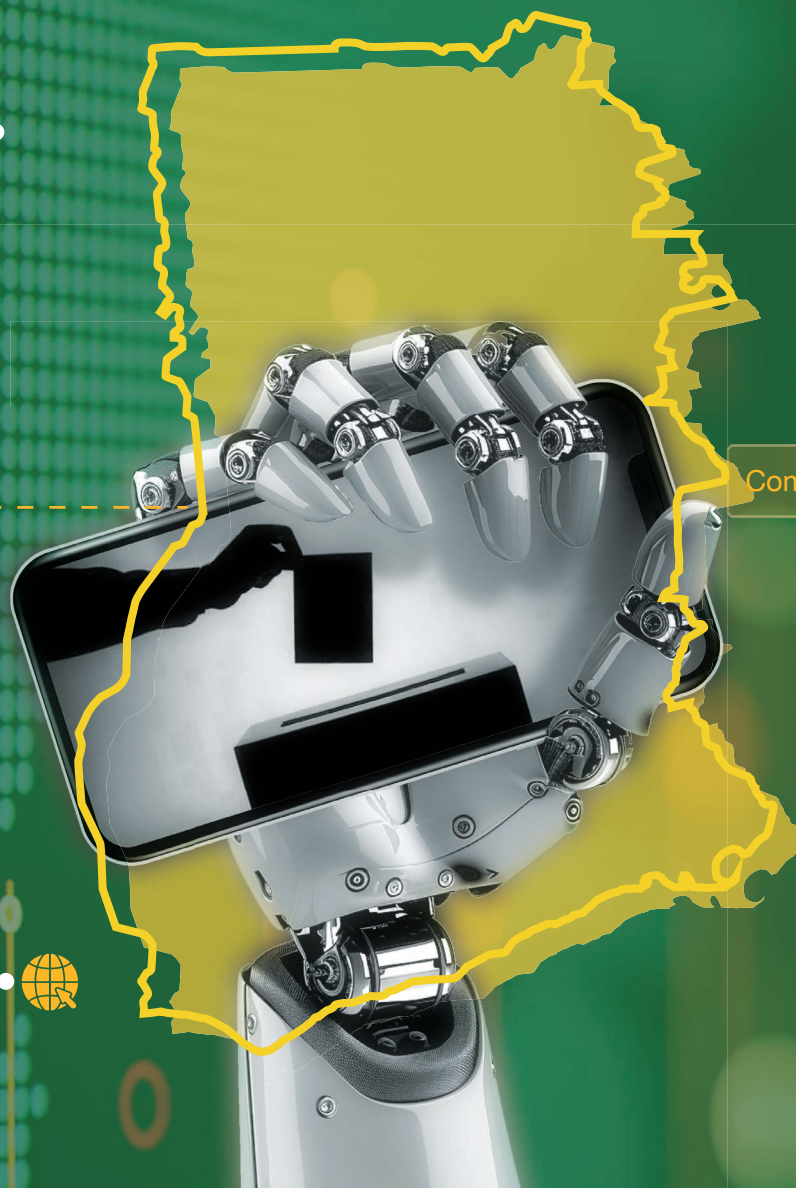


# State of Internet Freedom in Africa 2025

## Navigating the Implications of AI on Digital Democracy in Ghana

September, 2025



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Command Prompt : |

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State of Internet Freedom in Africa 2025  
Navigating the Implications of AI on Digital Democracy in Ghana  
Written by Felicia Anthonio and Osei Manu Kagyah

*Published September 2025*



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# Executive Summary

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This report examines the rapidly evolving landscape of Artificial Intelligence (AI) in Ghana. As Ghana positions itself as a burgeoning AI hub, the study explores the tension between technological innovation and the protection of digital rights. Ghana has a robust history of digital rights advocacy and a 70% internet penetration rate (approximately 24.3 million users). In 2022, the country launched a National Artificial Intelligence Strategy (2023–2033). However, following a change in government, the current administration has shelved this plan to develop a new framework. While the country benefits from foundational laws like the Data Protection Act 2012 and Cybersecurity Act 2020, these frameworks were not designed for the specific challenges posed by AI, such as algorithmic bias and automated surveillance.

The primary objective of this study is to assess AI's dual role as both an enabler of civic empowerment and a vector for digital rights risks. It specifically investigates: the value AI adds to Ghana's civic space; the risks AI poses to digital rights, including surveillance and disinformation; and the current state of institutional readiness and regulatory frameworks. The study employed a qualitative research design using a triangulated approach. The literature review included a synthesis of academic publications, civil society reports, and media analysis. The study also conducted legal and policy analysis.

The key findings are that AI is revolutionising media through fact-checking bots (e.g., Dubawa) and enhancing linguistic inclusivity via local language tools like Khaya (Twi, Ga, and Fante translator). It is also improving healthcare through predictive diagnostics. However, during the 2024 elections, AI-generated disinformation and deepfakes targeted presidential candidates, with nearly 28.5% of verified false claims targeting the NPP and 24.4% targeting the NDC. Also, the country's "Safe City" initiative and the procurement of AI-powered forensic tools (like Cellebrite and Reign spyware) raise alarms regarding privacy and the monitoring of dissent. Also, there is a significant "policy-reality" gap, as current laws do not cover AI aspects such as algorithmic audits or redress mechanisms for AI-related harms.

The study makes several recommendations. It calls on the government to accelerate the adoption of a binding, human rights-centred AI policy; establish an independent AI governance body; and update legacy laws (Data Protection Act 2012) to include AI-specific safeguards. It calls on the Private Sector to embed transparency and accountability in AI design and take proactive measures to moderate harmful content while protecting free expression. Lastly, it calls upon Civil Society and Media to advocate for the representation of marginalised voices in policy drafting and promote digital literacy to help the public identify AI-mediated disinformation.

# 1. Introduction

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Ghana has a vibrant digital rights advocacy and open civic space with several organisations over the past two decades focusing on advancing human rights in the digital age. With an increasing mobile phone adoption and rapid expansion of technologies, the human rights spectrum of the country has evolved to include the opportunities and challenges that come with digital transformation and technological advancement. The advent of social media platforms, digital communication tools, and data-driven technologies has become an integral part of people’s lives and activities in Ghana, including the facilitation of political discourse, civic engagement, and access to information.<sup>1</sup> However, these advancements and innovations have also introduced serious concerns such as online harassment, threats to freedom of expression, mass surveillance and data privacy violations. The advancement of Ghana’s digital landscape is further facilitated by the country’s liberal legislative framework, as well as its commitments to international and regional human rights obligations.<sup>2</sup>

Ghana’s rapid adoption of artificial intelligence (AI) technologies presents both immense opportunities and complex challenges for civic space and digital rights. In 2022, Ghana launched its National Artificial Intelligence Strategy (2023–2033), signalling a strong commitment to harnessing AI to drive digital transformation across key sectors, including agriculture, health, finance, logistics, and education.<sup>3</sup> However, with the change in government, the current administration has indicated its plans to review and relaunch a new AI strategy.<sup>4</sup> Regionally, the African Union also adopted the Continental AI Strategy in July 2024, to “harness AI for Africa’s development and prosperity”.<sup>5</sup>

As of early 2025, 24.3 million Ghanaians (around 70% of the population) were internet users, with mobile broadband being the dominant mode of connectivity.<sup>6</sup> This widespread digital access in the country creates a fertile ground for AI adoption and implementation. Ghana’s ambition to integrate the use of AI across various sectors holds immense promise, offering innovation such as predictive diagnostics in healthcare, advancing efficiency in service delivery and improving civic feedback systems on national policies.<sup>7</sup>

As of  
January 2025



**24.3**

million Ghanaians  
were internet users



**70%**

of the population

- <sup>1</sup> International Society for Human Rights (ISHR), “Human rights in digital spaces in Ghana”, accessed 13 August 2025, <https://ishr.org/human-rights-in-digital-spaces-in-ghana/?pdf=19485>
- <sup>2</sup> Michael Gyan Nyarko, “Ghana Digital Rights and Inclusion 2021 Report”, Paradigm Initiative, 22 May 2022, accessed 13 August 2025, <https://paradigmhq.org/wp-content/uploads/2022/06/Londa-Ghana-Report-2021-Ir.pdf>.
- <sup>3</sup> Ministry of Communications and Digitalisation, “Republic of Ghana National Artificial Intelligence Strategy: 2023-2033”, Africa Data Protection, 22 October, 2022, accessed: July 23, 2025, <https://www.africadataprotection.org/Ghana-AI-Strat.pdf>.
- <sup>4</sup> Manuel Anyamah, “Ghana’s 10-year AI strategy nears completion – Julius Debrah”, Citi Newroom, July 25, 2025, accessed: 27 July 2025, <https://citinewsroom.com/2025/07/ghanas-10-year-ai-strategy-nears-completion-julius-debrah/>.
- <sup>5</sup> African Union, “Continental Artificial Intelligence Strategy” 9 August, 2024, accessed: 22 July, 2025, <https://au.int/en/documents/20240809/continental-artificial-intelligence-strategy>.
- <sup>6</sup> Simon Kemp, “Digital 2024: Ghana”, DataReportal, 23 February 2024, accessed: 14 July 2025, <https://datareportal.com/reports/digital-2024-ghana>; Maria Buza & Sherif Taha, “DPA Digital Digest: Ghana [2025 Edition]”, Digital Policy Alert, 2 April 2025, accessed: July 14 2025, <https://digitalpolicyalert.org/digest/dpa-digital-digest-ghana>.
- <sup>7</sup> Doreen Aglago-Cofie, “Key policies shaping the nation’s digital policy landscape”, The B&FT Online, 13 March 2025, accessed: 14 July 2025, <https://thebftonline.com/2025/03/13/key-policies-shaping-the-nations-digital-policy-landscape/>

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The legislative framework for digital governance comprises the Data Protection Act 2012 (Act 843), which established the Data Protection Commission (DPC) to oversee personal data processing,<sup>8</sup> and the Cybersecurity Act 2020 (Act 1038), which created the Cyber Security Authority (CSA) to regulate cybersecurity service providers and protect critical information infrastructure.<sup>9</sup> While these instruments provide a foundational regulatory architecture, they were not conceived with AI in mind, leaving governance gaps around transparency, algorithmic accountability, automated decision-making, and ethical safeguards. Furthermore, other statutes, such as section 100 of the Electronic Communications Act, 2008 (Act 775), grant the state power to intercept communications under certain conditions, raising enduring debates over proportionality, judicial oversight, and potential chilling effects on free expression.<sup>10</sup>

This research investigates three core questions:

1. What value does AI offer to Ghana’s civic space and digital rights?
2. What challenges and risks do the design and use of AI systems pose to civic space and digital rights in Ghana?
3. What is the current state of AI regulation and institutional readiness in Ghana?

The objective is to assess AI’s dual potential as an enabler of civic empowerment and as a vector of digital rights risks, while examining Ghana’s emerging regulatory frameworks. The study is critically timed as Ghana positions itself to become a leading AI hub in Africa. Notable investments such as its recently launched “One Million Coders” initiative, aimed at empowering and equipping young people with digital skills as well as Google’s first newly launched AI community centre in Accra reflect the country’s commitment to build its human capital for the digital age<sup>11</sup> and position Ghana as a key hub for AI education, research, and innovation in Africa.<sup>12</sup> However, without governance frameworks that are context-sensitive and inclusive, these advances risk exacerbating digital inequalities or deepening institutional distrust.<sup>13</sup>

It is therefore essential to study how citizens and stakeholders are adopting and implementing AI across its lifecycle to advance transparency, mutuality and alignment of AI deployment with social well-being and democratic values. AI adoption is critical not only for developing responsive and rights-based regulatory frameworks but also for nurturing an inclusive innovation ecosystem. In such ecosystems, civic agency must be safeguarded and amplified, ensuring that technological progress supports, rather than undermines, democratic values and social equity.<sup>14</sup>

<sup>8</sup> National Information and Telecommunication Authority, accessed 15 July 2025, <https://nita.gov.gh/thevooc/2017/12/Data-Protection-Act-2012-Act-843.pdf>

<sup>9</sup> Cyber Security Authority (CSA), “Ghana launches National Cybersecurity Policy and Strategy (CSA, October 2024)” accessed: 29 July 2025, <https://www.csa.gov.gh/ghana-launches-national-cybersecurity-policy-and-strategy.php>.

<sup>10</sup> National Information and Telecommunication Authority, 2008, (Act 775) section 100 as amended, accessed 13 August 2025, <https://nita.gov.gh/thevooc/2017/12/Electronic-Communications-Act-775.pdf>.

<sup>11</sup> Ministry of Communications, Digital Technologies and Innovation, “President Mahama launches one million coders initiative”, 2 May 2025, accessed: 14 July 2025, <https://moc.gov.gh/2025/05/02/president-mahama-launches-one-million-coders-program/>.

<sup>12</sup> Esinam Jemimah Kuatsinu, “Google opens first AI Community Center in Accra”, *Ghanaian Times*, 29 July 2025, accessed 13 August 2025, <https://ghanaiantimes.com.gh/google-opens-first-ai-community-centres-in-accra/>.

<sup>13</sup> *The High Street Journal*, ‘Ghana Must Fast-Track AI Laws Before It’s Too Late, IT Expert Urges’ (28 July 2025) <https://thehighstreetjournal.com/ghana-must-fast-track-ai-laws-before-its-too-late-it-expert-urges/> accessed 18 August 2025.

<sup>14</sup> O Mentkaka and N Díaz-Rodríguez, “Aligning Trustworthy AI with Democracy: A Dual Taxonomy of Opportunities and Risks”, Cornell University, 19 May 2025, accessed: 31 July 2025, <https://arxiv.org/abs/2505.13565>.

## 2. Country Context



**1GB**  
Data bundle  
costing  
**GHS 10–12**  
(USD 0.80 - 1)

As of January 2025, Ghana had a population of 34.7 million,<sup>15</sup> with 70% internet penetration, 113% mobile penetration and 21% social media use.<sup>16</sup> The main internet service providers (ISPs) include MTN Ghana, Telecel, AT (formerly AirtelTigo), and Glo.<sup>17</sup> Despite growing connectivity, high mobile data costs remain a key barrier, especially for low-income communities with a 1GB data bundle costing GHS 10–12 (USD 0.80 - 1).<sup>18</sup>

Ghana's digital policy has evolved from the ICT for Accelerated Development (ICT4AD) Policy (2003) to the Digital Economy Policy and Strategy(2024), structured around five strategic pillars: universal access, digital skills, infrastructure, digital government, and emerging technologies.<sup>19</sup> As data becomes central to digital transformation, protecting individuals from misuse by data holders is critical.<sup>20</sup> The rising value of data has increased cyberattacks, posing serious risks to people, businesses, and governments.<sup>21</sup> Strong enforcement of adaptable legal frameworks is essential to protect human rights.

Ghana's Data Protection Act, 2012 (Act 843), enforced by the Data Protection Commission (DPC), outlines clear rules for handling personal data. However, enforcement is weak. Many companies fail to report breaches within 72 hours, undermining transparency. Enforcement is further constrained by the DPC's limited capacity and low public and corporate awareness of data protection obligations.<sup>22</sup> Complementing the Act, Ghana's Cybersecurity Act (2020) and the National Cybersecurity Policy (2024) provide legal and technical safeguards for critical infrastructure.<sup>23</sup> The 2023 ratification of the AU's Malabo Convention signals Ghana's intent to align with continental data protection and cybercrime standards.<sup>24</sup>

<sup>15</sup> DataReportal, *Digital 2025: Ghana*, retrieved on 14 July 2025 <https://datareportal.com/reports/digital-2025-ghana?rq=ghana>

<sup>16</sup> Digital Policy Alert, *DPA*, accessed 30 July, <https://digitalpolicyalert.org/digest/dpa-digital-digest-ghana>.

<sup>17</sup> Mordor Intelligence, "Ghana Telecom Market Size & Share Analysis - Growth Trends & Forecasts (2025 - 2030)", accessed: 23 July 2025, <https://www.mordorintelligence.com/industry-reports/ghana-telecom-market>.

<sup>18</sup> Isaac Kofi Tsoenamawu, "Ghana's Digital Future Rests on Affordable, Universal Connectivity", *High Street Journal*, 23 May 2025, accessed: 14 July 2025, <https://thehighstreetjournal.com/ghanas-digital-future/>; Oxford Business Group, "Ghana's e-commerce growth to capitalise on large, young population", accessed: 14 July 2025, <https://oxfordbusinessgroup.com/reports/ghana/2024-report/ict/plugged-in-continued-e-commerce-expansion-harnesses-the-entrepreneurial-drive-of-a-sizeable-tech-savvy-youth-population-overview/>.

<sup>19</sup> Doreen Aglago-Cofie, "Key policies shaping the nation's digital policy landscape", *The B&FT Online*, 13 March 2025, accessed: 14 July 2025, <https://thebftonline.com/2025/03/13/key-policies-shaping-the-nations-digital-policy-landscape/>.

<sup>20</sup> Linda Kleeman, "Building an equitable data ecosystem for AI development in Ghana", *Africa Center for Economic Transformation*, 3 December 2024, accessed August 13 2025, <https://africanetforafrica.org/research-and-analysis/insights-ideas/building-an-equitable-data-ecosystem-for-ai-development-in-ghana/#:~:text=The%20role%20of%20data%20in,responsible%20data%20and%20AI%20ecosystem.>

<sup>21</sup> ThreatCombatGH, "Without Robust Data Protection, Ghana's Cyber Security Act Is Meaningless", 11 November 2024, accessed: 23 July 2025, <https://threatcombatgh.com/without-robust-data-protection-ghanas-cyber-security-act-is-meaningless/>

<sup>22</sup> *Supra* note 21

<sup>23</sup> Parliament of Ghana, *Cybersecurity Act, 2020 (Act 1038)* (Republic of Ghana, assented in December 2020, entered into force 29 December 2020) <https://www.moc.gov.gh> accessed 14 July 2025.

<sup>24</sup> Kofi Ampeah Woode, "Ghana ratifies AU Cross-border convention", *Ghana Peace Journal*, 4 September 2023, accessed: 23 July 2025, <https://ghanapeacejournal.com/ghana-ratifies-au-cross-border-convention/>. an

AI adoption is accelerating, supported by infrastructure investments and government-led initiatives, but structural gaps persist. Although Ghana scores 43.95 on the Oxford Government AI Readiness Index—behind regional leaders like Mauritius (53.94), South Africa (52.91), and Rwanda—it currently lacks an institutional framework to oversee AI ethics, transparency, or accountability.<sup>25</sup> The proposed Responsible AI Office, outlined in the 2023 strategy, remains inactive pending policy review.<sup>26</sup>

In May 2025, the Minister for Communication, Digital Technology and Innovation, Samuel Nartey George, announced new steps to fast-track Ghana’s digital transformation agenda, including the development of a National Digital Transformation and Emerging Technology Strategy, which will prioritise artificial intelligence, shaped by inclusive dialogue and international cooperation.<sup>27</sup> The Ministry also announced that Ghana’s new AI strategy would address opportunities, security risks and resource needs to develop a strong, ethical and inclusive governance framework. The Minister also highlighted ongoing collaborations with partners like the British High Commission and UNESCO to support Ghana’s AI ambitions.<sup>28</sup>

Ghana maintains a relatively open digital environment backed by legal protections such as Article 21 of the 1992 Constitution, which guarantees freedom of expression, association, and assembly<sup>29</sup> and the Right to Information Act (2019).<sup>30</sup> A vibrant digital rights ecosystem, led by civil society groups like the West Africa Civil Society Institute (WACSI), the Media Foundation for West Africa (MFWA) and Internet Society Ghana, continues to push for stronger privacy safeguards, internet freedom and digital inclusion.<sup>31</sup> However, structural concerns persist. Surveillance powers under the Electronic Communications Act 2008 (Act 775) raise fears of political misuse.<sup>32</sup> A 2024 expert review warned that Ghana’s cybersecurity framework lacks adequate oversight.<sup>33</sup> Civic space is under pressure, with rising reports of journalists’ arrests, online censorship, and election-related disinformation highlighting tensions between security and digital rights.<sup>34</sup>



**Ghana**  
maintains a  
relatively open  
**Digital**  
**Environment**

<sup>25</sup> Oxford Insights, *Government Readiness AI Index*, <https://oxfordinsights.com/ai-readiness/ai-readiness-index/>, accessed 23 July; Ministry of Communication, Digital Technologies and Innovation, *Embracing the Future: Ghana Launches National AI Strategy to drive Innovation*, [https://moc.gov.gh/2025/05/02/embracing-the-future-ghana-launches-national-ai-strategy-to-drive-innovation-2/#:::text=The%20program%20aims%20to%20equip,commitment%20and%20a%20social%20contract](https://moc.gov.gh/2025/05/02/embracing-the-future-ghana-launches-national-ai-strategy-to-drive-innovation-2/#:::text=The%20program%20aims%20to%20equip,commitment%20and%20a%20social%20contract.), accessed 14 July 2025.

<sup>26</sup> Ministry of Communications and Digitalisation, “*Republic of Ghana National Artificial Intelligence Strategy: 2023-2033*”, *Africa Data Protection*, 22 October, 2022, accessed: July 23, 2025, <https://www.africadataprotection.org/Ghana-AI-Strat.pdf>.

<sup>27</sup> Ministry of Communication, Digital Technology and Innovation, “*Ghana To Develop National AI Strategy Initiative Amid Digital Transformation Push*”, 2 May 2025, accessed 14 August 2025, <https://moc.gov.gh/2025/05/02/ghana-to-develop-national-ai-strategy-initiative-amid-digital-transformation-push/>.

<sup>28</sup> *ibid*

<sup>29</sup> Constitution Net, “*Constitutional documents available for the Republic of Ghana*”, accessed 13 August 2025, <https://constitutionnet.org/sites/default/files/Ghana%20Constitution.pdf>.

<sup>30</sup> Commonwealth Human Rights Initiative, “*In historic move, Ghanaian president signs into law the Right to Information Act*”, accessed 13 July 2025, <https://www.humanrightsinitiative.org/press-releases/in-historic-move-ghanian-president-signs-into-law-the-right-to-information-act>.

<sup>31</sup> West Africa Civil Society Institute (WACSI), “*WACSI Harnesses its Capacity to Expand Digital Civic Space in West Africa*”, 23 January 2024, accessed 31 July 2025, <https://wacsi.org/wacsi-harnesses-its-capacity-to-expand-digital-civic-space-in-west-africa/>.

<sup>32</sup> Institute of Development Studies, “*Ghana’s democracy at risk due to use of surveillance technology, warns new report*”, 27 September 2023, accessed 13 August 2025, <https://www.ids.ac.uk/press-releases/ghanas-democracy-at-risk-due-to-use-of-surveillance-technology-warns-new-report/>.

<sup>33</sup> *Supra* note 21

<sup>34</sup> Media Foundation for West Africa (MFWA), *Freedom of Expression in Ghana: Report, May 2025*. Accra: MFWA, July 2025. Available at: <https://demo.mfwa.org/wp-content/uploads/2025/07/Freedom-of-Expression-May-2025.pdf> (Accessed: 8 August 2025).

Government plans  
to deploy

**4,400**



telecom towers by  
**2028** with  
**EUR 155 million**  
(USD 162.7 million)  
investment in  
infrastructure to  
boost 4G coverage

Despite the ongoing efforts to strengthen Ghana’s digital ecosystem, major internet disruptions in March and May 2024 exposed ongoing vulnerabilities.<sup>35</sup> Also, damage to submarine cables affected multiple African countries,<sup>36</sup> with Ghana’s NCA estimating a five-week repair timeline.<sup>37</sup> Services to all four cable providers, including Africa Coast to Europe (ACE), South Atlantic Telecommunications number 3 (SAT-3), and the West Africa Cable System (WACS), were fully restored in May 2024.<sup>38</sup> The incidents underscored the need to diversify connectivity, secure infrastructure, and establish a harmonised governance framework for better response.<sup>39</sup> Meanwhile, the government plans to deploy 4,400 telecom towers by 2028 with a EUR 155 million (USD 162.7 million) investment in infrastructure to boost 4G coverage from 64% to 80%. However, internet access remains uneven, and rural areas continue to face significant disparities in broadband access and quality.<sup>40</sup>

In sum, Ghana’s digital ecosystem is marked by contrasts: growing internet penetration and policy momentum coexist alongside affordability constraints, misalignment between legislative and policy around AI innovation and persistent infrastructure vulnerabilities. This complex environment influences how AI is being adopted and highlights the need to protect civic space and digital rights,<sup>41</sup> while ensuring inclusive, multistakeholder engagement in both consultation and implementation processes.<sup>42</sup>

<sup>35</sup> Damian Zane, “Internet Outage Felt Across East Africa,” BBC News, May 13, 2024, accessed 14 August 2025, <https://www.bbc.com/news/articles/cprg0yn8q81o>.

<sup>36</sup> Internet Society, “2024 West Africa Submarine Cable Outage Report”, 18 April 2024, accessed: 29 July 2025, <https://www.internetsociety.org/resources/doc/2024/2024-west-africa-submarine-cable-outage-report/>.

<sup>37</sup> Bate Felix, “Ghana says repairs on subsea cables could take five weeks”, Reuters, 16 March 2024, accessed 13 August 2025, <https://www.reuters.com/world/africa/ghana-says-repairs-subsea-cables-could-take-five-weeks-2024-03-16/>.

<sup>38</sup> Isaac Kafui Nyanyovor, “Faulty undersea cables fixed; Telcos call for better cable infrastructure protection”, Joy Online, 20 May 2024, accessed 13 August 2025, <https://www.myjoyonline.com/faulty-undersea-cables-fixed-telcos-call-for-better-cable-infrastructure-protection/>.

<sup>39</sup> Jane Munga, “Beneath the Waves: Addressing Vulnerabilities in Africa’s Undersea Digital Infrastructure”, Carnegie Endowment for International Peace, 3 April 2025, accessed: 29 July 2025, <https://carnegieendowment.org/research/2025/03/beneath-the-waves-addressing-vulnerabilities-in-africas-undersea-digital-infrastructure?lang=en>.

<sup>40</sup> Ministry of Communications and Digitalisation, “Minister’s Press Briefing – Communications Ministry Makes Strides In Ghana’s Digital Transformational Agenda”, 21 February 2024, accessed: 30 July 2025, <https://moc.gov.gh/2024/02/21/ministers-press-briefing-communications-ministry-makes-strides-in-ghanas-digital-transformational-agenda/>.

<sup>41</sup> Sandra Aceng and Florence Nakazibwe, “Seeding change: Artificial intelligence and emerging technologies and their impact on civic space in Africa”, Association for Progressive Communications, 26 July 2024, accessed 13 August 2025, [https://www.apc.org/en/blog/seeding-change-artificial-intelligence-and-emerging-technologies-and-their-impact-civic-space?utm\\_source=chatgpt.com](https://www.apc.org/en/blog/seeding-change-artificial-intelligence-and-emerging-technologies-and-their-impact-civic-space?utm_source=chatgpt.com).

<sup>42</sup> Mainul Zaber and Caroline Khene, “Beyond digital rights: Shaping AI for inclusive development”, Institute for Development Studies, 14 July 2025, accessed 13 August 2025, [https://www.ids.ac.uk/opinions/beyond-digital-rights-shaping-ai-for-inclusive-development/?utm\\_source=chatgpt.com](https://www.ids.ac.uk/opinions/beyond-digital-rights-shaping-ai-for-inclusive-development/?utm_source=chatgpt.com).

# 3. Research Methods

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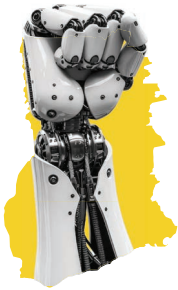
This study adopts a qualitative research design to critically examine the implications of artificial intelligence (AI) for civic space and digital rights in Ghana. Qualitative methods were adopted to understand the complex social and governance phenomena. The research utilised a triangulated methodology comprising literature review, legal and policy analysis and comparative case study examination.<sup>43</sup>

The literature review synthesised current debates, empirical findings and theoretical perspectives from academic publications, civil society reports, media analysis and grey literature. Policy and legal analysis involved a close examination of existing and emerging regulatory frameworks governing AI, digital rights, and data protection in Ghana and comparable African jurisdictions.

Although Key Informant Interviews (KIIs) were initially planned to enhance the depth of this report, they could not be conducted due to a shift in government policy. The current government has discontinued implementation of the AI Strategy launched in 2022 by the previous administration and has instead initiated the development of a new strategy. However, there is limited transparency around the stakeholders involved and the content or direction of the new strategy. There has also been limited information to the general public regarding the consultation processes for drafting this new strategy and which stakeholders are involved in the process. As a result, the analysis in the report relies on the National AI Strategy (2023-2033) and publicly available information about ongoing efforts to develop a new framework for AI governance in Ghana.

<sup>43</sup> Moinul Zaber and Caroline Khene, "Beyond digital rights: Shaping AI for inclusive development", Institute for Development Studies, 14 July 2025, accessed 13 August 2025, [https://www.ids.ac.uk/opinions/beyond-digital-rights-shaping-ai-for-inclusive-development/?utm\\_source=chatgpt.com](https://www.ids.ac.uk/opinions/beyond-digital-rights-shaping-ai-for-inclusive-development/?utm_source=chatgpt.com).

# 4. Research Results



## 4.1 Value of AI to Ghana's Civic Space and Digital Rights

Artificial Intelligence (AI) is emerging as a transformative force in Ghana's civic space and digital rights ecosystem. Stakeholders across government, civil society, academia, media, and private enterprise are leveraging AI to advance participatory governance, improve access to information, enhance service delivery and foster digital inclusion. AI is transforming Africa's media landscape, with newsrooms and content creators increasingly exploring the potential of AI-powered tools. Fact-checking organisations such as Ghana Fact-Checking Coalition and Dubawa are deploying AI bots to verify viral claims circulating on digital communication platforms like Facebook and WhatsApp.<sup>44</sup>

The media sector is also leveraging AI for content generation, data analysis, and social media monitoring to improve audience engagement and reach. In the past, the use of AI in newsrooms was largely limited to basic algorithms and automation tools aimed at performing routine tasks such as data sorting and content archiving. However, this is rapidly changing. Today, media organisations are leveraging advanced machine learning and natural language processing technologies to enhance reporting capabilities. AI tools are now used to analyse large datasets, detect patterns, and even generate written content by freeing up journalists to concentrate on deeper analysis and more impactful storytelling. Also, in a context where access to reliable data is often limited, AI-driven analysis offers a powerful alternative for journalists to unlock new opportunities for investigative journalism and evidence-based reporting.<sup>45</sup>

Similarly, civil society actors in Ghana are also integrating AI into digital literacy and civic education campaigns.<sup>46</sup> Activists, journalists and civil society organisations are adopting technology to advance and strengthen civic oversight mechanisms. To combat AI-generated disinformation, especially during electoral periods, organisations such as the Ghana Fact-Checking Coalition have initiated multi-pronged responses, including digital literacy campaigns, monitoring dashboards, and public advisories. Despite these initiatives, regulatory gaps remain. The National Communications Authority has yet to enact comprehensive policies governing AI-generated political content.

<sup>44</sup> Rebecca Avusu, "AI Content Creation: Threat or Opportunity for African Journalism?", *Penplusbytes*, 4 August 2025, accessed 15 August 2025, <https://penplusbytes.org/ai-content-creation-threat-or-opportunity-for-african-journalism/>.

<sup>45</sup> James Faraday Ocran, "Enhancing Ghanaian journalism with AI: balancing innovation and integrity", *Joy Online*, 6 September, 2024, accessed 15 August 2025, <https://www.myjoyonline.com/enhancing-ghanaian-journalism-with-ai-balancing-innovation-and-integrity/>.

<sup>46</sup> Organisation for Economic Co-operation and Development (OECD), "Tackling Civic Participation Challenges with Emerging Technologies", 9 April 2025, accessed: 15 July 2025, <https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/04/tackling-civic-participation-challenges-with-emerging-technol>

In anticipation of Ghana's 2024 elections, several civil society organisations and stakeholders launched targeted initiatives to curb the spread of disinformation and safeguard the integrity of the electoral process. Notably, the Ghana Fact-Checking Coalition deployed machine learning systems to detect deepfakes, AI-generated disinformation and synthetic media during the 2024 electoral cycle.<sup>47</sup> Also, a coalition consisting of civil society organisations, including Fact-Check Ghana, Dubawa Ghana, and GhanaFact, used Full Fact AI tools to perform social media monitoring and counter misinformation and disinformation and identify smear campaigns throughout the elections.

Ghana Fact-Checking Coalition launched crisis media rooms in Accra and Tamale. These centres used AI-powered verification tools, bulk SMS alerts, and WhatsApp chatbots to counter misinformation in over 45 local languages. Broadcasting through more than 100 media outlets, they helped contain false narratives despite limited access to real-time electoral data.<sup>48</sup> The coalition used AI-powered tools to flag and counter polarising narratives and false information throughout the electoral period. This initiative contributed significantly to promoting people's access to accurate and timely information, thereby enhancing democratic resilience.<sup>49</sup> These systems also enabled civil society actors to design responsive interventions. The coalition played a pivotal role in safeguarding the integrity of the 2024 general elections by effectively countering misinformation and disinformation. The coalition's efforts enhanced transparency and trust in Ghana's electoral process.<sup>50</sup>

Founded in 2016 by the Media Foundation for West Africa, Fact-Check Ghana earned a strong reputation for verifying political claims, particularly during Ghana's 2016, 2020 and 2024 elections. Beyond politics, it was instrumental in debunking health misinformation during the COVID-19 pandemic, contributing to public trust and helping to promote accurate public accountability.<sup>51</sup>

Similarly, Penplusbytes, a Ghana-based not-for-profit organisation, deployed an AI-powered Disinformation Detection Platform (DDP) under its Action for a Holistic Electoral Approach for Democracy (AHEAD) Africa Project aimed at conducting real-time monitoring and analysis of social media narratives, and countering disinformation, during Ghana's 2024 elections. The DDP platform monitors and analyses disinformation using keyword tracking, supporting accurate reporting and promoting accountability throughout the electoral process. Penplusbytes partnered with the Ghana Fact-Checking Coalition and the Coalition of Domestic Election Observers (CODEO) to detect, verify and refute misleading content, thereby helping to safeguard the integrity of the information space.<sup>52</sup> This initiative was designed to strengthen democratic integrity before, during and after the December 7 polls. Additionally, these initiatives provided timely access to accurate electoral information and helped counter the spread of misinformation and disinformation,



Ghana Fact-Checking Coalition launched crisis media rooms which used **AI-powered** verification tools

<sup>47</sup> Fafa Kpartufo, "AI-Fueled Disinformation in Ghana's 2024 Elections: Ghana Fact-Checking Coalition", Citi Newsroom, 29 January 2025, accessed: 30 July 2025, <https://citinewsroom.com/2025/01/ai-fueled-disinformation-in-ghanas-2024-elections>.

<sup>48</sup> Caroline Anipah, "Un ejército de verificadores de datos para luchar contra la desinformación electoral en Ghana", El País, 7 December 2024, accessed on 15 July 2025, <https://elpais.com/planeta-futuro/2024-12-07/un-ejercito-de-verificadores-de-datos-para-luchar-contra-la-desinformacion-electoral-en-ghana.html>.

<sup>49</sup> Full Fact, "Full Fact AI supports African fact checkers in year of elections", 13 December 2024, accessed: July 15 2025, <https://fullfact.org/blog/2024/dec/full-fact-ai-supports-african-fact-checkers/>.

<sup>50</sup> Ghana Fact-Checking Coalition, "Countering Electoral Disinformation: Lessons from Ghana's 2024 Elections", 29 January 2025, accessed 13 August 2025, accessed 15 July 2025, <https://www.fact-checkghana.com/wp-content/uploads/2025/02/GFC-Report-Brochure-Final-View-1.pdf>.

<sup>51</sup> Media Foundation for West Africa, "Ghana's Elections 2020: MFWA's Fact-Check Ghana Partners CODEO, Others to Counter Fake News", 7 December 2020, accessed 14 August 2025, <https://mfwa.org/ghana-elections-2020-mfwas-fact-check-ghana-partners-codeo-others-to-counter-fake-news/>.

<sup>52</sup> Penplusbytes, "Defending Democracy: Penplusbytes Launches Disinformation Detection Platform (DDP) to Monitor and Combat Election Disinformation", 4 December 2024, accessed: 29 July 2025, <https://penplusbytes.org/defending-democracy-penplusbytes-launches-disinformation-detection-platform-ddp-to-monitor-and-combat-election-disinformation/>.

enabling citizens to make more informed political decisions. They also enhanced the quality of voter education and introduced mechanisms for ongoing scrutiny, thereby strengthening the foundations of democratic accountability.

In Ghana, however, several companies are pioneering AI initiatives and are pushing back against this imbalance and driving innovation on local terms. Mazzuma, through its flagship product MazzumanGPT, enables users to generate smart contract code - digital agreements that automate specific tasks directly from natural language prompts, making blockchain technology more accessible. Meanwhile, the Ghana Natural Language Processing (Ghana NLP) initiative, an open-source project focused on applying NLP to local languages and challenges, is breaking new ground with its flagship product, Khaya, the first AI-powered translator tailored for Ghanaian languages such as Twi, Dagbani, Ga and Fante. Khaya is also expanding to include languages from other African countries, including Nigeria, Burkina Faso, Kenya and Tanzania.



## Abena AI,

a voice assistant launched in 2021 that supports the Twi language to enhance inclusivity.

Another example is the Abena AI, a voice assistant launched in 2021 that supports the Twi language to enhance inclusivity.<sup>53</sup> These tools are enhancing linguistic inclusivity, particularly in marginalised and rural communities, by enabling localised civic education campaigns and improving access to relevant information among underserved populations and communities. The Ghana NLP also supports civic engagement, enriches online discourse, and fosters evidence-based advocacy.<sup>54</sup> The positive impact of AI is further evident in expanded participation in digital spaces, increased civic awareness, and the rise of youth-led digital advocacy networks.<sup>55</sup>

Additionally, innovations such as DeafCanTalk, an AI-powered application developed in Ghana, are mitigating communication barriers by enabling bidirectional translation between sign language and spoken language. The platform has supported improved educational attainment and enriched social engagement for more than 10,000 deaf users across Africa, thereby fostering their active involvement in community life and democratic processes.<sup>56</sup>

These initiatives are helping close the digital divide, enable the dissemination of content in indigenous languages, and address the “empowerment gap” faced by communities historically excluded from the digital transformation agenda.<sup>57</sup> These initiatives are laying the foundation for a more inclusive and self-determined Ghanaian tech ecosystem by promoting cultural preservation, local innovation, and sustainability.

<sup>53</sup> Joy Online, “Preserving Ghanaian culture and empowering communities: The Story of Abena AI”, 4 April 2023, accessed 14 August 2025, <https://www.myjoyonline.com/preserving-ghanaian-culture-and-empowering-communities-the-story-of-abena-ai/>.

<sup>54</sup> Kojo Apeagyei, “Facilitating Agency in Ghana’s Tech Ecosystem: Lessons from Mazzuma and Ghana NLP”, Research ICT Africa, 5 December 2024, accessed: 14 July 2025, <https://researchictafrica.net/2024/12/05/facilitating-agency-in-ghanas-tech-ecosystem-lessons-from-mazzuma-and-ghana-nlp/>.

<sup>55</sup> Organisation for Economic Co-operation and Development (OECD), “Tackling Civic Participation Challenges with Emerging Technologies”, 9 April 2025, accessed: 15 July 2025, <https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/04/tackling-civic-participation-challenges-with-emerging-technol>

<sup>56</sup> Adonal Conrad Qenum, “Ghana’s AI-Powered DeafCanTalk App Breaks Communication Barriers for the Deaf”, We Are Tech Africa, 19 May 2025, accessed 14 August 2025, <https://www.wearetech.africa/en/fjls-uk/solutions/ghana-s-ai-powered-deafcantalk-app-breaks-communication-barriers-for-the-deaf>.

<sup>57</sup> Kojo Apeagyei, “Facilitating Agency in Ghana’s Tech Ecosystem: Lessons from Mazzuma and Ghana NLP”, Research ICT Africa, 5 December 2024, accessed: 14 July 2025, <https://researchictafrica.net/2024/12/05/facilitating-agency-in-ghanas-tech-ecosystem-lessons-from-mazzuma-and-ghana-nlp/>.

At the national level, Ghana has rolled out a number of initiatives and policies aimed at advancing digital transformation and harnessing AI innovation across sectors in the country and positioning Ghana as a digital hub in Africa. Launched in November 2024 to replace the ICT4AD Policy, the Ghana Digital Economy Policy and Strategy aims to enhance efficiency in public service delivery through digital platforms like Ghana.gov. The strategy also seeks to promote digital innovation among businesses and expand access and inclusion for the general public, driving broader participation in the digital economy.<sup>58</sup>

The deployment of an AI strategy in Ghana highlights its dual role in driving innovation, enhancing civic engagement and public service delivery, while also presenting significant governance and ethical challenges. The Government of Ghana views AI through the lens of operational efficiency, revolutionising governance, improving public sector delivery and enhancing national security. This was announced in July 2025 by the Minister of Communications, Digital Technology and Innovation, during a three-day high-level bootcamp designed to equip Cabinet Ministers and key government officials with a strategic understanding of how to harness AI in Ghana's national development agenda. The bootcamp also provided practical training to help ministers with practical skills to co-develop and integrate AI-driven solutions tailored to their respective mandates.<sup>59</sup>

Several government institutions have already begun integrating the use of AI into their operations and are actively building the capacity of their personnel to effectively leverage these technologies. In July 2025, the Ghana Civil Service provided digital governance training to 1,300 stakeholders, incorporating AI-enabled intelligence dissemination. Concurrently, other departments, including the Information Services Department (ISD), adopted AI-powered e-newsletters to enhance public communication. Since December 2024, four editions have been released, delivering policy updates, success stories, and real-time data on Ghana's digital transformation initiatives.<sup>60</sup> There is also a push to integrate AI into performance assessments and Key Performance Indicators (KPIs) for ministries, thus exploring AI integration to optimise data processing and transparency. These innovations exemplify how AI can facilitate public accountability and foster civic participation.<sup>61</sup>

In April 2025, President John Dramani Mahama launched the 'One Million Coders' programme, a nationwide initiative aimed at equipping one million Ghanaians, particularly the youth, with coding and digital skills. The goal is to accelerate Ghana's technological and digital transformation, create new economic opportunities and empower individuals to participate meaningfully in the digital economy. The programme seeks not only to foster innovation and entrepreneurship but also to prepare the workforce for the demands of the future by investing in the digital capacity of citizens. Speaking at the launch, the Minister of Communication, Digital Technology and Innovation emphasised that the initiative is also a strategic effort to bridge the digital divide across the country, ensuring inclusive access to digital education and opportunities regardless of regions, gender, or socioeconomic background. The programme will also include partnerships



AI strategy in Ghana highlights its dual role in driving innovation, enhancing civic engagement and public service delivery

<sup>58</sup> *Supra* note 7.

<sup>59</sup> Attractive Mustapha Nii Okai Inusah, "Ghana launches AI bootcamp for cabinet ministers to drive digital governance", *Modern Ghana*, 26 July 2025, accessed: 26 July 2025, <https://www.modernghana.com/news/1419639/ghana-launches-ai-bootcamp-for-cabinet-ministers.html>.

<sup>60</sup> Ghana News Agency, "Civil Service Week Launches with Focus on AI and Automation", *Ghana Business News*, 17 July 2025, <https://www.ghanabusinessnews.com/2025/07/17/civil-service-week-launches-with-focus-on-ai-and-automation/> [accessed 13 August 2025].

<sup>61</sup> Jibril Abdul Mumun, "Civil Service Week launches with focus on AI and automation", *Ghana News Agency*, 17 July 2025, accessed: 29 July 2025, <https://gna.org.gh/2025/07/civil-service-week-launches-with-focus-on-ai-and-automation/>, United Nations Development Programme (UNDP) Ghana. "Government of Ghana and UNDP Kick Off Ministerial Bootcamp to Strengthen AI Capacity and Advance AI-Enabled Public Services". UNDP Ghana, [no date]. Available at: <https://www.undp.org/ghana/press-releases/government-ghana-and-undp-kicks-ministerial-bootcamp-strengthen-ai-capacity-and-advance-ai-enabled-public-services> (Accessed: 13 August 2025).

with educational institutions, tech companies, and international development partners, and is expected to serve as a cornerstone in Ghana's broader digital inclusion and youth empowerment agenda.<sup>62</sup>

The Ministry of Communication also supports the Ghana Innovation Hub, which was established in 2018 with backing from the government and the World Bank. The hub provides training and resources for AI startups, entrepreneurs and IT professionals, in collaboration with BlueSpace Africa and the Ghana Communication Technology University. In addition to its training programmes, the Hub offers co-working facilities to assist entrepreneurs with ideation and incubation. It also provides investment matchmaking services, including both online and offline networking opportunities, exchange events, access to business tools and policy briefs.<sup>63</sup>

In the education sector, Ghana is making significant investments to integrate AI and strengthen digital literacy across all levels of learning. The Ministry of Education, in collaboration with international partners such as UNESCO, has launched initiatives to embed coding, robotics, and AI into the national curriculum from primary schools to universities.<sup>64</sup> This forward-looking approach seeks to equip students with the skills needed for the digital economy and job market. At the tertiary level, institutions like the Kwame Nkrumah University of Science and Technology (KNUST), the University of Ghana and Ashesi University have introduced programmes in AI and data science, some developed in partnership with global tech companies including IBM and Google.<sup>65</sup>



**Tech hubs and Innovation centres** play a crucial role in fostering AI talent and developing AI solutions

Furthermore, tech hubs and innovation centres play a crucial role in fostering AI talent and developing AI solutions aligned with national development priorities. They provide resources, mentorship, and networking opportunities for aspiring AI professionals. For example, in addition to the Ghana Tech Hub initiative by the Ministry of Communications, Meltwater Entrepreneurial School of Technology (MEST) offers comprehensive training programmes in software development, including AI and machine learning, combining practical and theoretical learning experiences. The iSpace Foundation supports tech enthusiasts and entrepreneurs through workshops, hackathons, and bootcamps on AI and other emerging technologies. The Ghana Tech Lab also contributes by offering AI and data science training, incubation services, and coworking spaces for startups and tech professionals. In addition, Ovation Hall, a web hosting company, has recently launched [ai.ovationhall.com](https://ai.ovationhall.com), a platform dedicated to promoting AI education and awareness across Ghana.<sup>66</sup> Kumasi Hive, on the other hand, supports entrepreneurs and innovators by helping them advance social impact businesses and develop innovative products and processing methods. It also facilitates networking opportunities between local innovators and key stakeholders, including government agencies, industry players, start-ups, and CSOs.<sup>67</sup>

<sup>62</sup> Mac JordanGh, "Ghana's One Million Coders Programme Launched", 17 April 2025, accessed 15 August 2025, <https://macjordangh.com/ghana-one-million-coders-programme-launched/>.

<sup>63</sup> MDF, "The Ghana Innovation Hub", accessed 15 August 2025, <https://www.mdf.nl/assignments/the-ghana-innovation-hub>.

<sup>64</sup> Severious Kale-Dery, "Ghana makes strides in integrating AI into curricula", *Graphic Online*, 30 September 2024, accessed: 31 July 2025, <https://www.graphic.com.gh/news/education/ghana-news-ghana-makes-strides-in-integrating-ai-into-curricula.html#:~:text=Ghana%20is%20one%20of%2015,the%20practical%20applications%20of%20AI>.

<sup>65</sup> AI Ghana, "AI Education and Talent Development in Ghana", accessed: 31 July 2025, <https://aighana.net/ai-education-talent-development-ghana/>.

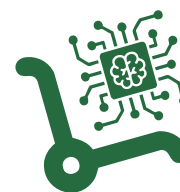
<sup>66</sup> *ibid*

<sup>67</sup> Aspen Network for Development Entrepreneurs, "Kumasi Hive business accelerator", accessed 15 August 2025, <https://ghana.ecomap.tech/resources/kumasi-hive-business-accelerator>.

AI applications also span other sectors, notably agriculture, health, and education. In agriculture, companies like AgroCenta and Esoko are integrating AI into mobile platforms that facilitate access to credible information and help farmers to make informed decisions about planting, harvesting, and crop pricing and production, fostering rural economic empowerment. AI applications are transforming Ghana's healthcare sector, particularly in disease diagnosis and treatment. AI algorithms are also used to analyse medical imagery such as X-rays and Magnetic Resonance Imaging scans (MRIs), delivering quicker and more accurate results. This enables early detection of conditions like cancers and infectious diseases, significantly improving patient outcomes.<sup>68</sup>

AI is also playing a key role in enhancing Ghana's pharmaceutical supply chain through monitoring, demand forecasting and diagnostic support. A leading example is mPharma, a Ghanaian health-tech startup that is revolutionising access to medication across Africa. The company is building a vast network of community pharmacies and aims to become the primary healthcare provider for millions of people across the continent. mPharma currently has a presence in Ghana, Nigeria, Kenya, Zambia, Malawi, Rwanda and Ethiopia through its virtual centres. Its Mutti Online Pharmacy is among the few exclusively digital pharmacies operating in Africa, alongside platforms such as Kenya's MyDawa.<sup>69</sup> Local developers are also training machine learning models for disease diagnosis, including malaria, tuberculosis, and cervical cancer. Collaborative projects have piloted AI-enabled mobile health applications for symptom assessment, triage, and referral, particularly in underserved rural areas.<sup>70</sup>

In sum, AI is increasingly being used to improve service delivery across sectors such as education, healthcare, agriculture, and advocacy. As adoption grows, the government needs to accelerate the implementation of a national AI strategy to ensure responsible, inclusive and effective use.



AI is increasingly being used to improve service delivery across sectors such as education, healthcare, agriculture, and advocacy.

<sup>68</sup> Atianashie Miracle A. and Chukwuma Chinaza Adaobi, "Transforming Healthcare in Ghana: The Impact of Artificial Intelligence in Hospitals", 01 January 2024, accessed 15 August 2025, <https://www.modernghana.com/news/1283034/transforming-healthcare-in-ghana-the-impact-of.html>. q

<sup>69</sup> Annie Njanja, "mPharma raises \$35 million in round joined by Tinder co-founder's JAM fund, Bharti executive", Tech Crunch, 5 January 2022, accessed 15 August 2025, <https://techcrunch.com/2022/01/05/mpharma-raises-35million-in-round-participated-by-tinder-co-founders-jam-fund-bharti-executive/?tpcc=tcplustwitter>.

<sup>70</sup> GreenViews, "Artificial Intelligence in Ghana: Opportunity or Challenge?", 9 May 2025, accessed: 14 July 2025, <https://greenviewsresidential.com/artificial-intelligence-in-ghana/>.



## 4.2 Risks and Challenges of AI to Ghana's Civic Space and Digital Rights

The adoption of AI in Ghana holds promise but faces significant challenges affecting scalability, accessibility, and long-term sustainability. AI development intersects with the country's technical, economic, regulatory, political and societal realities. Key barriers include persistent digital divide, high costs, talent and skills gaps, data fragmentation, unreliable power supply and the absence of a comprehensive regulatory framework.

Additionally, concerns include algorithmic bias, erosion of civic trust, inadequate oversight, overreliance on AI systems, and exclusion of marginalised groups. These issues were particularly evident during the 2024 elections and early AI integration in public systems, and the urgent need for inclusive policies, ethical safeguards, and transparent governance mechanisms to guide AI's development and deployment.

The 2024 Global Risk Report identified misinformation and disinformation among the most critical global risks, particularly in the context of elections.<sup>71</sup> The proliferation of false or misleading information poses serious threats to democratic processes, with the potential to undermine electoral credibility, disrupt public trust, and jeopardise peaceful outcomes.<sup>72</sup>

With AI governance progressing slowly across much of the Global Majority, and international tech giants maintaining significant dominance of the AI ecosystem, local organisations often face the challenge of competing with limited resources.

### 4.2.1 Ghana's AI Integration Faces Gaps in Policy, Inclusion and Data Security

Ghana has made notable progress in integrating AI into its digital transformation agenda, but major inclusion and governance challenges persist. The country lacks a comprehensive AI policy or regulatory framework, posing risks to innovation, citizen protection, and responsible AI deployment. Without clear legal guidelines, accountability for AI-related harms remains weak—especially in sensitive sectors like healthcare, law enforcement, and elections.<sup>73</sup>

Ghana's Data Protection Act (2012) provides a legal foundation for AI regulation but predates modern AI applications and fails to address emerging threats such as automated surveillance, algorithmic bias, and AI-linked cybersecurity vulnerabilities.

AI adoption remains uneven across the country, hindered by issues such as algorithmic bias, attribution challenges, intellectual property concerns, and the spread of disinformation. Despite attempts to improve accessibility, many AI systems lack universal design, limiting usability for older adults, persons with disabilities, and rural women.<sup>74</sup> Linguistic diversity and infrastructural gaps further restrict access. Civil society groups report misinterpretations of local dialects by AI models, exacerbating exclusion.<sup>75</sup>



Ghana's Data Protection Act (2012) provides a legal foundation for AI regulation

<sup>71</sup> World Economic Forum, "The Global Risks Report 2024", January 2024, accessed 15 August 2025, [https://www3.weforum.org/docs/WEF\\_The\\_Global\\_Risks\\_Report\\_2024.pdf](https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf).

<sup>72</sup> Media Foundation for West Africa, "Disinformation and elections: Here's what we learnt during Ghana's 2024 elections", 19 February 2025, accessed 15 August 2025, <https://mfwa.org/issues-in-focus/disinformation-and-elections-heres-what-we-learnt-during-ghanas-2024-elections/>.

<sup>73</sup> Solomon Boakye, "Ghana Must Fast-Track AI Laws Before It's Too Late – IT, Expert Urges", The Highstreet Journal, 31 May 2025, accessed 15 August 2025, <https://thehighstreetjournal.com/ghana-must-fast-track-ai-laws-before-its-too-late-it-expert-urges/>.

<sup>74</sup> Supra note 32.

<sup>75</sup> International Republican Institute, Ghana 2024 Elections: A Risk Assessment of the Online Information Space (IRI, May 2024) <https://www.iri.org/wp-content/uploads/2024/08/Ghana-Report-Designed-6th-Version.pdf> accessed 29 July 2025.

Marginalised groups, including persons living with disabilities (PLWDs), rural populations and women, continue to face structural barriers to AI access due to digital illiteracy, poor infrastructure, and limited language support. While AI tools like chatbots and translation services exist, their uptake remains low among these communities.<sup>76</sup>

Security concerns are also growing, particularly around database integration. The linking of banking, health, and voter registration systems without strong safeguards increases the risk of mass surveillance and data misuse.

On April 24, 2025, MTN Group disclosed a cybersecurity breach by an “unknown third party.” Although core services were reportedly unaffected, the incident raised alarm due to the vast biometric data collected during the 2021-2023 SIM re-registration, which linked fingerprints and facial data to the Ghana Card. Experts warn of major vulnerabilities, including poor oversight and unencrypted storage, which could enable identity theft and AI-enhanced surveillance.<sup>77</sup>

#### 4.2.2 Impact of AI-Generated Disinformation on Ghana’s 2024 Elections

The rise of AI has introduced powerful opportunities, but also serious threats to information integrity. Advanced models, particularly large language models (LLMs), now generate content that often appears credible but factually inaccurate, blurring the line between truth and fabrication. During the 2024 elections, AI-generated disinformation surged, raising alarm over its role in manipulating public opinion, disrupting democratic processes and eroding trust in information systems.<sup>78</sup> Politically manipulated misinformation was used to target key institutions and individuals, especially leaders of the two major parties, the New Patriotic Party (NPP) and the National Democratic Congress (NDC).

According to Fact-Checking Ghana Coalition, out of a total of 123 verified claims documented during the 2024 electoral cycle, 28.5% targeted the NPP and 24.4% targeted the NDC. Presidential candidates John Dramani Mahama (NDC) and Dr Mahamudu Bawumia (NPP) were attacked, with 21.1% and 5.7% of claims, respectively. Other targets included the Chairperson of the Electoral Commission (0.08%) and the institution itself (17.9%).<sup>79</sup>

AI-generated bot accounts promoted Bawumia on social media, using hashtags such as #Bawumia2024, #NPP, and it is #ItsPossible. Featuring fake profile images and names such as “Glenn Washington” and “Netflix Series & Movies,” the bots also spread disinformation against Mahama with hashtags like #mahamaisaliar and #DrunkmamiMahama. These campaigns used deepfakes, recycled audiovisual, and coordinated networks to distort public perception. NewsGuard identified 171 bot accounts on X using ChatGPT-generated posts to promote Bawumia and discredit Mahama.<sup>80</sup>

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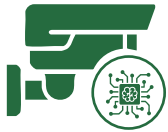
<sup>76</sup> Bismarck Kwesi Davis, *Reprogramming a Nation: The Good, The Bad, and The Ugly of AI in Ghana’s Digital Renaissance* (Modern Ghana, 18 April 2025) <https://www.modernghana.com/news/1393917/reprogramming-a-nation-the-good-the-bad-and.html> accessed 15 July 2025.

<sup>77</sup> Pet-Paul Wepeba, “MTN Cyber Attack: A Looming Biometric Nightmare for Millions of Ghanaians”, *Modern Ghana*, 26 April 2025, accessed 15 July 2025, <https://www.modernghana.com/news/1395600/mtn-cyber-attack-a-looming-biometric-nightmare.html>.

<sup>78</sup> Reyhana Masters, “Disinformation, democracy, and the digital battlefield”, *IFEX*, 29 April 2025, accessed 16 August 2025, <https://ifex.org/disinformation-democracy-and-the-digital-battlefield-fighting-falsehoods-with-truth/>.

<sup>79</sup> Ghana Fact-Checking Coalition, “Countering Electoral Disinformation: Lessons from Ghana’s 2024 Elections”, 29 January 2025, accessed 13 August 2025, <https://www.fact-checkghana.com/wp-content/uploads/2025/02/GFC-Report-Brochure-Final-View-1.pdf>.

<sup>80</sup> Caroline Haskins, “Phony X Accounts Are Meddling in Ghana’s Election: A Network of 171 Bot Accounts Is Using AI to Write Political Posts”, *Rest of World*, 12 November 2024, accessed 29 July 2025, <https://restofworld.org/2024/ghana-election-ai-bots-x-twitter/>.



The growing use of AI-driven surveillance technologies by both state and non-state actors in Ghana is raising serious ethical and privacy concerns

Female politicians also faced AI-driven attacks. NDC vice presidential candidate Prof. Naana Jane Opoku-Agyemang was the subject of doctored videos exploiting cultural biases to question her leadership.<sup>81</sup> In March 2024, a TikTok video falsely suggesting internal NDC concerns about Mahama's health was traced back to a 2016 clip unrelated to him.<sup>82</sup> Days before the election, a WhatsApp audio clip purportedly of Mahama urging deception was revealed to be AI-generated.<sup>83</sup> Similarly, a deepfake video circulated during the NPP's January primaries falsely accusing a parliamentary candidate of embezzlement and visa fraud were debunked by Fact-Check Ghana.<sup>84</sup>

### 4.2.3 AI-Powered Surveillance in Ghana Raises Alarms Over Privacy and State Outreach

The growing use of AI-driven surveillance technologies by both state and non-state actors in Ghana is raising serious ethical and privacy concerns. These include facial recognition-enabled CCTV systems deployed under Ghana's Safe City initiative, and biometric scanners at Kotoka International Airport,<sup>85</sup> and in public places like malls, universities and hospitals. While tools are often justified as enhancing public security, their reliance on artificial intelligence for real-time identification, behaviour analysis, and pattern recognition significantly expands their surveillance capabilities.<sup>86</sup> The Ghana Card system utilises fingerprint and facial biometric authentication,<sup>87</sup> allowing for more efficient identity verification but operating without independent oversight or clear frameworks for citizen consent.<sup>88</sup>

AI-backed proliferation of surveillance infrastructure heightens fears of encroachment on privacy and civic freedoms. Civil society organisations caution that these tools, particularly combined with automated data processing and predictive analytics, can reinforce state capacity to monitor dissent and augment state power for monitoring dissent and conduct algorithmic profiling.<sup>89</sup> Though documented cases of AI-enabled profiling remain scarce, related incidents, including the seizure of journalists' devices and targeted interrogations, suggest the emergence of machine-assisted surveillance patterns.<sup>90</sup>

<sup>81</sup> Carol Odera, *Deepfakes: The Dark Side of AI* (CIO Africa, 13 January 2025) <https://cioafrica.co/deepfakes-the-dark-side-of-ai/> accessed 15 July 2025

<sup>82</sup> Rhoda-Bondzie, "Video of Felix Ofose Kwakye allegedly announcing Mahama's ill health doctored", Fact Check Ghana, 28 March 2024, accessed 15 August 2025, <https://www.fact-checkghana.com/video-of-felix-ofosu-kwakye-allegedly-announcing-mahamas-ill-health-doctored/>.

<sup>83</sup> Ghana Fact-Checking Coalition, "Viral audio alleging Mahama advocated lying to electorates AI-generated", 5 December 2024, accessed 15 August 2025, <https://www.fact-checkghana.com/audio-alleging-mahama-advocated-lying-to-electorates-cloned/>.

<sup>84</sup> Thelma Dede Amedeku, "Disinformation trends to watch out for in 2024 election season", Ghana Fact-Checking Coalition, 27 February 2024, accessed 15 July 2025, <https://www.fact-checkghana.com/disinformation-trends-to-watch-out-for-in-2024-election-season/>.

<sup>85</sup> Graphic Online, "Bawumia unveils digital border control system and e-gates at Kotoka International Airport", 3 December 2024, accessed 17 August 2025, <https://www.graphic.com.gh/news/general-news/vp-bawumia-unveils-digital-border-control-system-and-e-gates-at-kotoka-international-airport.html>; Source Security, "Hikvision IP CCTV system secures Ghana's International Airport", accessed 17 August 2025, <https://www.sourcesecurity.com/news/co-3425-ga-co-12479-ga.3169.html>.

<sup>86</sup> Peter Martey Agbeko, "The Watchful Eye: Why CCTV cameras are essential for security and justice", 28 February 2025, accessed 17 August 2025, <https://www.myjoyonline.com/the-watchful-eye-why-cctv-cameras-are-essential-for-security-and-justice/>.

<sup>87</sup> Institute of Development Studies & African Digital Rights Network, *Ghana's democracy at risk due to use of surveillance technology, warns new report* (IDS & ADRN, 27 September 2023) <https://www.ids.ac.uk/press-releases/ghanas-democracy-at-risk-due-to-use-of-surveillance-technology-warns-new-report/> accessed 15 July 2025

<sup>88</sup> Bismarck Kwesi Davis, *Reprogramming a Nation: The Good, The Bad, and The Ugly of AI in Ghana's Digital Renaissance* (Modern Ghana, 18 April 2025) <https://www.modernghana.com/news/1393917/reprogramming-a-nation-the-good-the-bad-and-the-ugly.html> accessed 15 July 2025.

<sup>89</sup> *Supra* note 90.

<sup>90</sup> *Ibid.*

In April 2023, Citizen Lab and Microsoft reported that the Ghanaian government had procured Reign spyware from the Israeli firm QuaDream, which utilises AI to automate surveillance tasks such as data exfiltration and one-click browser exploits.<sup>91</sup> Similarly, in 2020, the Committee to Protect Journalists (CPJ) revealed that Ghana’s Criminal Investigations Department possessed Cellebrite’s AI-powered forensic technology, capable of decrypting and analysing large volumes of encrypted data—technology reportedly supplied by the US, UK, and Interpol.<sup>92</sup>

### 4.3 AI Regulation and Governance in Ghana

Ghana is in the early stages of developing a comprehensive regulatory framework for artificial intelligence (AI), with recent momentum signalling a policy shift toward more inclusive and rights-based governance. With the change in government, Ghana’s initial AI strategy, which was adopted in 2022, has been shelved, as the current administration plans to relaunch a new National AI Strategy.<sup>93</sup> Developed in partnership with Smart Africa, GIZ, and UNESCO, the strategy identifies ethical, inclusive, and locally relevant AI as a national priority. The strategy foregrounds ethical, inclusive and locally relevant AI, explicitly linking these priorities to digital rights protection and equitable access. It emphasises safeguards for privacy, transparency, and accountability in AI deployment. Provisions also encourage civic participation in AI governance, ensuring citizen voices inform policy and implementation. It also proposes the establishment of a Responsible AI Office to oversee cross-sectoral implementation and ensure that AI technologies align with Ghana’s development aspirations while respecting human rights.<sup>94</sup>



In April 2025, a series of stakeholder consultations was held with representatives from academia and the judiciary to inform the new strategy. Academic stakeholders highlighted AI’s transformative potential across sectors such as agriculture, healthcare, logistics, and financial inclusion, while emphasising Ghana’s potential to become an AI hub in Africa. Their input focused on inclusivity, especially for youth and persons living with disabilities, as well as indigenous data quality, ethical governance, capacity building, and cultural preservation.<sup>95</sup> Judicial stakeholders called for an inclusive, ethical, and legally sound framework, stressing the need to align AI with existing laws on data protection, privacy, intellectual property, and human rights, while also warning of risks like algorithmic bias and misinformation.

The government had announced plans to finalise and launch the strategy by June 2025.<sup>96</sup> In an August 1, 2025 video update on the National Artificial Intelligence Blueprint, the Minister of Communication, Digital Technology, and Innovation announced that it was leading the development of Ghana’s AI Strategy in collaboration with local and international partners

<sup>91</sup> Bill Marczak et al, “A First Look at Spyware Vendor QuaDream’s Exploits, Victims, and Customers”, *The Citizen Lab*, 11 April 2023, accessed 17 August 2025, <https://citizenlab.ca/2023/04/spyware-vendor-quadream-exploits-victims-customers/>; Microsoft Threat Intelligence, “DEV-0196: QuaDream’s “KingsPawn” malware used to target civil society in Europe, North America, the Middle East, and Southeast Asia,” Microsoft, April 11, 2023, accessed 17 August 2025, <https://www.microsoft.com/en-us/security/blog/2023/04/11/dev-0196-quadreams-kingspawn-malware-used-to-target-civil-society-in-europe-north-america-the-middle-east-and-southeast-asia/>.

<sup>92</sup> Jonathan Razen, “US, UK, Interpol give Ghana phone hacking tools, raising journalist concerns on safety and confidentiality”, *Committee to Protect Journalists*, 14 July 2020, accessed 17 August 2025, <https://cpj.org/2020/07/us-uk-interpol-give-ghana-phone-hacking-tools-raising-journalist-concerns-on-safety-and-confidentiality/>.

<sup>93</sup> Law Gratis, *Artificial Intelligence Law at Ghana (Law Gratis, 2024)* <https://www.lawgratis.com/blog-detail/artificial-intelligence-law-at-ghana> accessed 16 July 2025.

<sup>94</sup> *Ghana National Artificial Intelligence Strategy (2023–2033)*, Ministry of Communications and Digitalisation, October 2022, <https://dig.watch/resource/ghanas-national-artificial-intelligence-strategy-2023-2033>(accessed 16 July 2025)

<sup>95</sup> Emmanuel Quaicoe and Gift Hukpati, “Ghana advances National AI Strategy with second consultation at KNUST”, *Joy Online*, 23 April 2025, accessed 15 August 2025, <https://www.myjoyonline.com/ghana-advances-national-ai-strategy-with-second-consultation-at-knust/>.

<sup>96</sup> Emmanuel Quaicoe and Gift Hukpati, “Judiciary contributes to National AI Strategy at key consultation forum”, *Joy Online*, 30 April 2025, accessed 15 August 2025, <https://www.myjoyonline.com/judiciary-contributes-to-national-ai-strategy-at-key-consultation-forum/>.

including the Kwame Nkrumah University of Science and Technology’s Responsible AI Lab, the British High Commission, UNESCO, GIZ, and UNDP. The draft strategy is now complete and has been submitted for legal review and subsequent parliamentary approval.<sup>97</sup> It is unclear which civil society organisations in Ghana were involved in these consultations, as those contacted for the purpose of this report were unaware of this process.

Similar processes and consultations aimed at strengthening Ghana’s AI ecosystem had begun under the previous administration. Ghana participated in UNESCO’s Ethical AI Readiness Assessment (ETH-RAM), which highlighted key regulatory deficits and helped inform national consultations.<sup>98</sup> The Ministry of Communications and Digitalisation initiated stakeholder workshops to draft ethical guidelines for AI development, with input from academia, the private sector, and civil society. These forums aimed to establish a roadmap for regulation that integrates global standards such as the OECD AI Principles and UNESCO’s Recommendations on the Ethics of AI into national practice.<sup>99</sup> Civil society organisations called for a transparent drafting process that incorporates public submissions and guarantees safeguards for free expression, privacy, and equality. The success of such initiatives will depend on whether they lead to enforceable regulatory tools and robust oversight mechanisms.<sup>100</sup>



**Ghana’s Constitution**  
and the Data Protection  
Act provide a  
foundational layer for  
regulating AI.

Furthermore, existing laws such as Ghana’s Constitution and the Data Protection Act provide a foundational layer for regulating AI. Ghana’s Constitution protects rights such as privacy (article 18), equality (article 17), and human dignity (article 15) and can be interpreted to apply to algorithmic systems. The Data Protection Act grants individuals the right to be informed of automated decision-making and to request human intervention in cases where such decisions have legal or significant effects.<sup>101</sup> However, AI-powered facial recognition systems deployed in public spaces for security purposes could violate Ghana’s data protection law if individuals are not informed or given the option to opt out, making enforcement difficult.

The Cybersecurity Act (2020) provides a framework for protecting digital infrastructure and mandates reporting and risk mitigation obligations, which may extend to AI systems deployed in critical sectors such as smart city infrastructure.<sup>102</sup> In addition, the Right to Information Act (2019) underpins transparency in government-held data, which is critical in contexts where public sector AI tools are deployed without clarity or oversight.<sup>103</sup> However, there is a lack of operational legal standards or jurisprudence to ensure effective redress for AI-related harms. Additionally, there is currently no statutory obligation in Ghana for algorithmic audits, ex ante impact assessments, or public redress mechanisms for harms caused by AI systems.

<sup>97</sup> Adom FM, “Ghana’s National AI Strategy and digital transformation’s blue print - Sam George” 1 August 2025, accessed 17 August 2025, <https://www.youtube.com/watch?v=xKV-9I5-aO4>

<sup>98</sup> UNESCO and Data Protection Commission Ghana, *Ethical AI Readiness Assessment (ETH-RAM)* (September 2024) <https://www.unesco.org> accessed 14 July 2025.

<sup>99</sup> Fredrick Ogenka & Aaron Stanley, *Regulating Artificial Intelligence in Africa: Strategies and Insights from Kenya, Ghana, and the African Union* (Wilson Center Africa Program, 18 September 2024) <https://www.wilsoncenter.org/blog-post/regulating-artificial-intelligence-africa-strategies-and-insights-kenya-ghana-and-0> accessed 15 July 2025.

<sup>100</sup> World Economic Forum, *Rwanda Launches Centre for Fourth Industrial Revolution, Joins Global Network* (Kigali, 31 March 2022) <https://www.weforum.org/press/2022/03/rwanda-launches-centre-for-fourth-industrial-revolution-joins-global-network/> accessed 29 July 2025.

<sup>101</sup> OneTrust Data Guidance, *GDPR v. Data Protection Act of 2012: A Comparative Overview* (Data Guidance, December 2023) [https://www.dataguidance.com/sites/default/files/gdpr\\_v\\_ghana.pdf](https://www.dataguidance.com/sites/default/files/gdpr_v_ghana.pdf) accessed 15 July 2025.

<sup>102</sup> Parliament of Ghana, *Cybersecurity Act, 2020 (Act 1038)* (Republic of Ghana, assented in December 2020, entered into force 29 December 2020) <https://www.moc.gov.gh> accessed 14 July 2025.

<sup>103</sup> Ministry of Information, *Right to Information Act, 2019 (Act 989)*, <https://www.rti.gov.gh> accessed 14 July 2025

These laws predate the emergence of generative AI and are therefore insufficient in addressing emerging issues and challenges posed by AI. Although Ghana’s legal architecture provides a broad normative foundation for AI governance, it is insufficient to confront the unique risks and governance challenges posed by AI technologies. The current administration needs to adopt reforms that incorporate algorithmic accountability, data sovereignty, and human rights safeguards to avoid risks that entrench existing inequalities and undermine public trust in AI-enabled systems. Ghana could also draw lessons from jurisdictions like Kenya and Rwanda, where institutionalised multi-stakeholder oversight and regulatory innovation are being pursued, in its journey towards adopting an AI governance framework that is inclusive, enforceable and centres Ghana’s context and priorities.<sup>104</sup>

Aside from the legal constraints, capacity building in AI in Ghana remains in its early stages, characterised by fragmented initiatives, limited institutional coordination and significant gaps in technical infrastructure, skills development and policy support. Institutionally, the capacity to govern AI is underdeveloped. Agencies such as the Data Protection Commission and the Cyber Security Authority are not yet adequately resourced to audit complex AI systems or investigate algorithmic harms. Key stakeholders from the judiciary and academia have nonetheless taken part in consultations on Ghana’s AI Strategy.<sup>105</sup>

Although the Automated Fingerprint Identification System (AFIS) is used in the Ghana Card registration process and relies on sophisticated algorithms for pattern matching and advanced biometric technology, it is not classified as artificial intelligence.<sup>106</sup>

Furthermore, efforts are underway to localise AI governance within broader digital transformation agendas. The Ghana Digital Economy Policy 2024 aims to harness digital technologies to drive inclusive economic growth, improve public service delivery, and secure equitable access to digital resources for all citizens. The Policy is built on five foundational pillars, including universal access and connectivity, digital skills and research, digital government, and data and emerging technologies. It also emphasises adaptive regulation, cross-sector collaboration, and partnerships with development actors such as the World Bank and the Tony Blair Institute, to promote innovation while protecting citizens from risks like fraud and misinformation.<sup>107</sup>

In sum, Ghana’s regulatory landscape for AI is evolving but remains fragmented and aspirational. The country has demonstrated a clear intent to align AI innovation with constitutional rights and democratic values. Yet, to meaningfully protect civic space and digital rights, Ghana must bridge the gap between policy ambition and legislative action. Ensuring effective and inclusive AI governance will require not only technical frameworks but also political will, stakeholder engagement and strong accountability mechanisms.



Ghana’s regulatory landscape for AI is evolving but remains fragmented and aspirational.

<sup>104</sup> Emmanuel, “We need a unique Ghanaian AI strategy to reflect the country’s priorities – Dr Acheampong”, [https://gna.org.gh/2025/06/we-need-a-unique-ghanaian-ai-strategy-to-reflect-the-countrys-priorities-dr-acheampong/#google\\_vignette](https://gna.org.gh/2025/06/we-need-a-unique-ghanaian-ai-strategy-to-reflect-the-countrys-priorities-dr-acheampong/#google_vignette)

<sup>105</sup> *Supra* note 98.

<sup>106</sup> Biometric Update. (2025, February 7). Ghana to make national ID a multipurpose card for seamless services. Biometric Update.<https://www.biometricupdate.com/202502/ghana-to-make-national-id-a-multipurpose-card-for-seamless-services>.

<sup>107</sup> National Information Technology Agency, “Ghana Digital Economy Policy & Strategy Document”, (Accra: NITA, December 2024), accessed 15 July 2025, <https://nita.gov.gh/theevooc/2024/12/Ghana-Digital-Economy-Policy-Strategy-Documents.pdf>.



#### 4.4 Towards Human Rights-Centred and Participatory AI Governance in Ghana

Ghana's pathway to effective AI governance is evolving within a complex interplay of policy gaps, unmet stakeholder aspirations and nascent institutional capacity. Ensuring human rights-centred, participatory governance of AI systems demands inclusive approaches that bridge expertise, representation, and public accountability.<sup>108</sup> For Ghana to meaningfully advance AI governance, the Ministry of Communication, Digital Technology and Innovation's ongoing efforts to adopt a National AI Strategy must prioritise a human rights-centred and citizen-focused approach. This strategy should not just protect Ghanaians from AI-related harms but also ensure the benefits of AI are equitably distributed and reflective of Ghana's diverse values, social context and national priorities.

To realise this, a multi-stakeholder, participatory governance framework is essential from the outset. This includes meaningful engagement with civil society, academia, the private sector, marginalised communities, and technical experts through the design, implementation, and monitoring phases. Additionally, the process must establish a dedicated independent oversight body to guide development of the strategy, ensure transparency and accountability, and uphold ethical standards of AI use. This multi-pronged approach will be critical in building a trustworthy, inclusive, and contextually relevant AI ecosystem in Ghana.

The level of technical expertise among national institutions varies significantly. While some research hubs and innovation centres are incubating AI competencies, many public institutions lack the capacity to understand or regulate the complexities of algorithmic systems. This deficit weakens institutional oversight over private sector deployments of AI, particularly in sectors such as finance, surveillance, and e-governance.

Foundational principles needed for Ghana's AI governance must centre on human dignity, transparency, accountability, and non-discrimination. These values should guide the development of regulatory frameworks that protect civic space and digital rights. An AI strategy anchored in constitutional protections, international human rights obligations, and data sovereignty would provide a normative base for ethical AI deployment. Moreover, participatory design principles should be embedded at all stages of AI system development, especially when these systems affect public services or marginalised populations.

Several actions are necessary to strengthen inclusive and accountable AI governance. First, the government should institutionalise multi-stakeholder advisory bodies with defined mandates, including civil society, academia, industry, and affected communities. Such bodies can co-create guidelines and provide oversight. Second, legal instruments such as the Data Protection Act and the Right to Information Law should be updated to reflect AI-specific risks, including algorithmic bias and automated decision-making. Third, public awareness campaigns and digital literacy initiatives are essential to ensure citizens understand their rights and the implications of AI technologies. This is particularly important in rural areas and among population groups where AI literacy remains low.<sup>109</sup>

<sup>108</sup> <https://techafricanews.com/2024/10/02/ghana-launches-ai-readiness-assessment-for-ethical-ai-use-with-unesco-collaboration/> accessed 15 July 2025 <https://nita.gov.gh/thevoac/2024/12/Ghana-Digital-Economy-Policy-Strategy-Documents.pdf>.

<sup>109</sup> *Rewiring the Future: The Urgent Call for AI Integration in Ghana's Basic Education* Modern Ghana (2025, April) <https://www.modernghana.com/news/1392530/rewiring-the-future-the-urgent-call-for-ai-integr.html> accessed 18 August 2025.

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At the regulatory level, Ghana can draw lessons from countries such as Rwanda, which has established the Centre for the Fourth Industrial Revolution in partnership with the World Economic Forum. This model institutionalises public-private cooperation and accelerates rights-based innovation. Ghana could adopt a similar model to create an AI and Emerging Technologies Commission with statutory powers, tasked with setting standards, conducting audits, and facilitating public consultations.<sup>110</sup>

In conclusion, Ghana's AI governance landscape is marked by early-stage experimentation and active dialogue but constrained by institutional limitations and regulatory inertia. Moving forward, there is an urgent need for an integrated, human-rights-based framework grounded in multi-stakeholder cooperation, capacity-building, and public accountability. Such a framework would not only enhance civic space protections but also foster responsible innovation and trust in Ghana's digital future.

<sup>110</sup> UNESCO, *Recommendation on the Ethics of Artificial Intelligence* (41st General Conference, adopted 24 November 2021) <https://unesdoc.unesco.org/ark:/48223/pf0000380455> accessed 29 July 2025

# 5. Discussion:

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## 5.1 The role of AI in Ghana’s Civic Space and Digital Rights

Artificial Intelligence (AI) offers a significant opportunity to enhance democratic participation, digital rights, and inclusive governance. As AI becomes more embedded in the public domain, its benefits depend on rights-based, transparent and accountable deployment. While AI is expanding participatory governance and service delivery, it also exposes gaps in legal protection and rights enforcement.

Ghana’s legal framework, including the Data Protection Act of 2012, is outdated and lacks provisions for automated decision-making or algorithmic accountability. Efforts to develop an AI strategy are still in early stages, and institutions like the NCA have no mandate on AI-generated political content. In contrast, models like South Africa’s POPIA or the EU’s AI Act offer guidance for rights-based regulation.<sup>111</sup>

Stakeholders remain divided: the government focuses on efficiency and innovation, while civil society stresses fairness, inclusion, and oversight. Youth-led projects like Ghana NLP are advancing local language AI tools, but infrastructure and affordability challenges persist, especially in rural areas.<sup>112</sup> Unlike Kenya, Ghana currently lacks a dedicated, multistakeholder AI governance mechanism.<sup>113</sup>

To maximise AI’s civic value, Ghana must develop binding legal safeguards, foster inclusive innovation, and establish independent oversight. Without this, the democratising potential of AI risks entrenching asymmetries in access, participation, and accountability.

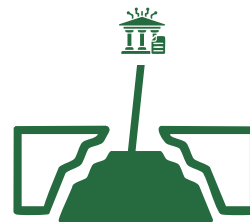
<sup>111</sup> Timcke, S., Hlomani. H. (2023, February). *Decoding the Ballot: How Might AI Reshape Democracy on the African Continent?* Research ICT Africa, Report, 70pp

<sup>112</sup> Sheriff Issaka et al., *The Ghanaian NLP Landscape: A First Look* (arXiv preprint, 10 May 2024) <https://doi.org/10.48550/arXiv.2405.06818> accessed 17 July 2025.

<sup>113</sup> VinciWorks, *Data Protection in Africa: Key Regulatory Developments* (VinciWorks Blog, 13 July 2025) <https://vinciworks.com/blog/data-protection-in-africa-key-regulatory-developments/> accessed 29 July 2025.

## 5.2 Risks and Governance Gaps in AI Deployment in Ghana's Civic Space

AI deployment in Ghana's civic space has revealed acute governance, legal, and design vulnerabilities. During the 2024 general elections, coordinated use of generative AI, including synthetic text and deepfake video, was documented by the Ghana Fact-Checking Coalition and external monitors. These tools were deployed to influence public discourse and erode trust in democratic institutions. These were exacerbated by delays in official data release and opaque content moderation by platforms such as X and Facebook.<sup>114</sup>



AI deployment in Ghana's civic space has revealed acute governance, legal, and design vulnerabilities

Structural risks extend to the design of biometric systems. The Ghana Card and SIM registration frameworks, implemented by the National Identification Authority (NIA) and the National Communications Authority (NCA), utilise facial and fingerprint recognition without ex ante algorithmic audits or oversight mechanisms.<sup>115</sup> Section 50 of the Data Protection Act addresses biometric data but lacks provisions on automated decision-making or redress. By contrast, Kenya's Draft Data Protection (Biometrics) Regulations (2023) require Data Protection Impact Assessments and prior registration of biometric controllers.

Content moderation practices further complicate civic engagement. Ghanaian journalists and civic actors report erroneous takedowns of election-related reporting without access to effective appeal processes. Automated moderation systems lack transparency regarding thresholds for removal or reinstatement, contributing to public distrust.

Moreover, inclusion remains uneven. Civil society reports document algorithmic misinterpretation of local dialects and the marginalisation of low-literacy groups, especially rural women and persons with disabilities. These gaps indicate the urgent need for binding oversight, participatory policymaking, and transparency standards to govern AI systems deployed in civic contexts.

<sup>114</sup> Rachel Hall & Claire Wilmot, *Meta faces Ghana lawsuits over impact of extreme content on moderators* (The Guardian, 27 April 2025) <https://www.theguardian.com/technology/2025/apr/27/meta-faces-ghana-lawsuits-over-impact-of-extreme-content-on-moderators> accessed 15 July 2025

<sup>115</sup> Alena Thiel, *Biometric Identification Technologies and the Ghanaian 'Data Revolution'* (The Journal of Modern African Studies 57(2) 2019) [Cambridge Core], <https://www.cambridge.org/core/journals/journal-of-modern-african-studies/article/biometric-identification-technologies-and-the-ghanaian-data-revolution/D57C74137A1DOC3342C772C450779ADB> accessed 19 July 2025

### 5.3 AI Regulation and Governance - Bridging Policy Intent and Legal Reality

Ghana's AI governance framework is emerging but remains legally non-binding and institutionally underdeveloped. The launch of the National Artificial Intelligence Strategy (2023–2033) signals a normative commitment to rights-based AI, anchored in ethical, inclusive, and context-specific principles.<sup>116</sup> However, the strategy lacks statutory force and key institutional mechanisms, including the proposed Responsible AI Office, remain unrealised. This gap between policy ambition and enforceable regulation limits the framework's capacity to address AI-related risks in civic spaces.

Existing legal instruments such as the Constitution, the Data Protection Act, the Cybersecurity Act, 2020, and the Right to Information Act provide foundational safeguards and guardrails for data privacy, infrastructure protection, and transparency.<sup>117</sup> Yet, these statutes were not designed with AI-specific risks in mind. Notably, Ghana lacks legal mandates for algorithmic transparency, fairness audits, or impact assessments in high-risk AI deployments, in contrast to South Africa's draft AI policy and Kenya's Data Protection (Biometrics) Regulations.<sup>118</sup>

Institutional capacity is also constrained. The Data Protection Commission and Cyber Security Authority face resource and expertise gaps in conducting audits of complex AI systems. Further, consultations reveal that marginalised communities remain underrepresented in policy dialogues, raising procedural fairness concerns.<sup>119</sup> Additionally, AI deployments in biometric verification and facial recognition continue without formalised consent or a grievance mechanism.

International cooperation, such as Ghana's participation in UNESCO's ETH-RAM process, has stimulated regulatory dialogue.<sup>120</sup> However, without enforceable obligations, such initiatives risk remaining aspirational. Therefore, closing the gap requires codifying ethical principles into law and institutionalising inclusive, accountable governance structures.

<sup>116</sup> Artificial Intelligence law at Ghana Law Gratis <https://www.lawgratis.com/blog-detail/artificial-intelligence-law-at-ghana> accessed 18 August 2025.

<sup>117</sup> Republic of Ghana, Data Protection Act, 2012 (Act 843) (Accra: Government Printer, 2012) <https://nita.gov.gh/theevooc/2017/12/Data-Protection-Act-2012-Act-843.pdf> accessed 31 July 2025.

<sup>118</sup> Office of the Data Protection Commissioner, Kenya (2023), Draft Biometrics Regulations; South African Department of Communications and Digital Technologies (2021), AI Policy Framework

<sup>119</sup> Business & Financial Times, Cyber Security Act is meaningless if Data Protection Act is toothless (27 April 2023), <https://thebftonline.com/2023/04/27/cyber-security-act-is-meaningless-if-data-protection-act-is-toothless/> (accessed 7 September 2025)

<sup>120</sup> UNESCO (2023), AI Readiness in Ghana: ETH-RAM Assessment Report

## 5.4 Building a Rights-Based and Inclusive Framework

The results highlight Ghana’s cautious yet expanding efforts to institutionalise AI governance. The absence of a consolidated national AI policy constrains coherence, though multi-stakeholder consultations such as those led by UNESCO mark progress toward inclusive norm-setting. These initiatives, however, remain advisory and depend on executive uptake for policy integration. The uneven stakeholder engagement, particularly the underrepresentation of marginalised groups, signals a legitimacy gap. This raises concerns about procedural justice in the shaping of AI norms and calls for institutional design that ensures equitable participation.<sup>121</sup>

Likewise, the disparity in technical capacity across state institutions presents a significant governance deficit. While civil society and academic entities show emergent competence, key public institutions, including the judiciary, lack sufficient technical understanding of algorithmic harms. This undermines the state’s ability to regulate private deployments, especially in high-risk domains such as finance and surveillance. Comparatively, Rwanda’s Centre for the Fourth Industrial Revolution offers a model for institutionalising public-private coordination and could inform Ghana’s trajectory.

Legal frameworks such as the Data Protection Act and Right to Information Law require reform to address AI-specific risks, notably automated decision-making and algorithmic bias.<sup>122</sup> A coherent governance framework must embed rights-based principles; non-discrimination, transparency, accountability, aligned with Ghana’s constitutional commitments and international obligations.<sup>123</sup>

Ultimately, Ghana’s AI governance is at an inflexion point. A proactive, human rights-centred strategy anchored in participatory processes, legal reform, and institutional capacity-building is essential to secure public trust and democratic oversight in the age of algorithmic governance.

<sup>121</sup> Media Foundation for West Africa, *Regulatory gaps hinder AI use among journalists, threaten press freedom in West Africa* (Media Foundation for West Africa, 2 May 2025) <https://mfwa.org/issues-in-focus/regulatory-gaps-ai-press-freedom-west-africa/> accessed 31 July 2025.

<sup>122</sup> Republic of Ghana, *Data Protection Act, 2012 (Act 843)* (Accra: Government Printer, 2012) <https://nita.gov.gh/theevooc/2017/12/Data-Protection-Act-2012-Act-843.pdf> accessed 31 July 2025.

<sup>123</sup> Republic of Ghana, *Constitution of the Republic of Ghana, 1992* (Accra: Assembly Press, 1992) <https://www.wipo.int/edocs/lexdocs/laws/en/gh/gh014en.pdf> accessed 17 July 2025.

# 6. Conclusion and Recommendations

## 6.1 Conclusion

Ghana's evolving AI governance landscape is still evolving. The government's current approach reveals a gap between its aspirations and the legal or regulatory measures in place. Urgent action is needed to establish a comprehensive AI governance framework that not only addresses emerging challenges but also ensures safe and effective deployment of AI systems across the country.

This framework must transcend political interests and focus on policies that safeguard citizens' rights while promoting responsible AI innovation. The politicisation of the National Artificial Intelligence Strategy (2023–2033) process, which was launched by the previous administration, and the current government's move to introduce an entirely new framework risk undermining progress and stalling Ghana's advancement in AI governance.<sup>124</sup>

Despite the progress by the Ministry of Communication, Digital Technology, and Innovation in advancing a new National AI Strategy, the document itself has yet to be published, and there is scant detail on consultations with local civil society and human rights organisations. Rather than abandoning the work initiated by the previous administration, the government could have built upon and improved it, particularly by robustly addressing AI-related civic risks such as those inherent in electoral systems, biometric identification, and information ecosystems. These overlooked threats underscore broader deficiencies in Ghana's AI policy framework, including the absence of algorithmic accountability, weak safeguards for data sovereignty, and a lack of enforceable transparency mandates.<sup>125</sup> A genuinely inclusive process, rooted in the participation of local stakeholders and grounded in human rights, would ensure that the strategy not only reflects national priorities but also protects against the potential harms of emerging AI technologies.<sup>126</sup>

Additionally, the country's heavy reliance on international partnerships, without building strong local skills and systems, risks keeping the country on the sidelines of the global AI landscape. Without clear protections that take into account the country's local context and realities, vulnerable groups in Ghana could face risks of discrimination, surveillance and exclusion from the use of AI systems.<sup>127</sup> To fix this, Ghana must enact statutory obligations for algorithmic audits, prior impact assessments, and public redress mechanisms, while embedding constitutional and international human rights standards within a cohesive AI governance regime.<sup>128</sup> Comparative

<sup>124</sup> Thompson Gyadu Kwakye, "AI policies in Africa: Lessons from Ghana and Rwanda", *The Conversation*, 25 April 2025 republished on TechXplore, accessed 30 July 2025, <https://techxplore.com/news/2025-04-ai-policies-africa-lessons-ghana.html>.

<sup>125</sup> National Information Technology Agency, "Republic of Ghana, Data Protection Act, 2012 (Act 843)", Accra: Government Printer, 2012, accessed 31 July 2025, <https://nita.gov.gh/thevooc/2017/12/Data-Protection-Act-2012-Act-843.pdf>.

<sup>126</sup> *ibid.*

<sup>127</sup> Desmond Israel, "Ghana's National Artificial Intelligence Strategy: A Critical Policy Analysis on Building a Sustainable AI Ecosystem" (SSRN, 2024) <https://ssrn.com/abstract=5123653> accessed 30 July 2025.

<sup>128</sup> *ibid.*

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lessons from jurisdictions such as Rwanda and Kenya highlight the urgency of institutionalising multistakeholder oversight and resource-backed regulatory bodies.<sup>129</sup>

Ultimately, the benefits of AI in Ghana will depend not only on technological advancement, but on making sure it is deployed in ways that protect democracy, human rights and public trust.

## 6.2 Recommendations

As Ghana advances its digital transformation agenda, the government and relevant actors must consider the following recommendations to ensure effective and responsible AI governance:

### Government:

- Adopt a harmonised legal framework grounded in human rights and constitutional guarantees to ensure ethical and people-centred AI deployment.<sup>130</sup> Specifically, the government must accelerate efforts towards the adoption of a binding national AI policy in consultation with civil society organisations and aligned with the UNESCO Recommendation on the Ethics of Artificial Intelligence, which emphasises the protection of human rights and dignity, centres on local realities and is consistent with international risk-tiered frameworks such as the EU AI Act.<sup>131</sup>
- To future-proof Ghana’s AI ecosystem, legacy laws enacted before the AI era, such as the Electronic Transactions Act, 2008 and the Data Protection Act, 2012, require systematic review and amendment as they are insufficient to regulate contemporary risks such as algorithmic opacity, biometric surveillance, and automated decision-making.
- Establish a well-resourced and independent AI governance body aligned with global best practices and mandated with regulatory, investigatory and enforcement powers to oversee the ethical and accountable development and deployment of AI in Ghana.<sup>132</sup>
- Prioritise investment in long-term digital infrastructure, local data centres and inclusive AI training programmes to address structural inequities in access, participation and capacity within the digital and AI ecosystem.<sup>133</sup>
- Ensure accountability is institutionalised through legally mandated algorithmic audits, transparency requirements and rights-based complaint mechanisms to prevent harm and build civic trust in AI-enabled governance.<sup>134</sup>

<sup>129</sup> Fredrick Ogenga and Aaron Stanley, ‘Regulating Artificial Intelligence in Africa: Strategies and Insights from Kenya, Ghana, and the African Union’ (Wilson Center, 18 September 2024) <https://www.wilsoncenter.org/blog-post/regulating-artificial-intelligence-africa-strategies-and-insights-kenya-ghana-and-african> accessed 31 July 2025

<sup>130</sup> Desmond Israel, ‘Ghana’s National Artificial Intelligence Strategy: A Critical Policy Analysis’ (2024) SSRN <https://ssrn.com/abstract=5123653>. accessed on 31 July 2025

<sup>131</sup> UNESCO, Artificial Intelligence (undated) <https://www.unesco.org/en/artificial-intelligence> accessed 31 July 2025, European Parliament, EU AI Act: First Regulation on Artificial Intelligence (published 8 June 2023, last updated 19 February 2025) <https://www.europarl.europa.eu/topics/en/article/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence> accessed 31 July 2025

<sup>132</sup> *Ibid* 91.

<sup>133</sup> Solon Barocas, Moritz Hardt and Arvind Narayanan, *Fairness and Machine Learning: Limitations and Opportunities* (MIT Press, 2023) ch 7, 214 accessed on 31 July 2025

<sup>134</sup> *Ibid* 91

### The private sector:

- In response to the growing threat of disinformation, Big Tech companies need to adopt proactive measures in moderating harmful content on their platforms in a timely and effective manner while protecting fundamental rights to freedom of expression and access to information.
  - Private sector actors should embed transparency, accountability and rights-based safeguards in AI development, while collaborating with civil society and regulators to prevent misuse in surveillance and disinformation. Aligning innovation with civic responsibility will ensure AI strengthens democratic participation, civic participation and public trust.<sup>135</sup>
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### Civil society actors:

- Actively engage in national consultations, strategy development and policymaking processes related to AI. It is essential to provide and contribute expertise through dialogue, representing the needs of marginalised voices and ensuring transparency and accountability in government-led AI initiatives.
  - Promote public awareness and drive digital literacy through strategic campaigns to highlight the benefits, risks and implications of AI technologies, especially for marginalised groups.
  - Monitor implementation and hold institutions accountable for the implementation of Ghana's AI-related policies and strategies, monitoring for ethical non-compliance, human rights standards and transparency in public sector use of AI.
  - Advocate for respect of fundamental rights throughout the implementation of AI policies and strategies by calling for stronger data protection laws and ethical data governance policies, and respect of individuals' rights to privacy, consent and control over personal data.
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### The media:

- While AI is transforming Ghana's news delivery, media organisations must prioritise journalism safeguards and ethical considerations for its use to ensure integrity and preserve public trust in journalism.
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### To the general public:

- The public should cultivate critical digital literacy to engage responsibly with AI-mediated civic spaces, identify misinformation, understand privacy risks and assert data rights. Active civic participation in digital governance debates and demand for transparency from state and private actors are pivotal.
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### All stakeholders:

- Prioritise cross-disciplinary and sector collaboration, adopt and implement clear ethical guidelines, invest in AI-focused training, as well as improve inclusive infrastructure to bridge the urban-rural digital divide.<sup>136</sup>

<sup>135</sup> UNESCO. (2021). *Recommendation on the Ethics of Artificial Intelligence*. Paris: UNESCO. Available at: <https://unesdoc.unesco.org/ark:/48223/pf0000381137> Accessed 16 August 2025

<sup>136</sup> Clement Edward Kumsah, "AI in Ghanaian Journalism: Navigating Opportunity and Uncertainty", *Modern Ghana*, 30 July 2025, accessed: 31 July 2025, <https://www.modernghana.com/news/1420679/ai-in-ghanaian-journalism-navigating-opportunity.html>; Media Foundation for West Africa (MFWA), "30 journalists in Ghana, Kenya, and Tanzania benefit from digital and physical security trainings", 18 June 2025, accessed: 30 July 2025, <https://mfwa.org/issues-in-focus/journalists-in-ghana-kenya-tanzania-trained-on-digital-physical-safety/>.



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