AFRICAN ALLIANCE FOR ACCESS TO DATA (AAAD)

MINUTES OF THE MEETING HELD ON 18 SEPTEMBER 2026

Meeting Type	Alliance Monthly Meeting (Virtual / Zoom)
Chair	Alfred Nkuru Bulakali
Rapporteur / Minute support	Elias Mane, Alfred Bulakali

1. Attendance

94 + members were sent invitation for the meeting

A total number of 23 members attended

Members identified during the meeting included:

Alfred Bulakali (Article19) Churchill Otieno, Dr Laeed Zaghlami, Elias Mane, Francis P. Crawley, Gilbert Sendugwa, Guy Berger, Israel Olatunji Tijani, ChatVE Ivy Gikongo, CHR Izak Minnaar, Kehinde Adegboyega, Laeed Zaghlami, Marystella Simiyu, Michael O'Donovan, Zoe Titus, NMT Media Foundation, Nompilo Simanje, IPI Ompha Tshamano, Gibs Osei Kagyah, Peace Oliver Amuge, APC Raymond Amumpaire, Olunifesi Suraj, Tshepiso Hadebe, RIA Vusumuzi Sifile, PANOS

Apologies: Christine Ajuku,

2. Kick off of the meeting

2.1. Opening and Welcome

The Chair opened the meeting and welcomed members. As an entry point, after formal greetings, he invited participants to briefly reflect on their experiences since the Alliance last met in June and to reconnect with colleagues and the space.

Francis P. Crawley highlighted the importance of access to data, noting that access should be understood not merely as data sharing but as a basis for cooperation in scientific, educational and digital/AI spaces.

2.2. Arrangements for Taking Minutes

Guy Berger requested that a volunteer be identified to take minutes for the meeting and support follow-up. Elias Mane agreed to assist, with the Chair indicating that they would work together to capture the proceedings and produce the minutes.

Marystella Simiyu suggested that future meetings be recorded, subject to members' agreement, to facilitate accurate minute-taking. The Chair welcomed the suggestion and proposed that it be considered under Any Other Business for future meetings.

2.3. Adoption of the agenda

The Chair presented the agenda that was adopted without amendment. Points of the adopted agenda are developed below and the whole agenda presented in annex 1 of these minutes.

2.4. Introduction of New Members

We welcomed a new member from the Ghana's Human Rights Commission, Mr Elias Mane. In his introduction, indicated that he works as the Digital Rights Focal Person at the Ghana's Human Rights Commission. He noted that he became connected to the Alliance through engagements at the Digital Rights and Inclusion Forum and expressed his interest in learning from and contributing to the expertise within the Alliance.

The chair welcomed Elias and encouraged him to continue engaging actively in the Alliance.

2.5. Confirmation and Adoption of Previous Minutes

The meeting reviewed the minutes of the previous meeting held on 11 June 2026. The Chair recalled that the June meeting covered, among other matters, an update from the Special Rapporteur on the guidelines, announcements, upcoming events, future meeting arrangements and routine matters.

No corrections or substantive observations were raised. Elias Mane moved for adoption of the minutes, noting that they accurately reflected the proceedings. The motion was seconded and the minutes were adopted.

3. Updates

3.1. Update the Guidelines on Access to Data (Website submission and draft process)

Guy Berger provided an update on the progress of the guidelines and the consultation process. He reported that the African Commission on Human and Peoples' Rights (ACHPR) had received 18 submissions during its consultation process. These submissions came from a range of stakeholders, including universities, civil society organisations, legal and privacy groups, and representatives from several African countries.

The Alliance reviewed and assessed the submissions, with Tshepiso Hadebe, working with Professor Guy Berger and colleagues, supporting the process of coding and consolidating the comments. A substantial compilation of approximately 46 pages of comments and recommendations was reviewed.

It was reported that the latest draft circulated to Alliance members incorporated those submissions considered relevant and within the scope of the guidelines. The actual guidelines were reported to be approximately 17 pages, with additional material placed in appendices, bringing the overall document to approximately 25 pages.

The consultation feedback was described as overwhelmingly positive. The guidelines were recognised in submissions as timely, ambitious and relevant to digital rights governance in Africa, with particular appreciation for their rights-based foundation, treatment of data as a strategic asset for public good, and alignment with African and national policy priorities.

Key Cross-Cutting Issues Identified from the Submissions

- AI governance and algorithmic accountability, including calls for human rights impact assessments, transparency, explainability, bias assessment and auditing.
- Platform accountability and access to platform-held data, including safeguards and mechanisms for public-interest research and journalism.
- Intersectional protections and safeguards for vulnerable groups.
- Children's data protection and stronger links with relevant child-rights instruments and guidance.
- Institutional capacity and implementation realism, including the capacity of regulators and information commissioners.
- National sovereignty and regional interoperability, including considerations arising under the African Continental Free Trade Area (AfCFTA).
- Narrowly framed exceptions and limitations on non-disclosure, particularly in relation to national security, public order and commercial secrecy.
- Harmonisation of institutional roles and protection of regulator independence.
- Health-data governance, including cybersecurity, patient rights, cross-border data sharing, institutional capacity and protection of vulnerable populations.
- Data altruism and collective governance.

Discussion on Data Sovereignty and Balance of Interests

Francis P. Crawley raised a substantive concern that the guidelines should consider not only the interests of persons seeking access to data, but also the interests and sovereignty of data holders. He stressed the importance of balancing access to data with respect for those who generate, hold or control data, including considerations raised by indigenous communities in international discussions.

Prof. Guy Berger acknowledged that data sovereignty is addressed to some extent in the draft and noted that several submissions had requested a fuller treatment of the concept. He indicated that a comprehensive treatment of data sovereignty might fall beyond the immediate scope of the instrument, but agreed that the concern raised was relevant to the guidelines.

Members were encouraged to provide practical wording and indicate where such a point could be incorporated in the draft. Tshepiso Hadebe similarly invited Francis to review the document and suggest specific language and placement.

Members were reminded that final comments on the penultimate draft were required by 5:00 p.m. on 18 September 2026 so that the drafting team could consider them before submission to the Rapporteur and subsequently to the ACHPR.

Implementation Strategy and Member Survey

Prof. Berger presented a recap of a member survey conducted to inform implementation of the guidelines following their anticipated adoption by the ACHPR.

The survey received 10 responses. It was emphasised that the findings were not necessarily representative of all African countries, and that national circumstances would differ.

- Members identified a range of countries where country-level action could be pursued and were encouraged to act as champions where feasible.

- Respondents generally supported combining legal action, capacity building, political advocacy and coalition building.
- Members were encouraged to form country-level working groups or small coalitions to promote awareness and practical use of the guidelines.
- Potential entry points identified included AI policy, cybersecurity, child rights, health, environmental issues, anti-corruption, gender rights, data journalism, research, regulators and other policy processes.
- Potential barriers identified included resistance from companies or government/security agencies, weak institutions, bureaucratic silos and limited capacity.
- Members were encouraged to identify at least one practical opportunity or stakeholder group in their respective countries where implementation could be advanced.
- The proposed council or engagement mechanism involving information, privacy and data protection regulators was identified as a possible means of sustaining attention to data-access issues.
- Members were encouraged to integrate data-access activities into existing programmes and budgets where dedicated funding may not be available.

It was also noted that the ACHPR is expected to review the 2013 Model Law on Access to Information in 2027. The Alliance was encouraged to consider contributing to that process, recognising that a model law has a different status and potentially broader policy impact than guidelines.

3.2. Update on the CSTD Working Group / Data Governance Discussions

Olunifesi Suraj provided an update on his participation in the relevant CSTD working group/data governance discussions. He clarified that his participation had been undertaken following his volunteering and endorsement by the Alliance.

He raised the need for the African Alliance to Access Data to be consistently recognised as the organisational affiliation in relevant meetings, registration and representation, rather than having members represented solely through their individual institutional affiliations.

Substantive issues reported from the discussions included:

- Human rights as an overarching anchor for data governance.
- Data sovereignty and data residency as unresolved and complex issues.
- Interoperability and the possibility of using cross-border or multistakeholder sandboxes as an alternative or complement to regulatory approaches.
- The need for stronger African perspectives and content in global data-governance discussions.
- AI and data governance, including the potential disruptive effect of AI on existing data-governance ecosystems.
- Geospatial data flows and their implications for AI.
- Multilingualism and metadata as issues requiring greater attention.
- The economic dimension of access to international standards, including concerns about the cost of accessing standards.
- A preference in some discussions for cooperation among governments and regions rather than relying solely on regulatory or legal frameworks.

The Chair acknowledged the update and noted that the issues raised warranted further discussion and follow-up.

4. EVENTS FOR ADVANCING DATA ACCESS AWARENESS

4.1. IDUAI - International Day for Universal Access to Information – Freetown

The meeting discussed the IDUAI activities scheduled to take place in Freetown, Sierra Leone, at the end of September (28-30 September) together with the Conference of the National ATI Commissions. Prof. Berger noted that several Alliance members were expected to participate and proposed establishing a small coordination group to facilitate meetings on the margins of the event and ensure that the Alliance's implementation agenda is reflected in relevant discussions.

Gilbert Sendugwa agreed to help convene Alliance members attending the event and coordinate discussions on advancing the implementation agenda.

The possibility that the ACHPR could adopt the guidelines around the time of the Freetown event was noted as an important opportunity for communication and visibility, subject to the Commission's actual decision.

4.2. Africa IGF: 2 – 5 Nov, Accra

Guy Berger reported that UNESCO had agreed to support one Alliance member to attend the Africa Internet Governance Forum (Africa IGF), scheduled for 2–5 November 2026 in Accra, Ghana, and to liaise with UNESCO while representing the Alliance.

For transparency, members interested in being considered were invited to send an email on 18 September 2026 explaining why they should be nominated. The information would be forwarded to UNESCO, which would make the final selection.

4.3. Other Upcoming Events

Members attending other relevant events were encouraged to indicate their participation in the meeting chat so that the Alliance could coordinate engagement and identify opportunities for collaboration. Events mentioned included:

- IDUAI: 28 - 30 September, Freetown, Sierra Leone
- FiFAfrica: 28 Sept to 1 October, Mauritius
- Africa Fact Check Summit: 21-22 October, Nairobi
- Africa IGF: 2 – 5 Nov, Accra
- African Women in Media: 2-4 December, Windhoek.
- IGF Nairobi: 14-18 December, Nairobi
- Other regional/international information and media-related gatherings.

5. Any Other Business and Closure

The chair invited members to raise any additional business through the chat.

6. Key Decisions and Action Points

No.	Action / Decision	Responsible	Timeline

1	Final comments on the penultimate guidelines draft to be submitted for consideration.	All members; particularly members with substantive comments	By 5:00 p.m., 18 Sept. 2026
2	Provide practical wording and suggested placement concerning data-holder sovereignty/data sovereignty in the guidelines.	Francis P. Crawley; other interested members	18 Sept. 2026
3	Consolidate final comments and prepare the next version for submission to the Rapporteur/ACHPR process.	Guy Berger, Tshepiso Hadebe and drafting team	From 19 Sept. 2026
4	Coordinate Alliance engagement and possible side meetings at the Freetown International Day for Universal Access to Information event.	Gilbert Sendugwa, with participating members	Before/during Freetown event
5	Ensure the African Alliance to Access Data is properly reflected as the affiliation in relevant CSTD/data-governance participation and event representation.	Alliance coordination / relevant representatives	Follow-up required
6	Members interested in UNESCO support for Africa IGF attendance to submit motivation for consideration.	Interested Alliance members	18 Sept. 2026
7	Members attending upcoming events to indicate participation in the chat to support coordination.	All participating members	As applicable
8	Consider recording future Alliance meetings to facilitate accurate minute-taking, subject to members' agreement.	Chair / Alliance members	For future meetings

7. Next Meeting and closing note.

No specific date for the next meeting was indicated. Members will be informed through the Alliance's usual coordination channels. The chair thanked members for their participation, contributions and attention, and wished everyone a good weekend. Members exchanged closing remarks.