Policy Brief

Ethical AI Governance for African Policymakers

A Strategic Framework for Sovereignty, Risk Mitigation, and Value for Money

QTrust

Contents

Acknowledgement

This policy brief was authored by Doreen Abiero, Policy Lead at Qhala, whose research and analysis formed the foundation of the work. The author also acknowledges the valuable contributions of Samuel Mwangi, whose expertise was instrumental in the design and development of the policy brief. Their collective efforts helped ensure that the analysis and recommendations presented here reflect practical insights drawn from Qhala Trust's AI literacy masterclasses for policymakers and ongoing work on artificial intelligence governance and policy capacity building across Africa.

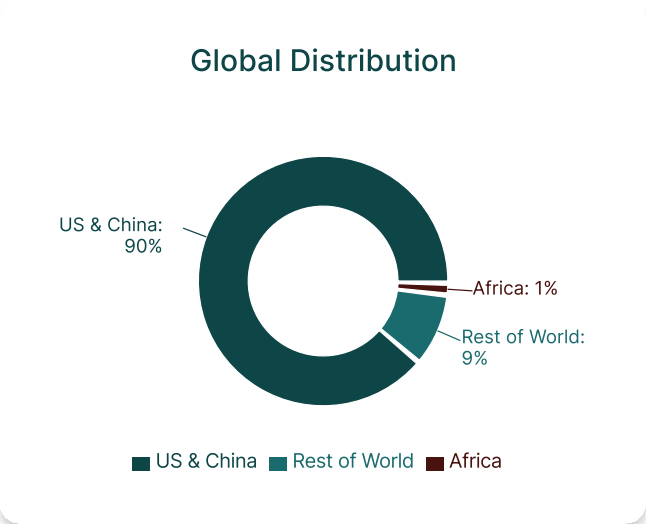
Executive Summary

The global rise of Artificial Intelligence (AI) signifies a transformative juncture for the African continent, representing a nation-defining capability that necessitates a profound recalibration of technology governance. A study by the Carnegie Endowment for International Peace estimates that artificial intelligence has the potential to contribute between $2.9 trillion and $4.8 trillion USD to Africa's Gross Domestic Product by 2030, which would equate to an annual growth rate of approximately 3 percent. Such growth is projected to lift nearly 11 million people out of poverty while creating 500,000 new jobs annually across diverse sectors. However, this immense promise is tempered by the reality of a global AI landscape characterized by extreme power concentration in the Global North, where African nations are frequently relegated to the periphery of the value chain.

This policy brief synthesizes the critical outcomes and best practices from the AI 101 Masterclasses for Policymakers conducted in Nigeria, South Africa and Kenya between late 2025 and early 2026. These masterclasses, facilitated by Qhala Trust in partnership with regional stakeholders like Data Science Nigeria and various national telecommunications departments, targeted senior decision-makers to foster institutional literacy and policy agency. The overarching goal of these interventions was to catalyze a fundamental shift in mindset, transitioning public sector leaders from being passive consumers of foreign technology to becoming architects of Africa-first governance frameworks.

The core findings of this report underscore three strategic pillars for African AI policy: risk mitigation, value for money, and transparency standards. Risk mitigation focuses on addressing algorithmic bias, protecting data sovereignty, and preventing the emergence of AI colonialism, which threatens to exploit African data and labor. Value for money emphasizes strategic procurement and institutional capacity building to ensure that public investments in AI yield tangible socio-economic returns, particularly in sectors such as transportation, agriculture, and healthcare. Transparency standards involve establishing robust accountability mechanisms and clear documentation for AI systems to maintain public trust and democratic integrity. By aligning national strategies with the African Union's Continental AI Strategy (2025–2030), policymakers can ensure that technology serves the collective well-being and economic sovereignty of the continent.

1. Introduction: The Geopolitical Imperative for African AI Sovereignty



US & China
~90%
Control nearly all global high-performance computing

Africa
<1%
Access to global computing resources

The emergence of artificial intelligence as a primary driver of global transformation has created an urgent need for African governments to rethink their roles in the digital ecosystem. For too long, the narrative has been one of technology transfer rather than technological sovereignty. The current global landscape is defined by an intense concentration of compute power, with the United States and China controlling nearly 90% of the world's high-performance computing resources, while Africa accounts for less than 1%. This imbalance creates a strategic vulnerability where African nations risk perpetual dependency on foreign-built systems that often ignore local contexts, languages, and cultural nuances.

The strategic imperative for AI literacy among policymakers is driven by the fact that decision-makers cannot govern what they do not understand. The Nigerian National AI Strategy (NAIS) 2024 and Kenya's National Artificial Intelligence Strategy (2025–2030) exemplify a new era of enhanced policymaking where AI is positioned as an enabler of socio-economic growth aligned with the AU's Agenda 2063. These strategies are not merely technical documents; they are declarations of digital agency. The 2024–2025 period represents a unique window in African digital history, marked by the adoption of the AU Continental AI Strategy and the establishment of the Africa AI Council, a multi-stakeholder regional body designed to strengthen Africa's leadership in the global AI arena.

Central to this transformation are the 6 essential pillars of AI development comprising data, compute, talent, governance, investment, and markets, which serves as a blueprint for building a functioning AI ecosystem. Countries that fail to establish this foundational infrastructure risk losing the ability to participate in the age of intelligence on their own terms. The AI 101 Masterclasses provided the necessary conceptual grounding to address these challenges, moving officials beyond technical jargon to the ethical and socio-economic dimensions of AI governance.

This report argues that Africa's engagement with AI must be rooted in the principles of Ubuntu, an African philosophy of interconnectedness that prioritizes the societal good over individual gain, ensuring that technology serves as a tool for dignity and collective prosperity.

2. Key Problem Focus: Identifying Ethical and Systemic Risks

Policymakers across the continent face a complex array of ethical dilemmas that require a balanced regulatory approach. The masterclass series identified several recurring challenges that must be addressed to protect citizens while enabling innovation.

2.1 The Pervasiveness of Algorithmic Bias and Data Colonialism

One of the most immediate concerns is algorithmic bias, where AI systems reproduce and amplify the inequities found in the datasets used to train them. Because much of the world's AI is trained on data from the Global North, these systems frequently fail when applied to African contexts. For instance, facial recognition technologies have been found to have significantly higher error rates for darker-skinned individuals, particularly women, which raises serious human rights concerns when deployed in policing, border control, or public service delivery.

Furthermore, there is an emerging threat of AI colonialism, where global technology firms exploit African data and labor without providing equitable returns. African workers are often employed as low-wage data annotators to clean the data that powers Western models, yet these workers and their communities rarely benefit from the final products. This extractive model mirrors historical colonial patterns and underscores the need for policies that promote local value addition and protect the rights of data workers in the AI supply chain.

2.2 The Trust Paradox and Misinformation Risks

A critical outcome of the masterclass in South Africa was the identification of the trust paradox within the civil service. While there is a high level of cautious optimism regarding AI's potential to improve government efficiency, there is a simultaneous lack of documented workflows and institutional trust required to scale these technologies responsibly. This lack of trust is exacerbated by the rise of AI-generated misinformation and disinformation. In the Nigerian context, the use of deepfakes during the 2023 elections demonstrated the potential for generative AI to mislead voters and disrupt democratic processes, highlighting misinformation as a fundamental governance challenge rather than just a technical one.

2.3 Infrastructure and Resource Constraints

The development of AI is resource-intensive, requiring significant energy, water, and land. In many African regions, where energy security and water scarcity are already pressing issues, the construction of massive data centers presents a complex trade-off. A typical mid-sized data center can consume as much as 1.4 million liters of water per day for cooling purposes. Policymakers must therefore navigate the environmental impact of AI, moving toward Green AI practices that improve resource efficiency and integrate environmental management into national digital strategies.

1.4M

Liters of Water

Consumed daily by a typical mid-sized data center

⚠AI & Data Center Risk Assessment

Risk Category	Description	Policy Implication
• Algorithmic Bias	Models reflecting non-African data patterns.	Requirement for localized datasets and audits.
• AI Colonialism	Extraction of data and labor by foreign firms.	Focus on data sovereignty and fair work principles.
• Misinformation	Deepfakes and automated propaganda.	Strong transparency and provenance standards.
• Resource Strain	High energy and water consumption of data centers.	Integration of "Green AI" and sustainable infrastructure.
• Labor Disruption	Displacement of entry-level roles by automation.	Focus on reskilling and human-in-the-loop oversight.

3. Masterclass Insights: Regional Outcomes and Best Practices

The AI 101 Masterclasses provided a platform for regional harmonization and the sharing of best practices among policymakers in Nigeria, South Africa, and Kenya. These sessions were characterized by intensive policy simulations and World Café discussions that moved beyond theoretical ethics to practical application.

3.1 Nigeria (Lagos): From Consumption to Stewardship

In Nigeria, the masterclass outcomes emphasized the transition from being a consumer of technology to becoming a steward of the digital square. The program was closely aligned with the five pillars of the Nigerian National AI Strategy (NAIS) 2024, which includes building foundational infrastructure and ensuring ethical AI development.

- Pillar Alignment: The training directly addressed the establishment of the AI Ethics Expert Group (AIEEG) and the development of a proposed AI Bill to establish regulatory sandboxes and prescribe fines for non-compliance.
- Transportation Case Study: A hands-on simulation focused on the Lagos State Ministry of Transportation allowed participants to ideate on AI-powered traffic regulation and multimodal transport systems. Research suggests that AI-driven solutions in this sector can reduce passenger wait times from 20 to 10 minutes while increasing fleet utilization by 20%.

Best Practices: A key takeaway was the Human-in-the-Loop requirement, the recognition that regardless of a model's intelligence, its safe application remains a human responsibility.

3.2 South Africa (Pretoria): Use Case Sprints and Risk Classification

The South Africa masterclass, held in March 2026, focused on identifying immediate pathways for fiscal return on investment (ROI) through sector-specific use cases. Participants utilized the AI Canvas to define policy outcomes, target populations, and current system failures before proposing AI interventions.

USE CASE 1

Population Register

⚠ High

POLICY OUTCOME

Reduce visa fraud and corruption.

EXISTING LEGAL FRAMEWORK

The Protection of Personal Information Act (POPIA), Immigration Law.

USE CASE 2

Youth Employment

Moderate

POLICY OUTCOME

Alignment of training with market demand.

EXISTING LEGAL FRAMEWORK

National Development Plan.

USE CASE 3

Procurement Screening

High

POLICY OUTCOME

Detect irregularities and fraud in bids.

EXISTING LEGAL FRAMEWORK

Public Finance Management Act (PFMA), Municipal Finance Management Act (MFMA).

USE CASE 4

Water Infrastructure

Low-Moderate

POLICY OUTCOME

Early detection of leaks and usage anomalies.

EXISTING LEGAL FRAMEWORK

Municipal Regulations.

USE CASE 5

Multilingual Chatbot

Low-Moderate

POLICY OUTCOME

Increase compliance and service access.

EXISTING LEGAL FRAMEWORK

POPIA, Digital Services.

USE CASE 6

Correctional Monitoring

High

POLICY OUTCOME

Automated detection of suspicious communication.

EXISTING LEGAL FRAMEWORK

Correctional Services Act.

USE CASE 7

Spectrum Allocation

Moderate

POLICY OUTCOME

Efficient infrastructure planning.

EXISTING LEGAL FRAMEWORK

Electronic Communications Act (ECA), Telecom Regulations.

The South African context highlighted that high-risk systems, particularly those involving identity and public finance, require the most stringent oversight mechanisms and human review processes.

3.3 Kenya (Nairobi): Ubuntu and Relational Ethics

The Kenya masterclass emphasized the integration of indigenous knowledge and the Ubuntu principle into AI governance. This approach challenges Western techno-individualism by viewing data as a communal resource that should be managed for the benefit of the entire society rather than private owners.

- **Relational Ethics:** The focus in Kenya was on ensuring that AI systems enhance community well-being and social cohesion.
- **Decolonizing AI:** This involves identifying and dismantling data colonialism by ensuring models are trained on local datasets that reflect Kenyan languages and cultural nuances.
- **Legal Scaffolding:** Kenya's AI governance operates within a broader digital regulatory environment, including the Data Protection Act (2019) and the Computer Misuse and Cybercrimes Act, which provide foundational protections while the country develops AI-specific legislation.

4. Policy Recommendations: Risk Mitigation, Value for Money, and Transparency

Based on the insights from the masterclasses and the AU Continental AI Strategy, the following policy agenda is recommended for African policymakers. This agenda is designed to be rights-based, development-oriented, and sovereignty-conscious.

4.1 Decolonize AI Governance and Development

African policymakers should move beyond copy-pasting regulations like the EU AI Act or GDPR without considering the local context. Governance must be local-first, meaning it should be grounded in the historical and socio-economic realities of the continent.

- **Linguistic Sovereignty:** Governments should invest in African-language datasets and local benchmarks to ensure that large language models (LLMs) accurately represent African worldviews.
- **Just Laws:** Policymakers should focus on developing laws that respond to people's fundamental needs, such as food security and peaceful communities, rather than just technical efficiency.
- **Technological Agency:** Move from being a rule-taker to a rule-maker in the global AI era by supporting local innovators and startups through regulatory sandboxes.

4.2 Protect Labor and Human Dignity in the AI Supply Chain

As AI becomes a core part of the economy, it is essential that it does not exacerbate labor exploitation. Africa's role in the AI economy should not be limited to providing cheap, invisible labor.

- Fairwork Principles: Policymakers should mandate fair pay, fair contracts, and fair management for data workers. Governments should ensure that major AI firms are held accountable for labor conditions across their subcontracting chains.
- Reskilling Programs: As automation disrupts entry-level roles, governments must invest in reskilling pathways to ensure that workers can transition into more skilled andSkilled roles within the technology sector.
- Ubuntu-Centric Design: AI should be a tool that fosters human dignity and mutual support rather than purely individualistic efficiency.

4.3 Embed Strategic Minerals and Infrastructure into AI Strategy

AI policy cannot be separated from mineral, industrial, and energy policies. The global race for technological supremacy relies on critical minerals like cobalt and lithium, much of which are found in Africa.

- **Value Chain Negotiation:** African nations should move beyond exporting raw materials and instead negotiate stronger positions in the AI hardware value chain, promoting local processing and beneficiation.
- **Sovereign Infrastructure:** Investment in local data centers and high-performance computing (HPC) is essential to prevent digital dependency on foreign providers.
- **Green AI:** Establish technical and policy levers for resource-efficient AI development to mitigate the environmental impact on water and energy systems.

4.4 Ensure Value for Money and Fiscal Return on Investment

For public sector AI adoption to be successful, it must demonstrate measurable value to taxpayers and improve the effectiveness of government operations.

- Smarter Procurement: Governments should adopt agile, outcome-based contracting for AI projects. Vetting vendor claims through internal sandboxes before full-scale deployment can prevent expensive failures and wasted public funds.
- **Procurement Transparency:** Implement automated screening and auditable trails in public procurement to reduce corruption and ensure that funds are managed effectively.
- **High-Impact Sector Targeting:** Prioritize AI investments in sectors like agriculture and transportation, where the potential for efficiency gains and poverty reduction is highest.

4.5 Establish Robust Transparency and Accountability Standards

Transparency is essential for maintaining public trust, particularly when AI systems are used in sensitive areas like healthcare, policing, or finance.

- Explainable AI: Africa should emphasize transparency standards that advocate for clear documentation and explainable models that non-experts can understand.
- Provenance Standards: To combat misinformation, policymakers should support global standards for content provenance and digital signatures, ensuring that citizens can distinguish between authentic and AI-generated media.
- **Continuous Evaluation:** Establish independent review bodies and AI advisory boards to evaluate the efficacy and ethical impact of AI systems throughout their lifecycle.

Policy Pillar	Core Objective	Key Action
Decolonization	Ensure African worldviews in AI.	Invest in local language datasets and benchmarks.
Labor Rights	Prevent exploitation in the AI supply chain.	Enforce Fairwork principles and reskilling programs.
Resource Sovereignty	Protect minerals and energy.	Promote local beneficiation and Green AI.

$ Value for Money	Optimize public sector ROI.	Adopt agile procurement and pre-deployment sandboxes.
Transparency	Build public trust and accountability.	Mandate explainable models and provenance standards.

5. Institutional Cooperation and Continental Harmonization

No African country is likely to secure AI sovereignty alone. Regional coordination through institutions like the African Union and Smart Africa is vital for scaling impact and ensuring a unified voice in global governance.

5.1 The Role of the African Union and the Africa AI Council

The AU Continental AI Strategy provides the anchor document for the union's 55 member states, offering a singular vision for development-focused and inclusive AI governance. The establishment of the Africa AI Council in late 2025 marks a decisive step toward continent-level leadership.

- Common African Position: Stronger regional coordination will allow Africa to speak with one voice in international negotiations, strengthening its bargaining power against global technology oligopolies.
- Resource Mobilization: The council is mandated to mobilize resources, including the proposed $60 billion USD Africa AI Fund, to support infrastructure development and local startups.
- Harmonization of Laws: Efforts must be made to harmonize data protection and cybersecurity laws across the continent through frameworks like the Malabo Convention and the AU Data Policy Framework.

5.2 South-South Collaboration and Network-Level Impact

The strategic partnership between hubs like Qhala Trust(Nairobi) and Data Science Nigeria (Lagos) demonstrates the power of South-South collaboration in enhancing technology governance. By sharing lessons from policy simulations and sector-specific deep dives, these organizations are building a Pan-African community of practice for policymakers.

- Scalable Models: The masterclass series established a replicable model for promoting digital literacy that can be scaled across Sub-Saharan Africa.
- Shared Infrastructure: African nations should explore distributed computing and shared compute pools to democratize access for startups and researchers, reducing dependence on expensive foreign platforms.

6. Implementation Roadmap: 2025–2030

The implementation of African AI strategy should unfold in structured phases, as outlined in the AU Continental AI Strategy.

Foundation Phase

Phase 1

2025–2026

Focus on establishing governance structures, creating national AI strategies, and mobilizing initial resources.

- **Governance Structures**
  Establish frameworks and institutional mechanisms
- **National AI Strategies**
  Develop country-specific AI roadmaps
- **Resource Mobilization**
  Secure funding and investment commitments
- **Organizing Forums**
  Facilitate stakeholder engagement and dialogue
- **Centers of Excellence**
  Set up AI research and development hubs

Execution Phase

Phase 2

2027–2030

Concentrate on executing core projects and infrastructure investments, informed by a mid-term review.

- **Core Projects**
  Execute priority AI initiatives across sectors
- **Infrastructure Investment**
  Build computing and data infrastructure
- **Mid-term Review**
  Assess progress and adapt to emerging risks
- **Capacity Building**
  Train workforce and build technical expertise

Governments must simultaneously address horizontal enablers (infrastructure, data, talent) and vertical use cases (agriculture, health, education) to avoid fragmented pilot projects and build sustainable ecosystems.

7. Conclusion: Turning the AI Moment into a Legacy of Prosperity

The emergence of artificial intelligence represents a transformative moment for Africa's digital future. Through initiatives like the AI 101 Masterclasses for Policymakers, the continent is moving from being a bystander in global technology debates to becoming an active and informed participant in shaping its own destiny. The success of these masterclasses proves that when provided with the right conceptual frameworks, senior public servants are not only capable of understanding complex AI systems but are also eager to design governance models that prioritize local needs while meeting global standards.

The key messaging angle for African policymakers remains clear: governance must prioritize risk mitigation, value for money, and transparency. By grounding technological adoption in ethical principles, local realities, and the philosophical foundation of Ubuntu, Africa can ensure that AI serves the common good and supports a future of dignified livelihoods and sovereign growth.

Ultimately, the most powerful tool in the AI age is not the algorithm itself, but the informed human mind capable of governing it for the benefit of society. By building institutional capacity, protecting digital rights, and fostering regional cooperation, African nations can leverage AI to bridge historical inequalities and emerge as leaders in the digital age. The 2024–2026 period represents the most decisive window for shaping how AI is governed, used and trusted on the continent and the actions taken now will define Africa's socio-economic trajectory for decades to come.

policy@qhala.com
3rd Floor, Marsabit Plaza, Ngong Road.
P. O. Box 44276 - 00100
+254 719 210 449

QTrust