²⁹ In 2023, however, Kenya experienced its first targeted shutdown (during a school exam period), while significant drops in national connectivity were reported during the June 2024 protests.¹³⁰ Some sources calculate that in 2024 Kenya ranked third in Africa (after Sudan and Ethiopia) in terms of scale of economic losses resulting from internet disruptions and number of users affected.¹³¹ In short, it has become apparent that the Kenyan state now has the capacity and inclination to use network shutdowns as a governance and security response, with worrying implications for civic freedoms.

There is no clear evidence to suggest the Kenyan government or security forces have specifically targeted mobile or internet shutdowns in the country’s borderlands with Somalia. This is despite the fact that many areas along the border have increasingly become active zones of conflict between al-Shabaab and Kenyan troops.¹³² Although complaints have been raised that network connectivity is poorer in certain borderland hubs such as Mandera,¹³³ this has been ascribed to poor infrastructure and difficult terrain rather than state-imposed telecom blocking. There have, however, been several incidents of al-Shabaab attacks on Safaricom infrastructure (cell towers) in Mandera county.¹³⁴ These not only constitute attempts to undermine security in the borderlands, but may be seen as responses to Kenyan airstrikes against similar mobile telecoms infrastructure in Somalia.¹³⁵

129 Meta, ‘Internet disruptions’. Accessed 15 December 2024, <https://transparency.meta.com/reports/internet-disruptions/>.

130 Access Now, ‘Authorities in Kenya must immediately restore internet access and #KeepItOn throughout protests and unrest’, 25 June 2024. Accessed 15 January 2025, <https://www.accessnow.org/press-release/kenya-protests-internet-shutdown/>.

131 John Waweru and Vincent Owino, ‘Rise of Internet censorship in Kenya and its effects on economic growth’, *Business Daily*, 15 January 2025. Accessed 15 January 2025, <https://www.businessdailyafrica.com/bd/corporate/technology/rise-of-internet-censorship-in-kenya-and-economic-effects-4890282>.

132 ACLED, ‘Kenya-Somalia Border: Rising al-Shabaab Threat in the Wake of ATMIS Drawdown’, 1 September 2023. Accessed 10 December 2024, <https://acleddata.com/2023/09/01/special-report-kenya-somalia-border-rising-al-shabaab-threat-in-the-wake-of-atmis-drawdown/>.

133 Adan Mohamed, ‘Mandera residents frustrated by persistent network outages’, *The Eastleigh Voice*, 27 April 2024. Accessed 10 December 2024, <https://eastleighvoice.co.ke/Safaricom/37159/mandera-residents-frustrated-by-persistent-network-outages>.

134 Manase Otsialo, ‘Suspected Shabaab terrorists damage Safaricom mast in Mandera’, *The Nation*, 9 August 2023. Accessed 10 December 2024, <https://nation.africa/kenya/counties/mandera/suspected-shabaab-terrorists-damage-safaricom-mast-mandera-4331034>; ‘Al-Shabaab Claims Responsibility for Attacks on Telecom Infrastructure in Mandera County’, *Halqabsi News*, 12 January 2024. Accessed 10 December 2024, <https://halqabsi.com/2024/01/al-shabaab-claims-responsibility-in-kenya/>.

135 ‘Suspected KDF airstrike in Somalia destroys telecom infrastructure’, *Garowe Online*, 17 June 2023. Accessed 10 December 2024, <https://www.garoweonline.com/en/news/somalia/suspected-kdf-airstrike-in-somalia-destroys-telecom-infrastructure>.

In terms of social media content moderation and censorship (whether in relation to wider political issues or cross-border security issues), the Kenyan government appears to have a greater level of contact with social media platforms than Ethiopia or Somalia, having made a far higher number of requests to Meta for platform data and content restrictions on Facebook and Instagram.¹³⁶ Data is not available on the types of content restricted through these interactions, although civil society actors have noted the history of high-profile political connections between global Meta leaders and the Kenyan political elite.¹³⁷ This, along with the fact that the company has a significant presence in Kenya (including for regional and continental content moderation), has led to much speculation concerning the potentially enhanced ability of politicians to exert influence on platform content.

136 Meta, 'Transparency reports'.

137 Interview, Kenyan journalist, London, 29 January 2025.

CONCLUSION AND POLICY CONSIDERATIONS

In early 2025, Meta made a number of changes to its content policies and processes. As a result, there has been a reduction in political fact checking, a lifting of prohibitions on previously banned speech, and reductions in automated content moderation. Although announced in relation to the US context, the changes signal a potentially global de-prioritization of systematic oversight regarding content posted to Meta's platforms. In the past, civil society organizations have criticized tech companies for not doing enough to combat social media incitement to violence in Global South contexts.¹³⁸ It now appears that Meta may be preparing to further reduce the resources available for complex, politically contested content moderation. This is often already harmful for the low-paid human workers engaged in such work (being exposed to massive amounts of disturbing and illegal user-uploaded material) in countries like Kenya.¹³⁹ Similarly, under Elon Musk, Twitter/X has made clear its disregard for maintaining existing content moderation standards, at least for certain types of material on the platform.¹⁴⁰ Such removals of safeguards will likely have the greatest impact in settings where existing content moderation mechanisms are already constrained by limited commercial attention or local-language capacity for effective oversight.

Although TikTok is employing automated methods to remove significant amounts of user-posted content in Ethiopia and Somalia, there is virtually no public data about how this automated filtering operates, nor which types of content are being flagged as violating platform usage policies. Content that may incite or exacerbate armed conflict along pre-existing political fault-lines has undoubtedly proliferated on TikTok and other social media platforms, as the examples in this report testify.

While certain types of content can be identified for removal through automated methods, limited capacity for the monitoring and processing of indigenous African-language audio-visual material (including knowledge of the cultural and political context) mean that preventing

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- 138 Pat de Brún and Maung Sawyeddollah, 'Meta's new content policies risk fuelling more mass violence and genocide', Amnesty International, 17 February 2025. Accessed 17 February 2025, <https://www.amnesty.org/en/latest/news/2025/02/meta-new-policy-changes/>.
- 139 Maureen Kasuku, 'Death in moderation', *The Continent*, 194, 15 March 2025. Accessed 23 March 2025, <https://continent.substack.com/p/death-in-moderation>.
- 140 Adrian Kopps, 'Two years after the takeover: Four key policy changes of X under Musk', The Humboldt Institute for Internet and Society, 28 October 2024. Accessed 23 March 2025, <https://www.hiig.de/en/policy-changes-of-x-under-musk/>.

the proliferation of violence-inciting material will always be difficult. Technical fixes remain challenging and potentially open to political manipulation. *Greater platform transparency* is therefore required for stakeholders—especially civil society—in the HoA region. This means access to data showing the scope of content moderation across different contexts; the contextually-specific parameters and limitations of these processes; and the level of contact and influence different states have with external platforms. Western states concerned about conflict and security in the region should use their leverage to *push global tech companies for greater transparency and data openness* around content moderation processes. Only through greater knowledge of how platform policies are (or are not) being enforced in the HoA can local civil society actors hold tech companies to account, while also informing local debates about acceptable social media use.

These debates will continue to evolve alongside the changing platform landscape. Going forward, it is likely that conflict actors will retain their capacity to use secure messaging platforms, both for internal communications and the unregulated sharing of propaganda. State actors within and beyond the region may seek to *exert increased pressure on mainstream social media platforms regarding algorithmic processes* that make certain types of content go viral, potentially influencing conflict dynamics. In order to assess the significance of the HoA's digital environment, *greater policy and research focus is needed on how identity politics, conflict and social media polarization interact* in conflict-affected parts of the region. Key here would be engaging with platforms to uncover the extent to which content-monetization inequalities between users inside the region and those outside it may be contributing to the intensification of transnational conflict-communication.

In terms of digital finance, it is clear that cross-border Somali business networks have had a greater role in the spread (and increasing interoperability) of digital transaction platforms than state-led market integration initiatives. Research shows how significant these cross-border networks (or corridors) are for political order and state-making in the region.¹⁴¹ Despite the proliferating means of transferring financial resources across platforms and borders, however, the HoA's digital finance space is far from borderless. Digital borders are encountered when people lack access to the necessary telecoms networks on both sides of a physical border, or when state security measures restrict particular types of transfers on platforms that remain non-interoperable. Divergent state governance regimes impede the seamless flow of digital finance, while uneven regulation across borders (or even within, if we consider Somalia–Somaliland) creates grey zones where security-focused KYC restrictions can be circumvented, often through brokers located within a telecoms–remittance–financial services nexus of companies and service providers.

The short-term prospects for increased consistency, harmonization and enforcement of regulation across the HoA is limited by general interstate competition. Nevertheless, national

141 Tobias Hagmann and Finn Stepputat, eds., *Trade Makes States: Governing the Greater Somali Economy*, London: Hurst Publishers, 2023.

developments may make evading KYC regulations more difficult. One example is the issuance of Somalia's new national ID cards, although it remains to be seen whether their use will spread beyond Mogadishu due to the constraints imposed by al-Shabaab's presence and ongoing political divisions between the FGS and FMSs. Even if the process is limited to Mogadishu, however, *the increased standardization of ID requirements and practices* may prove significant in terms of using digital financial technologies.

More generally, it appears to be in the FGS's interests to prioritize mobile money (over printing physical cash) given the potential for counter-terrorism financial oversight and automated taxation systems—as illustrated by the 5 per cent sales tax introduced in Mogadishu in 2024. In terms of conflict dynamics, struggles over cash—physical or digital—may come increasingly to the fore as al-Shabaab contends with the state's limited but potentially growing capacity to monitor virtual transactions. In both Somalia's cities and borderlands, *greater policy attention should be directed at how cashlessness may impact vulnerable populations.*

Overall, this report has highlighted various questions arising from the HoA's messy but highly dynamic digital financial and media content space. Cross-border activities—and borderlands themselves—have often been central to these developments, with different states displaying varying levels of institutional capacity when it comes to exerting influence over digital flows. While some of the flows pertinent to security issues currently remain largely beyond the control of the state, digitization does offer the prospect of greater legibility due to the data being generated by multiple actors. Contestation over access to these data flows will become an ever more important factor in the region's state-making. Against this backdrop, *the varying relationships between governments, national telecoms sectors and external technology actors demands comparative attention from scholars and policymakers* invested in understanding the HoA's cross-border security dynamics.

ABBREVIATIONS

DPA	Data Protection Authority
EAC	East African Community
FGS	Federal Government of Somalia
FMS	Federal Member State
HoA	Horn of Africa
IDGC	Initiative for Digital Government and Cybersecurity
INSA	Information Network Security Administration
IS	Islamic State
KYC	know-your-customer
NISA	National Intelligence and Security Agency
SRS	Somali Regional State
TPLF	Tigray People's Liberation Front

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