

Governing Artificial Intelligence in Africa

Position paper on ECA's responsible use of Artificial Intelligence and support to member States

Executive Summary

Artificial intelligence (AI) is reshaping public, private, and civil society sectors worldwide. The African Union's Continental AI Strategy, adopted in 2024, provides a continental framework for responsible AI through an Africa-led, people-centered approach emphasizing governance, capacity building, and effective institutions (African Union, 2024). Yet significant barriers persist: according to the ITU Global Connectivity Report (2025), only 40 percent of Africans use the internet, Africa has just 56 mobile broadband subscriptions per 100 inhabitants, and nearly 600 million people in sub-Saharan Africa lack electricity (IEA, 2024). AI governance in Africa must therefore address both ethical and infrastructure challenges simultaneously.

The Economic Commission for Africa (ECA) serves 54 member States and is well-positioned to lead AI governance efforts, translating continental strategies into practical tools, policy guidance, and measurable outcomes.

This paper proposes a two-part approach. First, ECA should establish strong internal governance for its own AI use, including risk assessments, ethical reviews, staff training, and incident reporting. Second, ECA should support member States, regional economic communities (RECs), and continental organizations through policy advice, shared data systems, procurement frameworks, readiness evaluations, and capacity building. Five priorities are identified: closing the technology gap, building African data commons, increasing AI transparency, aligning AI with African values and contexts, and strengthening institutional capacity. The paper also proposes an internal governance framework, an external support plan, and regular publication of an African AI Readiness and Maturity Index.

Why AI Governance Matters for Africa Now

The UN High-Level Advisory Board on Artificial Intelligence notes a global governance gap for AI. Effective AI governance is essential to maximize benefits and manage risks. According to the UN AI Advisory Body, AI's raw materials, from critical minerals to training data, are sourced globally, but its power and advantages are concentrated among a few companies and countries. The development, deployment, and use of this technology should not be left solely to the market or a small group of countries. ([UN AI Advisory Body, Sept 2024](#))

Establishing an effective AI governance system is a key goal and priority outlined in the African Continental AI Strategy, aimed at optimizing benefits, curbing risks, and ensuring AI is used transparently and responsibly. The strategy showcases AI's significance for agriculture, education, healthcare, public services, climate change, and peace and security. It also underscores the need for strong governance, standards, and adoption by both the public and private sectors.

A further urgent concern is that AI may exacerbate existing inequalities if Africa remains dependent on external providers rather than developing its own institutions and capabilities. The UN cautions that power could become concentrated in segments of the AI supply chain, such as computing and data modeling. AI also has the potential to widen the gap between developing and

developed nations, perpetuate biases, and harm the environment. These challenges are particularly acute in Africa, where weak infrastructure, limited bargaining power, and fragmented markets could result in new dependencies related to AI adoption.

A third major challenge is readiness. Over the past decade, the number of African countries with data protection laws has more than doubled, reaching 36 by January 2024 (African Union, 2024). Additionally, 25 countries now have open data portals (UNESCO, 2021). However, UNESCO's AI Needs Assessment Survey, which included 32 African countries, reveals ongoing gaps: AI governance remains new, legal and regulatory systems need strengthening, public-sector skills are limited, data management quality varies, training systems require updates, and support for AI research and development is insufficient ([African Union, 2024](#); [UNESCO, 2021](#)).

AI governance is advancing rapidly due to technological progress and growing concerns about risks. Africa needs a unified voice, and ECA, working with other continental organizations, is well-placed to promote this perspective.

Rationale for an ECA-led AI Governance Discussion in Africa

The rationale for an ECA-led AI governance discussion stems not from a lack of global frameworks, but from the absence of an African-centered platform capable of translating these frameworks into the continent's specific context. Current AI governance debates and standard-setting processes are predominantly shaped outside Africa, despite their direct impact on African labour markets, public services, data systems, languages, and regulatory choices. This representation gap is measurable: African countries remain underrepresented in bodies such as the OECD's Global Partnership on AI (GPAI), were not primary participants in the EU AI Act negotiations despite its extraterritorial reach and hold limited seats in major standard-setting bodies such as ISO/IEC JTC 1/SC 42 on AI. The result is that African countries are left to adapt to externally developed rules, models, and norms rather than shaping them from the outset.

A second reason is the need for context. Africa's development conditions, infrastructure constraints, linguistic plurality, data gaps, and social priorities require a governance approach that is adapted to African realities rather than imported wholesale from other regions. Many existing frameworks offer important principles, but they are often too generic or too detached from the conditions under which African countries will adopt and govern AI. An African AI governance discussion, led through ECA in alignment with the AU Continental AI Strategy and other UN AI-related strategies, is therefore necessary to ensure that governance is grounded in local priorities such as inclusion, public value, state capability, regional integration, and the protection of African knowledge systems, cultures, and languages.

A third rationale is the need for coordination. Africa's current AI governance landscape lacks effective mechanisms for regional coherence, policy harmonization, and implementation support. A practical intermediary is needed to connect global and continental principles with national action. Such a platform would help member States, RECs, and continental bodies coordinate positions, share tools and experiences, avoid duplication, and develop interoperable approaches. ECA's convening power, policy expertise, operational mandate, and regional reach position it to lead implementation-focused discussions, strengthen Africa's collective voice, support context-appropriate governance, and propose concrete mechanisms for regional coordination and institutional capacity development.

Governance Pillars

Pillar One: Bridging the compute divide

AI requires more than software; it depends on electricity, cooling, broadband, cloud services, data centers, and computing platforms. The AU AI Strategy identifies infrastructure, computing, and investment as essential components. However, in many parts of Africa, these foundational elements remain weak, uneven, and costly. Africa hosts less than 2 percent of the world's large scale data center capacity, concentrated primarily in South Africa, Kenya, and Nigeria. Electricity costs for computing in many African countries are high, and average international bandwidth prices remain among the highest globally. These constraints have directly limited AI deployment: health-sector machine-learning pilots have stalled due to unreliable power; agricultural prediction models have been hosted entirely offshore, creating latency and data-sovereignty concerns.

Limited computing resources force reliance on external platforms, cloud contracts, imported models, and externally determined pricing. This dependence reduces bargaining power, restricts local research and innovation, and risks confining African organizations to less valuable positions within the AI supply chain ([United Nations CEB](#)).

Pillar Two: Building African data commons

AI systems are only as effective as the data ecosystems that support them. The AU Data Policy Framework endeavors to strengthen and unify data governance and establish a shared African data space. It also highlights that “data deserts” in many African countries mirror the digital divide and restrict the data available for decision-making and algorithm training. The AU AI Strategy similarly considers high-quality and diversified datasets as a strategic asset for African ownership of data and AI ([AU Data Policy Framework, 2022](#); [AU AI Strategy, 2024](#)).

Africa's data challenge extends beyond data scarcity to include fragmentation, inconsistent quality, siloed records, limited digitization, weak metadata, interoperability issues, limited language resources, and insufficient institutional capacity for management. These challenges are both political and technical, involving tensions between openness and privacy, cross-border data flows and sovereignty, and public versus commercial interests.

Pillar Three: Building governable systems

The governance challenge is not to render every AI system entirely transparent, but to ensure that systems are transparent, explainable, traceable, and auditable to a degree commensurate with their associated risks. The AU Continental AI Strategy articulates this by calling for accountability and transparency in AI design and deployment, recommending transparency registers, and explicitly requiring explainability, privacy-by-design, and lifecycle governance. UNESCO's Recommendation on the Ethics of AI reinforces this, emphasizing that appropriate levels of transparency and explainability depend on context, while auditability and traceability remain essential. OECD guidance further links transparency to the public's ability to understand and challenge AI outcomes ([AU AI Strategy, 2024](#); [OECD AI Observatory](#); [UNESCO](#)).

This is especially important in Africa, where many institutions will first encounter AI through procurement and imported platforms rather than domestic model development. If ministries, regulators, hospitals, banks, schools, or courts cannot assess a system's purpose, assumptions,

training data limitations, language coverage, bias risks, or local performance, they cannot provide effective oversight. The AU Strategy addresses this risk by proposing oversight bodies, public procurement standards, transparency registers, red-teaming, and African-led research on AI risks within African societies.

For Africa, the governance priority should be to shift from opaque AI adoption to manageable AI deployment. This includes stronger procurement rules, mandatory system and model documentation, independent testing against African and local-language benchmarks, audit trails, incident reporting, and clear pathways for explanation, contestation, and redress. UNESCO's Ethical Impact Assessment is especially relevant because it was designed not only for developers but also for AI procurers, emphasizing data representativeness, robustness, transparency, auditability, and checkpoints throughout the lifecycle. The UN system model policy supports the same principle: where AI impacts rights, services, benefits, or entitlements, people should be informed and have access to the reasons and logic behind decisions. ([UNESCO](#))

Pillar Four: Aligning AI with African contexts and values

If African realities are missing from the data used to train and test AI systems, those systems will misunderstand African institutions, languages, ecosystems, labor markets, disease patterns, settlement trends, and cultures. Encouragingly, there are African-led initiatives that are involved in locally grounded AI models, such as the Masakhane research community and Lelapa AI in South Africa. These examples demonstrate that Africa is not starting from zero. The AU Strategy's principles, such as local-first development, diversity, and respect for African cultures and languages, support this approach.

This also means African AI governance must be both rights-based and community-focused. The AU Strategy adopts a local-first and people-centered approach, grounding AI in dignity, culture, and values like Ubuntu, which, in governance terms, could translate into community consent models for data collection, collective benefit-sharing from AI-derived insights, and dispute resolution mechanisms rooted in communal decision-making. It warns that English-dominant generative AI can marginalize African languages and worldviews. It also highlights a dual responsibility: AI should help preserve and strengthen African heritage, indigenous languages, and local knowledge systems, while governance must also protect them from appropriation, distortion, and exploitation. In African contexts, the test is not only whether a system respects individual rights but also whether it enhances or undermines social trust, cultural continuity, linguistic inclusion, and the status of rural and underserved communities.

Furthermore, Africa's AI governance must account for the continent's youthful and rapidly expanding population. Governance discussions should address demographic shifts, positioning AI policy as a long-term priority for employment, education, public services, social cohesion, and the continent's capacity to support its growing population.

Pillar Five: Capacity development

Capacity should be recognized as a critical governance requirement. AI governance struggles not only when rules are missing but also when institutions cannot interpret vendor claims, draft suitable procurement requirements, assess risks, test system performance, maintain metadata, or exercise meaningful human oversight throughout the entire lifecycle. In African contexts, these

gaps often span ministries, regulators, national statistical offices (NSOs), universities, and companies (African Union, 2024; UNESCO, 2021).

Limited capacity results in persistent governance challenges, including issues related to model development and selection, training, evaluation, deployment, inadequate procurement requirements, insufficient model documentation, limited audit capabilities, excessive reliance on external providers, and inadequate incident response. The problem extends beyond a shortage of engineers to include gaps in law, public administration, statistics, cybersecurity, language technologies, and sector regulation. In overstretched institutions, AI tools may be adopted for convenience before adequate accountability measures are in place.

ECA is well-positioned to support member States and regional institutions through model curricula, regulatory fellowships, leadership briefings, and assistance for NSOs and sector regulators. At the continental level, ECA should help organize regular platforms and set minimum capability standards for responsible AI governance. At the national level, it should support focal institutions, cross-ministerial coordination, and review capacity.

Internal ECA AI Governance Agenda

1. ECA should apply the same governance principles it promotes to member States: lifecycle-based, risk-proportionate (minimize legal, operational, reputational, ethical, and financial risks), transparent, and accountable. The UN system's model policy on responsible AI already provides a solid baseline, including responsibility frameworks, training, risk classification, impact assessment, transparency, privacy and data governance, logging, red-teaming, complaints handling, and lifecycle monitoring. ECA should customize that baseline to suit its own mandate, data environment, and knowledge products. Implementation should be phased: first, establish the internal task force, adopt the enterprise AI policy, and launch role-based training; second, operationalize the AI Accountability and Review Board, deploy the risk classification framework, and establish the AI registry and incident reporting channel; and finally, implement the AI sandbox, complete the first cycle of red-team testing, and conduct an internal governance review.
2. ECA should implement an enterprise AI policy that covers AI systems it develops, acquires, integrates, or uses. The policy should apply to staff, consultants, and implementing partners where ECA directs the work. It should define scope, approved uses, prohibited uses, approval thresholds, lifecycle controls, and accountability.
3. A tiered model (such as low, medium, high, and very high risk) should be adopted, together with a category of unacceptable uses.
4. An AI Accountability and Review Board should be established, chaired by the ES office, with representation from relevant sub programmes and offices, including ACS, TICID, ICTSS, SROs and DOA. The Board should have binding authority over high-risk and very-high-risk AI deployments, advisory authority over medium-risk uses, and should convene regularly or upon request when a new high-risk system is proposed. Its mandate should include reviewing risk assessments, approving or rejecting deployments, investigating incidents, and reporting annually to the Executive Secretary.
5. ECA should require internal usage notes. Staff and consultants must document significant AI use in internal documents. For public or member-state-facing outputs, staff should disclose when AI substantially informs drafting or analysis, while ensuring final accountability remains with humans.

6. Approved generative AI tools may support low- and medium-risk tasks such as brainstorming, preparing first-drafts, summarization, translation support, code assistance, and knowledge discovery.
7. As a foundational principle, ECA should never treat AI output as evidence in itself. This applies across all knowledge products: official statistics, normative publications, country advisory notes, and high-level correspondence must not incorporate AI-generated claims without independent verification from authoritative sources. This principle should be embedded in all staff guidance, editorial workflows, and quality assurance processes.
8. ECA must keep a central register of AI systems and AI-assisted workflows that surpass a specific threshold, maintain logs consistent with the level of risk and data sensitivity, oversee sensitive uses through red-team activities, and establish a reporting channel for non-compliance and incidents.
9. ECA should implement role-based training for senior management, professional, and general service staff, including economists, statisticians, ICT staff, translators, and program management officers.
10. ECA should establish an AI sandbox for experimentation, development, and documentation, using available and low-risk synthetic data whenever possible.
11. Collaborations with AUC, continental bodies, academia, the private sector, AI-related bodies, UN agencies, and other centers of excellence, RECs, NSOs, and standards organizations should focus on transparency, public good, data protection, and avoiding dependence on a single vendor or platform.

External ECA Support Agenda

1. Externally, ECA should serve as a practical partner in implementing responsible AI governance across Africa, transforming continental frameworks into practical support for member States, RECs, NSOs, and sector ministries.
2. ECA should create tailored curricula aimed at policymakers, regulators, judges, parliamentarians, ministries, NSOs, procurement officers, and sector agencies.
3. ECA should bring together governments, private companies, civil society, disability advocates, researchers, youth, and regional organizations to focus on sectoral use, assurance, computation, and data commons. It should promote peer learning, regional observatories, centers of excellence, shared benchmarks, and public-interest open tools where suitable.
4. ECA should provide a model national AI strategy framework aligned with the AU Strategy, including modules on priorities, lifecycle governance, sector use, procurement, rights safeguards, financing, and institutional coordination.
5. ECA, in partnership with other UN agencies such as UNESCO, should develop readiness diagnostics, sectoral governance checklists, and an annual African AI Readiness and Maturity Index.
6. ECA should assist NSOs and public institutions in improving the availability, quality, interoperability, and governance of data essential for AI readiness and accountability, including administrative data, geospatial data, disaggregation, and metadata.

Follow-up actions

1. ECA should establish a structured follow-up programme focused on mapping, readiness assessment, and regular monitoring, organized in three phases. Phase 1: establish the internal task force (led by the ES office), launch the AI mapping exercise (led by ACS and TICID), and convene the first multi-stakeholder dialogue. Phase 2: complete country and sector readiness assessments (led by ACS with sub-programme support), publish the first African AI Readiness and Maturity Index, and issue the model national AI strategy framework. Phase 3: institutionalize the annual AI Readiness and Maturity Index (led by ACS) and conduct the first comprehensive governance review.
2. As an immediate step, ECA should immediately establish an internal task force to guide the governance framework and spearhead the implementation.
3. ECA should establish a platform to discuss AI issues with academia, the private sector and member States.
4. ECA should produce AI status reports on Africa based on readiness assessments and the AI Readiness and Maturity Index, including country profiles.
5. The mapping exercise should start with a comprehensive continental exercise that includes public and private-sector AI applications, key vendors and deployment strategies, national policies and regulations, computing resources, data institutions, language resources, assurance mechanisms, and centres of excellence. The goal should not be just a static list, but a foundation for setting priorities and encouraging peer learning.
6. ECA should evaluate preparedness at various levels, such as the country and sector levels. Country assessments should analyse legal, infrastructural, institutional, and capability conditions. Sector diagnostics should measure readiness in health, education, agriculture, finance, public administration, labour, justice, identity, and climate. Sectoral diagnostics should assess governance, procurement, records, data stewardship, staffing, and oversight within specific organizations.
7. ECA should publish an annual index that serves as a practical, mixed-method tool applying quantitative indicators, document reviews, expert validation, and country consultations. It should be designed as a peer-learning and policy-improvement resource rather than a simple league table.
8. ECA should include a module on NSO and public data system preparedness, covering interoperability, administrative data integration, geospatial capabilities, metadata quality, disaggregation, privacy protection, and data science readiness. Given ECA's comparative advantage, this should become a key contribution.

Conclusion

Africa needs an AI governance model that reflects African priorities, aligns with global standards, is practical, and supports development. The African Union has set the strategic direction, but the main challenge now is implementing it. ECA can assist by strengthening African capabilities, ensuring accountable governance, maximizing public value, and fostering regional unity. By managing its own AI practices effectively and providing support, tools, measurement frameworks, and regional public goods to member States, ECA can help ensure AI upholds sovereignty, inclusion, transparency, resilience, and sustainable development across Africa.

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Note:

ChatGPT, Gemini, and Claude were used to support early-stage brainstorming, outline development, and language refinement. All substantive judgments, fact-checking, interpretation, and final wording were reviewed and validated by the authors.