Examining the Governance Frameworks and Gender Dimensions of Artificial Intelligence Policy in Uganda

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Contents

List of Acronyms

AI - Artificial Intelligence

AHA - Anti-Homosexuality Act

APC - Association for Progressive Communications

CEDAW - Convention on the Elimination of All Forms of Discrimination Against Women

HRIAs - Human Rights Impact Assessments

ICT - Information and Communication Technology

IP - Intellectual Property

KII - Key Informant Interviews

LGBTQI - Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex

NITA-U - National Information Technology Authority Uganda

STEM - Science, Technology, Engineering, and Mathematics

UCC - Uganda Communications Commission

4IR - Fourth Industrial Revolution

1. Introduction

This research aimed to examine the governance frameworks surrounding Artificial Intelligence (AI) in Uganda and it assessed the gender dimensions embedded in AI policymaking processes. The study focused on three main objectives: analyzing the legal and regulatory frameworks governing AI, identifying gender gaps in AI policy formulation, and proposing strategies to integrate gender and human rights perspectives into AI governance. To guide our findings and discussions, we proposed operational definitions that are key to contextualising our nuanced understanding of the study.

Operational Definition of Key Terms

Artificial Intelligence (AI): AI in this study refers to the development of computer systems capable of performing tasks typically requiring human intelligence, such as visual perception, decision-making, speech recognition, and language translation. The focus here is on how these technologies are governed and the policies surrounding their implementation in Uganda.

Governance Frameworks: This term refers to the legal, regulatory, and institutional policies that shape the development, deployment, and regulation of AI. In this study, the governance frameworks for AI in Uganda include laws, regulations, and best practices at both the national and international levels.

Gender Dimensions: Gender dimensions pertain to the ways in which gender impacts or is affected by AI governance. This study investigated how women and marginalized gender groups are included or excluded from AI policy discussions, if any and how AI may or may not perpetuate gender inequalities.

2. Research Design:

The study employed a qualitative research design utilizing both desk research and primary data collection through interviews with key informants. The qualitative approach is appropriate given the policy analysis focus, aiming to generate in-depth insights into the governance framework and gender dimensions of AI in Uganda. We analysed our data through thematic and content analysis.

Qualitative research design was employed. Qualitative approaches enabled the researchers to understand specific contexts, phenomena, and experiences of respondents in a great level of detail. It provided the researchers with insights into the lived experiences and interpretations of the stakeholders and allowed for a greater depth of understanding into the complexity of the research topic, experience and context (Mentz 2017[1]; Leckenby. D, & Hesse-Biber 2011[2]).

Data collection was conducted between 15th October and 15th December 2024. Data collection was achieved through literature review and key informant interviews. Primary data came from 25 purposively selected key informants on the basis of their expertise, experiences, positions they hold in institutions. These were deemed to be knowledgeable and to offer representative views for their stakeholder groups about the topic of the study.

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1 Mentz Melody (2017). The benefits of both worlds: Towards an integrated mixed-methods approach for evaluating women's empowerment: Journal of Gender, Agriculture and Food Security, Vol 2, Issue 1 2017
2 Leckenby. D, & Hesse-Biber (2011). Feminist Approaches to Mixed Methods Research.pdf

3. Methodological Approach

3.1. Desk Review

The research began with a comprehensive desk review of existing literature, policy documents, laws, and regulations related to AI in Uganda.

The following areas were covered:

- Review of Uganda's current laws and regulations on AI. For example; National Artificial Intelligence Strategy, Data Protection and Privacy Act, 2019, Data Protection and Privacy Regulations 2021,

- Review of international best practices in AI policy and governance. For example; Ethical AI frameworks, Human-Centric AI, Inclusive AI Development, Global Index on Responsible AI.

- Gender analysis of existing policy discussions on AI in Uganda, with a focus on gaps.

3.2. Key Informant Interviews (KIIs)

A series of semi-structured interviews were conducted with key stakeholders involved in AI policymaking and gender advocacy. The interviewees included: Government officials from ministries such as the Ministry of ICT and National Guidance and its line agencies such as the UCC, Civil society

- 4 Government officials from ministries such as the Ministry of ICT and National Guidance and its line agencies such as the UCC.

- 5 Civil society organizations involved in AI governance and gender equality.

- 2 Experts in AI ecosystem

- 4 Policy Analysts from Academia and Research Institutions.

- 4 Women in Technology professionals to assess their experience and perspectives

- 3 Representatives from Development Partners

- 3 Representatives from the Private Sector.

3.3. Gender Analysis Framework

The study employed the APC Gender and Cybersecurity Framework[3] as a guiding tool to analyze the gendered impacts of AI policy. This framework ensured that both explicit and implicit gender-related factors in AI governance are identified and articulated.

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3 APC (2023) A Framework for Developing a Gender-Responsive Cybersecurity Policy: Assessment Tool apcgendercyber-assessmenttool.pdf

4. Data Collection Techniques

4.1. Desk Research

A detailed policy analysis of the current legislative frameworks surrounding AI in Uganda were conducted. This involved reviewing government publications, official reports, and policy briefs from various stakeholders. Secondary data from existing gender-related studies and AI governance literature were utilized to provide context for understanding the gender gaps.

4.2. Semi-Structured Interviews

Interviews were transcribed and analyzed using qualitative content analysis. Thematic coding was used to identify key themes related to AI governance and gender dimensions. Qualitative content analysis involved systematically categorizing verbal or textual data into meaningful themes or patterns to allow interpretation of the underlying meaning of the interviews by identifying recurring topics, ideas, and relationships between concepts. On the other hand, thematic coding methods were used to identify, analyze, and report patterns (themes) within the qualitative data. This flexible approach enabled us to focus on specific areas of interest in the study, exploring the stated opinions and assumptions and the reasons behind them.

5. Data Analysis

Data was analyzed using thematic content analysis, where patterns and themes were identified based on the research questions and objectives. The APC Gender and Cybersecurity Framework[4] provided a structured approach for gender analysis, ensuring that the final recommendations adequately address gender and human rights issues.

5.1. Legal and Regulatory Framework Analysis

Laws, policies, and regulations were examined to identify any existing governance frameworks for AI in Uganda. Gaps in these policies, especially regarding gender and human rights perspectives, were highlighted.

5.2. Gender Gap Identification

Through both desk research and interviews, the study focused on identifying gaps in the participation of women in AI policymaking processes and the impacts of AI on different gender groups. It interrogated the question if AI governance frameworks include gender perspectives, and gender issues are included into the policies or not.

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4 Ibid

6. Sample techniques

For this project, the sampling technique for Key Informant Interviews (KIIs) used was purposive sampling. Purposive sampling is effective because it allows for the intentional selection of individuals who are directly involved in AI policymaking, gender advocacy, or who are experts in the intersection of gender and AI. We also employed snowball sampling, where initial interviewees suggested other relevant stakeholders for inclusion, helping to ensure that the researchers captured a broad range of perspectives.

6.1. Sample size

The sample size for interviews depended on the availability of key informants and the saturation point, where no new information was generated from additional interviews. A proposed sample size of 25 key informants were arrived at. This is usually sufficient for qualitative research, especially when seeking in-depth insights.

7. Study limitations

Availability of participants: Some key informants were difficult to access due to busy schedules or unwillingness to participate, especially policymakers or high-ranking officials.

Generalizability: Since this study is qualitative, the findings might not be broadly generalizable to all sectors or countries beyond Uganda. However, the aim is to provide deep, context-specific insights.

8. Literature review

8.1 The legal and regulatory framework governing AI in Uganda

Artificial Intelligence (AI) is rapidly transforming industries across the globe, enhancing efficiencies, and creating new avenues for innovation. In Uganda, AI's growth promises transformative potential across sectors such as healthcare, agriculture, finance, and education. However, as AI's influence expands, so does the need for a robust legal and regulatory framework to address challenges such as data privacy, ethical considerations, and accountability. This study examined the current legal and regulatory framework governing AI in Uganda, exploring the existing laws, policies, and regulatory bodies overseeing the development, deployment, and use of AI technologies.

Data Protection and Privacy:

Many AI systems are dependent on being trained on large volumes of data in order to perform effectively, raising concerns around the privacy of the individual and data protection.[5] Many of the concerns raised around privacy and data protection relate to the need to ensure that the use of data infringes on the rights of the individual to privacy as little as possible, including considering issues of surveillance or monitoring which may become concomitant with the sharing of personal data.

In Uganda, the legal foundation for data governance is laid by the Data Protection and Privacy Act (2019). This Act seeks to regulate the collection, processing, and storage of personal data, ensuring that individuals' privacy is protected. The law mandates that data controllers and processors must collect and use data fairly, lawfully, and transparently. Given that AI systems often rely on personal data to make decisions, the Data Protection and Privacy Act is pivotal in regulating AI use in Uganda. However, the Act does not explicitly address the unique challenges posed by AI, such as automated decision-making, algorithmic bias, and the right to explanation.

This is significant because AI systems can sometimes make decisions that directly affect individuals, such as in credit scoring or employment screening. There is a need for specific provisions to ensure AI systems do not lead to discriminatory outcomes or violate individual rights.[6]

Moreover, while the National Information Technology Authority of Uganda (NITA-U) oversees compliance with the Data Protection and Privacy Act, its capacity to monitor AI-specific data uses remains limited. Enhancing NITA-U's role in AI regulation would be critical for addressing AI-related privacy concerns.

Cybersecurity and AI:

AI systems are vulnerable to cybersecurity risks, including data breaches and adversarial attacks that could compromise the integrity of the system or the data it processes. Uganda's

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5 Coeckelbergh, M., 2020. AI Ethics. The MIT Press

6 D. Shao, N. Marwa and D. Matendo, "Regulatory Strategies for Fostering Responsible AI Innovation in African Economies," 2023 First International Conference on the Advancements of Artificial Intelligence in African Context (AAIAC), Arusha, Tanzania, United Republic of, 2023, pp. 1-11

Computer Misuse Act (2011) and the Electronic Transactions Act (2011) form the core legal framework addressing cybersecurity risks in the country.

The Computer Misuse Act criminalizes unauthorized access, modification, or destruction of computer systems, which extends to AI-powered systems. The Electronic Transactions Act, on the other hand, promotes secure and efficient electronic communications and transactions. While these laws provide a general framework for cybersecurity, they do not explicitly cover the complexities introduced by AI, such as algorithmic security, AI-driven cyber-attacks, and machine learning vulnerabilities.

In light of these gaps, the National Cybersecurity Strategy (2021-2026) calls for the development of a more comprehensive legal and regulatory framework to address emerging cybersecurity challenges, including those posed by AI. However, as of now, Uganda lacks AI-specific cybersecurity regulations, which leaves a regulatory void as AI systems become more embedded in critical infrastructure such as healthcare, energy, and finance.[7]

Intellectual Property and AI Innovation:

AI innovation in Uganda raises questions about intellectual property (IP) protection, particularly regarding the ownership of AI-generated works. The Copyright and Neighbouring Rights Act (2006) and the Patents Act (1991) govern IP rights in Uganda, providing protection for human authors and inventors. However, these laws do not account for the rise of AI-generated content, which presents a legal challenge: who owns the rights to works created by AI systems? As AI becomes more capable of generating original works, such as music, art, and written content, the Ugandan IP framework will need to evolve to determine whether AI systems, developers, or users own the output.

Additionally, Uganda's National Intellectual Property Policy (2019-2024) emphasizes the importance of innovation, including AI, but it lacks specific provisions for protecting AI-driven innovations. Revising the Patents Act to explicitly address AI-generated inventions and the role of AI in the innovation process would ensure that Ugandan innovators can fully benefit from their AI-driven creations.

8.2 Strategies to Integrate Gender and Human Rights Approaches in AI Policy

As Artificial Intelligence (AI) technologies become more pervasive across industries and societies, it is crucial to ensure that their development and deployment align with human rights principles and promote gender equality. AI has the potential to greatly enhance human capacity, yet if left unchecked, it may also exacerbate existing social inequalities, especially regarding gender, and lead to human rights violations. The policy-making process is an essential arena to address these issues by integrating gender perspectives and human rights approaches from the outset. This section outlines strategies for ensuring AI policy-making is both gender-sensitive and human rights-compliant.

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7 Governing Artificial Intelligence (AI) and Other Technologies in the Digital Era

Conduct Inclusive Policy Research and Data Collection:

At the foundation of AI policy-making lies the research and data that inform decision-making. Unfortunately, historical biases in data collection, particularly regarding gender, have often led to skewed outcomes that disadvantage women and marginalized groups.

To integrate gender perspectives into AI policy, a first step is to ensure that data collection is gender-disaggregated, meaning it accounts for the differences in how men, women, and non-binary individuals experience the effects of AI technologies.[8]

Beyond data collection, it is essential to consult with a diverse range of stakeholders, including gender experts, human rights activists, and representatives from marginalized communities. Conducting qualitative research, such as interviews and focus groups, can provide nuanced insights into the specific challenges these groups face and how AI can be designed to address, rather than amplify, those challenges.[9]

Ensure Representation in Decision-Making Bodies:

One of the core strategies to promote gender and human rights considerations in AI policy-making is ensuring diversity within decision-making bodies. When decision-making panels, advisory boards, or policy commissions lack diversity, they may overlook the distinct experiences and concerns of women, minorities, and other underrepresented groups.[10] To address this, it is crucial to prioritize gender-balanced representation in AI governance bodies.

Diverse perspectives not only lead to more inclusive policies but also help to counteract the biases that can inadvertently be embedded in AI technologies. Including women and gender minorities in the policy-making process fosters the creation of AI policies and systems that account for varied lived experiences, contributing to outcomes that are more equitable and less likely to perpetuate systemic discrimination.[11]

Adopt Human Rights Impact Assessments:

AI policies should be rooted in a human rights framework. Human Rights Impact Assessments (HRIAs) are powerful tools to ensure that AI technologies respect fundamental rights such as privacy, equality, freedom from discrimination, and the right to work.[12] Before developing or deploying AI systems, governments and organizations should conduct HRIAs to identify any potential adverse impacts on individuals' rights, especially the rights of women and marginalized groups.

A rights-based approach requires constant monitoring and evaluation of AI systems to ensure compliance with human rights standards throughout their lifecycle. Incorporating human rights principles into AI policies also involves adhering to internationally recognized agreements, such as the Universal Declaration of Human Rights and the Convention on the Elimination of All Forms of Discrimination Against Women **(CEDAW)**.

8 UNESCO. (2020). Artificial Intelligence and Gender Equality: Key findings of UNESCO's Global Dialogue
9 Binns, R. (2018). Fairness in Machine Learning: Lessons from Political Philosophy
10 European Commission. (2021). Gendered Innovations 2: How Inclusive Analysis Contributes to Research and Innovation.
11 West, S. M., Whittaker, M., & Crawford, K. (2019). Discriminating Systems: Gender, Race, and Power in AI.
12 Human Rights Council. (2021). Report on the Impact of Artificial Intelligence on Human Rights.

Develop Gender-Sensitive AI Standards and Guidelines:

International organizations, industry associations, and governments need to collaborate to establish AI standards and guidelines that are explicitly gender-sensitive and human rights-focused.[13] These guidelines should provide clear criteria for ensuring that AI systems do not reinforce gender stereotypes or discrimination, and that they promote inclusivity and equality.

Today's digital world is ruled by the collection and consolidation of information and digital data, which is wielded by corporations primarily to generate profit. Frequently used to develop algorithms that guide users' activities online, the data collected often display gender or racial biases, replicating and reinforcing systems of oppression that structure our offline worlds within the design of ICTs.

This situation has profound ramifications for marginalized populations: algorithms are involved in the vast majority of users' online activities, from applying for bank loans to conducting searches on job-listing websites. Algorithms display different information and results for different users, with the result that access to ICTs, as well as user identity, guides key life decisions and outcomes.[14] These disparities demand further intervention at the level of digital governance, with an emphasis on data transparency and platform policies that acknowledge and address the varied impacts of data collection on marginalized populations

For instance, AI systems used in areas such as hiring, healthcare, and law enforcement should be scrutinized to prevent gender bias in decision-making processes. Setting standards for algorithmic transparency and accountability will also ensure that AI systems can be audited for compliance with gender and human rights norms.

Promote Gender-Responsive AI Education and Training:

Capacity-building initiatives play a pivotal role in integrating gender and human rights perspectives in AI. Policymakers, AI developers, and other stakeholders must be equipped with knowledge and skills related to gender equality and human rights.[15] Offering specialized training programs in gender-sensitive AI design, algorithmic bias, and ethical AI practices will ensure that those involved in AI development understand the broader societal implications of their work. Moreover, it is essential to encourage more women and gender minorities to pursue careers in AI through education and mentorship programs.[16] Increasing their presence in the tech industry will help shape AI systems that reflect a wider range of perspectives and contribute to more inclusive outcomes.

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13 United Nations. (2020). Universal Declaration of Human Rights (UDHR)

14 Ceia, V., Nothwehr, B., & Wagner, L. (2021). Gender and Technology: A rights-based and intersectional analysis of key trends. Accessed via https://oxfamilibrary.openrepository.com/handle/10546/621189

15 International Telecommunications Union. (2021). AI for Good Global Summit Report.

16 Whittaker, M., Crawford, K., & Dobbe, R. (2021). The AI Now Institute's 2021 Annual Report.

Create Mechanisms for Accountability and Redress:

An essential aspect of integrating gender and human rights in AI policy is the establishment of mechanisms for accountability and redress.[17] If an AI system causes harm or discrimination, there should be clear channels through which affected individuals can seek justice. Governments should set up independent regulatory bodies to monitor AI systems, investigate complaints, and enforce regulations that protect human rights and gender equality.[18]

Additionally, AI policies should include provisions for algorithmic transparency, ensuring that AI developers are required to disclose how decisions are made and the data sources used.[19] This will help to identify potential biases and allow for timely interventions when AI systems harm vulnerable populations.

8.3   Gender and Human Rights Gaps in Uganda's Legal and Regulatory Frameworks

These gaps can be understood in the context of broader challenges related to gender equality in the tech and innovation sectors. Here are some of the main gender gaps related to AI in Uganda's legal and regulatory frameworks:

Lack of Gender-Specific AI Policies;

 Most of Uganda's AI-related policies, such as the National Fourth Industrial Revolution (4IR) Strategy and the ICT Innovation Framework, do not explicitly address gender issues. While these frameworks encourage the adoption and development of AI, they fail to incorporate specific provisions for ensuring gender inclusion or addressing the underrepresentation of women in AI research, development, and leadership.

Digital Gender Divide;

Uganda continues to experience a digital gender divide, with fewer women having access to digital tools and technology compared to men. While policies like the Uganda Digital Vision seek to drive digital inclusion, they don't fully address the barriers women face in accessing AI-related opportunities, such as limited access to education in AI fields, lower digital literacy, and socio-cultural factors that discourage women from engaging with tech.

Underrepresentation of Women in AI and Tech Fields;

Women are significantly underrepresented in AI development and innovation in Uganda, a gap not sufficiently addressed in the regulatory frameworks. There are no specific legal measures encouraging the participation of women in AI development, such as promoting women-led AI startups, scholarships for women in AI education, or affirmative action programs within tech hubs and innovation incubators.

Bias in AI Systems and Lack of Gender Impact Assessment;

AI systems in Uganda, as elsewhere, may inadvertently perpetuate gender biases due to the lack of gender-sensitive data or biased algorithms. There are no explicit regulatory frameworks requiring that AI systems undergo gender impact assessments to ensure that they do not reinforce existing inequalities or stereotypes. Legal provisions to encourage or mandate the use of gender-balanced datasets for AI training are absent.

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17 UNESCO. (2021). AI and Gender Equality: Engendering Artificial Intelligence – A Policy Toolkit.

18 Amnesty International. (2019). Surveillance Giants: How the Business Model of Google and Facebook Threatens Human Rights

19 Floridi, L. (2019). Establishing the Rules for AI Governance.

9. Findings and Discussions

9.1 Legal and regulatory framework governing Artificial Intelligence in Uganda

Understanding of Frameworks:

A majority of respondents understand the broader legal and regulatory frameworks on digital governance in Uganda, but specific AI-related laws are either non-existent or in the early stages of development.

Gaps in Legislation :

o   Existing laws like the Data Protection and Privacy Act (2019) and the Fourth Industrial Revolution Strategy are foundational but not tailored to address AI-specific issues, such as algorithmic bias, automated decision-making, and ethical concerns.

o   This lack of AI-specific legislation poses challenges in addressing biases within AI systems, ensuring accountability, and leveraging AI for Uganda's digital economy.

Government Prioritization:

Respondents believe the government has not prioritized AI as a key driver of digital transformation, limiting its potential benefits for sectors like healthcare, education, and agriculture.

Institutional Mechanisms:

o   The Uganda Communications Commission (UCC) established an AI taskforce, but it is criticized for lacking diversity (e.g., women, youth) and being ineffective.

o   Transparency and public engagement are minimal, undermining trust and the taskforce's functionality.

Recommendations for Improvement:

o   Amend existing digital governance laws to address AI-specific challenges in the short term, including provisions for algorithmic accountability, cybersecurity, and intellectual property for AI-generated content.

o   Ensure gender-sensitive and inclusive policy development by improving representation in decision-making bodies and conducting public consultations.

9.2. Gender Gaps in Uganda's AI Policymaking Processes

Exclusion of Women and Marginalized Groups:

o   Women, LGBTQI communities, and other vulnerable groups are largely excluded from AI policymaking due to systemic inequalities and cultural barriers.

o   The Anti-Homosexuality Act criminalizes LGBTQI perspectives, further marginalizing these communities.

Underrepresentation in Policymaking:

o   The digital and AI policy landscape is male-dominated, deprioritizing women's ideas and perspectives.

o   This results in a lack of gender-sensitive data, perpetuating gendered inequalities and vulnerabilities in AI governance.

Challenges of AI Bias:

o   AI systems often reflect global biases and fail to consider local contexts, leading to solutions that do not adequately address the needs of Ugandan communities.

Barriers to Women's Participation:

o   Limited digital skills among women and societal attitudes hinder their involvement in policymaking and AI development.

o   Gendered impacts of AI, such as online harassment and exploitation, are poorly addressed due to the absence of accountability mechanisms.

Recommendations for Inclusivity:

o   Conduct gender and human rights assessments and ensure equitable representation in AI policymaking.

o   Foster capacity-building initiatives to empower women and marginalized groups.

o   Promote mindset changes and dismantle cultural biases that limit women's participation in the digital ecosystem.

9.3. Broader Awareness and Capacity-Building Needs

Education on Emerging Technologies:

o   Broader awareness of emerging technologies, including AI, is critical to fostering deeper understanding and innovation.

o   Public awareness campaigns, training programs, and integrating AI into curricula are necessary steps to bridge knowledge gaps.

Global Best Practices:

o   Uganda should prioritize research and policy approaches informed by global best practices while tailoring them to local realities.

Transparency and Public Engagement:

o   Transparent governance mechanisms, regular reporting, and public consultations are crucial for building trust and accountability in AI policy development.

9.4. Digital Skills Gaps and Gender Inequality

- The lack of digital skills among women was identified as a significant barrier, limiting their participation in AI policymaking.

- The male-dominated policy landscape deprioritizes women's ideas, resulting in the absence of gender-sensitive data and policies.

The findings resonate with global and local insights from the literature review, which highlight the digital skills gap as a critical factor in perpetuating gender inequalities. In Uganda, structural barriers such as limited access to education, cultural biases, and unequal economic opportunities hinder women's ability to develop the technical expertise needed to engage in AI and digital governance.

Addressing these gaps requires targeted interventions, including:

1. Capacity-building programs for women in AI and digital governance.

2. Mentorship initiatives to promote female leadership in technology.

3. Policy frameworks that mandate gender parity in decision-making processes.

The absence of gender-sensitive data further underscores the need for equitable data collection

9.5. Lack of Gender-Sensitive Policies and Ethical Standards

- Respondents raised concerns about the absence of ethical standards and accountability mechanisms in AI policymaking, particularly regarding gendered impacts.

- Issues such as online harassment, exploitation, and gendered disinformation disproportionately affect women and girls.

The literature review highlights the importance of ethical frameworks in mitigating the adverse impacts of AI on vulnerable populations. Without such standards, AI systems can exacerbate existing inequalities, including gender-based violence, discrimination, and online harassment.

The findings emphasize the need for:

1. Gender and human rights assessments to evaluate AI's societal impacts.

2. Gender audits of existing policies to identify gaps and opportunities for improvement.

3. Mechanisms to address online harassment and disinformation, including stronger enforcement of the Data Protection and Privacy Act (2019).

By integrating ethical considerations into AI policymaking, Uganda can reduce the risks associated with AI deployment and foster a safer digital environment for women and marginalized groups.

9.6. Gender Denialism and Resistance to Inclusive Policies

- Limited awareness of the gendered impacts of technology was identified, with some respondents dismissing gender concerns as irrelevant or exaggerated.

- Scepticisms toward gender-related issues hinders the adoption of gender-sensitive approaches to AI policymaking.

The findings point to a broader cultural resistance to addressing gender inequality, which is rooted in patriarchal norms and societal biases. The literature review highlights similar challenges, noting that gender denialism undermines efforts to create inclusive and equitable digital policies.

To counter this resistance, Uganda must prioritize:

1. Awareness campaigns to educate stakeholders about the gendered impacts of AI and technology.

2. Cultural transformation initiatives to challenge discriminatory norms and promote gender equality.

3. Evidence-based advocacy to demonstrate the benefits of inclusive AI policies for national development.

Further research is needed to explore the extent of gender denialism in Uganda's digital

ecosystem and its influence on AI governance processes.

The findings for Research Question Two reveal a lack of inclusivity in Uganda's AI policymaking processes, with significant barriers to the participation of women and marginalized groups.

Key challenges include:

1. Exclusion of marginalized voices, particularly LGBTQI communities and women.

2. Digital skills gaps that limit women's engagement in AI governance.

3. Absence of ethical standards and accountability mechanisms to address gendered impacts.

4. Cultural resistance to gender-sensitive policy making.

Addressing these challenges requires a multi-faceted approach, including capacity-building, gender audits, ethical governance frameworks, and cultural transformation initiatives. By fostering inclusivity and diversity, Uganda can create AI policies that are equitable, representative, and capable of addressing the needs of all citizens.

9.3 Integrating human rights and gender perspectives into AI governance in Uganda

Integrating gender and human rights perspectives into AI and digital governance policy making processes is vital for Uganda. Respondents emphasized the importance of ensuring diverse perspectives, including those of women, and fair representation in key institutional bodies such as the newly established AI task force. While the need for an AI policy is widely acknowledged, many respondents expressed concerns that, in its urgency, Uganda might adopt AI policies and laws modelled on those of developed countries without adequately reflecting local and national realities. Laws and policies tailored to governing AI are crucial for promoting transparency and accountability.

The proliferation of AI surveillance technologies in Uganda's public sphere emerged as a significant concern, particularly in the context of the country's upcoming general elections in 2026. These technologies could undermine human rights and the rule of law if left unchecked. Respondents emphasized the importance of integrating gender and human rights standards into AI policymaking, advocating for a human-centric approach to AI policy and regulation. This should include the use of gender and human rights impact assessments, such as gender audits, to ensure inclusivity and fairness.

To further promote a multi-stakeholder approach and highlight the roles of various actors in AI and digital governance, respondents recommended establishing independent oversight mechanisms for auditing AI policy decisions. Such mechanisms were viewed as critical for advancing Uganda's nascent AI sector.

Key recommendations for advancing AI policy and governance in Uganda included prioritizing AI funding, investing in AI research, addressing the gendered impacts of AI from an intersectional perspective, encouraging women to pursue STEM courses, fostering mindset change, and raising public awareness. Development partners such as Enabel and regional initiatives like SMART Africa were recognized for their roles in promoting the rights of women and girls. Additional recommendations focused on enhancing digital literacy and inclusive education, raising public awareness, addressing broadband connectivity challenges, building capacity, and fostering participatory policymaking processes.

The findings for this research question underline the critical importance of embedding gender

and human rights considerations into Uganda's AI and digital governance frameworks.

These findings are discussed in light of the literature review as follows:

1. Importance of Diverse Perspectives and Fair Representation

- Respondents emphasized the need for fair representation of women and other marginalized groups in key institutional bodies, such as the AI task force.
- Concerns were raised about Uganda adopting AI policies modelled after developed countries guidelines without reflecting local realities.

The literature review aligns with these findings, highlighting the importance of inclusive and localized policymaking processes. Global AI policies often fail to address the unique socio-cultural and economic realities of developing countries like Uganda. Adopting such models without customization risks perpetuating inequalities and overlooking the needs of women and marginalized groups.

Ensuring fair representation in institutional decision-making, including the AI taskforce, is essential for fostering inclusivity and addressing systemic inequalities in AI governance. Uganda must prioritize a bottom-up approach that involves diverse stakeholders and contextualizes global best practices to align with local realities.

2. Risks Associated with AI Surveillance Technologies

- Respondents expressed concerns about the proliferation of AI surveillance technologies, particularly in the context of the 2026 general elections.
- These technologies could undermine human rights and the rule of law if left unchecked.

The findings resonate with global concerns about the use of AI surveillance technologies, which often lead to violations of privacy, freedom of expression, and other human rights. The literature review underscores the need for regulatory frameworks to govern AI's deployment, ensuring transparency, accountability, and compliance with human rights standards.

Uganda must adopt a human-centric approach to AI policymaking, prioritizing ethical considerations and safeguards to protect citizens' rights. **This includes:**

1. Conducting human rights and gender impact assessments, such as gender audits, to evaluate the implications of AI technologies.
2. Implementing oversight mechanisms to regulate AI's use in sensitive areas like elections, law enforcement, and public spaces.

3. Recommendations for Advancing AI Policy and Governance

- Respondents highlighted key recommendations, including prioritizing AI funding, investing in research, promoting STEM education for women, raising awareness, and fostering mindset changes.
- Development partners like Enabel and initiatives such as SMART Africa were recognized for their roles in promoting gender-sensitive digital governance that contributes to fostering inclusive AI policies.

The findings align with the literature review's emphasis on a multi-stakeholder approach to AI

governance. Effective AI policymaking requires collaboration among government, private sector actors, academia, civil society, and international development partners.

Key strategies for advancing gender and human rights perspectives in AI governance include:

1. Promoting STEM education for women and girls: Encouraging their participation in AI-related fields addresses the gender skills gap and fosters diversity in AI development.

2. Raising public awareness: Educating citizens about AI's opportunities and risks promotes informed participation in policy discussions.

3. Fostering mindset changes: Tackling cultural biases and stereotypes is crucial for creating an enabling environment for women and marginalized groups in AI governance.

4. Addressing broadband connectivity and capacity-building: Bridging the digital divide ensures that all citizens can benefit from AI advancements.

International collaborations and regional initiatives like SMART Africa play a vital role in building capacity, sharing best practices, and promoting inclusive AI policies.

4. Independent Oversight Mechanisms

- Respondents recommended establishing independent oversight mechanisms to audit AI policy decisions.

The need for independent oversight mechanisms aligns with the literature review's call for transparent and accountable governance structures. Such mechanisms are essential for ensuring that AI policies are implemented ethically and inclusively.

Independent bodies can:

1. Monitor compliance with gender and human rights standards.

2. Audit AI systems for biases and unintended consequences.

3. Provide recommendations for improving AI governance frameworks.

These mechanisms also enhance public trust in AI technologies and their governance.

Integrating gender and human rights perspectives into AI policymaking processes in Uganda requires a multi-pronged approach that addresses systemic inequalities and promotes inclusivity.

Key priorities include:

1. Ensuring fair representation of women and marginalized groups in decision-making bodies.

2. Adopting localized and human-centric AI policies tailored to Uganda's realities.

3. Regulating AI surveillance technologies to safeguard human rights and the rule of law.

4. Investing in STEM education, capacity-building, and digital literacy to bridge skills gaps and promote diversity.

5. Establishing independent oversight mechanisms to enhance transparency and accountability.

By embedding gender and human rights considerations into AI and digital governance

frameworks, Uganda can create policies that are equitable, inclusive, and aligned with its socio-economic development goals.

Areas for Future Research

Based on the findings and discussions, three significant **areas of research to prioritize are**:

1. Gender and AI in Uganda

- **Rationale**: The findings highlight significant gender disparities in AI policymaking, digital skills, and representation in Uganda. Women and marginalized groups face systemic barriers that hinder their participation in AI and digital governance. Addressing these disparities is crucial for creating inclusive policies and ensuring equitable access to opportunities.

- Key Research Focus:
    - Investigate the socio-cultural and systemic barriers limiting women's participation in AI and digital policymaking.
    - Assess the effectiveness of existing gender-sensitive initiatives in addressing these disparities.
    - Explore the intersectionality of gender with other marginalized identities (e.g., rural women, LGBTQI communities) in AI-related contexts.

2. AI and Human Rights in Uganda

- **Rationale**: The proliferation of AI surveillance technologies in Uganda, especially in the public sphere and during electoral processes, poses significant risks to human rights, including privacy, freedom of expression, and equality. Integrating human rights standards into AI governance is critical to mitigating these risks.

- Key Research Focus:
    - Analyze the impact of AI technologies on privacy, surveillance, and democratic freedoms in Uganda.
    - Evaluate the role of human rights assessments in shaping AI policies.
    - Investigate mechanisms to ensure accountability and transparency in the deployment of AI systems.

3. Localized Data and Contextual Biases in AI

- **Rationale**: The findings highlight that AI systems often fail to reflect local realities, leading to biases that undermine their effectiveness in addressing Uganda's unique challenges. Developing localized AI solutions that account for Uganda's cultural and socio-economic diversity is essential for meaningful AI adoption.

- Key Research Focus:
    - Study the challenges in creating localized datasets that accurately represent Uganda's diverse communities.
    - Investigate the impact of biases in globally developed AI systems on Ugandan users.
    - Explore methods to align AI systems with Uganda's local contexts, particularly in sectors like agriculture, education, and health.

These areas for further research study are interlinked and address foundational challenges in Uganda's AI policy and governance landscape. Research in these fields would not only inform the development of inclusive, rights-based, and contextually relevant AI policies but also ensure that AI technologies benefit all segments of society equitably.

10 Recommendations

The following are key recommendations from the study:

1. **Context-Specific AI Policy and Governance:** Develop AI policies and governance frameworks that are tailored to Uganda's local context and realities.

2. **Investment in AI Research:** Prioritize funding and support for AI research to drive innovation and inform policy decisions.

3. **Capacity Building and Inclusive Education:** Strengthen capacity through awareness campaigns and inclusive education and training programs to empower diverse stakeholders.

4. **Stakeholder Integration:** Ensure the active involvement of all relevant stakeholders in AI policy governance and decision-making processes.

5. **Institutional Mechanisms and Oversight:** Establish institutional mechanisms, including independent AI oversight bodies, to ensure accountability and transparency.

6. **Human Rights and Gender Integration:** Embed human rights and gender frameworks into AI policy design and implementation.

7. **International Benchmarking:** Adopt best practices from international bodies to inform and enhance Uganda's AI governance frameworks.

8. **Connectivity Challenges:** Address pervasive internet and broadband connectivity issues across the country to ensure equitable access to digital technologies.

11. Conclusion

The research underscores the critical need to integrate gender and human rights perspectives into AI and digital governance frameworks in Uganda. The findings reveal that while the AI policy landscape in Uganda is still in its infancy, the absence of comprehensive legislation, ethical standards, and oversight mechanisms presents significant challenges. These gaps hinder the country's ability to harness AI's transformative potential while exacerbating vulnerabilities for women, marginalized groups, and minority communities.

The discussions highlighted that Uganda's policy making process must address systemic inequalities, cultural biases, and existing skill gaps, particularly among women. The lack of gender-sensitive data, coupled with limited representation of women and marginalized groups in decision-making bodies, perpetuates digital exclusion and undermines efforts to create inclusive AI policies. Furthermore, unchecked AI surveillance technologies pose risks to human rights and the rule of law, especially in the context of political processes like elections.

The recommendations provide a roadmap for advancing AI governance in Uganda, emphasizing a multi-stakeholder approach that includes diverse perspectives and fosters equitable representation. Key priorities include:

1. **Developing localized and human-centric AI policies** that reflect Uganda's socio-economic and cultural realities.

2. **Investing in STEM education, digital literacy, and public awareness** to bridge the gender skills gap and promote participation in AI development and policy making.

3. **Establishing independent oversight mechanisms** to enhance transparency, accountability, and ethical compliance in AI governance.

4. **Collaborating with development partners and regional initiatives** to build capacity, share best practices, and promote inclusive policy frameworks.

By adopting these strategies, Uganda can address existing inequalities, mitigate risks associated with AI technologies, and create an enabling environment for leveraging AI as a tool for sustainable development. Integrating gender and human rights perspectives into AI governance is not only a matter of equity but also a prerequisite for fostering trust, innovation, and socio-economic progress in the digital age

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