

A Mapping of National AI Strategies Across Select SWANA Countries: Gaps and Opportunities

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Acknowledgments

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Key Terms and Definitions

- ➔ AI: In computer science, Artificial Intelligence (AI) is defined as the field of computer science concerned with machines and technologies performing tasks previously attributed to humans such as language processing, making decisions, and identifying objects and analysing data.¹
- ➔ AI actors: According to UNESCO, “any actor involved in at least one stage of the AI system lifecycle, and can refer both to natural and legal persons, such as researchers, programmers, engineers, data scientists, end-users, business enterprises, universities and public and private entities, among others.”
- ➔ AI (ethical) principles: An overarching policy guiding the development and deployment of AI in a country or an organization. Principles are often accompanied by more detailed guidelines to help operationalise them. The set of ethical principles and guidelines governing the ethical challenges posed by AI make up an ethical AI framework.
- ➔ AI system lifecycle: Different stages of the AI lifecycle, ranging from research, design and development, to deployment and use and until the disassembly and termination of a system.²
- ➔ Biometric surveillance: Methods for identifying and tracking individuals based on their physical or biological characteristics such as facial traits, fingerprints, and DNA.³
- ➔ Deepfake sexual abuse: A type of hyper-realistic synthetic media created using Generative AI which sexualizes or sexually abuses others, particularly targeting women and children.
- ➔ Digital sovereignty: The concept that a state or an organization should possess control over its digital assets, infrastructure, and environment.⁴ While in recent years, the concept has become a priority for many governments and organizations, in discussions and implementation, ‘human-centric sovereignty’⁵ is often neglected, and in SWANA, it is frequently a pretext for governments to censor and control the digital space.
- ➔ Dual-use technologies: Technologies that can have both civilian and military purposes.
- ➔ Facial recognition: A type of AI-powered biometric identification system that identifies or verifies someone’s identity by analysing their facial features.

¹ “AI Overview and Definitions,” Notre Dame Learning, Undated, <https://learning.nd.edu/resource-library/ai-overview-and-definitions/>.

² “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

³ Electronic Frontier Foundation, “Biometric Surveillance,” Street Level Surveillance, October 1, 2023, <https://sls.eff.org/technologies/biometric-surveillance>.

⁴ Ogundokun, R.O., Bello, R.W., Owolawi, P.A., van Wyk, E.A. (2026). Advancing Human-Centric Digital Sovereignty: A Comprehensive Review. In: Misra, S., Kvalvik, P., Kjølervbakken, K., Jørgensen, P.A. (eds) 2nd International Conference on Digital Sovereignty . ICDS2025 2025. Springer Proceedings in Complexity. Springer, Cham. https://doi.org/10.1007/978-3-032-21524-6_7

⁵ Ibid.

- ➔ Final human determination: The concept that humans should make ultimate decisions when deploying AI, particularly when such decisions are irreversible or difficult to reverse, like life and death decisions.
- ➔ Frugal AI: A concept for “creating AI systems that are high-performing yet lightweight, cost-effective, and accessible, even when resources are limited.”⁶
- ➔ Generative AI (Gen AI): An AI technology that automatically creates and generates synthetic content such as text, videos, photos, and audio based on training data patterns in response to user prompts.
- ➔ Gulf Cooperation Council (GCC): A regional intergovernmental, political, and economic organization consisting of the high-income Arab States of the Persian Gulf.
- ➔ High-risk AI: AI systems that pose serious risks to health, safety, critical infrastructure or fundamental rights.
- ➔ Human rights due diligence: An ongoing process for identifying, preventing, mitigating, and accounting for human rights impacts. To assess impacts of AI, due diligence can take the form of human rights impact assessments or ethical impact assessments.⁷
- ➔ Large Language Models (LLMs): In Natural Language Processing (NLP), LLMs are models that are trained on large text datasets to understand language and generate human-like text.⁸
- ➔ Machine learning: “A subset of AI in which algorithms mimic human learning while processing data.”⁹
- ➔ Natural Language Processing (NLP): A type of AI that enables computers to understand spoken and written human language.¹⁰
- ➔ National AI strategy: A plan developed by a government to articulate its strategic goals in relation to AI, often with the purpose of enhancing economic growth and societal well-being while addressing ethical considerations. It typically includes defined goals, objectives, and actions to foster AI research and innovation, develop and attract talent, build infrastructure, integrate AI in key sectors, and pass regulations.
- ➔ Responsible and Trustworthy AI: It refers to the frameworks, principles, and practices that guide the ethical and safe development and deployment of artificial intelligence systems to ensure their fairness, transparency, accountability, safety, and reliability while accounting for ethical considerations and human rights.¹¹

⁶ “Frugal AI principles,” Frugal AI Hub at University of Cambridge Judge Business School, Undated, <https://frugalai.org/frugal-ai-principles/>.

⁷ “Human Rights Due Diligence & Impact Assessment,” Business and Human Rights Centre, July 23, 2026, <https://www.business-humanrights.org/en/big-issues/governing-business-human-rights/human-rights-due-diligence-impact-assessment>.

⁸ “Artificial Intelligence Glossary: Learn AI Vocabulary,” Coursera, August 4, 2025, <https://www.coursera.org/resources/ai-terms>

⁹ “Artificial Intelligence Glossary: Learn AI Vocabulary,” Coursera, August 4, 2025, <https://www.coursera.org/resources/ai-terms>

¹⁰ “Artificial Intelligence Glossary: Learn AI Vocabulary,” Coursera, August 4, 2025, <https://www.coursera.org/resources/ai-terms>

¹¹ “What is Responsible AI?”, Stanford University HAI, Undated, <https://hai.stanford.edu/ai-definitions/what-is-responsible-ai>.

- ➔ Small Language Models (SLMs): As opposed to LLMs, these models are trained on small datasets.
- ➔ Smart cities: Urban areas where technology is used to enhance urban life such as safety, traffic management, and waste collection and management. A wide range of surveillance and tracking technologies (also known as smart city tech) can be deployed in smart cities including facial recognition, vehicle license plate recognition, sensors, access control systems, and motion and intrusion detection systems.
- ➔ SWANA: South West Asia and North Africa, an alternative decolonial term for Middle East and North Africa (MENA).



Executive Summary

Artificial intelligence (AI) is moving fast in South West Asia and North Africa (SWANA), but the rules meant to govern it are lagging behind. Wealthy Gulf countries like Saudi Arabia and the United Arab Emirates (UAE) are pouring money into AI companies and cloud infrastructure, competing to become the next AI Hub in the region. Middle-income countries like Jordan and Egypt are integrating AI more slowly across sectors. This is occurring within political environments marked by authoritarianism, entrenched discrimination, shrinking civic space, and, in some places, active war. AI is already being used in policing,¹² border¹³ and crowd control,¹⁴ and public services.¹⁵ Generative AI and recommendation systems shape what people see and say online. Yet, there is still no rights-based AI governance architecture that matches the pace and scale of these deployments while effectively upholding human rights.

Six of the eight countries studied: Egypt, Jordan, Oman, Qatar, Saudi Arabia, and the UAE, now have national AI strategies and ethical frameworks. In some cases, AI ethical principles adopted mimic language used in the UNESCO Recommendation on the Ethics of Artificial Intelligence: such as fairness, accountability, safety, and transparency. Upon closer inspection, this alignment is superficial. Robust and explicit commitments to human rights are lacking and appear as vague references to “humanity” and “human-centredness.” Undefined terms like “cultural values” can be used to legitimize censorship rather than protect rights. None of the frameworks ban lethal autonomous weapons, despite the deployment of AI-assisted targeting systems in Gaza and Iran. Government surveillance and AI-powered surveillance remains largely unaddressed despite the growing reliance on smart city surveillance across the region. Provisions on transparency and redress are equally thin: some policies say people should be informed when AI is used and allowed to ask for explanations, but they do not clearly define which decisions count as “significant,” what qualifies as harm, or how people can effectively challenge AI-driven decisions and obtain remedy. All of this sits on top of legal systems where discrimination against women, migrants, Black communities and minority groups is often lawful and sometimes written into personal status or labour laws. In that context, ethical principles about “fairness” risk becoming empty slogans. AI systems would only scale this discrimination.

¹²Blavatnik School of Government, University of Oxford. "United Arab Emirates: AI in Law Enforcement for Surveillance, Prosecutors, Courts, and Defence." Tech and Justice AI Atlas, Last modified March 2026, <https://www.techandjustice.bsg.ox.ac.uk/research/united-arab-emirates>.

¹³Mixed Migration Centre. "AI, Surveillance and the Privatisation of Migration Management." Mixed Migration Review 2025, November 19, 2025. <https://mixedmigration.org/publications/mmr/2025/ai-surveillance-privatised-migration-management/>.

¹⁴Skyline for Human Rights. "No Room to Protest: How AI Surveillance Is Shutting Down Freedom of Assembly in West Asia and North Africa." August 27, 2025, <https://skylineforhuman.org/en/news/details/882/no-room-to-protest-how-ai-surveillance-is-shutting-down-freedom-of-assembly-in-west-asia-and-north-africa>.

¹⁵Observatory of Public Sector Innovation (OECD). "U-Ask." Last modified June 26, 2024, <https://oecd-opsi.org/innovations/u-ask/>

The report argues that ethical charters and guidelines are not meaningless, but will not stop AI from deepening existing injustices on their own.

As long as personal data laws carve out broad national security exceptions, cybercrime laws criminalise peaceful online speech, anti-discrimination protections are weak or absent, and courts and regulators lack independence, AI governance will remain cosmetic. Moving beyond this requires binding, rights-based legal reforms; independent oversight bodies that can confront both states and companies; and concrete tools such as mandatory human-rights and gender-impact assessments for high-risk systems. Developers of AI systems should also develop these systems based on human rights principles. This all means taking environmental limits and labour impacts seriously.

The report advocates for a contextual and regional ethical framework for AI, grounded in international human rights law and the UNESCO Recommendation while centering the region's specific realities: militarisation, water scarcity, migration, gender inequality, and the marginalisation of Arabic and other local languages and dialects in global AI systems. Finally, it underlines that none of this will work if civic space keeps shrinking. Civil society, unions, independent researchers, and affected communities need room to operate, and people in the region need the media and information literacy skills to understand how AI shapes their information environments, so that they can push back when these systems silence them instead of serve them.

Introduction

Adoption of Artificial Intelligence (AI) is accelerating in the South West Asia and North Africa (SWANA) region, raising pressing questions about its risks, harms, and governance. This landscape is marked by profound asymmetries, not only in the scale of investment across countries, but also in how governments and private companies are choosing to deploy and exploit the technology. Despite the governance frameworks and strategies that SWANA states have adopted, persistent gaps remain to manage the risks and harms linked to the deployment of AI. This research seeks to address these gaps by mapping the region's emerging AI governance landscape and offering a critical account of how these frameworks measure up against global human rights and accountability standards that are at stake.

The level and scope of this AI adoption by local governments and companies differ, with high-income and technologically advanced Gulf Cooperation Council (GCC) countries, especially Saudi Arabia and the UAE, in the lead. These countries are leading not only in integration of AI across different sectors and public services, but also in AI infrastructure, such as cloud centers, and investments in AI companies and services.¹⁶ For instance, substantial investments include the announcement of USD 14.9 billion in AI-related initiatives at LEAP 2025, a major technology conference held annually in Riyadh, as well as the UAE's establishment of government-backed investment firms such as MGX and large-scale funds supporting AI startups.¹⁷

Regardless of varying levels of AI adoption between countries, its impacts are felt across the region.¹⁸ Advancements in Generative AI underpin many widely used services such as AI assistants, chatbots, search engines, and messaging applications. At the same time, content recommendation and moderation systems shape what content people can see and access online, often suppressing freedom of expression and aggravating the spread of harmful content, such as gender-based violence and hate speech. Many countries across the region are increasingly deploying AI in policing and law enforcement, particularly through facial recognition and smart city tech, with repercussions on the right to privacy, freedom of assembly, and participation in the public sphere. As AI adoption accelerates and expands into sensitive areas like welfare allocation, job recruitment, healthcare, and banking, populations will likely be exposed to heightened risks of bias, discrimination and job precarity, exacerbating existing socioeconomic and gender inequalities in SWANA. These risks are further intensified in conflict settings where AI systems are deployed. Finally, some countries, specifically in the Gulf, are expanding their cloud infrastructure, needed to power AI ventures, and are tapping into already limited water resources in the world's most water-stressed region, furthering the impacts of environmental degradation and climate change.

¹⁶ Nur Arafeh, "The Promise and Risks of Artificial Intelligence," Malcolm H. Kerr Carnegie Middle East Center, September 12, 2025.

<https://carnegieendowment.org/middle-east/diwan/2025/09/the-promise-and-risks-of-artificial-intelligence>

¹⁷ Metehan Durmaz, "AI Investments in the Gulf: Opportunities and Surveillance Risks," SMEX, May 19, 2025.

<https://smex.org/ai-investments-in-the-gulf-opportunities-and-surveillance-risks/>

¹⁸ Afef Abrougui and Nadine Mouawad, "Artificial Intelligence and Social and Gender Justice Activism in MENA: Spaces of co-optation, engagement and resistance. Oxfam International," *Oxfam International*. October 10, 2025, DOI: 10.21201/2025.000090

<https://policy-practice.oxfam.org/resources/artificial-intelligence-and-social-and-gender-justice-activism-in-mena-spaces-o-621738/>.

Despite the severe risks to human rights, equality, and the environment, governance of AI is still lagging behind. Some countries in SWANA launched AI strategies, ethical AI frameworks, and in some cases, AI governance bodies. Others are reviewing draft laws on AI governance. As the region is rapidly investing in AI, these developments are unfolding in political contexts characterised by strong state control and state-led governance,¹⁹ growing corporate influence driven by large-scale AI investments and partnerships with global technology firms, expanding surveillance industries,²⁰ and the exclusion of civil society and affected populations from decision making.

This research explores the extent to which AI governance and ethical frameworks adopted by select SWANA countries comply with human rights principles and frameworks and seeks to identify gaps in legal frameworks and relevant institutions that hinder the respect and protection of human rights in the development, deployment, and governance of AI in the region. The research is guided by two primary questions:

- ➔ How do national AI strategies, governance bodies, and legal frameworks in SWANA align with human-rights-based principles, and what opportunities and policy gaps emerge from their intersections?
- ➔ What regionally coherent, rights-based standards and governance principles are necessary to guide the accountable and inclusive adoption of AI across SWANA countries?

¹⁹ Doua Dridi, “AI Strategy Considerations in the MENA Region: Challenges and Opportunities,” Central European Lawyers Initiative, November 25, 2025, <https://ceuli.com/ai-strategy-consideration-in-the-mena-region-challenges-and-opportunities/>.

²⁰ Metehan Durmaz, “AI Investments in the Gulf: Opportunities and Surveillance Risks,” SMEX, May 19, 2025, <https://smex.org/ai-investments-in-the-gulf-opportunities-and-surveillance-risks/>.

Methodology

The methodology for this research combined desk research, policy analysis, and Key Informant Interviews (KIIs). In the research design phase, a review of existing literature on AI strategies and ethical frameworks in SWANA, emerging AI governance bodies and initiatives, and challenges of AI governance in the region was conducted. This also included a review of global AI governance frameworks that provide ethical and practical guidance for responsible AI deployment, including the OECD AI Principles,²¹ the UNESCO Recommendation on the Ethics of Artificial Intelligence,²² the African Union Continental Artificial Intelligence Strategy's Guiding Principles,²³ and the United Nations Resolution on "Seizing the opportunities of safe, secure and trustworthy artificial intelligence systems for sustainable development."²⁴ Based on these frameworks, a list of key principles for governing AI were identified:

- ➔ Human rights and rule of law
- ➔ Nonviolent and peaceful applications
- ➔ Right to privacy and data protection
- ➔ Right to non-discrimination
- ➔ Transparency and explainability
- ➔ Accountability and human oversight
- ➔ Right to remedy
- ➔ Safety and security
- ➔ Environmental impact
- ➔ Feminist principles
- ➔ Local needs, impacts, and contexts (specifically impacts on labour and language)
- ➔ Inclusivity and multi-stakeholderism (in deployment and governance of AI systems)

These principles were later used to assess SWANA ethical frameworks against global standards and guide comparative analysis.

Desk research was then conducted to identify relevant AI strategies and ethical frameworks in eight SWANA countries: Egypt, Jordan, Morocco, Oman, Qatar, Saudi Arabia, Tunisia, and the UAE. Morocco and Tunisia did not publish relevant policies, and as a result assessments of national strategies and ethical policies eventually only focused on six countries. After disclosures pertaining to the principles above in each policy were identified, the safeguards and measures they outlined were compared to those prescribed by the UNESCO Recommendation on

²¹ "AI principles," OECD, 2019, <https://www.oecd.org/en/topics/ai-principles.html>.

²² "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

²³ "Continental Artificial Intelligence Strategy Harnessing AI for Africa's Development and Prosperity," African Union, July 2024, https://au.int/sites/default/files/documents/44004-doc-EN-Continental_AI_Strategy_July_2024.pdf.

²⁴ United Nations General Assembly, "Seizing the Opportunities of Safe, Secure and Trustworthy Artificial Intelligence Systems for Sustainable Development," Digitallibrary.un.org, March 11, 2024, <https://digitallibrary.un.org/record/4040897?ln=en&v=pdf>.

the Ethics of Artificial Intelligence.²⁵ This allowed for a comprehensive comparative analysis that identified gaps in SWANA approaches to governing AI and similarities and differences between countries.

To assess the safeguards and measures outlined by SWANA policies, relevant disclosures were compared to the recommendations prescribed by the UNESCO Recommendation on the Ethics of Artificial Intelligence.²⁶ While there are a few other AI governance frameworks that provide ethical and practical guidance for responsible AI deployment, the UNESCO Recommendation was used as a basis for the analysis because it includes recommendations covering a wide range of human rights threats and ethical challenges, including those of particular relevance to the region, such as surveillance, the rights of children, environmental impacts, cultural rights, socioeconomic rights, and gender.

Further, seven semi-structured KIs were conducted with key civil society stakeholders working on AI policy, governance, and ethics – researchers, academics, digital rights activists, and legal experts – with the purpose of better understanding their perspectives on these policies, gaps, and their levels of engagement in shaping them. Digital Action had initially planned to conduct ten interviews. However, identifying the right people to interview proved challenging for some countries, and when experts were identified and reached out to, they either had a busy schedule or declined to be interviewed. This was mitigated by interviewing experts with regional expertise or knowledge spanning multiple countries.

A protocol to guide qualitative data collection consisted of a set of core questions aligned with the research objectives, while allowing flexibility to tailor follow-up questions based on participants' expertise, country focus, and contextual insights. This approach ensured a balance between consistency across interviews and the ability to capture nuanced, country-specific perspectives on AI governance, human rights, and policy implementation across the SWANA region. Core questions addressed the extent to which national AI policies align with internationally recognised human-rights frameworks, concrete gaps, interesting or positive aspects, regulatory frameworks governing AI, the role of multistakeholderism and civil society in shaping the adoption of AI policies, obstacles to civil society's participation in shaping these policies, and rights based standards or safeguards of particular importance to SWANA.²⁷

²⁵ "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

²⁶ Ibid.

²⁷ The core comparative analysis focuses on publicly available national AI strategies and ethical/governance frameworks. Relevant legal and institutional frameworks, including data protection, cybercrime, oversight arrangements and documented implementation practices, were examined where necessary to contextualize the findings, but were not subject to the same systematic cross-country assessment. KIs were used to supplement the desk research and provide contextual perspectives rather than as representative evidence for each country.

Chapter 1

Overview of AI Strategies and Ethical Frameworks

This chapter provides an overview of the countries that adopted AI strategies and ethical frameworks. It also summarizes the key objectives of the strategies and lists the key principles of each ethical framework. Out of the eight countries studied, Egypt,²⁸ Jordan,²⁹ Oman,³⁰ Qatar,³¹ Saudi Arabia,³² and the UAE³³ all adopted national AI strategies and ethical principles for AI deployment, while Morocco and Tunisia have not published such policies.

Morocco's digital strategy, Digital Morocco 2030, has one single brief page on Artificial Intelligence in a section titled "transversal levers." The vision outlined by the document for AI is to "harness the potential of AI to support the digitization of private and public services" and "support and strengthen the AI ecosystem and contribute to the development of the digital economy."³⁴

On the other hand, Digital Action was not able to locate a strategy for Tunisia despite media reports and government announcements stating that work on a strategy has been underway since 2018.³⁵ At the time this report was finalized, a strategy was yet to be released to the public. According to the OECD AI Policy Navigator, Tunisia adopted an AI roadmap in 2021, with the objectives to raise awareness about AI challenges, possibilities, and its impacts, strengthening the AI ecosystem, establishing needed infrastructure and adopting data policies and implementing AI projects.³⁶ However, an actual copy of the roadmap was not found.

"No one is familiar with it. It was done with a small group. They did not share it, we do not know about it. I always hear people from the government saying, we launched our [strategy]. Okay, what is the consultation [process]? You launched an AI policy. Wonderful. You said that you are supporting women. Excellent. Where is it? Even if you go to the OECD website, you will not find it," said Maha Jouini, a Tunisian AI policy researcher.³⁷

²⁸ "Egypt National Artificial Intelligence Strategy Second Edition (2025-2030)," The National Council for Artificial Intelligence, January 14, 2025, <https://ai.gov.eg/SynchedFiles/en/Resources/AIstrategy%20English%202016-1-2025-1.pdf>.

²⁹ "Jordan's Artificial Intelligence Strategy and Implementation Plan 2023 - 2026," Ministry of Digital Economy and Digital Entrepreneurship, https://www.moddee.gov.jo/ebv4.0/root_storage/en/eb_list_page/40435648.pdf.

³⁰ "Oman AI & Digital Future Program (2024-2026)," Minister of Transport, Communications, and Information Technology, September 22, 2024, <https://mtcit.gov.om/media-4/news-announcements-11/news-85/oman-ai-digital-future-program-20242026-171>.

³¹ "National Artificial Intelligence Strategy For Qatar," Qatar Center for Artificial Intelligence, 2022, <https://qcai.qcri.org/wp-content/uploads/2022/12/OCRI-Artificial-Intelligence-Strategy-2019-ENG.pdf>.

³² "National Strategy for Data & AI," SDAIA, October 2020, <https://sdaia.gov.sa/ar/SDAIA/SdaiaStrategies/Documents/BrochureNSDAISummit.pdf>.

³³ "UAE National Strategy for Artificial Intelligence 2031," Mohamed Bin Zayed University of Artificial Intelligence, <https://staticcdn.mbzuaia.ac.ae/mbzuaiaiwpprd01/2022/07/UAE-National-Strategy-for-Artificial-Intelligence-2031.pdf>.

³⁴ "National Strategy Digital Morocco 2030," Ministry of Digital Transition and Administration Reform, 2024, https://www.mmsp.gov.ma/sites/default/files/2024-09/PlaquetteInstitutionnel_18092024_Ang.pdf.

³⁵ "Stratégie nationale de l'IA en Tunisie : annoncée depuis 2018, toujours introuvable en 2026," Tunisie Haut Debit, July 22, 2026, <https://www.thd.tn/strategie-nationale-de-lia-en-tunisie-annoncee-depuis-2018-toujours-introuvable-en-2026/>

³⁶ "Tunisia AI Roadmap," The OECD.AI Policy Navigator, July 9, 2025, <https://oecd.ai/en/dashboards/policy-initiatives/tunisia-ai-roadmap-1825>.

³⁷ Maha Jouini, interview with author, April 23, 2026.

According to Yosr Jouini, a Tunisian digital rights researcher, this lack of openness is not an isolated case, as Tunisia previously failed to make available another key policy document, the National Digital Strategy 2021 - 2025. “We never got the file totally available for everyone, publicly available. You see a pattern, unfortunately. That document was referenced in every project they have, if you go to the budget you find references to it, but they make it so hard to find, unfortunately.”³⁸ This secrecy and lack of public consultations is not only limited to Tunisia, as this report shows in later chapters.

The six countries that adopted and made their national AI strategies publicly available are pursuing a number of strategic objectives aimed at making AI an integral part of economic and social life. Some of these objectives are ambitious. The UAE and Saudi Arabia are vying to become an AI global hub, Jordan and Egypt are both aiming to become regional leaders in SWANA, with Egypt additionally seeking that role in Africa. By 2030, Egypt's targets include the establishment of more than 250 domestic AI companies. In its AI programme, Oman aims to increase the size of investments in AI to 400 million US dollars in 2030 from 20 million at the time of the strategy's publication. It also aims to increase the number of AI startups and SMEs by 20% annually.³⁹

Oil-rich Gulf countries are attempting to leverage AI and advanced technologies as a means of economic diversification to lessen dependency on oil and gas. The UAE and Saudi Arabia have particularly been making massive investments in AI,⁴⁰ which according to a report by PwC, is expected to contribute 14% and 12.4% to their respective GDPs.⁴¹ Humain, an AI company owned by Saudi Arabia's sovereign wealth fund, is aiming to make the kingdom the third largest AI market in the world.⁴² Other strategic objectives include developing local AI skills and capacities through education reform and professional training, attracting AI talent, building a local AI ecosystem, and deployment of AI to improve efficiency and access to services.

It is interesting to note the emphasis on ambitious economic targets and the adoption of AI solutionist narratives in SWANA AI strategies. Yet, not all countries have the funds and infrastructure necessary to make AI a strong enabler of economic growth. Even for Gulf countries – specifically Saudi Arabia and the UAE – despite their robust digital infrastructure and massive resources to attract top AI talent, AI startups and companies and cloud centers remain dependent on cloud infrastructure and powerful AI chips imported from the US⁴³ and to a lesser extent China.⁴⁴

³⁸ Yosr Jouini, interview with author, March 12, 2026.

³⁹ “Executive Program for Artificial Intelligence and Advanced Technologies,” Oman Portal, Undated, https://oman.om/docs/default-source/default-document-library/the-executive-program-for-ai-and-advanced-technologies.pdf?sfvrsn=94b08f03_0.

⁴⁰ Metehan Durmaz, “AI Investments in the Gulf: Opportunities and Surveillance Risks,” SMEX, May 19, 2025, <https://smex.org/ai-investments-in-the-gulf-opportunities-and-surveillance-risks/>.

⁴¹ Shivangi Jain, “US\$320 billion by 2030? The potential impact of AI in the Middle East,” PwC, Undated, <https://www.pwc.com/m1/en/publications/documents/economic-potential-ai-middle-east.pdf>.

⁴² Tala Alrajjal, “Saudi Arabia is making a massive bet on becoming a global AI powerhouse,” CNN, November 2, 2025, <https://edition.cnn.com/2025/11/02/tech/saudi-arabia-ai-powerhouse>.

⁴³ Graham, Emma. “U.S. greenlights AI chip exports to Gulf tech giants after Saudi Crown Prince's Washington visit,” CNBC, November 20, 2025, <https://www.cnbc.com/2025/11/20/us-approves-ai-chip-exports-to-gulf-after-saudi-crown-prince-visit.html>.

⁴⁴ Eck, Aksel. “Mapping Tech Companies' Cloud Expansion in the Gulf and its Human Rights Implications,” SMEX, March, 14, 2024, <https://smex.org/mapping-tech-companies-cloud-expansion-in-the-gulf-and-its-human-rights-implications/>.

As part of their AI strategies, all six countries listed establishing an AI regulatory framework as an objective. They also all adopted ethical charters and/or guidelines for the deployment of AI. The table below illustrates the list of foundational policies outlining ethical principles in the deployment and development of AI systems. It does not list all the ethical policies of each country, as some countries had additional policies that provided additional guidelines focusing on specific systems (such as Generative AI) or end-users. Only policies that outlined foundational principles governing the development and deployment of all AI systems throughout their lifecycle are listed in the table below. Policies outlining additional guidelines were taken into account in the analysis in the next sections.



Country	Policies outlining foundational AI principles
Egypt	The Egyptian Charter for Responsible AI. ⁴⁵ Adopted in 2023, the non-binding Charter outlines five principles: human-centeredness, transparency and explainability, fairness, accountability, and security and safety. While it is grounded in global principles and guidelines including the UNESCO Recommendation, it is also “adapted to the local context and combined with actionable insights to help ensure the responsible development, deployment, management, and use of AI systems in the country.”
Jordan	The National Artificial Intelligence Code of Ethics. ⁴⁶ Adopted in 2022, the Charter establishes a non-binding ethical framework for AI deployment in Jordan, outlining eight principles including humanity and society, inclusiveness and justice, privacy, and transparency. The Charter emphasizes a regulatory approach that “stem[s] from human and religious values, customs and traditions of the Jordanian society.”
Oman	The General Policy for the Safe and Ethical Use of Artificial Intelligence Systems. ⁴⁷ Adopted in 2025, the Policy's goal is to govern the use and development of AI systems in Oman “to ensure their responsible and safe use.” It applies to government entities and the private sector in their development and use of AI systems and outlines three principles: humanity and society, inclusiveness and justice, and responsibility and accountability.
Qatar	Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence. ⁴⁸ Dated November 2024, this document outlines non-binding guidelines “for anyone developing or deploying artificial intelligence (AI) systems that impact the public.” Its eight principles include do no harm, robustness and security, environment protection, privacy, and transparency.
Saudi Arabia	AI Ethics Principles. ⁴⁹ The policy was adopted by the Saudi Data and AI Authority (SDAIA) in September 2023, and it applies to “all AI stakeholders designing, developing, deploying, implementing, using, or being affected by AI systems” within the country. It has seven principles including fairness, privacy and security, and social and environmental benefits.
UAE	The UAE Charter for the Development and Use of Artificial Intelligence. ⁵⁰ Dated July 2024, the policy serves as a guiding framework for ethical use of AI and sets “principles for compliance with existing legislation and agreements related to the development and use of AI in the country.” It has 12 principles that include safety, fairness, data privacy, transparency, and human oversight.

Table 1: Foundational policies outlining ethical principles for the deployment and development of AI systems.

⁴⁵ “Egyptian Charter for Responsible AI,” The National Council for Artificial Intelligence, 2023,

<https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

⁴⁶ “The National Artificial Intelligence Code of Ethics,” Ministry of Digital Economy and Entrepreneurship, 2022, bit.ly/4x8gAjU

⁴⁷ “General Policy for the Safe and Ethical Use of Artificial Intelligence Systems,” Ministry of Transport, Communications, and Information Technology, April 1, 2025,

<https://mtcit.gov.om/library-3/legislations-policies-8/policies-73/general-policy-for-the-safe-and-ethical-use-of-artificial-intelligence-systems-291>.

⁴⁸ “Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology,” November 2024,

https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

⁴⁹ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023,

<https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁵⁰ “The UAE Charter for the Development and Use of Artificial Intelligence,” UAE Legislation, July 2024,

<https://uaelegislation.gov.ae/en/policy/download/the-uae-charter-for-the-development-and-use-of-artificial-intelligence>.

Common overarching principles emerged in the ethical charters and guidelines of the six countries that adopted such documents. They all adopted principles on human centeredness or humanity, responsibility and accountability, and bias, inclusiveness and/or fairness. All countries, with the exception of Oman, had principles on transparency and the reliability and/or safety of AI systems. Egypt and Oman did not adopt an overarching principle on privacy, while only Jordan, Qatar, and Saudi Arabia had a principle that explicitly mentioned the environment. All six countries mention or reference the UNESCO Recommendation.

Jordan, Oman, and Qatar are still at the stage of overarching principles and general guidelines, while Egypt, Saudi Arabia and the UAE adopted more detailed guidelines to operationalize implementation of principles. The Egyptian and Saudi frameworks listed guidelines according to the AI system lifecycle. This reflects guidance in the UNESCO Recommendation which emphasizes applying principles throughout the lifecycle.

Egypt's National Guidelines for Trustworthy and Responsible AI, adopted in March 2026 spanning over 80 pages, "serves as the Operational Manual" for public institutions and private sector companies seeking to deploy AI responsibly."⁵¹ It aims to translate the country's high-level ethical principles into operational guidelines using practical tools like methodologies, metrics, and checklists. The operational guidelines are divided into four pillars – institutional governance, AI lifecycle governance, stakeholder engagement, and society and sustainability – with each outlining procedures and policies to ensure responsible AI deployment. It further has a scoring methodology for organizations to assess their institutional readiness to adopt AI and their AI systems' alignment with the four pillars mentioned earlier.

In each of its seven principles, Saudi Arabia's AI Ethics Principles, provide a list of recommended actions per each step of the AI system lifecycle – plan and design, prepare input data, build and validate, and deploy and monitor. The policy includes additional practical guidance and tools. It defines key roles and responsibilities for individuals responsible for implementing AI ethics at adopting entities (Chief Data Officer, Chief Compliance Officer, Responsible AI Officer, and AI system assessor) and provides an optional registration mechanism "to motivate target entities to consider AI ethics when building and developing AI-based solutions to ensure a responsible use." Under optional registration, the Saudi Authority for Data and Artificial Intelligence (SDAIA) can assess compliance of registered entities and provide motivational badges to "reflect the level of compliance and progress on AI ethics adoption."

In its AI Ethics and Principles, the UAE attempted to provide some detailed guidelines and practical recommendations per each principle,⁵² However, these are not as comprehensive as the guidelines adopted by Egypt and Saudi Arabia. The nonbinding policy also only applies to AI systems "which make or inform 'significant decisions' or 'critical decisions.'"⁵³ Significant decisions are defined as "those decisions which have the potential for significant impact either on individuals or on society as a whole." Critical decisions, a subset of significant decisions, are "deemed to either have a very large impact on an individual or to have especially high stakes."

⁵¹ "AI Ethics Principles and Guidelines," The Official Platform of the UAE Government, <https://assets.u.ae/api/public/content/893c940c21c4403ea8df7faad66a889e?v=b2f9c1a1>

⁵² Ibid.

⁵³ Ibid.

While the guidelines give examples of such decisions, they fail to provide a comprehensive list that can better guide developers and deployers.

The next chapter examines, in detail, the extent to which these AI ethics frameworks adopted across SWANA align with the UNESCO Recommendation on the Ethics of Artificial Intelligence. The UNESCO Recommendation on the Ethics of Artificial Intelligence was selected as the primary benchmark for this analysis for two reasons. First, its scope is comprehensive relative to the risks most relevant to SWANA. Beyond core principles like transparency, fairness, and accountability, it explicitly addresses surveillance and mass data collection, the rights of children, environmental and climate impacts, cultural diversity, socioeconomic rights, and gender equality, issues that are central to how AI is being deployed and experienced in the region but that are often absent from narrower, or purely technical AI governance frameworks. Second, since all six countries studied explicitly reference or ground their own frameworks in the UNESCO Recommendation, it further offered a shared reference point that allowed for a comparative analysis across countries rather than measuring each policy against an external standard it never claimed to follow.

Chapter 2

How SWANA Frameworks Compare to the UNESCO Recommendations

SWANA countries adopted ethical AI principles that align with the principles established by the UNESCO Recommendation, in particular on fairness and non-discrimination, responsibility and accountability, safety and security, and transparency and explainability. Qatar and the UAE had the most number of principles aligning with the Recommendation (seven principles) followed by Jordan (six principles). Only the UAE had a principle dedicated to awareness and literacy while not a single country had a principle dedicated to multi-stakeholder and adaptive governance and collaboration.

This chapter will dive deeper into the different policies, identifying specific safeguards and measures listed by AI ethical policies and guidelines to address AI-related harms.

Human rights and peaceful, nonviolent applications

The UNESCO Recommendation, grounded in international human rights standards, emphasizes respect, protection, and promotion of human dignity and rights throughout the lifecycle of AI systems.⁵⁴ By contrast, the six SWANA countries did not include strongly-worded principles on human rights in their policies, opting instead for vaguely worded principles such as ‘humanity’ and ‘human-centeredness.’ While the different policies mention the necessity of protecting human rights in the AI lifecycle, these disclosures are sometimes vague and include broad references to cultural, societal, or religious values, raising questions about how such language could be used to interfere with human rights in the deployment of AI systems.

For instance, the Saudi AI Ethics Principles state that “AI systems should be built using an ethical methodology to be just and ethically permissible, based on intrinsic and fundamental human rights and cultural values to generate a beneficial impact on individual stakeholders and communities.”⁵⁵ Oman’s General Policy for Safe and Ethical Use of AI systems emphasizes “a human-centered and community-sensitive framework for the use of artificial intelligence systems, ensuring respect for fundamental human rights such as privacy, equality, justice, and the preservation of human dignity, in accordance with Islamic principles.”⁵⁶

⁵⁴ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

⁵⁵ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁵⁶ Oman: General Policy for the Safe and Ethical Use of Artificial Intelligence Systems,” Ministry of Transport, Communications, and Information Technology, April 1, 2025,

Qatar is the only country that does not mention human rights in its policies. The Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, in the seventh principle, rather emphasizes "a human-centred approach" for "user-friendly, ethical, and inclusive" AI and the need to "adhere to the cultural and religious values and refrain from any form of disrespect or attempt to alter established norms."⁵⁷

Beyond this general framing on human rights, the UNESCO Recommendation also speaks directly to one of the region's biggest challenges: lethal and violent applications of AI. Under its Proportionality and Do No Harm principle, the Recommendation states that final human determination should apply in decisions that result in "an impact that is irreversible or difficult to reverse or may involve life and death decisions." The Recommendation prohibits use of AI systems for social scoring or mass surveillance purposes. This principle carries particular weight in SWANA, which has become a testing ground for the latest automated warfare technologies, namely by Israel, during its ongoing genocide in Gaza and its attacks on other countries in the region. Bias and dehumanization of Palestinians, flawed training datasets, and the absence of due diligence and human control in the design and operation of these systems, have undermined the legal and ethical safeguards meant to protect the right to life.

Against this backdrop, national frameworks diverge sharply in how they address human oversight of lethal decisions. Saudi Arabia and the UAE both state in their frameworks that life and death decisions should be governed by humans, with Saudi Arabia adopting language very similar to UNESCO, banning AI social scoring or mass surveillance use cases.⁵⁸ The UAE AI Ethics and Principles state that "decisions related to lethal force, life and death should not be delegated to AI systems" and human control should be ensured over those decisions.⁵⁹

The policies of Egypt, Jordan, Oman, and Qatar were less clear about the role of human oversight and final human determination in lethal uses. For example, Jordan's National Artificial Intelligence Code acknowledged the risk of AI "enabling some extremist groups to develop weapons and tools of conflict and crime and use them against states and societies," but did not mention state-deployed weapons and applications and the necessity of human oversight and determination.⁶⁰ Egypt's charter stated that "final human determination is always in place" and "additional measures should be in place in case of sensitive or mission-critical AI applications," but these disclosures do not explicitly mention lethal applications.⁶¹

<https://mtcit.gov.om/library-3/legislations-policies-8/policies-73/general-policy-for-the-safe-and-ethical-use-of-artificial-intelligence-systems-291>.

⁵⁷ Qatar: "Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology," November 2024,

https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

⁵⁸ "AI Ethics Principles," Saudi Data and Artificial Intelligence Authority, September 2023,

<https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁵⁹ "AI Ethics Principles and Guidelines," The Official Platform of the UAE Government,

<https://assets.u.ae/api/public/content/893c940c21c4403ea8df7faad66a889e?v=b2f9c1a1>

⁶⁰ "The National Artificial Intelligence Code of Ethics," Ministry of Digital Economy and Entrepreneurship, 2022, bit.ly/4x8gAjU

⁶¹ "Egyptian Charter for Responsible AI," The National Council for Artificial Intelligence, 2023,

<https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

The right to nondiscrimination and gender equality

The UNESCO Recommendation's fairness and non-discrimination principle calls on AI actors to “promote social justice and safeguard fairness and non-discrimination of any kind in compliance with international law” and ensure AI benefits are “available and accessible to all,” including persons with disabilities, girls and women, and disadvantaged, marginalized and vulnerable people. AI actors also actively avoid reinforcing or perpetuating discriminatory applications and outcomes throughout the entire AI system lifecycle and ensure effective remedy mechanisms against discrimination and biased algorithmic decisions. States, on the other hand, “should work to tackle the digital divides and ensure inclusive access to and participation in the development of AI.” Moreover, technologically advanced States should support the least advanced “to ensure that the benefits of AI technologies are shared.”

The six SWANA ethical frameworks address fairness and non-discrimination in some form, though the depth of these disclosures varies considerably. Jordan and Oman's guidelines are the least detailed and remain largely general. The UAE guidelines on fairness state that “AI systems should not discriminate against people or groups in a way that could have an adverse impact” instead of outright banning any form of discrimination regardless if the impact is ‘adverse’ or not. What counts as “adverse impact” is not defined, leaving the threshold for a violation unclear.

Where the frameworks are more developed, they tend to focus on practical guidance for developers and deployers to avoid reinforcing discriminatory outcomes. The policies of Egypt⁶² and Saudi Arabia,⁶³ and to a lesser extent the UAE,⁶⁴ provide the most detailed measures and tools to address and mitigate bias and discrimination. This includes discrimination or fairness impact assessments, engagement with a wide range of stakeholders including affected individuals and vulnerable groups, and evaluating training datasets for bias, inaccuracies or representativeness of affected populations. Egypt's guidelines also recommend the establishing of mechanisms for users to report bias and discrimination.⁶⁵ By comparison, the state-level dimension of this principle receives far less attention.

⁶² Egypt Center for Responsible AI, “Egypt National Guidelines for Responsible AI,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2026,

<https://ai.gov.eg/SynchedFiles/ar/Resources/Egypt%20National%20Guidelines%20for%20Trustworthy%20and%20Responsible%20AI.pdf>.

⁶³ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023,

<https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁶⁴ “AI Ethics Principles and Guidelines,” The Official Platform of the UAE Government,

<https://assets.u.ae/api/public/content/893c940c21c4403ea8df7faad66a889e?v=b2f9c1a1>

⁶⁵ Egypt Center for Responsible AI, “Egypt National Guidelines for Responsible AI,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2026,

<https://ai.gov.eg/SynchedFiles/ar/Resources/Egypt%20National%20Guidelines%20for%20Trustworthy%20and%20Responsible%20AI.pdf>.

Jordan,⁶⁶ Qatar,⁶⁷ Saudi Arabia,⁶⁸ and the UAE⁶⁹ all stress the need to ensure AI benefits are accessible to all, particularly vulnerable groups, but none translate this into specific, actionable guidelines for how that access should be guaranteed.

None of the six frameworks outline measures for States to address digital divides. In particular, the Gulf's most technologically advanced countries, particularly Saudi Arabia and the UAE, did not express a commitment of solidarity with those least technologically advanced in the region.

The UNESCO Recommendation further stresses protection of gender equality in AI systems and includes policy recommendations for Member States on gender, in particular incorporating a “transversal gender perspective” in Ethical Impact Assessments and adopting digital programmes and policies to ensure women and girls are not left behind in the AI economy.⁷⁰ Further recommendations include ensuring gender stereotyping and discrimination are not translated into AI systems, ensuring female participation and engagement in all stages of the AI lifecycle, assuring public funds in research, innovation, and technology go to gender inclusive programmes and companies, and incentivizing girls and women to join AI academic and industry research.⁷¹

A gender-inclusive lens is largely absent in the SWANA frameworks closely studied in this report. In most cases, gender is mentioned in relation to personal and sensitive data categories that need to be safeguarded in the AI lifecycle. Saudi Arabia states that “the functionality of an AI system should not be limited to a specific group based on gender, race, religion, disability, age, or sexual orientation.”⁷² In its National AI Governance Framework guide, Egypt listed two gender equality priorities: implementing safeguards against gender-based discrimination in AI systems and promoting participation of women in the AI workforce.⁷³

⁶⁶ Jordan: “The National Artificial Intelligence Code of Ethics,” Ministry of Digital Economy and Entrepreneurship, 2022, bit.ly/4x8gAju

⁶⁷ Qatar: “Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology,” November 2024, https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

⁶⁸ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>

⁶⁹ “AI Ethics Principles and Guidelines,” The Official Platform of the UAE Government, <https://assets.u.ae/api/public/content/893c940c21c4403ea8df7faad66a889e?v=b2f9c1a1>

⁷⁰ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>

⁷¹ Ibid.

⁷² “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>

⁷³ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>

Transparency and explainability

The UNESCO Recommendation treats transparency as a precondition for protecting human rights, since a lack of it can undermine the ability to challenge AI-driven decisions and thereby infringe the right to effective remedy. The Recommendation states that people should be “fully informed” of decisions pertaining to them made or informed by AI.⁷⁴ When such decisions affect their safety or human rights, those affected should be able to request explanatory information from the relevant AI actor or public sector institutions. Individuals whose rights and freedoms are affected by AI should be able to access the reasons informing such decisions and be able to submit requests to a human (designated staff member of the private sector company or public sector institution) to review and correct the decision. The Recommendation defines explainability as “making intelligible and providing insight into the outcome of AI systems.”⁷⁵ AI actors should ensure that AI outcomes and the sub-processes leading to them are “understandable and traceable, appropriate to the context.”⁷⁶ A meaningful explanation should be provided with any AI decision that may impact the end user “in a way that is not temporary, easily reversible or otherwise low risk.”⁷⁷

Egypt,⁷⁸ Qatar,⁷⁹ Saudi Arabia,⁸⁰ and the UAE⁸¹ all stated in their policies that people should be informed of decisions involving AI systems or when they are interacting with such systems. For example, the UAE stated that “AI operators should consider providing affected AI subjects with a means to request explanations for specific significant decisions.”⁸² Egypt maintained that “appropriate mechanisms should be in place to allow anyone adversely affected by an AI system to challenge its outcome based on plain and easy-to-understand information on the factors, and the logic that served as the basis for the prediction, recommendation, or decision.”⁸³ However, these disclosures do not specifically mention human rights impacts, nor do they specify what “significant” decisions and “adverse” impacts those affected will be able to request information for.

⁷⁴ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

⁷⁵ Ibid.

⁷⁶ UNESCO Recommendation on the Ethics of Artificial Intelligence, para. 40: “Explainability refers to making intelligible and providing insight into the outcome of AI systems. The explainability of AI systems also refers to the understandability of the input, output and the functioning of each algorithmic building block and how it contributes to the outcome of the systems. Thus, explainability is closely related to transparency, as outcomes and sub-processes leading to outcomes should aim to be understandable and traceable, appropriate to the context.” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

⁷⁷ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

⁷⁸ “Egyptian Charter for Responsible AI,” The National Council for Artificial Intelligence, 2023, <https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

⁷⁹ Qatar: “Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology,” November 2024, <https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb>

⁸⁰ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁸¹ “The UAE Charter for the Development and Use of Artificial Intelligence,” UAE Legislation, July 2024, <https://uaelegislation.gov.ae/en/policy/download/the-uae-charter-for-the-development-and-use-of-artificial-intelligence>.

⁸² Ibid.

⁸³ “Egyptian Charter for Responsible AI,” The National Council for Artificial Intelligence, 2023, <https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

Only Saudi Arabia and the UAE adopted language that recommends the public release of training data or source code of AI systems. This is the case for “data pertaining to social and environmental topics in Saudi Arabia”⁸⁴ and the source code for “non-sensitive public sector use cases designed for the common good” in the UAE.⁸⁵ This falls short of the Recommendation's suggestion that, in cases of serious threats of adverse human rights impacts, transparency may require sharing code or datasets more broadly, a threshold none of the six frameworks explicitly adopts.

Accountability and human oversight

In the human oversight and determination principle, the UNESCO Recommendation states that “Member States should ensure that it is always possible to attribute ethical and legal responsibility for any stage of the lifecycle of AI systems” and emphasizes the role of “inclusive public oversight.”⁸⁶ Under this principle, only humans should decide, and only in “limited cases,” when to transfer control to AI systems adding that “as a rule, life and death decisions should not be ceded to AI systems.”⁸⁷ The responsibility and accountability principle goes further still and attributes a legal and ethical responsibility to Member States in respecting, protecting, and promoting human rights and freedoms and protection of the environment throughout the AI system lifecycle.⁸⁸ To operationalize this, the recommendation calls for specific measures to ensure responsibility and accountability of AI systems, including appropriate oversight, impact assessment, and audit and human rights due diligence.⁸⁹

Ethical frameworks adopted by the six countries contain weak safeguards and guidelines for human oversight and responsibility and accountability. In particular, they prescribe limited roles for public and inclusive oversight and States' ethical and legal responsibility when it comes to AI systems. This asymmetry is not incidental and it reflects a structural choice across the different frameworks. **The different policies rather put much of the onus of responsibility on individual developers and deployers, treating accountability largely as a matter of internal governance and self assessment rather than State-backed enforcement.** For example, Saudi Arabia's AI Ethics Principles assign concrete compliance roles (Chief Data Officer, Chief Compliance Officer, Responsible AI Officer, etc.) to organizations deploying AI, effectively placing the machinery of accountability inside the private and public entities building and using these systems, rather than within an independent State oversight body.

With the exception of Oman, all countries adopted language that attributed accountability, responsibility or liability of AI decisions to AI actors and their associated roles in the AI system's lifecycle. None of the six

⁸⁴ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023,

<https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁸⁵ “The UAE Charter for the Development and Use of Artificial Intelligence,” UAE Legislation, July 2024,

<https://uaelegislation.gov.ae/en/policy/download/the-uae-charter-for-the-development-and-use-of-artificial-intelligence>.

⁸⁶ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021,

<https://unesdoc.unesco.org/ark:/48223/pf00000381137>.

⁸⁷ Ibid.

⁸⁸ Ibid.

⁸⁹ Ibid.

frameworks disclosed that States assume legal and ethical responsibility to protect human rights and the environment throughout the lifecycle of AI systems.

Additionally, while these frameworks acknowledged the different risks associated with deployment of AI, including risks to human rights, bias, and the environment, safeguards in case of adverse human rights risks and impacts were lacking. For instance, all countries established a right to remedy in their policies, however, it was not always clear if in the case of adverse human rights impacts, those affected can request explanatory information and have human staff review their complaints and correct decisions.

Finally, the different guidelines and policies contained minimal and vague safeguards on the role of inclusive public oversight. When these policies mentioned oversight entities of regulatory authorities, they were either not specified or they lacked independence. For instance, Jordan's National Artificial Intelligence Code of Ethics states that the Ministry of Digital Economy and Entrepreneurship should put in place channels "to receive complaints related to the ethics of artificial intelligence."⁹⁰ The Saudi AI Ethics, on the other hand, highlighted the role of the SDAIA in "measuring compliance" and conducting ethical investigations and audits along with the support of national regulatory authorities, without specifying which authorities.⁹¹ Oman's Policy requires deployers and developers to provide documents and information related to AI systems to regulatory authorities to verify compliance in case of an investigation.⁹² The list of authorities is not specified. The Guide to Egypt's National AI Governance Framework outlined the role of the Personal Data Protection Authority and different sector regulators for sector compliance, in particular, in healthcare, telecommunications, and finance.⁹³

The right to privacy and data protection and the safety and security of AI systems

Protection of privacy and personal data is fundamental throughout the lifecycle of AI systems and the UNESCO Recommendation states that data for these systems should be handled in accordance with international law.⁹⁴ The recommendation requires adequate privacy impact assessments of algorithmic systems. It further requires that Member States ensure legislative protection for the right to privacy, including protection from surveillance, and that individuals retain rights over their personal data," including the right to access and erase their data.⁹⁵ It also has a Safety and Security principle, which states that "unwanted harms (safety risks), as well as

⁹⁰ "The National Artificial Intelligence Code of Ethics," Ministry of Digital Economy and Entrepreneurship, 2022, bit.ly/4x8gAjU

⁹¹ "AI Ethics Principles," Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁹² Oman: General Policy for the Safe and Ethical Use of Artificial Intelligence Systems," Ministry of Transport, Communications, and Information Technology, April 1, 2025, <https://mtcit.gov.om/library-3/legislations-policies-8/policies-73/general-policy-for-the-safe-and-ethical-use-of-artificial-intelligence-systems-291>.

⁹³ Egyptian Center for Responsible AI, "Guide To Egypt National AI Governance Framework," National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

⁹⁴ "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf00000381137>.

⁹⁵ Ibid.

vulnerabilities to attack (security risks) should be avoided and should be addressed, prevented and eliminated throughout the lifecycle of AI systems to ensure human, environmental and ecosystem safety and security.”⁹⁶

In their ethical AI frameworks, all six SWANA States highlighted the importance of privacy and data protection in the development and deployment of AI systems. Egypt, Saudi Arabia, and the UAE provided the most detailed guidelines, and they all recommend the implementation of privacy-by-design and, with the exception of Jordan, all list anonymization and encryption as specific measures to protect personal data across the AI lifecycle. Only Egypt, Saudi Arabia, and the UAE go further and explicitly state that impact assessments should cover risks to privacy specifically, rather than treating it as one risk category amongst many. To ensure robustness, safety, and security of AI systems, the different frameworks recommend conducting testing to identify and address system vulnerabilities or cybersecurity threats.

As with previous safeguards discussed in this chapter, SWANA frameworks neglect the role and responsibilities of States in ensuring privacy is guaranteed, particularly when it comes to surveillance in AI systems. Instead, SWANA frameworks are far more detailed on what private developers and deployers should do than on what States themselves should and should not do. Saudi Arabia was the only country that included a ban on systems deployed for massive surveillance and social scoring in its ethical framework.⁹⁷ The UAE adopted vague language stating that “surveillance or other AI-driven technologies should not be deployed to the extent of violating internationally and/or UAE’s accepted standards of privacy and human dignity and people rights.”⁹⁸ Egypt addressed surveillance in relation to dual-use systems stating in the National AI Governance Framework Guide that it “imposes strict export controls” on such technologies. It did not address surveillance of its own citizens.⁹⁹

Socio-economic and cultural rights

The UNESCO Recommendation’s Literacy and Awareness principle calls on governments, intergovernmental organizations, civil society, academia, the media, community leaders and the private sector to jointly promote public awareness and understanding of AI technologies “so that all members of society can take informed decisions about their use of AI systems and be protected from undue influence.”¹⁰⁰ The Recommendation adds that learning about the impact of AI systems should be “grounded specifically in AI’s impact on human rights and access to rights, as well as on the environment and ecosystems.”¹⁰¹

⁹⁶ Ibid.

⁹⁷ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

⁹⁸ Ibid.

⁹⁹ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹⁰⁰ Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

¹⁰¹ Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

SWANA States acknowledge the importance of AI awareness and digital literacy in their strategies, but largely frame this around building technical skills for the labor market rather than raising awareness of human rights impacts. Egypt's charter, for example, calls on "all members of the AI ecosystem, especially academic and educational institutions," to promote capacity building and public awareness of AI's "opportunities and challenges," without any reference to human rights.¹⁰²

The Recommendation also directs States to assess AI's impact on labor markets and education, close skills gaps through multi-stakeholder collaboration, and ensure a "fair transition" for at-risk workers through upskilling, social protection, and, where needed, tax reform to offset AI-driven unemployment.¹⁰³ Job displacement is an ongoing concern across SWANA policy language: Egypt's charter commits employers to support affected workers through training and access to new opportunities if job losses prove "inevitable,"¹⁰⁴ while Qatar's strategy acknowledges the "very real" risk of job losses in "administrative white collar occupations," with its first strategic pillar focused on growing and attracting AI talent through training, incentives, and fast-track residency.¹⁰⁵ Yet none of the frameworks studied address the broader social protection or tax measures the UNESCO Recommendation envisions, the focus remains almost entirely on education, training, and talent competition.

On culture, the Recommendation encourages Member States to incorporate AI systems, where appropriate, in the preservation of cultural heritage, and to examine and address the cultural impact of AI systems, especially natural language processing (NLP) applications "on the nuances of human language and expression," including reduction in use of local languages and dialects which could lead to their endangerment. States should also promote AI education and training for artists and promote awareness of AI tools among local cultural industries.¹⁰⁶ They should also promote research at the intersection of intellectual property (IP) and AI and assess how the rights of IP owners are impacted by AI.¹⁰⁷

SWANA frameworks instead emphasize protecting "cultural" and "religious" values in general terms, without defining what this entails in practice. Saudi Arabia requires periodic assessment to ensure AI systems align with "human rights and cultural values"¹⁰⁸; Qatar instructs employers and developers should "adhere to the cultural and religious values and refrain from any form of disrespect or attempt to alter established norms"¹⁰⁹; and

¹⁰² "Egyptian Charter for Responsible AI," The National Council for Artificial Intelligence, 2023, <https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

¹⁰³ Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf00000381137>.

¹⁰⁴ "Egyptian Charter for Responsible AI," The National Council for Artificial Intelligence, 2023, <https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

¹⁰⁵ "National Artificial Intelligence Strategy For Qatar," Qatar Center for Artificial Intelligence, 2022, <https://qcai.qcri.org/wp-content/uploads/2022/12/OCRI-Artificial-Intelligence-Strategy-2019-ENG.pdf>.

¹⁰⁶ "Egyptian Charter for Responsible AI," The National Council for Artificial Intelligence, 2023, <https://ai.gov.eg/SynchedFiles/en/Resources/Egyptian%20Charter%20For%20Responsible%20AI.pdf>.

¹⁰⁷ Ibid.

¹⁰⁸ "AI Ethics Principles," Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

¹⁰⁹ Qatar: "Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology," November 2024, https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

Egypt's governance framework calls for "ensuring foreign models introduced to the market are trained using relevant local data and adhering to Egyptian customs and norms."¹¹⁰ None of the six frameworks meaningfully address language preservation, support for artists, or AI's impact on intellectual property rights. Egypt's charter echoes UNESCO's call "to examine and address the cultural impact of AI systems," especially NLP, but assigns this responsibility to developers alone, without specifying any role for the State.¹¹¹

This gap has not stopped several countries from building their own Arabic-language AI tools. Oman is developing OmanGPT, trained on "Omani cultural, historical, artistic, scientific, civilizational, and political content."¹¹² Saudi Arabia's PIF-backed HUMAIN launched HUMAIN Chat;¹¹³ the UAE's Technology Innovation Institute released Falcon Arabic;¹¹⁴ and Qatar Computing Research Institute at Hamad Bin Khalifa University developed Fanar.¹¹⁵ These initiatives are particularly notable in the case of Saudi Arabia and the UAE, where State-backed investment in sovereign, Arabic-language LLMs is not simply about linguistic accuracy or technical independence from Western AI providers, but also about retaining control over how information, knowledge, and cultural narratives are represented and circulated domestically and across the region.¹¹⁶

Environment and climate change

The UNESCO Recommendation requires States and companies to "assess the direct and indirect environmental impact throughout the AI system lifecycle...and reduce the environmental impact of AI systems and data infrastructures."¹¹⁷ It adds that "Member States should ensure compliance of all AI actors with environmental law, policies and practices." Member States should also create incentives for the "development and adoption of rights-based and ethical AI-powered solutions" with the participation of local and Indigenous communities throughout the lifecycle of AI systems for the protection of the environment.¹¹⁸ AI method selection should follow proportionality, considering models' environmental impacts from intensive data and resource use.

¹¹⁰ Egyptian Center for Responsible AI, "Guide To Egypt National AI Governance Framework," National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹¹¹ Egyptian Center for Responsible AI, "Guide To Egypt National AI Governance Framework," National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹¹² "Chat GPT Omani Content Language Model Project (Phase One)," Ministry of Transport, Communications, and Information Tehcnology, Undated, <https://mtcit.gov.om/media-4/events-competitions-10/award-83/chat-gpt-omani-content-language-model-project-phase-one-327>.

¹¹³ "HUMAIN Launches HUMAIN Chat, Powered by ALLAM 34B The World's Most Advanced Arabic-First AI Model - Fluent in Islamic Culture, Values and Heritage," HUMAIN, August, 25, 2025, <https://www.humain.com/en/news/humain-chat-launch>.

¹¹⁴ "Falcon-Arabic: A Breakthrough in Arabic Language Models," Falcon, May 21, 2025, <https://falcon-lm.github.io/blog/falcon-arabic/>.

¹¹⁵ Carrington Malin, "Qatar launches Fanar sovereign large language model," Middle East AI News, December, 10, 2024, <https://www.middleeastainews.com/p/qatar-fanar-large-language-model-llm>.

¹¹⁶ Ramez Salah. "هل تدخل السعودية إلى سياق الذكاء الاصطناعي العالمي؟" Raseef22, June 1, 2026, bit.ly/4xBAB2w

¹¹⁷ "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf00000381137>.

¹¹⁸ Ibid.

Requirements should be developed for the provision of evidence that an AI application will achieve its intended effect or that there are safeguards in place that justify its use. Without such evidence, or if environmental impacts are disproportionately negative, the method should not be deployed.

The six SWANA countries acknowledge environmental risk associated with AI in their AI ethical principles and guidelines and urge developers and deployers to consider and mitigate environmental impacts of their systems, for instance, by weighing potential harms against benefits,¹¹⁹ opting for small models,¹²⁰ and incorporating environmental risks into impact assessments.¹²¹ For instance, Egypt adopted a frugal AI policy whereby developers of high-risk systems should prioritize “lightweight models” like small language models, “where technically feasible.”¹²² When this is not possible, developers should justify why a resource-intensive model is selected by documenting the technical justification and explaining why a lighter alternative was not sufficient. All government projects are required “to be preceded by a thorough impact assessment and that includes an evaluation of the environmental impact of these projects.” Qatar’s policy states that AI systems should only be developed when the net positive on social development outweighs the net negative effects on the environment in Qatar and worldwide.¹²³

Multistakeholderism

The UNESCO Recommendation maintains that “participation of different stakeholders throughout the AI system lifecycle is necessary for inclusive approaches to AI governance.”¹²⁴ Measures to ensure meaningful participation of marginalized groups and communities should be in place.¹²⁵ The Recommendation also states that all AI actors,

¹¹⁹ Qatar: “Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology,” November 2024, https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dc1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

¹²⁰ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹²¹ “AI Ethics Principles,” Saudi Data and Artificial Intelligence Authority, September 2023, <https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

¹²² Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹²³ Qatar: “Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology,” November 2024, https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dc1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

¹²⁴ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

¹²⁵ Ibid.

including researchers, civil society, lawyers, and users should be involved in setting new norms or adapting the existing legal frameworks.¹²⁶

While SWANA countries mentioned different stakeholders' involvement in their ethical frameworks, the role of multi-stakeholderism, civil society, and inclusiveness in governance of AI was largely unaddressed. Participation of "stakeholders" was emphasized during AI development and deployment, however, these were largely not defined. For instance, in the Saudi AI Ethics, there are references to "relevant stakeholders" and "stakeholders" that need to be engaged with during the design, development, and deployment of AI systems.¹²⁷ However, the types of stakeholders that need to be involved, including the role of civil society, were not specified. In another example, Qatar's guidelines state that developers and deployers should engage with "stakeholders at risk of being impacted by AI" and experts in the domain of AI application.¹²⁸ Yet, they did not address the government's own engagement with different stakeholders, especially civil society, when governing AI. Policies adopted by Egypt¹²⁹ and Jordan¹³⁰ do mention the role of civil society, including in governance. Jordan offers the clearest example in practice: the Jordan Open Source Association (JOSA), a local digital rights NGO, took part in the drafting committee of the ethical AI charter,¹³¹ which was established by The Ministry of Digital Economy and Entrepreneurship and included representatives from private sector, NGOs, and academia.¹³² JOSA's proposal¹³³ to encourage the adoption of open source models was included in the final version.¹³⁴

¹²⁶ Ibid.

¹²⁷ "AI Ethics Principles," Saudi Data and Artificial Intelligence Authority, September 2023,

<https://sdaia.gov.sa/en/SDAIA/about/Documents/ai-principles.pdf>.

¹²⁸ Qatar: "Principles and Guidelines for Ethical Development and Deployment of Artificial Intelligence, Ministry of Communications and Information Technology," November 2024,

https://prod16-assets.sprinklr.com/prod16-cdata/DAM/160136/33fb390b-d120-47f2-8708-532dcb1e15c3-1252740832/MCIT_National_AI_Strategy_-_AI.pdf

¹²⁹ Egyptian Center for Responsible AI, "Guide To Egypt National AI Governance Framework," National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024,

<https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹³⁰ Jordan: "The National Artificial Intelligence Code of Ethics," Ministry of Digital Economy and Entrepreneurship, 2022, bit.ly/4x8gAjU

¹³¹ JOSA, interview with author, March 30, 2026.

¹³² "The National Artificial Intelligence Code of Ethics," Ministry of Digital Economy and Entrepreneurship, 2022

¹³³ JOSA, email interview with author, May 1, 2026.

¹³⁴ "The National Artificial Intelligence Code of Ethics," Ministry of Digital Economy and Entrepreneurship, 2022

Chapter 3

Gaps in SWANA Ethical AI Policies and Principles

SWANA countries attempted to mirror the language of UNESCO's ethical AI principles, especially around fairness, transparency, and safety, however, they fell short of fully realizing their human-rights-based obligations in practice. Building on this mapping, this chapter turns to substance, examining in detail the key gaps that persist in SWANA ethical AI policies and principles.

1. Nonbinding policies, general guidelines and vague language

Although SWANA governments adopted ethical AI charters and guidelines, these instruments are almost entirely nonbinding. In a few cases, more recent documents introduce risk-based compliance models, but even these stop short of a clear legal regime. Egypt's Charter for Responsible AI is nonbinding, however in its National Guidelines for Trustworthy and Responsible AI, the country adopted a “proportionate binding approach wherein enforcement will be proportional to the level and threshold risk.”¹³⁵ A different document, the Guide to the National AI Governance Framework,¹³⁶ sets four risk tiers as follows: Tier 1 (prohibited) covers systems posing “unacceptable risks to sovereignty or fundamental rights”; Tier 2 (high risk) covers systems deployed in critical infrastructure and biometrics, subject to mandatory dual-check conformity assessments; Tier 3 (limited risk) includes chatbots, deepfake tools, and other Generative AI subject to transparency and labeling obligations; and Tier 4 (minimal risk) comprises standard software tools, which remain unregulated or voluntary. While this architecture implies stronger enforcement for prohibited and high-risk systems, Egypt still lacks a dedicated AI law that would translate these categories into binding statutory obligations and spell out concrete sanctions and redress mechanisms for noncompliance. It remains unclear what legal consequences deployers and developers face if they ignore these guidelines, and how affected individuals could seek remedy.

The binding nature of Saudi Arabia's ethics principles “fluctuates ambiguously between mandatory and optional,” according to a political scientist who researched Gulf countries' AI strategies and policies.¹³⁷ While the principles set norms which are non-binding, enforcement against non-compliance can be penalized under other

¹³⁵ Egypt Center for Responsible AI, “Egypt National Guidelines for Responsible AI,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2026, <https://ai.gov.eg/SynchedFiles/ar/Resources/Egypt%20National%20Guidelines%20for%20Trustworthy%20and%20Responsible%20AI.pdf>.

¹³⁶ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹³⁷ Anonymous political scientist, email interview with author, May 21st and May 25th, 2026.

relevant binding legal instruments such as the Personal Data Protection Law (PDPL).¹³⁸ Saudi Arabia's Personal Data Protection Law contains safeguards that align with international standards in a number of areas including data subject rights, legal basis for data processing, privacy policies requirements, and notification in case of data breaches.¹³⁹ However, these safeguards do not apply to the vague and broad exceptions of national security, the Kingdom's reputation and diplomatic relations, and confidential sources of information. In addition, as illustrated above, these policies remain general for some countries, failing to offer practical guidelines that can support developers and deployers in better ensuring ethical, responsible, and trustworthy AI adoption.

One particularly problematic area is the use of vague language around preserving religious, cultural, or societal values. While context-sensitive AI governance is important, broad, undefined references to "cultural or religious values" can easily become a mechanism for restricting AI applications that challenge prevailing norms, even when those applications do not violate human rights and, in many cases, help realize them. This is at odds with the UNESCO Recommendation, which explicitly requires States to use AI to improve access to information and “enhance freedom of expression” and to ensure that AI actors “respect and promote freedom of expression as well as access to information with regard to automated content generation, moderation and curation.” In practice, this means that restrictions based on culture or religion must still comply with international human rights standards: they must be legal, pursue a legitimate aim, and be necessary and proportionate under instruments such as the ICCPR. Vague claims about protecting “values” are not enough.

Existing evidence on AI-driven content moderation in Arabic shows how quickly these tensions can translate into systematic silencing.¹⁴⁰ For instance, access to chatbots that provide factual and non-stigmatizing sexual and reproductive health rights (SRHR) information in Arabic or local dialects can be blocked under the pretext of preserving religious or cultural values. Further, Arabic LLMs may be designed in a way that blocks queries about taboo subjects like religion, human rights, and SRHR, or generate answers and information that are manipulative or nonfactual. The development and deployment of local/localized solutions that are steeped in local languages and dialects and sensitive to the needs and contextual specificities of different regions, countries, and communities is encouraged. But without clear safeguards grounded in international standards on freedom of expression, “cultural specificity” risks becoming a pretext for building systems that structurally narrow the information space, normalizing State-aligned narratives and erasing dissenting or rights-affirming voices. From a freedom-of-expression perspective, the core question is not whether AI systems reflect local culture in the abstract, but whether any cultural or religious restrictions they embed can be justified under international human rights law, are transparently disclosed, and are subject to meaningful appeal and independent oversight. Taken together, these patterns show that while SWANA frameworks acknowledge ethical concerns, they often leave enforcement and interpretation to general laws or vague cultural norms, rather than providing clear, binding rules for AI actors.

¹³⁸ “Saudi Arabia - AI Ethics Principles,” regulations.ai, September 1, 2023, <https://regulations.ai/regulations/RAI-SA-NA-PCAESXX-2023>.

¹³⁹ Marianne Rahme, “Data Protection in Saudi Arabia: Comparative Analysis,” SMEX, February 10, 2022, <https://smex.org/data-protection-in-saudi-arabia-comparative-analysis/>.

¹⁴⁰ Stephannie Nasr, “New content moderation rules harm Arabic SRHR advocacy online,” SMEX, September 1, 2025, <https://smex.org/new-content-moderation-rules-harm-arabic-srhr-advocacy-online/>.

2. Human rights safeguards in practice

These shortcomings become more consequential when we examine how these frameworks interact with real-world human rights challenges.

Lethal AI applications

When it comes to lethal AI applications, none of the SWANA frameworks call for an outright ban on lethal applications, despite the horrendous impacts such systems have on civilians and civilian infrastructure in the region as a result of their deployment in different wars. For example, during the Gaza genocide, Israeli military deployed systems for detection, generation, and killing of targets, in violation of key principles of International Humanitarian Law (IHL), in particular military necessity, proportionality, distinction between combatants and civilians, and precaution.¹⁴¹ Over two years of AI-assisted genocide killed and injured more than 10% of the Gaza population.¹⁴² In recent years, calls for a ban have increased, with the UN Secretary General calling, last year, for a global ban on lethal autonomous weapon systems describing them as “politically unacceptable” and “morally repugnant.”¹⁴³ Yet, none of the SWANA frameworks examined in this report translate these concerns into concrete commitments. Only Saudi Arabia and the UAE affirm that life-and-death decisions should remain under human control, language closely mirroring UNESCO’s human oversight principle, but neither country endorses a categorical ban on lethal autonomous systems.

Surveillance, privacy and state power

Although these policies emphasize privacy and data protection throughout the AI systems’ lifecycle, they neglect the role of States in infringing on these rights in AI-powered surveillance.

For instance, Saudi Arabia adopted language that is inconsistent with its own surveillance practices. Its AI Ethics Principles state that “AI systems should not be used for social scoring or mass surveillance purposes.”¹⁴⁴ However, authorities in the kingdom deploy invasive biometric surveillance technologies and have been building smart cities where mass surveillance is a key element.¹⁴⁵ In a different example, Egypt states that it “imposes strict export controls” on dual-use AI technologies like surveillance systems and autonomous weapons.¹⁴⁶ Yet,

¹⁴¹ International Committee of the Red Cross (ICRC), “ICRC Position on Autonomous Weapon Systems,” May 12, 2021, <https://www.icrc.org/en/document/icrc-position-autonomous-weapon-systems>; Yuval Abraham, “‘Lavender’: The AI Machine Directing Israel’s Bombing Spree in Gaza,” +972 Magazine, April 3, 2024, <https://www.972mag.com/lavender-ai-israeli-army-gaza/>.

¹⁴² Neta Crawford, “The Human Toll of the Gaza War: Direct and Indirect Death from 7 October 2023 to 3 October 2025,” Costs of War, October 7, 2025, <https://costsofwar.watson.brown.edu/paper/HumanTollGaza>.

¹⁴³ “‘Politically unacceptable, morally repugnant’: UN chief calls for global ban on ‘killer robots,’” UN News, May 14, 2025. <https://news.un.org/en/story/2025/05/1163256>

¹⁴⁴ “AI Ethics Principles and Guidelines,” The Official Platform of the UAE Government, <https://assets.u.ae/api/public/content/893c940c21c4403ea8df7faad66a889e?v=b2f9c1a1>

¹⁴⁵ Lina Al-Hathloul, “Dictators in Egypt and Saudi Arabia love smart cities projects — here’s why,” Access Now, March 1, 2022, <https://www.accessnow.org/smart-cities-projects/>.

¹⁴⁶ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024,

Egyptian authorities are infamous for exporting and deploying advanced surveillance technologies including facial recognition and smart city tech.¹⁴⁷ The country's ethical AI framework does not outline any safeguards against AI-powered surveillance by government entities.

These contradictions raise serious questions as to governments' motivations behind adopting AI ethics. Are these principles and guidelines simply a means to join an AI economy that remains, after all, prohibitively inaccessible to most countries in the region, and is dominated by a few players in the Global North?

"Both Saudi Arabia and the UAE are investing in AI as part of the economic transition narrative and this narrative presents any discussion about rights as hindering development, or a western distraction," said a political scientist who requested anonymity.¹⁴⁸ "These principles are increasingly reflected in government and corporate frameworks, but there remains a significant gap between high-level commitments and consistent implementation in practice," Nour Naim, an AI ethics expert, said.¹⁴⁹ "Unfortunately, these principles in our countries, and especially in Qatar, remain theoretical on the ground and there is a big gap between official documents and the practical reality," she added.

Freedom of expression, access to information and information integrity

Meanwhile, **freedom of expression and information was not addressed in any of these frameworks despite the role AI plays in governing access to information and expression.** For instance, previous research and investigations repeatedly illustrated how content moderation algorithms and recommender systems deployed by social media platforms suppress and downrank content and stories from the region, including those pertaining to Palestinian human rights and information on sexual and reproductive health rights (SRHR).¹⁵⁰ This oversight is in contradiction with the UNESCO Recommendation, which states that Member States should use AI systems to improve access to information and knowledge and enhance freedom of expression and should "ensure that AI actors respect and promote freedom of expression as well as access to information with regard to automated content generation, moderation and curation."¹⁵¹

As one expert puts it, "any governance framework for AI should be built on international human rights law as a basis and not as an accessory. This means principles like nondiscrimination, privacy, transparency, accountability, and participation should not be taken as mere ethical values that can be negotiated, but rather as legal commitments derived from the International Covenant on Civil and Political Rights, the International Covenant

<https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%202015-3-2026.pdf>

¹⁴⁷ A. Abrougui. (2025). 'Phishing, Spyware, and Smart City Tech: Surveillance in Sisi's Egypt'. In *Digital Surveillance in Africa: Power, Agency, and Rights*, edited by T. Roberts and A. Mare, 57–84. London: Zed Books. <http://dx.doi.org/10.5040/9781350422117.ch-3>

¹⁴⁸ Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

¹⁴⁹ Nour Naim, Interview with author, April 1, 2026.

¹⁵⁰ Afef Abrougui and Nadine Mouawad, "Artificial Intelligence and Social and Gender Justice Activism in MENA: Spaces of co-optation, engagement and resistance. Oxfam International," *Oxfam International*. October 10, 2025, DOI: 10.21201/2025.000090

<https://policy-practice.oxfam.org/resources/artificial-intelligence-and-social-and-gender-justice-activism-in-mena-spaces-o-621738/>.

¹⁵¹ "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

on Economic, Social, and Cultural Rights, and the UNESCO Recommendation on Ethics of Artificial Intelligence.”¹⁵² The expert added that in regional discussions on AI governance and ethics, freedom of expression is often neglected despite the expansion of content moderation systems and their impacts.¹⁵³

Beyond access to information, the UNESCO Recommendation also links AI explicitly to "information integrity," urging States to address how AI systems can amplify misinformation, disinformation, and hate speech while still safeguarding freedom of expression and access to plural, reliable information. This includes obligations to ensure that AI-driven moderation and curation do not distort public debate, to require transparency and appeal mechanisms for content decisions, and to invest in media and information literacy so that users can critically assess AI-mediated information environments. SWANA frameworks failed to adequately address information integrity, disinformation, or hate speech mitigation, despite the region already grappling with algorithmic amplification of harmful content and suppression of rights-related speech.¹⁵⁴

Separately, Saudi Arabia issued guidelines for government¹⁵⁵ and public¹⁵⁶ use of Generative AI, including guidelines for mitigating the risks of deepfakes.¹⁵⁷ The UAE also issued a Generative AI guide¹⁵⁸ and a deepfake guide.¹⁵⁹ These guidelines acknowledge risks of misinformation, inaccuracies, hate speech, and political manipulation in deployment and outputs of Generative AI and provide tips on how to prevent and mitigate them. However, they did not account for the role of other algorithmic systems (recommender systems and content moderation systems) in undermining information integrity and neglected how States and tech companies developing AI systems should protect the online information space while aligning with international human rights standards. This silence leaves AI-driven misinformation and manipulation largely unaddressed at the policy level, even as Generative AI tools capable of producing convincing synthetic text, images, and video become more widely available across the region.

3. Environment protection, gender equality, and the rights of children

The gaps in human rights safeguards are mirrored by omissions in environmental protection and protections for women and children, even though UNESCO’s Recommendation treats all three as core ethical concerns.

¹⁵² Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

¹⁵³ Ibid.

¹⁵⁴ Zaghdoudi Aymen, The game is up: how MENA’s social media regulations silence and control, Access Now, July 16, 2026, <https://www.accessnow.org/mena-social-media-censorship/>

¹⁵⁵ “Generative Artificial Intelligence for Government,” SDAIA, May 2025, <https://sdaia.gov.sa/en/SDAIA/about/Files/GenAIGuidelinesForGovernmentENCompressed.pdf>

¹⁵⁶ “Generative Artificial Intelligence for Public,” SDAIA, May 2025, <https://sdaia.gov.sa/en/SDAIA/about/Files/GenerativeAIPublicEN.pdf>.

¹⁵⁷ “Deepfakes Guidelines Mitigating Risks While Fostering Innovation,” SDAIA, May 2025, <https://sdaia.gov.sa/en/SDAIA/about/Files/File0001.pdf>.

¹⁵⁸ “100 Practical Applications and Use Cases of Generative AI,” UAE Minister of State for Artificial Intelligence, Digital Economy and Remote Work Applications Office, April 2023, <https://assets.u.ae/api/public/content/b298fc0bf7e74b60b44e8c125a71a449?v=4f3f9cbf>

¹⁵⁹ Deepfake Guide, National Program for Artificial Intelligence, July 2021, <https://assets.u.ae/api/public/content/38a05cb9c7bb491b8411092b9426fef1?v=4e2a2c8a>.

Environmental impacts

The different policies failed to address the role of data centers in environmental degradation and climate change. Data centers powering AI infrastructure consume massive amounts of energy and water.¹⁶⁰ The SWANA region is one of the world's driest regions, with 83% of the population exposed to extremely high water stress, according to the Water Resources Institute, a global non-profit research organization.¹⁶¹ **Despite the water scarcity and AI's exacerbation of climate change, Gulf countries have been racing to become hubs for cloud centers¹⁶² and AI,¹⁶³ attracting major AI players and providers of cloud services, including Alibaba, Amazon, Google, Microsoft, and OpenAI and investing heavily in AI infrastructure.** Yet, in their ethical frameworks, while acknowledging the environmental impacts of AI systems, these countries failed to illustrate what governments are doing to protect scarce water resources and populations from AI-exacerbated climate change.

Gender equality, LGBTQ+ rights, and gender-based violence

Further, a gender lens that takes into account the multifaceted gendered impacts of AI is lacking.¹⁶⁴ **In fact, AI risks exacerbating gender inequality, gender-based violence, and discrimination against the LGBTQ+ community in the region.** This is particularly worrying given existing regional trends. Tech-facilitated gender-based violence is widespread, and Generative AI is further enabling deepfake sexual abuse targeting women and girls, with severe social consequences in societies where patriarchal norms remain entrenched.¹⁶⁵ These risks are intensified by the region's already restrictive SRHR environment, limiting access to essential resources. These harms disproportionately target women, girls, and gender-diverse people, and may carry particularly severe social, legal, economic, and physical consequences in contexts shaped by patriarchal norms, criminalization, censorship, and stigma around sexuality and gender diversity.

These risks intersect with the region's restrictive SRHR environment, which can limit access to reliable information.¹⁶⁶ Ensuring that women, girls, LGBTQ+ people, and other marginalized communities can safely access SRHR information online is a core part of any rights-based AI governance approach. For example, independent media outlet Raseef22 developed Ask Aunty,¹⁶⁷ an Arabic-language AI chatbot that provides

¹⁶⁰ Rest of World, "Data Center Heat Map," 2025, <https://restofworld.org/2025/data-center-heat-map/>.

¹⁶¹ Samantha Kuzma, Liz Saccoccia and Marlena Chertock, "25 Countries, Housing One-Quarter of the Population, Face Extremely High Water Stress," World Resources Institute, August 16, 2023, <https://www.wri.org/insights/highest-water-stressed-countries>.

¹⁶² Aksel Eck, "Mapping Tech Companies' Cloud Expansion in the Gulf and its Human Rights Implications," SMEX, March 14, 2024, <https://smex.org/mapping-tech-companies-cloud-expansion-in-the-gulf-and-its-human-rights-implications/>.

¹⁶³ Divsha Bhat, "Big Tech is building AI in the desert. The water may not last," Rest of World, August 4, 2025, <https://restofworld.org/2025/gulf-ai-water-crisis/>.

¹⁶⁴ Afef Abrougui and Nadine Mouawad, "Artificial Intelligence and Social and Gender Justice Activism in MENA: Spaces of co-optation, engagement and resistance. Oxfam International," *Oxfam International*, October 10, 2025, DOI: 10.21201/2025.000090 <https://policy-practice.oxfam.org/resources/artificial-intelligence-and-social-and-gender-justice-activism-in-mena-spaces-o-621738/>.

¹⁶⁵ Ibid.

¹⁶⁶ SMEX, From Sharing to Silence: Assessing Social Media Suppression of SRHR Content in WANA, April 2024, <https://smex.org/from-sharing-to-silence-assessing-social-media-suppression-of-srhr-content-in-wana/>.

¹⁶⁷ Rokaya Kamel, "Ask Aunty Bridges 'Taboo' Conversations in the Middle East," JournalismAI, June 1, 2025, <https://www.journalismai.info/blog/ask-aunty-bridges-middle-east-health-info-gap>.

stigma-free sexual and reproductive health guidance, and Meedan is partnering with SRHR organizations to build safer public-health chatbots that deliver context-specific information while minimizing harm.¹⁶⁸

In practice, SWANA frameworks mention gender mainly as a sensitive data category to be protected, rather than as a substantive equality concern. Saudi Arabia's ethics principles state that "the functionality of an AI system should not be limited to a specific group based on gender, race, religion, disability, age, or sexual orientation," and Egypt's National AI Governance Framework Guide lists two gender-related priorities: implementing safeguards against gender-based discrimination in AI and promoting women's participation in the AI workforce. Beyond these references, however, gender equality, sexual orientation, gender identity and expression are not treated as a distinct axis of analysis.

Children's rights

Lastly, another major gap lies in how the policies address children's rights. According to the UNESCO Recommendation, Member States should protect children and their rights throughout the AI lifecycle and promote research to better understand the long-term impacts of interacting with AI systems, particularly the psychological and cognitive impacts on children and young people.¹⁶⁹ UNICEF's Policy Guidance on AI for Children goes further, translating these expectations into nine core requirements for child-centred AI, including supporting children's development and well-being, ensuring inclusion, prioritizing fairness and non-discrimination, protecting children's data and privacy, ensuring safety, and providing transparency, explainability, and accountability specifically for children. More recent iterations of the guidance and commentary distil these into ten requirements and stress that when AI affects children, the bar for safety, privacy, and non-discrimination must be higher than for adults, with age-appropriate explanations, child-rights impact assessments, and strong regulatory oversight built in by default.¹⁷⁰

The 5Rights-led Joint Statement to the inaugural Global Dialogue on AI Governance pushes this logic even further, urging governments to adopt a simple principle: AI systems should not be used by or affect children unless they are designed to respect children's rights and have been independently shown to be safe. It calls for laws that require companies to prove systems likely to impact children are rights-respecting and safe before they reach the market, including through mandatory child-rights impact assessments, safety- and privacy-by-design across the AI value chain, bans on manipulative design practices, and prohibitions on unconsented tracking and surveillance of children in educational and commercial settings. It also stresses that children must have a meaningful say in the governance, design, and deployment of AI systems that affect them, and that governments must stop treating children as "test subjects" for untested AI.¹⁷¹

¹⁶⁸ Meedan, "Building Safer Chatbots for Public Health," Meedan, n.d., <https://meedan.org/post/building-safer-chatbots-for-public-health>.

¹⁶⁹ "Recommendation on the Ethics of Artificial Intelligence," UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf0000381137>.

¹⁷⁰ UNICEF Innocenti – Global Office of Research and Foresight, UNICEF Guidance on AI and Children 3.0, UNICEF Innocenti, Florence, December 2025, <https://www.unicef.org/innocenti/reports/policy-guidance-ai-children>

¹⁷¹ 5Rights Foundation et al. Joint Statement: The Inaugural Global Dialogue on AI Governance Must Deliver for Children. July 2026, <https://5rightsfoundation.com/resource/joint-statement-the-inaugural-global-dialogue-on-ai-governance-must-deliver-for-children/>

However, guidance on preserving children's rights was nearly absent in SWANA frameworks. It was primarily limited to integration of AI education from elementary school, safeguards for protecting children's data and ensuring age-appropriate design. **This does not address the range of AI-facilitated threats children and youth in the region are vulnerable to, including addictive designs of social media,¹⁷² algorithmic bias, impediment of their social, emotional and communication skills, and cognitive abilities,¹⁷³ and deepfake sexual abuse.** Automation of certain jobs and job functions could further increase the youth unemployment rate, which stood at 22.6% in Northern Africa and 26.2% in Arab States in 2025, double the global average.¹⁷⁴ None of the six frameworks studied require child-specific impact assessments, higher safety thresholds when systems are likely to affect children, or independent oversight tailored to children's rights, as UNICEF and 5Rights both recommend.

"I am scared for our kids because this is the future of our region. And we have a youth bulge! How can we use technology to train our kids responsibly? We need to train our youth on skills of the future while mitigating the horrors that could happen by using technology and AI from a young age," said Nagla Rizk, Founding Director of the Access to Knowledge for Development Center (A2K4D) and the Middle East and North Africa Observatory on Responsible Artificial Intelligence at the American University in Cairo.¹⁷⁵ She particularly highlighted the power of Big Tech platforms, and the insufficiency of guardrails over the design of their technologies, resulting in a tendency to harm young users' mental health.

These omissions suggest that SWANA frameworks treat environmental and social impacts, including the specific vulnerabilities of children, as peripheral rather than central concerns, even though they are likely to shape how AI affects the region's most vulnerable populations.

4. Accountability and civic participation

The previous sections highlighted gaps in what the frameworks say; this section focuses on how they assign responsibility and who is allowed to participate in shaping AI governance.

Accountability and human oversight

In their ethical frameworks, **the six SWANA governments emphasize the role of human oversight of AI decisions and outputs but have not addressed accountability through independent institutions and inclusive public oversight.** The UNESCO Recommendation requires Member States that acquire AI systems for

¹⁷² "Executive Summary: Artificial Intelligence and Children's Rights," UNICEF, May 2019.

https://www.unicef.org/innovation/media/10726/file/Executive_Summary_Memorandum_on_Artificial_Intelligence_and_Child_Rights.pdf

¹⁷³ Aida Traidi, "AI Integration in Education in the MENA Region: Will it Be a Driver of Social Inequality?", Global Campus Arab World, 2024, <https://repository.gchumanrights.org/server/api/core/bitstreams/d3c58797-06ec-469e-bf66-d07490a34f07/content>.

¹⁷⁴ "Global Employment Trends for Youth 2026", International Labour Organisation, 2026, <https://www.ilo.org/resource/news/youth-unemployment-rises-young-people-face-harder-road-decent-work>

¹⁷⁵ Nagla Rizk, interview with author, March 30, 2026.

use for “human rights- sensitive use cases” like healthcare, welfare, judicial systems, and employment to ensure such systems can be monitored by independent oversight authorities like data protection authorities and sector-specific oversight bodies.¹⁷⁶ The Recommendation adds that Member States “should enhance the capacity of the judiciary to make decisions related to AI systems as per the rule of law and in line with international law and standards.”¹⁷⁷ The different policies, as explained previously, primarily focus on what individual developers and deployers can do to ensure some level of accountability for AI outcomes. “The topics of privacy, transparency, and security have been greatly addressed across the region in articles, reports, research, studies, and conferences. We need to focus more on accountability and explainability to build trust for AI applications in the public sector, there is a big gap in this area,” said an AI ethics expert.¹⁷⁸

Civic participation and civil society

While different frameworks above mention the need to involve different stakeholders in development and deployment of AI models, they largely neglect the role of civil society. Across the region, AI strategies, policies, and ethical frameworks are being adopted through processes that lack inclusivity and the participation of a range of actors, particularly from civil society. For instance, while the UAE’s AI Principles and Guidelines state that they “are drafted as a collaborative multi-stakeholder effort,”¹⁷⁹ an expert familiar with the country’s policies said in an interview that there was no evidence of public consultation prior to the ethics’ adoption.¹⁸⁰

In Egypt, the AI Governance Framework guide states that the National Center for Artificial Intelligence will establish a “Multi-Stakeholder Advisory Committee” made up of industry leaders, civil society, and academia “to ensure Governance decisions reflect the realities of the market and public interest.”¹⁸¹ The website of the AI council, however, features international government organizations, academia, and the private sector as partners but not civil society.¹⁸²

Jordan offers one of the few concrete examples of civil society engagement. The Jordan Artificial Intelligence Policy 2020 directs the ministry to develop a National Charter on the Ethics of Artificial Intelligence “in cooperation with government and private entities, civil society organizations, universities and research institutes involved in AI.”¹⁸³ JOSA publicly welcomed this partnership, highlighting the joint creation of the ethics charter as

¹⁷⁶ “Recommendation on the Ethics of Artificial Intelligence,” UNESCO, November 23, 2021, <https://unesdoc.unesco.org/ark:/48223/pf00000381137>.

¹⁷⁷ Ibid.

¹⁷⁸ Nour Naim, interview with author, April 1, 2026.

¹⁷⁹ “The UAE Charter for the Development and Use of Artificial Intelligence,” UAE Legislation, July 2024, <https://uaelegislation.gov.ae/en/policy/download/the-uae-charter-for-the-development-and-use-of-artificial-intelligence>.

¹⁸⁰ Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

¹⁸¹ Egyptian Center for Responsible AI, “Guide To Egypt National AI Governance Framework,” National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies, March 2024, <https://ai.gov.eg/SynchedFiles/ar/Resources/Guide%20to%20Egypt%E2%80%99s%20National%20AI%20Governance%20Framework%2015-3-2026.pdf>.

¹⁸² “Become Our Partner,” National Council for Artificial Intelligence, Quantum Computing, and Emerging, Undated, Technologies, <https://ai.gov.eg/Partnerships>.

¹⁸³ Jordanian Ministry of Digital Economy and Entrepreneurship. Jordan Artificial Intelligence Policy 2020. Amman: Ministry of Digital Economy and Entrepreneurship, 2020, https://www.moddee.gov.jo/ebv4.0/root_storage/en/eb_list_page/ai_final_-_english_version.pdf

a positive step toward more open, multi-stakeholder AI governance.¹⁸⁴ JOSA, as stated above, took part in the drafting committee of the ethical AI charter, which was established by the Ministry of Digital Economy and Entrepreneurship and included representatives from the private sector, NGOs, and academia. Its proposal to encourage the adoption of open source models was included in the final version.¹⁸⁵

This chapter showed that while SWANA governments embraced the language of ethical AI, their frameworks remain largely nonbinding, selectively enforced, and weak on concrete safeguards for human rights, environment, gender equality, and children, especially where these collide with economic or political priorities. Taken together, these gaps suggest that tinkering at the level of principles will not be enough. The region needs a more robust, rights-based governance model that treats international human rights law as its foundation rather than an optional add-on, and that translates high-level values into specific duties, institutions, and enforcement mechanisms. Chapter 4 turns to this task, outlining what a rights-based SWANA framework could look like in practice and how it might move beyond ethical principles toward concrete guarantees of accountability, participation, and protection.

¹⁸⁴ Jordan Open Source Association (JOSA), “JOSA: Open Technologies Will Boost Jordan’s Digital Transformation.” July 11, 2021, <https://josa.ngo/blog/127>

¹⁸⁵ JOSA, email interview with author, May 1, 2026.

Chapter 4

Going Beyond Principles for a Rights-Based SWANA Framework

The previous chapter mapped where SWANA's ethical AI frameworks fall short, from unenforceable principles to blind spots on surveillance, lethal applications, and children's rights. This chapter builds on those findings to chart a path forward: it draws on desk research, policy analysis, and key informant interviews with experts across the region to identify what a genuinely rights-based approach to AI governance in SWANA would require, and what conditions must be in place for such a framework to work in practice rather than remain aspirational.

Before diving deeper into what is needed, it is important to acknowledge the regional differences when it comes to AI adoption and governance, as not all countries have the same level of financial, human, and technical resources, and robust digital infrastructure. Any credible regional approach must therefore actively include the perspectives of less-resourced countries alongside their wealthier, more technologically advanced neighbors, and must build in mechanisms for sharing tools, funding, and methodologies rather than assuming all countries can govern AI on equal footing.

“The main challenge the region faces is regional disparities. Saudi Arabia, Qatar and the UAE have huge budgets, developed infrastructures, and a high potential for adopting AI, so it is easier to launch initiatives and discuss AI governance there. But, other countries essentially lack the fundamental [legal] texts for the internet, there are countries that still have 2G internet, so the regional digital division makes it very difficult to have a one-size-fit all governance initiative that suits everyone. Only if there is regional justice in adoption and commitment from countries that have huge budgets, infrastructure, data centers and access to the biggest AI technologies,” said Naim, an AI ethics expert.¹⁸⁶ She added: “If we have Saudi Arabia, Qatar, and Oman and then add Jordan, Tunisia, and Morocco to a single discussion on AI governance, it is not possible to reach fair and realistic results because there is no regional justice either when it comes to internet access, adoption of strategies, policies and legal frameworks.”¹⁸⁷

Legal and human rights reforms

Ensuring responsible and ethical adoption of AI requires governments to build a robust regulatory framework that respects and protects human rights.

¹⁸⁶ Nour Naim, interview with author, April 1, 2026.

¹⁸⁷ Ibid.

This goes beyond AI-specific charters: cybersecurity, cybercrime, and data protection laws all shape how AI systems handle personal information, secure infrastructure, and interact with fundamental freedoms, and governments must strengthen and align these adjacent legal frameworks alongside any AI-specific legislation.

Personal Data Protection Laws are a foundational tool for protecting privacy throughout the AI lifecycle, yet across the six countries studied, they lack key safeguards such as independent oversight, protection from state surveillance, and robust data subject rights. When personal data protection safeguards exist they do not apply to processing done for national security and law enforcement purposes. For instance, in Egypt, the Personal Data Protection Law does not apply to “personal data related to judicial reports, investigations, and claims” and “personal data in possession of the national security agencies,” which grants public authorities, and specifically national security agencies, unchecked powers in the handling of personal information.¹⁸⁸ In Oman, article 3 of the Personal Data Protection Law states that its provisions do not apply to personal data carried out for “protection of national security or public interest,” and “detection or prevention of a crime on the basis of a formal written request by the investigation entities.”¹⁸⁹ These exceptions are dangerous in a region where governments often abuse national security and prevention of crime as pretexts to conduct massive surveillance and infringe on privacy. This is particularly worrisome, as adoption of intrusive AI-powered surveillance technologies, including facial recognition, continue to expand across the region. A political scientist interviewed as part of this research noted:¹⁹⁰

In both Saudi Arabia and the UAE, although limited, personal data protection laws for the first time provide a legal basis that individuals can theoretically rely upon. However, what is equally interesting is what these laws do not say; no mention of mass surveillance, AI uses in internal security, the exports of these technologies, and foreign workers despite constituting a large percentage of the UAE population,” adding: “In most countries in the [SWANA] region, personal data protection regulations are lacking. Biometric surveillance systems collect sensitive data on a daily and continuous basis, without individuals having any real rights to know what data is collected about them, how it is used and shared. This is not an accidental legislative omission, but rather, for the most part, a political choice that enables States to exploit data without any binding restrictions.

Such political choice is reflected in how governments in SWANA have long approached cybersecurity and cybercrime. Cybersecurity is fundamental to the safety and reliability of AI systems, and all IT systems, and protection of personal data throughout their lifecycle. However, SWANA governments’ cybersecurity or cybercrime laws are for the most part not in line with human rights standards as they criminalize peaceful speech on vague and broad grounds. An analysis by Access Now in 2024 found that there are more

¹⁸⁸ “Personal Data Protection Law: Does it Really Aim at Bolstering the Right to Privacy? Or Is it an Attempt to Give the Illusion of an Improvement in the Legislative Environment?”, Masaar, 2021, <https://masaar.net/wp-content/uploads/2021/01/Personal-data-protection-lawen.pdf>.

¹⁸⁹ “Royal Decree 6/2022 Issuing The Personal Data Protection Law,” Decree, February 9, 2022, <https://decree.om/2022/rd20220006/>.

¹⁹⁰ Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

content-based offences outlined in the cybercrime laws of Saudi Arabia, Jordan, and other SWANA countries than “cyber-dependent” crimes, that is crimes made possible by technology. “This shows how the governments in question are more interested in cracking down on dissent and in controlling online speech than in tackling genuine cybercrimes,” the analysis concluded.¹⁹¹

This approach not only threatens individuals for freely expressing themselves and opinions but also undermines the allocation of resources needed to address genuine cybersecurity threats, particularly at a time where AI is increasing these threats. “When we look at the strategies adopted by these States within their governments, we find that they are aligned to a great extent with international frameworks such as the UN principles, the EU AI Code of Practice and UNESCO [Recommendation], but this all at a surface level. The essential problem is the lack of details,” said Naim.¹⁹² She added: “When it comes to privacy, surveillance and digital rights, important concerns remain around safeguards, accountability and the existence of sufficiently clear and enforceable protections in practice.”¹⁹³

➡ **Draft AI laws: The risks of hasty adoption**

Not a single SWANA country so far adopted binding regulations specifically governing AI. However, Egypt, Morocco, and Saudi Arabia have all proposed draft legislation.

Egypt’s draft AI Governance Law builds on the country’s ethical framework, and if approved, will provide a legally binding framework for AI development and deployment in the country. At the time this research was finalized, a draft of the law was not made available to the public. However, according to regulations.ai, the draft would govern AI systems according to their risk, which is consistent with Egypt’s ethical framework so far, and high-risk AI systems “will likely include those affecting fundamental rights, safety, or critical infrastructure.”¹⁹⁴ The Law is also expected to formalize governance and oversight of AI systems in the hands of the National Council for Artificial Intelligence (NCAI) and the Center for Responsible AI, and establish sector-specific rules for AI applications in sensitive areas like finance and healthcare.

Morocco’s Digital X.0 Framework Law, proposed in 2025, aims to establish a legal framework “for digital services and AI across public and private actors that interact with the public sector and to coordinate implementation with existing supervisory bodies.”¹⁹⁵ If adopted, it would establish some baseline requirements for AI governance including transparency, risk assessment, and human rights reviews and establish some transparency requirements for the provision of AI-assisted services that interact with citizens.¹⁹⁶ Morocco has paired this legislative push with a parallel institutional initiative: its Ministry of Digital Transition signed a partnership

¹⁹¹ Aymen Zaghdoudi, “When “cybercrime” laws infringe human rights: lessons from the Arab region,” Access Now, November 27, 2024, <https://www.accessnow.org/arab-region-cybercrime-laws-infringe-human-rights/?tztc=1>.

¹⁹² Nour Naim, interview with author, April 1, 2026.

¹⁹³ Ibid.

¹⁹⁴ “Egypt - AI Governance Law (2024),” Regulations.ai, 2024, <https://regulations.ai/regulations/RAI-EG-NA-EDAIXXX-2024>.

¹⁹⁵ “Morocco - Digital Services Framework (2025),” Regulations.ai, 2025, <https://regulations.ai/regulations/morocco-2025-digital-x0-framework>.

¹⁹⁶ Ibid.

agreement with the National Commission for the Control of Personal Data Protection (CNDP) to build a sovereign national AI platform explicitly aligned with UNESCO's Recommendation on the Ethics of Artificial Intelligence. The plan centers on developing Moroccan large language models trained on the country's own languages, culture, legal framework, and digital identity data, with the stated goals of mitigating safety risks, setting clear guidelines for AI actors, and giving citizens, businesses, and public administrations access to Generative AI tools that respect fundamental rights. Together, the draft Digital X.0 law and the CNDP partnership suggest Morocco is pursuing AI governance on two tracks simultaneously, legislative reform and sovereign infrastructure-building, though as with Egypt's and Saudi Arabia's draft laws, it remains too early to assess how rigorously human rights safeguards will be enforced in practice.¹⁹⁷

In April 2026, Saudi Arabia published a draft Responsible AI Policy for public consultation. According to experts with Al Tamimi & Co. the draft "introduces a comprehensive governance framework for AI, signalling a shift from adoption to regulation."¹⁹⁸ It is unclear if the policy will be binding or not. The draft adopts a tiered risk approach when governing AI systems, categorizing them into four risk groups: critical, high, limited, and low risk.¹⁹⁹ It will also introduce and formalize operational requirements such as registration requirements for certain AI applications, AI ethics labelling, and audit and assurance obligations for high-risk systems, moving beyond a principle-based approach.²⁰⁰

Not every expert believes a binding AI law is the right near-term priority, however, some argue that weak institutional capacity and unclear politics will make premature legislation riskier than no legislation at all. Speaking of his country's approach not to adopt a legally binding policy, an Omani legal expert interviewed as part of this research said that in his "personal opinion, that is the right approach."²⁰¹ He explained: "the government actually does not know what it wants, and it does not have a vision of how it should be governed. In this country, the practice has been to make everything illegal. So, if something new comes up, they would say, 'that is not allowed, you need government approval'."²⁰²

In response to plans by the Egyptian government to adopt an AI governance law,²⁰³ Masaar, an Egyptian digital rights organization, wrote in a paper that while the proposal "demonstrates a genuine ambition for modernization and digital transformation, it also carries the risk of hasty legislation shaped more by political and economic considerations than by robust standards for protecting rights and freedoms."²⁰⁴ It instead recommends as an alternative: the gradual adoption of sector-specific regulations that address the particularities of each area,

¹⁹⁷ Middle East AI News. "Morocco to Develop Responsible National AI Platform." Accessed August 7, 2026, <https://www.middleeastainews.com/p/morocco-to-develop-responsible-national>

¹⁹⁸ Christine Khoury and Laith Alkayyali, "KSA's New AI Adoption Framework: What You Need to Know," Al Tamimi & Co., April 7, 2026, https://www.tamimi.com/law_update_articles/ksas-new-ai-adoption-framework-what-you-need-to-know/.

¹⁹⁹ Dana Ramadan and Cerys Stansfield, "Saudi Arabia moves to operationalise responsible AI governance," Access Partnership, April 29, 2026, <https://accesspartnership.com/opinion/saudi-arabia-moves-to-operationalise-responsible-ai-governance/>.

²⁰⁰ Ibid.

²⁰¹ Omani legal expert, interview with author, March 4, 2026.

²⁰² Ibid.

²⁰³ "Egypt - AI Governance Law (2024)," Regulations.ai, 2024, <https://regulations.ai/regulations/RAI-EG-NA-EDAIXX-2024>.

²⁰⁴ "Sectoral Governance Of AI As An Alternative To A Comprehensive Law In Egypt," Masaar, September 1, 2025, <https://masaar.net/en/sectoral-governance-of-ai-as-an-alternative/>.

especially sensitive sectors such as healthcare. “These tools should be grounded in human rights principles that explicitly prohibit the most harmful practices, such as violation of the right to privacy or discrimination based on gender, religion, race, or sex.”²⁰⁵

Building local solutions and infrastructure

Discussions about “digital sovereignty”²⁰⁶ in SWANA often focus narrowly on controlling online content, especially speech that criticizes governments, rather than on who owns and runs the infrastructure, data, and models that underpin today’s digital economy.²⁰⁷

While some SWANA countries aspire to achieve their definition of digital sovereignty, the region remains a consumer of foreign AI systems. Even Saudi Arabia and the UAE, despite emerging as key players in the AI field, investing massively in digital and AI companies, computing power and chips, and adopting AI solutions, still rely on foreign technology, specifically the powerful chips and data centers needed to run AI systems. This reality creates dependence and poses a challenge in the governance of systems controlled by a few powerful players in the Global North, namely the US.²⁰⁸

Building “local” in this context must therefore mean more than commissioning one-off Arabic-language models. It entails: developing locally governed infrastructure, investing in homegrown datasets and models in local languages and dialects, and cultivating local technical, legal, and governance expertise so that standards and enforcement do not simply mirror external interests. As Maha Jouini, a Tunisian AI governance expert said: “Sovereignty in AI or in the digital space is only related to content which criticizes the government. However, sovereignty is related to the infrastructure itself, about who is controlling today’s digital economy. In Tunisia, it is French infrastructure; the e-commerce sector is an extension of the previous colonialism which we had.”²⁰⁹

At the same time, poorly designed sovereignty tools can backfire. In Oman, the personal data protection law has strict data localization requirements for data processed by government entities on national security grounds, which in a small country like Oman, where the government is a big economic player, can hinder innovation and creativity. An Omani expert interviewed as part of this research said:

²⁰⁵ Ibid.

²⁰⁶ The term “digital sovereignty” is used throughout this text as it is invoked and defined by state and governmental actors rather than a definition endorsed by Digital Action. This does not reflect Digital Action’s framing of sovereignty which states that true sovereignty is technology that is developed, deployed and maintained by and for communities. It also depends on agency and stewardship over several layers at once: the physical infrastructure (data centers, connectivity, compute), the data and models that power AI systems, and the legal and governance frameworks that determine how those systems operate and whose interests they serve.

²⁰⁷ Zaghdoudi Aymen, The game is up: how MENA’s social media regulations silence and control, Access Now, July 16, 2026, <https://www.accessnow.org/mena-social-media-censorship/>

²⁰⁸ Middle East Institute. “From Crude to Compute: Building the GCC AI Stack.” December, 2025, <https://mei.edu/publication/from-crude-to-compute-building-the-gcc-ai-stack/>

²⁰⁹ Maha Jouini, interview with author, April 23, 2026.

Oman cares a lot about security as a country, so data localization and data security is a very big deal and we have very strict data localization rules. So, if you are doing anything with the government, if the government wants to build any sort of IT solution, the data must be locally hosted. If any government-owned company has to do something, data-related, the data must be locally hosted. And in Oman, the government, and governmental companies, play a very big role in society. And then if you add on top of these critical industries like banking, telecom, oil and gas, again, those industries are required to have the data locally hosted here and because we are such a small market, do not have any of the known brands for hosting and data centers.”²¹⁰ The expert added: “We need to reconsider our concept of data localization in a way that makes it realistic for something to actually be legally done here.”²¹¹

Against this backdrop, several interviewees stressed the need for genuinely local AI solutions, systems that are built in the region, in its languages, and on terms that reflect local rights and needs. The region needs local solutions that “look like us, understand our culture and language and reflect our identity as an Arab region...to minimize dependence on big companies as unfortunately we are under a global technological colonialism controlled by a few players,” said Naim.²¹² She explained that this move needs a political decision supported by an economic decision. For example, “The main issue is that Jordan is an AI consumer to a large degree, with little power to enforce policy on giant vendors of AI,” said an interviewee from JOSA.²¹³ The organization, in an interview, highlighted the role open source/weights models could play in limiting technological dependence.

Some countries in the region, specifically Qatar, Saudi Arabia, and the UAE, have been investing in local solutions, specifically Arabic-language LLMs. However, production of more tools on its own will not solve the bias and discrimination, privacy risks, disparities and dependence on foreign models, and other ethical questions associated with AI deployment. Additionally, Arabic LLMs do not automatically ensure inclusion. Arabic is a highly diverse, dialect-rich language, while Indigenous languages and other minority languages are even more likely to be excluded within the region.

Further, while on the surface these models seem to respond to the unmet needs of Arabic-language in dominant Global North models, particularly American and Chinese models, these models, products of tightly controlled government initiatives, are not neutral and represent “a strategic position within the global digital power structure,” wrote researcher Ramez Salah for Raseef22.²¹⁴ “To understand this positioning, it is essential to deconstruct the fundamental raw material of this technology: language. Controlling major linguistic models is, in essence, controlling the mechanisms of knowledge formation and automating bureaucratic and societal thought processes,” he added.

²¹⁰ Omani legal expert, interview with author, March 4, 2026.

²¹¹ Ibid.

²¹² Nour Naim, interview with author, April 1, 2026.

²¹³ JOSA, email interview with author, May 1, 2026.

²¹⁴ Ramez Salah. “هل تدخل السعودية إلى سباق الذكاء الاصطناعي العالمي؟” Raseef22, June 1, 2026, bit.ly/4xBAB2w

Further, despite the lack of training data in Arabic (Arabic content represents only 1% of all content on the internet), the resource intensiveness of LLMs and their environmental impacts, in addition to the significant and expensive computing power needed to operate them, these countries did not opt for smaller and more environmentally friendly models.²¹⁵

Chasing larger models is neither the only nor the most sustainable path to local AI capacity. In SWANA, however, discussion of sovereignty has so far focused more on controlling content and building flagship Arabic LLMs than on developing frugal, locally governed infrastructure and small models that could be more sustainable, rights-respecting, and accessible. A rights-based approach to sovereignty would therefore focus on three intertwined priorities: supporting local development of AI solutions and infrastructure; ensuring that data localization and sovereignty measures do not become tools for censorship or surveillance; and deliberately investing in smaller, environmentally sustainable models and open, community-driven initiatives that can help close the linguistic and infrastructural gaps without reinforcing existing power imbalances.

Tackling entrenched inequities in law and in practice

Different forms of inequalities, in particular gender inequality, digital divide, and forms of ethnic and racial discrimination, discrimination against migrants, and marginalisation of LGBTQ+ people and Indigenous communities need to be addressed in law and in practice, and not left to nonbinding ethical principles. Discrimination is a daily reality for many people across the region, notably migrant workers in the Gulf, refugees and asylum seekers, Black people, religious and ethnic minorities, Indigenous populations, women and girls, and LGBTQ+ people. Yet, adequate legal protections, beyond nonbinding ethical AI principles, are lacking. Without addressing these forms of discrimination in law and in practice, the AI systems deployed in SWANA will only further exacerbate these forms of discrimination.

➔ Gender and LGBTQ+ rights

Gender-based discrimination rarely operates in isolation, and AI systems risk compounding these vulnerabilities. Only Tunisia has a comprehensive anti-racism law²¹⁶ and across the region gender inequality is not only a persistent reality, but in many cases, it is enshrined in law such as Personal Status Laws.²¹⁷ LGBTQ+ people face an even more precarious legal landscape as same-sex relations remain criminalized in most SWANA jurisdictions,²¹⁸ meaning AI-enabled surveillance, data breaches or discriminatory content moderation can expose

²¹⁵ Ibid.

²¹⁶ Omar Fassatoui, “Tunisia’s Law against Racial Discrimination: The Mixed Results of a Pioneering Legislation,” Arab Reform Initiative, February 11, 2021,

<https://www.arab-reform.net/publication/tunisias-law-against-racial-discrimination-the-mixed-results-of-a-pioneering-legislation/>.

²¹⁷ “Trapped: How Male Guardianship Policies Restrict Women’s Travel and Mobility in the Middle East and North Africa,” Human Rights Watch, July 18, 2023,

<https://www.hrw.org/report/2023/07/18/trapped/how-male-guardianship-policies-restrict-womens-travel-and-mobility-middle>.

²¹⁸ Human Rights Watch, #Outlawed “The love that dare not speak its name”, https://features.hrw.org/features/features/lgbt_laws/

queer individuals to compounded legal, physical, and social risks that heterosexual people do not face to the same degree.

➔ Protection of Indigenous populations

Indigenous communities in the region, including Amazigh populations across North Africa,²¹⁹ face distinct risks from AI systems trained on data that erases or misrepresents their language, land claims, and cultural practices. According to Schulz and Loewen-Colon, AI governance remains largely unregulated, allowing corporations and States to extract and profit from Indigenous knowledge systems, ecological data, and traditional practices under the guise of “open data.”²²⁰ A UNESCO report on Indigenous data sovereignty in AI recommends that AI governance frameworks require free, prior, and informed consent before Indigenous languages, images, symbolic systems, and traditional knowledge are used to train AI models, and that Indigenous communities retain self-determination over how their data is collected, interpreted, and used.²²¹

➔ Racial and ethnic discrimination

Black people, religious minorities, and other ethnic minorities across SWANA face discrimination that AI systems deployed in surveillance, policing, and border management risk deepening, especially where anti-racism legal frameworks are absent. The narrow adoption of anti-racism laws (Tunisia’s 2018 anti-racism law is an example²²²) in the region means that when automated systems reproduce or amplify racial bias, affected individuals in most SWANA countries have little to no legal recourse.

➔ Labor and migration

Discrimination against migrant workers is often codified, as illustrated by the Omani expert interviewed for this research, who explained: “In Oman, discrimination is not illegal in that sense. An employer can say, I want someone from a certain nationality, I want a certain gender, or a certain age, it is fine. You can say, I want the person to be a man who is Omani, and less than 30 years old. That is 100% legal. You cannot say someone of a certain ethnicity or religion. We see official announcements every day [that state] ‘I want this person of this age, of this gender, this nationality.’ That is totally fine...Because the law actually allows people to discriminate based on nationality. But then, that is only for recruitment because I think that is the issue, but our law says once you are employed, you have to treat people the same.”²²³ This legal gap becomes particularly consequential as

²¹⁹ Minority Rights, Morocco, accessed on August 21, 2026, <https://minorityrights.org/country/morocco/>

²²⁰ Schulz, M., Loewen-Colón, J. Preventing AI extractivism: the case for braiding indigenous data justice with ABS for stronger AI data governance. *AI & Soc* 41, 6405–6419 (2026). <https://doi.org/10.1007/s00146-026-02931-z>

²²¹ UNESCO, “New Report and Guidelines for Indigenous Data Sovereignty in Artificial Intelligence Developments,” UNESCO, December 11, 2023, <https://www.unesco.org/ethics-ai/en/articles/new-report-and-guidelines-indigenous-data-sovereignty-artificial-intelligence-developments>.

²²² Omar Fassatoui, “Tunisia’s Law against Racial Discrimination: The Mixed Results of a Pioneering Legislation,” Arab Reform Initiative, February 11, 2021, <https://www.arab-reform.net/publication/tunisias-law-against-racial-discrimination-the-mixed-results-of-a-pioneering-legislation/>.

²²³ Omani legal expert, interview with author, March 4, 2026.

AI-driven recruitment tools and automated decision-making systems are adopted, since they can encode and scale these same discriminatory hiring preferences without meaningful oversight.²²⁴

Additionally, automation of jobs could risk increasing unemployment, particularly among women, migrants, and those in medium skill-level jobs, and as a result socio-economic inequalities.

“Automation in the [Gulf] region could affect 45% of the regional job market according to data by McKinsey. But the sharp paradox is that 93% of jobs vulnerable to automation in the UAE are held by expatriates. This means that the greatest social pressure will not fall on citizens in the near term, which weakens the political incentive to address the problem domestically – while migrant workers lack any meaningful bargaining power or adequate legal protection in the face of automation,” said one interviewee.²²⁵ He added: “On the gender front, 75% of women in the region express job-related anxiety tied to artificial intelligence. This concern is structurally warranted: surveys conducted by Gulf academics indicate that 95% of universities are not structurally prepared for the Fourth Industrial Revolution, nor do they equip their students with STEM skills. And if this is the state of affairs in the region's wealthy nations, what then is the situation in fragile states?”²²⁶

The AI industry's supply chain depends on a largely invisible, precarious labor force of content moderators and data annotators.²²⁷ An investigation by the Distributed AI Research Institute (DAIR) describes how these workers perform the repetitive, psychologically damaging task of labeling data and filtering violent or abusive content that underpins AI systems, often for low pay and without adequate mental health support. This kind of "ghost work" is disproportionately outsourced to workers in the Global South, who face job insecurity and trauma while enduring non-disclosure agreements that limit their ability to speak publicly about the harm.²²⁸

If these forms of discrimination are not adequately addressed, AI systems, not only LLMs but automated decision making and machine learning tools deployed in sensitive areas like healthcare, welfare allocation, recruitment, and surveillance, will only exacerbate discrimination and extractivism. Yet, governments in the region still have no comprehensive plans on addressing the potentially disruptive impacts of AI on jobs. In their strategies and ethical frameworks, the six SWANA countries acknowledged this risk and highlighted the role of upskilling and AI education. However, in a region that remains largely an AI consumer and suffers from a brain drain, there are disparities in the availability of AI jobs which are mainly concentrated in wealthy Gulf nations, particularly Saudi Arabia and the UAE, and to a lesser extent a few middle-income countries. A more comprehensive plan would seek to mitigate the multifaceted impacts of job automation,²²⁹ including those whose presence in the job market is fragile, upskill people across different sectors depending on the need of employers in each country, put in place

²²⁴ Stanford Institute for Human-Centered Artificial Intelligence, "AI Hiring Tools Can Yield Racial Bias and Systemic Rejection," Stanford University, accessed May 26, 2026, <https://hai.stanford.edu/news/ai-hiring-tools-can-yield-racial-bias-and-systemic-rejection>.

²²⁵ Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

²²⁶ *Ibid.*

²²⁷ "The Hidden Human Cost of AI Moderation," Jacobin, June 27, 2025, <https://jacobin.com/2025/06/ai-moderation-ndas-trauma-labor>.

²²⁸ Dinika, Adio-Adet. "The Janitors of the Internet." New Internationalist, March 1, 2026. <https://newint.org/science-and-technology/2026/janitors-internet>.

²²⁹ See: Organisation for Economic Co-operation and Development (OECD), Using AI in the Workplace (Paris: OECD, 2024) and International Labour Organization (ILO), Work Transformed: Promise and Peril of Artificial Intelligence (Geneva: ILO, n.d.).

transition plans for those most likely to be affected by AI automation, strengthen social welfare protection, and address discrimination at work in all its forms.

Strengthening the role and independence of oversight bodies

Robust, rights-based AI governance is impossible without independent institutions that can say “no” to government and corporate actors when AI systems threaten rights. To safeguard human rights in the development, deployment, and governance of AI systems, States must prohibit mass and indiscriminate surveillance, subject any interference with privacy, including government surveillance, to prior, independent judicial oversight, and empower regulatory bodies that can investigate, sanction, and remedy abuses. Personal data protection authorities and AI oversight bodies, in particular, need clear legal guarantees of independence, adequate budgets, and well-trained staff so they can monitor compliance, review complaints, and issue binding decisions without political or corporate interference.

However, while some SWANA countries established AI-focused bodies such as ministries and regulators, and more countries have data protection regulators in place, these often lack independence and the needed powers to hold developers and deployers to account. Data protection authorities, for instance, lack independence in most countries in the region. Oman, for example, does not have a data protection authority and its data protection law is enforced by the Ministry of Transport, Communications, and Information Technology (MTCIT). Its duties and powers include monitoring compliance, revoking licenses of infringing service providers, and receiving and reviewing complaints submitted by data subjects.²³⁰ In Jordan, the Personal Data Protection Council, is presided by the Minister of Digital Economy and Entrepreneurship and includes two representatives from security agencies as members.²³¹

Entities concerned with governing and overseeing AI also lack independence. In June 2026, the UAE established the Federal Authority for Artificial Intelligence and Data, a federal body “consolidating AI oversight, digital governance, and data regulation under a single structure.” The entity, which has a broad mandate, is presided by the Minister of State for Artificial Intelligence, Digital Economy, and Remote Work Applications and reports to the Cabinet.²³² This centralization of powers in one single entity is a similar approach adopted by Saudi Arabia with the establishment of SDAIA in 2019. The authority is mandated to develop policies, governance mechanisms, standards, and controls related to data and artificial intelligence. In addition to monitoring compliance with AI ethics and setting relevant standards, guides, and directives, it also acts as a data protection authority. While this centralization may streamline decision-making, it also creates a structural conflict of interest: the same authority is tasked with promoting AI adoption, managing government data, and setting and enforcing data and AI standards, without an external, independent supervisor.

²³⁰ “Royal Decree 6/2022 Issuing The Personal Data Protection Law,” Decree, February 9, 2022, <https://decree.om/2022/rd20220006/>.

²³¹ “Personal Data Protection Law No. (24) of 2023,” Ministry of Digital Economy and Entrepreneurship, https://www.modede.gov.jo/ebv4.0/root_storage/en/eb_list_page/pdpl.pdf.

²³² Ksenia Andreeva, “UAE Establishes Federal Authority for Artificial Intelligence and Data,” Morgan Lewis, June 15, 2026, <https://www.morganlewis.com/pubs/2026/06/uae-establishes-federal-authority-for-artificial-intelligence-and-data>.

“There is still a need for stronger and more independent oversight mechanisms specifically focused on the implementation of AI governance policies, including bias, discrimination, human rights impacts, and public accountability”, said Naim.²³³ Her point underlines why independence matters: without a separate institution whose mandate is to protect rights, not to promote AI or defend government policy, safeguards will remain largely voluntary.

Across the region, “accountability, judicial remedy, the existence of independent oversight entities, complaint mechanisms and the right to appeal and actual compensation are the weakest elements,” said a political scientist interviewed, who is familiar with the Saudi and UAE AI strategies and frameworks.²³⁴ He added: “There are no independent administrative courts capable of holding to account the decisions of AI systems. Even with the existence of personal data protection authorities in both countries, enforcing entities (SDAIA and the UAE Data Office) are still part of the executive which deploys the biggest AI systems.”²³⁵ **In other words, those most affected by AI systems are often asked to seek redress from the very institutions responsible for deploying and promoting those systems.**

Protecting the civic space and inclusion of civil society

For any rights-based AI framework to be legitimate and effective, people and communities affected by AI systems must have a real say in how those systems are designed, deployed, and governed. Another persistent gap that needs to be addressed is the participation of different stakeholders, and specifically civil society and human rights groups, women, and marginalized communities, labor unions, researchers, and affected users. In the region, “we are more following the trends. We are not designing with the perspective of our vulnerable community,” said Maha Jouini.²³⁶ Naim emphasized the need for gender inclusion in AI councils, bodies, and discussions in the case of Qatar, and quotas to enhance the representation of women, minorities and migrant workers.²³⁷

Several countries have at least opened the door to consultation. In Saudi Arabia, SDAIA ran public consultations on the AI Ethics Principles before adopting them and, more recently, on the draft Responsible AI Policy. In Jordan, JOSA participated in the ministry-led drafting committee for the National Artificial Intelligence Code of Ethics, which included representatives from the private sector, NGOs, and academia. JOSA successfully pushed for explicit encouragement of deploying open-source models in the final text, demonstrating how organized civil society can shape concrete provisions when given access to the process. These examples show that civil society involvement is both possible and productive, but they also remain the exception rather than the rule.

AI governance remains largely top down and exclusively accessible to a few powerful stakeholders, namely government institutions and the private sector, and to some extent academic institutions. Most affected communities, and the organizations that represent them, are kept at the margins.

²³³ Nour Naim, interview with author, April 1, 2026.

²³⁴ Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

²³⁵ Ibid.

²³⁶ Maha Jouini, interview with author, April 23, 2026.

²³⁷ Nour Naim, interview with author, April 1, 2026.

Saudi Arabia's public consultations are a "step that cannot be ignored and is a positive precedent in the Gulf context. However, neither the names of participating parties and summaries of comments nor a statement on how the consultation influenced the final version [of the AI ethics] were published. The consultation essentially took place only with government and academic entities, and companies, without the participation of independent human rights organizations, which are practically illegal and not able to work freely," said one Gulf expert.²³⁸ He explained: "In the GCC, the decision-making process is top down and the participation of civil society is limited. I describe this as consultative aesthetics; there are conferences, summits and documents open for public comments for a limited time, but without any real mechanisms to integrate those impacted in decision making. This applies to most of the region, and not only these two countries."²³⁹

Another expert working on Qatar also described the process there as topdown. The expert added that while consultations and workshops take place, participation is still limited to government officials and technology companies: "civil society, independent researchers, the academic community, marginalized groups and even those represented rarely take a seat at the drafting table, their presence is very weak."²⁴⁰ Similarly, Oman launched a national AI committee made up of "specialists from both the public and private sectors," tasked with guiding national efforts to integrate AI into key sectors such as education, healthcare, logistics, finance, and public services," and providing "expert insights on emerging AI technologies and explore their practical applications to address pressing challenges in the sultanate."²⁴¹ Civil society is not represented, and the committee has no mandate, no powers, and no budget. According to the Omani interviewee:

Generally speaking, civil society work is difficult in this country because the general legal framework does not allow you to establish an NGO. To establish an NGO, you need to follow an extremely complicated process and the approval of the Council of Ministers. And they have this requirement where, for every issue or topic or theme, there can only be one NGO in the country. So, if there is a lawyers' association, there is only one lawyers' association. If there is an IT society, there is only one IT society. So, the IT society is controlled by ex-government people. The head of the IT authority retired and became the chairman of the IT society. How can this be civil society when it is the same people? So, there are structural issues that make it difficult for civil society to actually contribute, but it is not unique to AI. When it comes to legal reform, I think the reality is, many of the laws are trade or business-centric. And they do hear the voices of the businesses, and I do not think there is a representation of the interests of the people. So when it comes to the TRA, the telecom regulator, they are very good, they do public consultation. But they only engage with the businesses. So, the business sector has a huge voice, and the system is kind of built to support the business needs.

²³⁸ Anonymous political scientist, email interview with author, May 21st and May 25th, 2026.

²³⁹ Ibid.

²⁴⁰ Nour Naim, interview with author, April 1, 2026.

²⁴¹ "Oman forms National AI Committee to drive digital transformation aligned with Vision 2040," SAMENA Council, May 15, 2025, https://www.samenacouncil.org/samena_daily_news?news=105701.

In this context, strengthening civic space is not an optional add-on to AI governance; it is a precondition for any meaningful form of participation. To enhance the participation of civil society, governments need to address the human rights crisis in the region and guarantee freedom of expression and information and freedom of association and the right to privacy. **“It is not possible to have participation in the absence of a minimum level of freedom of assembly, expression, and organization,”** said one interviewee referring specifically to the shrinking civic space in the UAE and Saudi Arabia.²⁴² Experts interviewed as part of the research also emphasized the importance of building the AI knowledge and capacity of civil society actors to more effectively shape AI governance and policies. “Technical capacity is concentrated in near-monopolistic government institutions or big technology companies. There are no independent and influential universities nor independent think tanks and specialized investigative journalism in tech. This creates a knowledge gap that makes any participation from outside the previously mentioned circles structurally unequal,” said one interviewee.²⁴³ Taken together, these structural constraints on civic space, oversight, and participation mean that even the strongest ethical principles risk remaining aspirational; the recommendations below distill what this research suggests should change, and what actors need to do first, for a genuinely rights-based AI governance model to take root in the SWANA region.

²⁴² Anonymous political scientist, email interview with author, May 21 and May 25, 2026.

²⁴³ Nour Naim, interview with author, April 1, 2026.

Conclusions and Recommendations

As governments across the SWANA region continue to accelerate their adoption of AI and investments in the field for economic and political reasons, they have initiated steps to address and govern the ethical challenges and risks associated with AI deployment. For instance, Egypt, Saudi Arabia, and the UAE established or announced AI governance and oversight bodies. In Egypt, Morocco, and Saudi Arabia, draft laws on AI governance are under review.

However, for the most part, AI governance efforts remain at their early stages and limited to the adoption of ethical AI principles and guidelines. These nonbinding policies use vague language on human rights protection and weak safeguards and guidelines for human oversight and determination, and responsibility and accountability. They also largely neglect the role of States in ensuring robust public oversight of AI systems and ensuring respect for human rights and environmental protection. For instance, while the different policies prescribed measures for privacy and personal data protection to be considered or followed by developers and deployers, they did not address how States will protect their populations from AI-powered surveillance. A gender lens is a glaring gap in these frameworks. One exception is Egypt, which addressed gender-based discrimination in AI systems and participation of women in the AI economy, although this still does not cover all of AI's gendered implications. Additionally, while Egypt, Saudi Arabia, and the UAE offered more detailed guidelines and tools to operationalize implementation of principles, the policies adopted by Jordan, Oman, and Qatar do not offer enough practical guidelines that can better support developers and deployers in implementing ethical AI principles.

Despite these shortcomings, there were some positive aspects. Jordan adopted language that encourages the deployment of open source models. SDAIA awards motivational badges to entities complying with AI ethics. Egypt has a Frugal AI policy and requires government AI projects to be preceded by an ethical impact assessment. Oman maintains that “[AI] benefits should be equally distributed among all social groups.” The road towards accountable, inclusive, and sustainable adoption of AI across SWANA countries does not stop at the adoption of nonbinding ethical principles and guidelines. There is also a strong case for developing a regionally coherent, contextual ethical framework for AI, one that is grounded in international human rights law and the UNESCO Recommendations, but explicitly tailored to the shared realities SWANA countries and populations face: active armed conflict and AI-enabled warfare, entrenched authoritarian governance and shrinking civic space, deep gender inequality codified in law, chronic water scarcity and climate vulnerability, large migrant and refugee populations with weak legal protections, and linguistic and cultural marginalization of Arabic and other regional languages and dialects in global AI systems.

The six countries that were closely studied in this research all adopted ethical principles and guidelines, introduced personal data protection laws, and some launched bodies concerned with governance and oversight of AI. However, actual human rights safeguards remain weak and there is a gap between these frameworks in

theory and the reality on the ground. The pursuit of ethical and responsible AI adoption cannot be dissociated from the rule of law crisis and undemocratic governance the region faces. Urgent legal and institutional reforms are needed to address discrimination in law and in practice, advance gender equality, protect human rights, and guarantee access to remedy and independent public and inclusive oversight of AI developers and deployers.

General recommendations

- ➔ All actors should ensure that AI systems uphold human rights, provide clear accountability for harmful outcomes, and guarantee accessible and effective remedies when systems cause errors or adverse impacts, with particular attention to how these harms intensify for individuals facing multiple forms of marginalization, such as women, LGBTQ+ people, migrants, refugees, Indigenous populations and racial and religious minorities.
- ➔ Governments, tech companies, developers, deployers and civil society should collaborate to provide practical, accessible AI and media literacy initiatives for affected communities and the wider public. These efforts should explain how AI systems are used to curate, rank, and synthesize information, including their potential benefits and risks and the rights of individuals affected by them. They should also equip people to recognize synthetic content and disinformation, critically evaluate AI outputs rather than treating them as neutral facts, and understand the avenues available for raising concerns or seeking redress.
- ➔ Technical experts, with the support of CSOs, can develop practical tools and guidelines for AI deployers and developers, including Small and Medium Enterprises (SMEs), such as a tool for conducting human rights impact assessments that specifically accounts for regional context, or a guide for developing inclusive Arabic-language Small Language Models (SLMs).

Recommendations for policymakers and governments

- ➔ Governments need to address the principle-practice gap when deploying AI systems by ensuring that states fulfil their legal and ethical responsibilities and are held accountable when AI systems are deployed without adequate safeguards or deploy high-risk AI systems.
- ➔ Policymakers and government entities drafting AI policies must refrain from using confusing and vague language and instead focus on clear and precise language. They should, for instance, list specific applications per risk category instead of leaving it up to the deployers and developers to decide what is a high risk system and regularly update the list in accordance with technological changes and documented harms.
- ➔ Policy makers in collaboration with ethical technology experts can develop and publish detailed practical guidelines to help developers and deployers operationalize and implement overarching AI ethical principles throughout the AI lifecycle.
- ➔ Priority should be given to strengthening, reforming, and enforcing existing legal frameworks and laws to enhance protection of privacy and personal data, gender equality, and the right to nondiscrimination.

- ➔ Governments should also ensure that oversight bodies and the judiciary are well-resourced and independent in law and in practice so that they can adequately perform their duties in holding accountable deployers and developers of AI systems and ensuring those affected have access to effective remedy.
- ➔ AI systems whose decisions and outcomes could affect fundamental rights and freedoms must be subject to mandatory, public and independent human rights impact assessments both before and after deployment, with periodic re-assessment as contexts, data, and models evolve. Deployers should also be legally mandated to disclose their use of such systems and those affected should be able to appeal at an independent judicial entity.
- ➔ Governments should initiate human rights reforms to protect freedom of expression and freedom of association, restrict government surveillance, and ensure effective and meaningful participation of civil society including human rights organizations and marginalized groups in AI governance.

Recommendations for private-sector developers and deployers

- ➔ Private companies operating in SWANA should not treat weak or nonbinding national frameworks as a ceiling. They should align their practices with international best standards, including the UNESCO Recommendation, OECD AI Principles, and the UN Guiding Principles on Business and Human Rights, even where domestic law is permissive.
- ➔ Developers and deployers should systematically conduct and publish human rights and discrimination impact assessments for high-risk systems, with particular attention to gender, migration status, racial and ethnic identity, disability, and age.

Recommendations for civil society and academia

- ➔ Civil Society organizations, alongside academics, technical and policy experts should co-develop a regionally coherent, contextual ethical framework for AI, one that is grounded in international human rights law and the UNESCO Recommendation.
- ➔ Capacity building and knowledge sharing is essential to ensure the harms and benefits of AI are well understood by a range of civil society, social justice movements and communities including labor unions, gender equality groups, artists, culture preservation entities, and those working on migrant protection and children's rights. Building specialized knowledge can help different actors better advocate and influence AI policies.
- ➔ Civil society and academics should initiate and organize discussions, campaigns, and produce knowledge and evidence on topics often neglected in AI governance in the region, such as impacts on children's rights online and mental health, impacts of AI infrastructure, including data centers on the environment and climate change, and the gendered impacts of AI.
- ➔ As Generative AI grows in usage and increasingly governs people's access to information online, researchers and academics should also explore how it is shaping access to information, knowledge, and resources in languages and dialects of SWANA. For example, Arabic LLMs could be tested or investigated to see if they censor or block queries on subjects still considered taboo.

Annex

Interview guide

1. Can you briefly introduce yourself, your organization/institution, and your main area of work related to technology, AI, or human rights?
 - a. Geographic scope of work: which country / countries or if work has a regional focus
2. In your view, which principles do you think should guide the development and deployment of AI in your country / in the region (e.g., non-discrimination, privacy, transparency, accountability, participation)?
3. How familiar are you with your country's (or the region's if they are regional experts) current AI strategy or any AI-related policy documents? (If you have not seen them, please explain why.)
4. To what extent do the policy frameworks / strategies in question address the principles you mentioned earlier (in Q 2)?
5. How closely do national AI policies align with internationally recognised human-rights frameworks (e.g., UN Guiding Principles, OECD AI Principles)?
6. Can you point to any concrete gaps where the strategy falls short?
7. Are there any elements in the policies or your country's approach in governing AI that you find interesting?
8. Which existing national laws (privacy, data-protection, cybercrime, labor, digital-economy) have informed the development of your country's strategy? In What ways?
9. In your view, were the policies / strategies in question adopted through an inclusive and consultative process?
10. If the process was consultative, did you / your organization take part in any meetings / discussions to inform the drafting and / or implementation of strategies / policies in question?
 - a. Describe how you / your organization has been consulted (if at all) or involved in the drafting or implementation of AI national policies.
 - b. If you were consulted, please give an example where civil-society input led to a change in policy (or where it was ignored).
11. What obstacles limit meaningful inclusive and consultative engagement in AI governance in your country / across the region?
12. Does your country have an entity that is dedicated to governing AI or which entity is leading AI governance efforts?
13. Are you aware of any SWANA-wide AI governance initiatives? If so, at what stage are they and what principles do they promote?
14. What rights-based standards or safeguards would you consider essential for a regionally coherent AI governance model?

Interviewees

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