REFLECTIONS FROM AFRICA
A guide to multi-stakeholder governance to democratise digital policy

How formal co-creation frameworks can address stakeholder imbalance and help create more inclusive and effective digital regulations in Africa

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REFLECTIONS FROM AFRICA: A GUIDE TO MULTI-STAKEHOLDER GOVERNANCE TO DEMOCRATISE DIGITAL POLICY

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Africa's digital policymaking is dominated by a small group; mostly comprising Big Tech corporations and regulatory agencies, leaving most voices unheard. At CcHUB we conducted a study, *Digital Regulations of the Future: A Comparative Analysis of Regulatory Frameworks in five African Nations*, and found that in Kenya, Big Tech and the government control 92% of policy influence: with Big Tech players alone commanding 57% of all digital regulatory issues mostly through setting content moderation practices, algorithmic patterns and setting revenue benchmarks for digital creators. This leaves citizens and local entrepreneurs with little say. Such an imbalance can make laws out of touch with local needs, limit innovation, and threaten digital rights.[1] This reflection outlines our proposed model for designing and advocating inclusive policy formulation bodies, and practical guidance for civil society organizations working to democratise digital policymaking in the Global South.

The current political momentum, including increased calls for democratisation and transparency particularly by young Africans, digital sovereignty debates, the rapid acceleration of digital economies across Africa, and the global focus on platform regulation create a unique window for the adoption of inclusive governance structures that reflect diverse stakeholder voices. To address this, our work through the Forecasting Working Group of the Global Network for Social Justice and Digital Resilience spearheads the creation of collective solutions, new frameworks, and a more effective approach to funding digital resilience work in the Global Majority.

By moving from exclusive deliberation to genuine co-creation, Africa can build digital ecosystems that are innovative and fair. As immediate steps, civil society organizations (CSOs) can start by convening local coalitions to build unified voices and conduct stakeholder mapping to clearly identify key players in digital policy discussions. These actions can set the stage for more inclusive and participatory governance models.

"In Kenya, Big Tech and the government control 92% of policy engagements, marginalising civil society and local entrepreneurs." CcHub Tech & Society, 2025.

1. CcHUB Tech & Society. 2025. Digital Regulations of the Future: A Comparative Analysis of Regulatory Frameworks in five African Nations. Available here.

2. Diplo. State of the African Digital Economy. Available here.

3. CIPESA. 2024. Building an Environment for Inclusive Digital Transformation in Africa: A Roadmap to Reform. Available here.

4. D4D HUB. 2023. Three Recommendations to Boost Innovation through Multistakeholder Collaboration. Available here.

A STAKEHOLDER DEMOCRACY DEFICIT

The digital revolution in Africa holds immense potential for economic development and social transformation.[2] Yet, the regulatory frameworks guiding this growth are often developed without participation from a diverse range of stakeholders.[3][4] Our research in Nigeria, Kenya, Uganda, Zambia, and Namibia revealed a "Stakeholder Democracy Deficit."

This gap is not accidental; it's structural. Exclusionary policymaking leads to ineffective or even harmful laws. For example, Uganda's 2018 social media tax, introduced without adequate consultation, caused a 12% drop in internet access, cutting off five million users overnight and raining massive losses to businesspeople.[5] Similarly, Kenya's Computer Misuse and Cybercrimes (Amendment) Act 2025, recently assented by the President, has faced national backlash and a legitimacy crisis, including suspension of some of its core provisions by the High Court of Kenya, pending litigation.[6]

THE NEEDED FRAMEWORK: FROM IMBALANCE TO INCLUSIVITY

Africa's digital economy, projected to reach $712 billion by 2050, stands at a regulatory crossroads. Governments are asserting digital sovereignty and exploring new taxation, data, and platform governance frameworks.[7] However, the process remains opaque and rushed. For instance, despite inherent resilience, Nigeria's burgeoning fintech industry faces significant hurdles, primarily the lack of clear regulations. This ambiguity causes confusion and delays as businesses strive to meet undefined compliance standards. Major constraints include:

- Fragmented regulatory landscape
- Burdensome licensing
- Complex compliance
- Rising cybersecurity threats
- Multiple taxation

However, government regulators still lead 43% of all digital policy discourse in Nigeria.[8][9] In Namibia, Big Tech and global platforms dominate 46%. This sidelines grassroots innovators and entrepreneurs who understand local challenges firsthand.[10]

While the African Union Digital Compact (ADC) provides a rights-based continental framework that prioritises participatory decision-making, its principles, besides facing immense constraints such as infrastructural limitations and external dependencies, often fail to translate into national policymaking due to weak coordination and limited multisectoral engagement.[11] The current imbalance is both urgent and consequential. What is missing is a deliberate, structured mechanism that embeds inclusivity and accountability into policy formulation, ensuring Africa's digital future reflects the aspirations of all its people, not just powerful corporate or state actors.

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5. Ratcliffe, R. Okiror, S. (2019). Millions of Ugandans quit internet services as social media taxes take effect. The Guardian. Available here.

6. Gichigi, J. (2025). High Court Suspends Key Provisions of Ruto's newly assented cybercrimes law. The Star. Available here.

7. Diplo. State of the African Digital Economy. Available here.

8. Okekenwa, I. 2025. Legal Challenges and Opportunities in Nigeria's Fintech Sector. SSRN. Available here.

9. CcHUB Tech & Society. 2025. Digital Regulations of the Future: A Comparative Analysis of Regulatory Frameworks in five African Nations. Available here.

10. CcHUB Tech & Society. 2025. Digital Regulations of the Future: A Comparative Analysis of Regulatory Frameworks in five African Nations. Available here.

11. Ayodele, O. 2025.The African Union's Strategy for Digital Transformation in Africa: Maximising Opportunities and Overcoming Challenges. Available here.

A GUIDE TO MULTI-STAKEHOLDER DIGITAL GOVERNANCE
The solution we propose seeks to institutionalise multi-stakeholder digital governance frameworks through a five-step process:

1. Identify & Diagnose
This entails moving from anecdotal claims to evidence. We quantified the dominance of different stakeholders using natural language processing (NLP), an artificial intelligence technique that enables computers to analyse and understand human language automatically. From 278,109 online articles, 451 relevant publications on digital regulation were identified across the study countries, alongside a supplementary sample of LinkedIn posts, and analysed using NLP and zero-shot classification to assess sentiment, key policy areas, and thematic domains. The resulting insights were synthesised into descriptive statistics to support clear cross-country comparison. Data like Kenya's 92% policy control thus became central to our advocacy.

Simultaneously, key informant interviews with technologists, legal experts, civil society actors, and digital rights advocates revealed how exclusion leads to impractical laws. For example, data protection policies that are inaccessible in local languages or misaligned with the realities of small businesses and local communities.

2. Convene a Coalition
The next crucial step (supported by robust evidence) involves assembling a diverse coalition of stakeholders, including civil society organizations (CSOs), academic researchers, policymakers, technology specialists, legal experts and technology enterprises, among others. Inclusion of grassroots voices such as local tech startups and community-based organizations (CBOs) is vital: it promotes inclusivity, diversity, and practicality in conversations. These actors, while often excluded from policy talks, especially at the inception stage hold invaluable, practical insights from local tech ecosystems and community levels. Similarly, high-profile events such as the FIFAfrica, DRIF and other continental-level dialogue fora and national summits, present ideal platforms for meaningful engagements on internet freedom, innovation and digital regulatory frameworks. Effective coalition-building can also occur successfully at more localised, district levels.

3. Design the Framework
Design a statutory multi-stakeholder model paying critical attention to key elements, including:

● **Composition:** Equitable representation from government, civil society, academia, local private sector (startups and telcos), multinational tech companies, and community actors.
● **Mandate:** A formal role in pre-drafting, review, and monitoring phases of all major digital legislation.
● **Capacity Building:** Continuous technical training for tech startups, CSOs (civil society organizations), advocacy groups and grassroots actors to enable informed participation.

4. Implement through Advocacy
The proposed consolidated policy output incorporating the model and supporting data should now move beyond discussions: present the finished output to ICT ministries, parliamentary committees, and data protection offices in target countries by leveraging regional Digital Rights convenings.

For instance, in Kenya, engagement with the Office of the Data Protection Commissioner (ODPC) promises discussions on inclusive approaches to AI regulation and protection of individual and communal data by social media platforms. This approach also aligns with the AU Digital Compact, positioning the model as a tangible mechanism for continental implementation.

5. Continuously Measure Impact
Monitor progress through:

● Increased CSO and entrepreneur citations in digital policy discourse.
● Formal inclusion of multi-stakeholder consultation clauses in emerging digital laws.
● Positive feedback from policymakers on legitimacy and practicality.

A case study of inclusive digital regulatory formation is the Kenyan Ministry of Agriculture's data governance framework, co-designed with farmers; an encouraging model of participatory regulation.

FROM DIAGNOSING *IMBALANCE* TO INSTITUTIONALISING *INCLUSION* — A DATA-DRIVEN ADVOCACY JOURNEY

Identify & Diagnose	→	Convene a coalition	→	Design the framework	→	Implement through advocacy	→	Continuously measure impact
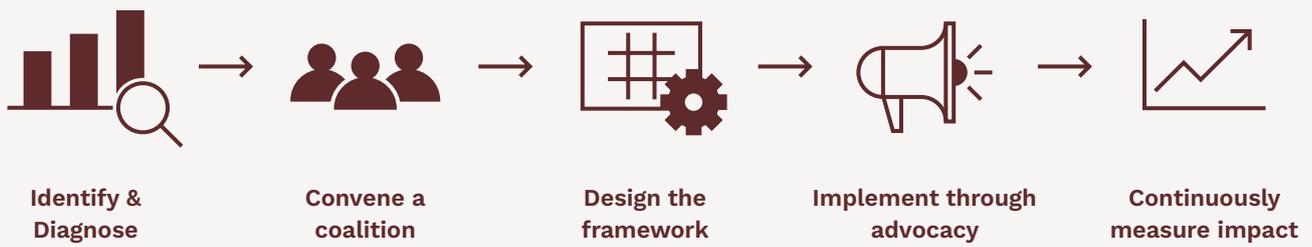
LEARNINGS
Our process reveals three core insights:

→ **Data Trumps Emotion:** Quantified evidence of imbalance is more persuasive than rhetoric. It reframes exclusion as a technical policy issue requiring a structural fix.

→ **Capacity is Power:** Inclusion without empowerment is tokenism. Civil society and grassroots actors need ongoing training in legal and technical literacy to engage meaningfully.

→ **Frame Inclusivity as Strength:** Government adoption improves when inclusion is positioned as a means to enhance policy quality, legitimacy, and enforceability, rather than as a concession to dissent.

RECOMMENDATIONS FOR THE DIGITAL RESILIENCE ECOSYSTEM
For organizations seeking to democratize digital governance, we recommend:

→ **Start with Evidence:** Conduct a localised stakeholder mapping. Using robust processes, NLP, or media analysis are some useful approaches to create data-driven advocacy.

→ **Build Coalitions Early:** Unite diverse actors before engaging government; fragmented advocacy is easy to dismiss.

→ **Co-Design, Don't Complain:** Arrive with a ready-to-implement model for multi-stakeholder inclusion.

→ **Identify Internal Champions:** Find reform-minded officials who can advance the framework within government.

→ **Invest in Capacity:** Budget for workshops, legal toolkits, and continuous training to sustain engagement quality.

AFRICA'S DIGITAL FUTURE DEPENDS ON WHO SHAPES IT
When regulations are crafted behind closed doors, they lack context, legitimacy, and support. This undermines innovation, digital rights, and trust in governance. Institutionalising multi-stakeholderism is how we transition from exclusion to co-creation, grounding innovation and safeguarding rights.

Read more: CcHUB Tech & Society. 2025. Digital Regulations of the Future: A Comparative Analysis of Regulatory Frameworks in five African Nations. Available here.

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