MINUTES OF THE AFRICAN ALLIANCE FOR ACCESS TO DATA HELD ON 6TH NOVEMBER 2026 VIA ZOOM AT 2:00 PM SAST

PRESENT

1. Commissioner Geereesha Topsy Sonoo
2. Guy Berger (Convenor)
3. Liz Orembo (Chair)
4. Ivy Gikonyo (Rapporteur)
5. Osei Kagyah
6. Ompha Tshamano
7. Gilbert Sendugwa
8. Francis P. Crawley
9. Vusumuzi Sifile
10. Toby Mendel
11. NMT Media Foundation
12. Christine (Open Institute)
13. Lorraine Mwanza Chisanga (Misa, Zambia)
14. Kwami Ahiabenu
15. Elias Mane
16. Laeed Zaghlami
17. Ompha Tshamano
18. Stephen E Moore
19. Raymond Amumpaire

Apologies: Al-Amin Yusuf (UNESCO), Alfred Bulakali.

AGENDA

1. Welcome, appointment of minute-taker, apologies and introduction of new participants.

2. Review and adoption of the September meeting minutes.
3. Presentation on the UNESCO-ICIC statement following the International Day for Universal Access to Information (IDUAI), held on 28–29 September in Freetown.
4. African countries' performance in the UNESCO CLD stress test.
5. Update from Commissioner Geereesha Topsy Sonoo on the Guidelines.
6. Update from Liz Orembo and Gilbert Sendugwa.
7. Report-back from the Africa Internet Governance Forum (IGF), held from 2–5 November in Accra.
8. Update on the UN Commission on Science and Technology for Development (CSTD) Working Group on Data Governance.
9. Upcoming engagements:
    - African Women in Media, 2–4 December, Windhoek.
    - Internet Governance Forum (IGF), 14–18 December, Nairobi.
10. Any other business and closure.

MIN 1/NOVEMBER: WELCOME AND ADOPTION OF PREVIOUS MINUTES

The meeting commenced at 14:05 SAST, with Liz Orembo, Chair, welcoming members and participants. Apologies were reported (see above).

The minutes of the September meeting were reviewed and adopted as a true record of the proceedings. Francis P. Crawley confirmed the minutes, while Vusumuzi Sifile and Lorraine Mwanza Chisanga (MISA Zambia) seconded their adoption.

MIN 2/NOVEMBER: UNESCO-ICIC STATEMENT AND AFRICAN COUNTRIES' PERFORMANCE IN THE CLD STRESS TEST

The meeting received presentations from Toby Mendel and Marius Lukosiunas on the UNESCO CLD stress test and the outcomes of the 2026 International Day for Universal Access to Information (IDUAI) conference in Freetown.

2.1 Presentation by Toby Mendel: UNESCO CLD Stress Test

Toby Mendel provided an overview of the stress test exercise (slides attached), which involves submitting identical requests for information to public bodies in different countries to assess and compare the implementation of access to information laws. The exercise has relevance to interest in data access from governments. For the 2026 exercise, two requests were submitted, focusing on:

- Budgetary information relating to children's programmes; and
- Investigations into social media platforms.

The exercise covered 90 countries globally. In Sub-Saharan Africa, 30 countries have access to information laws, and with 28 volunteers, the stress test requests resulted in requests being submitted across 16 countries.

The findings indicated significant challenges in the implementation of access to information laws. *Of the 29 requests submitted in Africa, 24 received no response, constituting what was described as mute refusals*. Public bodies did not respond within the stipulated 30-day period. Responses were received from Seychelles, Ghana and South Africa concerning information on children's programmes. South Africa also provided a response to the request concerning platform governance. Interested members of the Alliance were invited to contact Toby for more information or to take part in the Stress test in their country next year.

Toby observed that the high rate of non-responses could indicate that public institutions lack the necessary administrative systems and institutional capacity to process and respond to information requests within the prescribed timeframes. The findings are broadly consistent with those of the 2025 exercise, suggesting that the challenges remain persistent.

Responding to a comment that the findings were sobering and relevant to the Alliance's interests in trying to unlock data, Toby said "I think you will find the same obstacles whatever type of information you are looking for". He emphasised the importance of conducting more requests, noting that increased demand for information could encourage public institutions to establish and strengthen the systems necessary to respond to requests.

Asked whether future stress tests could incorporate questions seeking more granular data, including information on reported cyberattacks and details concerning the processing of access to information requests. Toby explained that the annual exercise currently focuses on budget-related information, with responses often providing reasonably granular data, particularly in the case of South Africa. He welcomed suggestions for additional questions and indicated that the Alliance could propose areas for consideration in future exercises. Regarding the reasons for non-responses, he noted that local volunteers would need to undertake further follow-up with the relevant public bodies.

2.2 Presentation by Marius Lukosiunas: Outcomes of IDUAI 2026

Marius Lukosiunas of UNESCO provided an update on UNESCO's work, including its ongoing survey on the Sustainable Development Goals (SDGs), through which countries report on progress and challenges in implementation of Goal 16.10 which is access to information and fundamental freedoms.

He reported that the 2026 International Day for Universal Access to Information was held in Freetown and culminated in the adoption of a conference statement under the auspices of the International Conference of Information Commissioners (ICIC). (Toby flagged a parallel civil society declaration from the same event).

Among the key issues addressed in the ICIC statement, highlighted by Marius, were:

- Transparency in the use of AI: The right to information should extend to transparency concerning the development and use of artificial intelligence.
- Right to know when interacting with AI: Individuals should be informed whether they are interacting with an AI system or a human being.
- AI as an enabler of access to information: Artificial intelligence should strengthen, rather than undermine, the right to information.
- Access to information and open governance: The statement recognises the importance of extending access to information principles to AI-related information, open data and open governance.

Marius identified three potential areas for further engagement:

1. Incorporating AI transparency requirements into access to information legislation.
2. Strengthening the right to know when information has been generated or manipulated using AI.
3. Addressing data governance and oversight in the context of AI.

He concluded that the right to information in the AI era must extend beyond traditional access to documents and encompass transparency and accountability in the use of emerging technologies.

2.3 Discussions and contributions

Following the presentations, members made the following observations and sought further clarification:

- Christine (Open Institute) questioned Kenya's positive classification in the stress test, noting that this did not reflect her organisation's experience of the bureaucratic and often cumbersome processes involved in accessing information in the country. She suggested that further work was needed to understand the actual state of implementation and identify appropriate interventions. Toby clarified that the Kenyan volunteer had submitted a response to the request, but the public body itself had not responded.

- Guy Berger noted that the right to know when one is dealing with AI should evidently include the right to know what data is taken, used and applied to the AI services' operations.

- Liz Orembo asked Marius whether UNESCO had considered discussions with countries on using AI to strengthen institutional capacity and improve the implementation of the right to know. Marius indicated that capacity-building had not yet been discussed in detail. However, UNESCO had successfully raised USD 70,000 for capacity-building activities. Some funds had also been used to facilitate the participation of Alliance members at the Freetown conference.

Marius expressed appreciation for the Alliance's continued cooperation with UNESCO, noting that this was the third consecutive IDUAI event at which the two had worked closely together.

MIN 3/NOVEMBER: UPDATE FROM COMMISSIONER GEEREESHA TOPSY SONOO ON THE GUIDELINES

Commissioner Sonoo informed members that the African Commission on Human and Peoples' Rights had been unable to consider and adopt the Guidelines during its last Ordinary Session due to time constraints. She subsequently sought to have them considered during the Extraordinary Session, but this did not materialise.

The Guidelines are therefore expected to be considered at the Commission's next session in February 2027, with the hope that they will be adopted. Following adoption, they will be presented to the relevant African Union organs in Addis Ababa for consideration and a decision on the way forward.

The Commissioner also drew members' attention to Draft Resolutions 630 and 631, which are available on the Commission's website. She encouraged members to review the resolutions and submit their contributions, with the hope that they could be adopted without the need for further rounds of revision. Consultation for Res. 630 guidelines on information integrity is open until 21 December 2026. Consultation for Res. 631 guidelines is open until 8 January 2027. Raymond volunteered to lead a team to submit on the 630 guidelines, with Osei agreeing to join.

MIN 4/NOVEMBER: UPDATE FROM LIZ OREMBO AND GILBERT SENDUGWA

Liz Orembo and Gilbert Sendugwa provided feedback on the Alliance's engagement in Freetown and outlined proposed areas of work.

4.1 Freetown meeting and stakeholder engagement

Liz reported that seven Alliance members had met in Freetown. They brainstormed a proposed workplan that is now online on the Alliance site. The discussions focused, among other things, on developing common messaging around the Guidelines, particularly to communicate their importance and the broader value of access to data to different stakeholders.

Members were encouraged to take responsibility for engaging relevant stakeholders in their respective countries and raising awareness of the Guidelines and their significance.

4.2 Development of a common research template

The meeting discussed the development of a common research template to support a light-touch assessment of the state of access to data across participating countries.

The proposed approach would rely on Alliance members volunteering to undertake research using a set of common, relatively straightforward questions. The findings would help establish the situation in different countries and identify areas requiring targeted interventions.

Interested members were encouraged to contact Gilbert and volunteer to participate. Raymond Amumpaire volunteered to undertake the exercise in Uganda, while Osei Kagyah volunteered for Ghana.

4.3 Review of the Model Law

The meeting also discussed the need for an expert review of the Model Law on Access to Information to assess its continued relevance in light of developments in the broader legal and technological landscape.

It was proposed that a small working group within the Alliance undertake an initial analysis of the Model Law against other relevant instruments and emerging technological developments. This would provide a basis for subsequent formal and national consultations.

4.4 Commissioner's remarks on the proposed activities

Commissioner Topsy welcomed the Alliance's proposed work on the Model Law and appreciated the group's willingness to contribute to the review process.

She informed members that the African Union had expressed interest in having the Model Law reviewed and that a consultant was expected to be engaged for this purpose. The terms of reference for the consultancy were expected to be circulated before the end of the year.

Regarding the Guidelines, the Commissioner asked whether the Alliance had sufficient internal capacity and expertise to undertake the proposed activities or whether it would be necessary to approach external partners for support.

Liz explained that the proposed approach took into account the Alliance's current resource constraints. She noted that the reference to IPI in the proposed work was based on the expectation that the organisation could potentially incorporate some of the activities into its existing programme.

In response, Commissioner Topsy emphasised the importance of first securing the adoption of the Guidelines, after which the Alliance could consider the next steps in their implementation.

MIN 5/NOVEMBER: UPCOMING ENGAGEMENTS AND ALLIANCE PARTICIPATION

5.1 African Women in Media, 2–4 December 2026, Windhoek

The upcoming African Women in Media engagement was noted. The matter was not discussed in detail due to time constraints and was deferred to a subsequent meeting.

5.2 Internet Governance Forum (IGF), 14–18 December 2026, Nairobi

Liz informed members that a communication would be circulated to establish members' availability to participate in the Nairobi IGF. Osei Kagyah offered to assist with coordinating the participation of Alliance members and facilitating co-operation on Alliance issues at the IGF. Please follow this link to signal your presence at the IGF.

Guy Berger further informed members that UNESCO, through its Rosa office, had indicated a willingness to consider supporting the participation of some Alliance members at the upcoming engagements. Members interested in attending were encouraged to communicate their interest so that possible support could be explored.

The meeting also discussed the possibility of convening a more substantive Alliance meeting in Nairobi alongside the IGF, subject to members' availability.

MIN 6/NOVEMBER: ANY OTHER BUSINESS AND CLOSURE

Due to time constraints, other outstanding report-back items on the agenda were deferred to the next meeting. Members agreed to explore the possibility of holding a substantive Alliance meeting in Nairobi during the IGF, depending on availability.

The meeting was thereafter brought to a close.

4. SUMMARY OF ACTION POINTS

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No.	Action point	Responsible person	Timeline
1.	Review Draft Guidelines in "sister" processes to the Data access initiative at the African Commission. Consultation for Res. 630 guidelines is open until 21 December 2026. Consultation for Res. 631 guidelines is open until 8 January 2027.	Anyone interested in a small group for a combined Alliance approach to contact Raymond and Osei.	ASAP
2.	Develop common messaging on the Guidelines and engage relevant stakeholders in their respective countries.	All (*suggestions can be tabled at next meeting of the Alliance*)	Ongoing
3.	Coordinate the development of a common research template for assessing access to data across participating countries.	Liz and Gilbert	TBD

4.	Undertake the proposed country-level research exercise.	Raymond Amumpaire (Uganda); Osei Kagyah (Ghana); other interested members	TBD
5.	Establish a small working group to undertake an expert review of the Model Law.	All (*RIA may present on this at the next meeting of the Alliance*)	TBD
6.	Circulate the terms of reference for the proposed Model Law review consultancy.	African Commission	By end of 2026
7.	Circulate a communication to establish members' availability for the Nairobi IGF.	Osei	Ahead of the IGF
8.	Coordinate Alliance members' participation at the Nairobi IGF.	Osei	Ahead of the IGF
9.	Communicate interest in attending upcoming engagements to facilitate possible UNESCO support for participation.	Interested members at the meeting	Ahead of the respective events