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Mapping AI Ethics in Africa: Global Principles and African Realities

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Policy Memo

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Bottom Line Up Front

African artificial intelligence (AI) strategies already endorse global principles such as human rights, fairness and accountability, and they place a strong emphasis on using AI for development. However, they pay much less explicit attention to the justice themes that African scholars and policy makers highlight as critical: data sovereignty, infrastructural dependency, democratic participation and colonial legacies. These concerns appear only partially and are rarely tied to concrete governance tools, such as procurement rules or conditions on cloud and data arrangements. If African institutions rely mainly on imported ethics language, there is a risk that they remain standards takers in AI, even while bearing a disproportionate share of the risks. The core recommendation is that continental and national AI strategies should explicitly embed justice-focused principles and link them to regulatory, infrastructural and bargaining mechanisms that increase African control over how AI is built and governed.

Key Points

- Global AI frameworks converge on a small set of principles, such as human rights, fairness, transparency, accountability and safety.
- African AI strategies adopt much of this vocabulary and add a stronger focus on socio-economic development and infrastructure.
- Justice themes that matter for African contexts, including data sovereignty, infrastructural dependency and colonial legacies, are only partially reflected and often thinly elaborated.
- These gaps increase the risk that African states remain dependent on foreign cloud, standards and technical expertise, while having limited leverage over how AI systems are designed and deployed.
- There is still a window to revise and supplement existing strategies so they better reflect African priorities and provide clearer guidance for regulators and public institutions.

Recommendations

- **Make justice themes principles explicit in AI strategies:** Future continental and national strategies should move beyond generic references to fairness and inclusion and clearly name principles related to data sovereignty, infrastructural justice and decolonial governance. These should be presented as core values, not secondary concerns.
- **Link principles to concrete governance tools:** High-level commitments to human rights, accountability or data sovereignty should be tied to specific mechanisms, such as impact assessments for high-risk AI systems, disclosure and documentation requirements, and conditions on public procurement and partnerships.
- **Treat digital and AI infrastructures as governance levers:** AI policies should address data ownership and governance, cloud contracts, data centre location, compute access and cross-border data flows, and use these as points of leverage when negotiating with foreign providers and investors.
- **Coordinate regionally on standards and bargaining positions:** Regional bodies should support common African positions on AI standards, infrastructures and safety norms. Shared positions can enhance collective bargaining power in multilateral forums and in negotiations with powerful firms and states.

Introduction

Artificial intelligence (AI) is rapidly being integrated into core infrastructures across Africa, from digital finance and agriculture to public administration and border security. This deployment is occurring in settings marked by structural inequality, limited regulatory capacity and dependence on foreign data and compute infrastructures (Soulé-Kohndou, Mills and Falajiki 2025). In such contexts, emerging technologies can scale existing fault lines. When governments do not actively govern for societal risk, those risks fall to firms whose incentives are commercial rather than civic, and AI may amplify inequality, opacity and dependency rather than correct them (Abungu et al. 2024).

Over the past decade, AI governance debates have been dominated by the language of principles. Global institutions have articulated high-level commitments to human rights, fairness, accountability, transparency, privacy and safety in widely cited frameworks, including the United Nations Educational, Scientific and Cultural Organization's (UNESCO's) *Recommendation on the Ethics of Artificial Intelligence*, the Organisation for Economic Co-operation and Development's (OECD's) *Recommendation on Artificial Intelligence*, the Council of Europe's *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law*, the European Union's Artificial Intelligence Act and the National Institute of Standards and Technology (NIST) AI Risk Management Framework. These texts present themselves as anchors for "trustworthy" or "responsible" AI. Jessica Fjeld et al. (2020) map 36 such instruments and show convergence around a small set of rights-based and ethics-based principles.

Critiques of this principled consensus highlight its limits in contexts shaped by colonial histories and structural inequality. Scholars of digital colonialism and epistemic injustice argue that global AI ethics can export Northern assumptions while leaving intact material arrangements that concentrate power and risk (Yilma 2025; Abungu et al. 2024). Ethics can become a legitimizing language for deployment rather than a framework that redistributes power or constrains harmful systems. In this view, fairness or transparency often do not address who owns infrastructure, who sets standards and whose interests prevail in trade-offs (Yilma 2025; Effoduh 2025).

African states and regional bodies are not simply passive recipients of global norms. The African Union's *Continental Artificial Intelligence Strategy* links AI governance to Agenda 2063, Ubuntu, data sovereignty, regional integration and development objectives, and calls for African agency in global standard setting (African Union 2024).[1] National strategies in Rwanda (Ministry of ICT and Innovation 2023), South Africa (Department of Communications and Digital Technologies 2024), Nigeria (Federal Ministry of Communication, Innovation and Digital Economy 2025) and Kenya (Ministry of Information, Communications & The Digital Economy 2024) frame AI as a tool for economic growth, social inclusion and infrastructure transformation, while also acknowledging risks and calling for ethical safeguards. Research ICT Africa's Just AI Framework of Inquiry and recent work on Ubuntu, decolonial AI governance and digital

1 Agenda 2063 is the African Union's long-term development blueprint, adopted in 2013, which envisions "an integrated, prosperous and peaceful Africa" over the following 50 years, with seven core aspirations spanning inclusive growth, regional integration and good governance (African Union 2024). Ubuntu is an African philosophical concept emphasizing collective well-being and communal interdependence, invoked in the Continental AI Strategy as a guiding ethical value (ibid.).

sovereignty deepen these debates by centring justice, structural inequality and African epistemologies (Chetty and Sey 2025; Yilma 2025; Effoduh 2025).

Despite this growing body of work, there remains limited systematic mapping of which ethics principles are prioritized in key African AI strategies, and how those priorities align with the "normative core" of global AI governance. Existing comparative studies often focus on global frameworks in the abstract or provide descriptive overviews of African strategies, without probing what is foregrounded, what is peripheral and what is absent (Fjeld et al. 2020; Research ICT Africa 2025; Effoduh 2025). As a result, policy makers have limited evidence about whether imported principle sets are sufficient for African contexts, or whether additional political and economic principles, such as data sovereignty, infrastructural justice and decoloniality, need to be made explicit and embedded.

This working paper addresses that gap as the first output of a broader project on Africa-centred AI ethics and governance. It asks three questions:

- Which global AI ethics principles are most consistently reflected in core African AI strategies and policies?
- Which African concerns, such as data colonialism, infrastructural dependency, economic development priorities and decolonial governance, are present, marginal or missing from those documents?
- What does this reveal about the limits of an "ethics-first" approach that is not explicitly grounded in questions of power, sovereignty and political economy?

To answer these questions, the paper adapts the mapping approach developed by Fjeld et al. (2020) to an African context. A set of normative core global AI governance instruments and a corresponding set of continental and national African AI strategies and policies are coded along two dimensions: widely recognized AI ethics principles and African-centred justice themes (Chetty and Sey 2025; Yilma 2025; Effoduh 2025).

Methodology

Document Selection

The analysis focuses on a purposive set of AI governance instruments selected as a baseline normative core for comparison with African strategies. Documents were chosen for institutional authority (adopted by a major multilateral body or major regulator); cross-jurisdictional influence (designed to travel across countries, sectors or supply chains); and governance function (together, they span principles, enforceable rules and operational risk-management tools). Five instruments were selected:

- UNESCO's *Recommendation on the Ethics of Artificial Intelligence* (UNESCO 2022);
- the OECD's *Recommendation of the Council on Artificial Intelligence* (OECD 2019);

- the European Union's Artificial Intelligence Act (Regulation (EU) 2024/1689);[2]
- the Council of Europe's *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law* (Council of Europe 2024); and
- the NIST *Artificial Intelligence Risk Management Framework 1.0* (NIST 2023).

Together, these instruments provide a structured Western/international baseline that covers ethics principles, binding regulation, treaty-based rights commitments and implementable risk-management practices.

The paper then selects a set of continental and national instruments:

- the African Union's *Continental Artificial Intelligence Strategy* (African Union 2024);
- *AI for Africa: Artificial Intelligence for Africa's Socio-Economic Development* (UNESCO et al. 2019);
- Rwanda's *National Artificial Intelligence Policy* (Ministry of ICT and Innovation 2023);
- the *South Africa National Artificial Intelligence Policy Framework* (Department of Communications and Digital Technologies 2024);
- Nigeria's *National Artificial Intelligence Strategy* (Federal Ministry of Communication, Innovation and Digital Economy 2025);
- the *Kenya Artificial Intelligence Strategy 2025–2030* (Ministry of Information, Communications & The Digital Economy 2024);
- the *Republic of Ghana National Artificial Intelligence Strategy: 2023–2033* (Ministry of Communications and Digitalisation et al. 2022); and
- the *Egypt National Artificial Intelligence Strategy, Second Edition (2025–2030)* (National Council for Artificial Intelligence 2025).

These documents were selected because they are explicitly framed as AI strategies or AI-specific policy frameworks, and because they are either adopted or sufficiently developed to function as policy reference points in current debates.

African countries are at different phases of AI governance, with a growing but still uneven set of national AI strategies and policies and many others in development; this paper therefore uses a purposive sample of publicly available AI-specific strategy and policy documents rather than attempting an exhaustive census (Munga and Quansah 2025).

2 EC, *Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act)*, [2024] OJ, L 2024/1689, online: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689>.

Coding Framework

The coding framework combines two layers.

The first layer operationalizes a set of widely recognized AI ethics principles, drawing on the themes identified by Fjeld et al. (2020) and by global frameworks such as UNESCO (2022), the OECD (2019) and the Council of Europe (2024). For the purposes of this study, these principles are grouped into seven themes:

- Human rights and dignity, including liberty and equality.
- Fairness and non-discrimination, including bias mitigation and inclusive design.
- Accountability and responsibility, including liability, oversight and redress.
- Transparency and explainability, including disclosure, documentation and contestability.
- Privacy and data protection.
- Safety, robustness and security.
- Sustainability, including environmental and intergenerational impacts.

The second layer introduces five African-centred justice themes that emerge strongly in regional scholarship and advocacy:

- **Data sovereignty and collective data rights:** Whether the document explicitly addresses ownership, control and governance of data generated in or about African societies, including recognition of community or collective data rights (Chetty and Sey 2025).
- **Development and industrial policy:** The extent to which AI is linked to industrial strategy, structural transformation, labour markets and economic diversification, encompassing the entire AI value chain (including governance of foundational activities such as data annotation and labelling), beyond generic “innovation” language (ibid.).
- **Geopolitics, dependency and infrastructure:** Whether the text acknowledges reliance on foreign cloud or compute providers, the political economy of standards and infrastructures, or tensions between external AI powers (Soulé-Kohndou, Mills and Falajiki 2025).
- **Democracy and public participation:** The presence of commitments to democratic oversight, public participation or mechanisms for affected communities to shape AI governance (Chetty and Sey 2025; Effoduh 2025).
- **Coloniality and decolonial framing:** Whether the document recognizes colonial legacies, digital or ethical colonialism, or explicitly situates AI governance within decolonial or African-centred epistemologies, such as Ubuntu (Yilma 2025; Effoduh 2025).

These themes are influenced by the Just AI Framework of Inquiry, which foregrounds economic, ecological, data and gender justice, as well as democratic governance and structural inequality, as key axes for assessing AI systems and policies (Chetty and Sey 2025). They also draw on work on decolonizing AI governance, digital sovereignty and epistemic injustice (Yilma 2025; Effoduh 2025; Abungu et al. 2024).

Scoring Procedure and Limitations

Each selected document was coded against the 12 themes and scored on a three-point scale:

- **0 (absent):** The theme is not addressed, or only as a passing reference without any clear normative stance (for example, a duty, right, requirement or prohibition) and without governance relevance (for example, oversight, accountability, enforcement or institutional responsibility).
- **1 (present, general):** The theme is clearly referenced and framed as a principle or intention, but the document does not explain how it would be implemented (for example, it does not specify responsible actors, policy tools, scope/thresholds or accountability processes).
- **2 (present, specific):** The theme is developed and linked to concrete implementation. A score of 2 is assigned when the document includes at least two of the following: specific obligations or requirements; named governance tools (such as impact assessments, audits, registration, licensing or procurement rules); assigned institutional roles or oversight bodies; enforcement or accountability mechanisms (such as monitoring, reporting, penalties, remedies or appeal rights); or defined scope, thresholds or prohibited practices.

Scoring focused on substance rather than word counts. For example, a single, well-developed section on data sovereignty that is linked to specific regulatory tools and regional cooperation warranted a score of 2, while multiple generic references to "data" as an economic resource without governance content did not. References to participation or consultation were coded under democracy and public participation only where they relate to ongoing governance processes, rather than to one-off stakeholder workshops.

This method assesses what is written, not what is implemented, and does not capture all AI-relevant law and policy. The scores are therefore treated as indicative rather than definitive (Fjeld et al. 2020; Chetty and Sey 2025; Yilma 2025).

Priority Principles in Global and African Instruments

The comparative coding revealed three broad patterns. The guiding objective of this mapping is to identify where African strategies remain legible within global AI governance instruments while making justice-oriented governance mechanisms more explicit and actionable.

First, the global instruments form a relatively coherent normative core. UNESCO (2022), the OECD (2019), the European Union's Artificial Intelligence Act,[3] the Council of Europe convention (Council of Europe 2024) and the NIST AI Risk Management Framework (NIST 2023) all give substantial prominence to human rights, fairness and non-discrimination, privacy and data protection, transparency, accountability and safety. These principles appear as named values or pillars, receive extended treatment and are linked to high-level obligations for states, providers, deployers or risk owners. Within this global set, sovereignty-oriented themes are uneven. The instruments offer limited sustained attention to industrial policy, geopolitical dependency or colonial legacies, and they tend to frame "data" primarily through privacy, protection and risk governance rather than as a bargaining lever in cloud, compute and cross-border arrangements. Economic development is present, but largely through innovation, competitiveness and responsible uptake rather than through industrial strategy for structurally disadvantaged regions (OECD 2019).[4]

Second, the African instruments broadly reproduce this global core, while adding a stronger emphasis on development and infrastructure. The African Union's *Continental Artificial Intelligence Strategy* (African Union 2024) and the *AI for Africa* report (UNESCO et al. 2019) both present AI as a lever for socio-economic development, job creation and structural transformation, and they treat safety, fairness and human rights as important but complementary concerns. In these strategies, development and industrial policy are among the most substantively integrated themes, linked to sectoral priorities such as agriculture, health and financial services.

Third, the African-centred justice themes are increasingly articulated, but unevenly operationalized. Data sovereignty and collective data rights are not only "visible." In several instruments, they appear as concrete commitments, including strengthening control over data and infrastructures, data localization, and sovereign cloud arrangements (African Union 2024; Ministry of Information, Communications & The Digital Economy 2024). At the same time, many strategies place greater weight on data as an economic asset than on data governance as a sovereignty mechanism that consistently binds procurement, enforcement and bargaining, especially across cross-border data flows and vendor relationships (African Union 2024; Ministry of Information, Communications & The Digital Economy 2024). Geopolitics, dependency and infrastructure appear strongly. Several documents recognize reliance on foreign cloud and compute providers and call for investment in African data centres and regional infrastructures (UNESCO et al. 2019; Federal Ministry of Communication, Innovation and Digital Economy 2025). Democracy and public participation are present in the form of consultation and stakeholder engagement, but there is limited detail on ongoing participatory governance mechanisms. Explicit coloniality and decolonial framing appear intermittently, for example, in references to colonial histories or the language of digital colonialism, but they are not consistently translated into sustained principles or policy tools.

3 *Ibid.*

4 *Ibid.*

Table 1: Summary of Coded Results

Theme	Global Instruments	African Instruments
Data sovereignty and collective data rights	1/5	7/8
Geopolitics, dependency and infrastructure	4/5	8/8
Coloniality/decolonial framing	1/5	8/8

Source: Author.

Note: Values in summary tables show "Number of documents coded at score = 2 / total documents coded."

Overall, the mapping suggests that African AI strategies are not normatively empty. They adopt much of the global ethics vocabulary and often articulate concerns about development, sovereignty and infrastructure. At the same time, the justice themes identified in African scholarship and in the Just AI Framework of Inquiry are not always translated into durable governance mechanisms, and some remain implicit or thinly elaborated relative to the policy ambition of "sovereignty" itself (Chetty and Sey 2025; Yilma 2025; Effoduh 2025).

Ethics, Sovereignty and Infrastructural Dependency

The findings point to a tension between convergence and specificity. On one hand, African AI strategies align closely with influential global governance approaches, endorsing human rights, fairness, accountability and transparency, and signalling a desire to build "trustworthy" or "responsible" AI compatible with ethics principles, treaty-based rights commitments, binding regulation and risk-management practice. This alignment can be strategically useful. It may ease cooperation with external partners, and support access to funding.

On the other hand, convergence on abstract principles risks obscuring the structural conditions that shape AI governance in African states. The documents devote less explicit attention to the material and geopolitical realities highlighted in African scholarship, such as reliance on foreign cloud providers, extractive data practices and limited bargaining power over standards and contracts (Soulé-Kohndou, Mills and Falajiki 2025; Abungu et al. 2024). Even where data sovereignty, infrastructural dependency or colonial legacies are named, they are not always translated into governance tools that shape day-to-day decisions. This gap reflects concerns raised by Kinfe Yilma (2025), Jake Okechukwu Effoduh (2025) and Pria Chetty and Araba Sey (2025) that justice and decoloniality remain inconsistently embedded.

In that environment, relying primarily on high-level ethics principles may still leave African states constrained by external infrastructures and vendor terms, even where strategies signal commitments to sovereignty and capability building (Abungu et al. 2024). The opportunity is to connect justice-oriented priorities to mechanisms that shape infrastructure, procurement and bargaining, while remaining legible in global debates.

Conclusion

African AI strategies and policies have begun to articulate normative commitments for the development and use of AI on the continent. They align closely with influential global AI governance instruments on high-level principles such as human rights, fairness, privacy and accountability, and they place greater emphasis on development and infrastructure than many of their global counterparts. At the same time, concerns about data sovereignty, infrastructural dependency, democratic participation and colonial legacies are not consistently translated into enforceable governance tools across the policy stack.

This mapping suggests that an ethics-first approach, grounded primarily in imported principle sets, is not sufficient for African contexts. Future work can build on this analysis by examining how AI systems are actually being deployed in specific sectors, how the principles and justice themes identified here are, or are not, being implemented in practice, and the political economy of strategy drafting itself, including why certain themes are foregrounded or marginalized, and whose interests are served by particular framings.

Recommendations

- **Make justice themes explicit in future AI strategies and revisions:** Continental and national AI instruments should move beyond generic references to fairness and inclusion, and explicitly articulate principles related to data sovereignty, infrastructural justice and decolonial governance. These principles should be presented as core commitments, not as add-ons.
- **Tie principle language to concrete regulatory and procurement tools:** References to human rights, accountability or data sovereignty should be linked to specific mechanisms, such as impact assessments for high-risk AI systems, mandatory disclosure and documentation standards, conditions on public procurement and requirements for local data governance arrangements.
- **Treat digital and AI infrastructures as sites of governance:** African governments and regional bodies should integrate discussions of cloud contracts, data centre location, compute access and cross-border data flows into AI governance strategies, and use these as levers to negotiate better terms with foreign providers and investors.
- **Institutionalize democratic participation in AI governance:** Strategies should specify how communities, workers and civil society organisations will participate in ongoing AI policy and oversight, beyond one-off consultations. This can include permanent advisory bodies, participatory impact assessments and oversight mechanisms with representation from affected groups.
- **Coordinate regionally on standards and bargaining positions:** Regional bodies such as the African Union and regional economic communities should support member states in developing common positions on AI principles and infrastructures. Shared standards and joint bargaining can increase African leverage in negotiations with foreign firms and in multilateral fora.

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