Chapter 4

Expanding geographies of accountability: rising contestations of Big Tech in Africa, and their meaning for policymaking

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Abstract

This chapter examines two diametrically different cases of contestation of the narratives and practices advanced by Big Tech in Africa. One is the challenge brought by content moderators in Kenya to the company Meta, accused of imposing dire working conditions on them under the questionable banner of impact sourcing – an alternative to development aid, seeking to offer dignified work to the poorest. The other is the shutdown of Facebook during the 2021 Ugandan elections, motivated by a selective takedown by the platform of pages and users tied to political parties. Despite the obvious disparities, both cases are indicative of an expansion of the areas in which Big Tech is being asked to account for its power, including the marginal spaces where tech companies have historically sought immunity for the consequences of their actions. They also reveal greater confidence emerging in Africa, and a willingness to reject or redefine the position of subalternity in which the continent has been placed since the diffusion of the global internet. As we argue at the end of the chapter, while this re-definition of roles has inspired new ways to act, it has not been able to shape new policies, which still tend to replicate old forms of dependency. And yet, greater opportunities exist to experiment with forms of cooperation, as Achille Mbembe stressed, that can find inspiration in Africa's long tradition of flexible, networked sovereignty.

Unprecedented efforts are coalescing to leverage Artificial Intelligence (AI) to address some of Africa's seemingly intractable challenges. Compared with earlier attempts to use Information and Communication Technologies (ICTs) to support economic growth and improve service delivery, however, this new wave of applications of digital innovations is marked by greater ambivalence and complexity (Schelenz & Pawelec, 2022). Alongside old tropes, framing the continent in terms of what it lacks and needs to acquire to avoid being left behind, new forms of contestation towards innovations imposed from above and new visions of Africa's role in global digital transformations have begun to emerge.

This chapter highlights some of the tensions rising between old and new frames applied to and emerging from digital Africa; between the tendency to replicate long-standing schemes, accepting Africa's destiny to chase innovations and opportunities coming from outside, and the new energies and sense of confidence that seem to animate parts of the continent, especially as they interface with the power of Big Tech.

We first offer a brief outline of some of the drivers that are making this conjuncture in Africa's digital journey different from previous ones, from an experiential, geopolitical, and conceptual angle. We then analyse two contrasting cases, from Kenya and Uganda, that illustrate how different actors in Africa – from labourers at the bottom of the digital value chain, to ministers in national governments – are contesting some of the practices and imbalances allowing tech giants to extract value from and exercise influence over countries in the Global South. We argue that these forms of contestation, while emanating from Africa, have global significance, generating expanding geographies of accountability that force large tech companies to face the real costs (at an economic, political, and social level) of their global operations. We conclude by examining how some of these forms of resistance can inform better and more locally grounded policymaking on diverse areas related to Big Tech in Africa – including AI, digital markets, taxation, and the gig economy – rather than simply replicating international templates.

Transforming digital visions and practices in Africa

Many African end-users have experienced first-hand the dramatic fading of the expectation that digital tools will serve as "liberation technologies" (Diamond, 2010). There are also growing questions around the promises of connectedness and entrepreneurship made by Big Tech, whose hypocrisy has been dramatically exposed by a steady stream of leaks. Former

Facebook employee Francis Haugen offered evidence as to just how unequal social media content moderation is, disclosing how Meta has been slow to act on evidence of conflict-provoking uses of its platform in Ethiopia’s civil war (Paul & Milmo, 2021); and when it did start to respond and take seriously the failures of content moderation, it did so tepidly, with insufficient resources and a lack of urgency. Similarly, Mark MacGann revealed how African workers have been seen as expendable by Uber executives (Davies et al., 2022). As the leaks revealed, after being lured into the business by promises of entrepreneurship, freedom and shared ownership, Uber drivers and couriers were progressively undermined by strategic decisions made by their own executives to increase Uber’s commissions and force drivers to work additional hours and reach into dangerous neighbourhoods to make a profit (MacMillan, 2022). “In public, Uber repeated a message that its service empowered people to become ‘entrepreneurs’. In private email exchanges, company officials referred to drivers as a mass of ‘supply’ whose low pay and minimal job protections were necessary for Uber to profit” (MacMillan, 2022). As a result, while entering the Uber workforce seemed an opportunity to join the middle class when the company first opened shop in countries such as South Africa, Ghana and Kenya, for many drivers and couriers, survival had become the main goal only a few years later (Webster & Masikane, 2021).

From a geopolitical standpoint, the initial global expansion of the internet coincided with the seemingly unstoppable wave of democratisation that followed the fall of the USSR, making the processes of technological and institutional transformation appear almost synonymous. Contemporary advancements in the digital space are taking place in a significantly different environment, where two powers – the USA and China – are clashing and competing for global leadership (Lee, 2018). As part of this race, concerns that the export to Africa of technologies and applications developed in China will embolden state surveillance and control have been leveraged to encourage resistance to Chinese technology and infrastructure (Gravett, 2020; Kerley et al., 2022). However, the excessive emphasis on China’s role in these processes has prevented examination of the responsibilities of other international actors that have provided solutions to authoritarian regimes (Feldstein, 2019; Gagliardone, 2019), or have promoted digital solutions as technical fixes to complex social issues that in actuality require deeper public engagement (Green, 2019). The increasingly heated discourse between the two superpowers has offered ammunition to those warning of a ‘digital cold war’ between the USA and China (Champion, 2019). However, from an African standpoint this rivalry appears very different from the one between the USA and the USSR. While the US has intensified pressure on African states to abandon partnerships with Chinese companies (Gardner, 2023), most African states have resisted taking sides, instead enjoying greater negotiating power to enforce their own vision of the information society.

Conceptually, innovative scholarship emerging from Africa (and/or from a radical repositioning of the continent) is giving visibility to the legacies of colonial domination (Gagliardone et al., 2023; Kimari & Ernstson, 2020) and to locally rooted forms of imagination and innovation (De Laet & Mol, 2000; Mavhunga, 2017; 2018). These reinvigorated efforts at decolonising scholarship, as well as tech infrastructures and platforms, have begun offering new frameworks to interpret technological development, challenging persistent stereotypes of African nations being condemned to uncritically replicate innovations from the Global North. Rather, they stress African agency in imagining distinct technological futures (Mavhunga, 2017). Alongside new scholarship emerging from or focusing on Africa, research on "postcolonial computing" (Irani et al., 2010) and "decolonial computing" (Ali, 2016) has pointed to critical imbalances of power in the design and application of technological artefacts, in ways that offer traditionally marginalised groups new avenues for contestation and for promoting more inclusive forms of innovation. They have stressed how a 'disembodied' perception of innovation, framed as the result of a neutral process led by experts, has in actuality led to the incorporation of sets of values and principles that have favoured a specific minority (white, male, educated, affluent), with significant consequences for other groups, based on race, gender, education, and class (Ali, 2016; Cave & Dihal, 2021). These approaches are commanding increasing attention and are originally informing emerging debates on inequalities, ethics and labour relations; especially with regard to forms of discrimination that digital innovation, including AI applications, may deepen or introduce (Floridi et al., 2020; Umbrello & Van de Poel, 2021). These debates – while often championed by academics – have also found resonance (in different forms and to different degrees) among other actors in Africa and globally, challenging the narratives of benevolent innovation and connectedness promoted by tech giants.

Asserting digital workers' rights in Kenya… and the rest of the world?

Disruptive digital innovations lend themselves to narratives that extol the power of the machine; its ability to produce, unaided, outcomes previously thought unattainable or unimaginable. These narratives also tend to conceal the 'dirty work' required for the machine to sustain its image of prowess and automation. Armies of data workers are required to ensure the integrity of datasets used to train AI models, or to remove content from social networking platforms to reduce their toxicity (Crawford, 2021). These workers are spread around the world, and the conditions under which each operates are significantly different.

Despite the pledges made to act ethically and fairly, the maximisation of profits pursued by Big Tech has encouraged companies such as Meta, OpenAI and TikTok to exploit imbalances of power and rights in the international division of digital labour. Data workers contracted in the Global South not only receive lower wages than their counterparts in North America or Europe; they also have fewer protections, and their remoteness contributes to the process of invisibilisation engineered to anonymise workers and conceal the contribution of their work from users' experiences (Gray & Suri, 2019). As Muldoon and Wu (2023) stressed, the work required in the training of large language models such as ChatGPT – and the same applies to the operations of social networking platforms – follows a colonial supply chain, reinforcing the legacies of historical colonialism and existing power imbalances. As they point out, "the work is structured in a way to render invisible the contributions of workers in the majority world from the public imaginary of AI's production, preferencing the so-called highly skilled work of engineers" (Muldoon & Wu, 2023, p. 13).

For a long time, this unequal distribution of labour, benefits and responsibilities has gone unchallenged; couched in powerful narratives celebrating disruptive innovation, considered an inevitable feature of global capitalism, or justified through the creation of new practices and concepts such as 'impact sourcing'. Impact sourcing emerged in the late 2000s (in opposition to traditional forms of aid) as a type of outsourcing seeking to give dignified work to the poorest, in ways that would guarantee them a living wage and possibly benefit their immediate communities (Janah, 2017). The US company Sama (known until 2021 as Samasource) pioneered this practice, presenting itself as an 'ethical AI' company and winning large contracts from companies such as Google, Walmart, Microsoft and eBay for data cleaning, annotation and verification. They claimed that "Sama is driving an ethical AI supply chain that meaningfully improves employment and income outcomes for those with the greatest barriers to work" (Sama 2023, as cited in Muldoon et al., 2023, p. 2).

This narrative of transformative and compassionate transfer of value was seriously questioned, however, when a South African employee of Sama's office in Nairobi, Daniel Motaung, revealed the exploitative working conditions under which data workers in Kenya actually operated; and Billy Perrigo, a journalist for *Time* magazine, published a damning investigation based on the testimony of Motaung and other workers (Perrigo, 2022a). Motaung's accounts were related to the contract Sama had signed with Meta to provide content moderation on its Facebook platform in Southern and Eastern Africa, and revealed critical information about how both Sama and Meta treated and thought of data workers in Kenya.

After gaining access to Sama's payslips, *Time* revealed that workers in Kenya received as little as USD1.50 per hour, among the lowest rates paid to Sama's employees on the planet (Perrigo, 2022a). The calculation of these salaries is supposedly based on the company's mandate to pay a living wage in a way that will not distort local labour markets, and follows the 'Anker Methodology for Estimating a Living Wage' supported by organisations such as the International Labour Organisation. However, research on Sama's operations in East Africa revealed circumstances in which the company had transgressed its own – widely publicised – commitment to pay these minimum standards, in response to pressure from clients and an increasingly competitive market (Muldoon et al., 2023). Additionally, the working regime under which Sama's employees operate seems to contravene the promise of dignified work advertised by the company. Through a digital monitoring system, workers' activities are closely observed to determine whether they are 'productive', 'idle' or 'out of focus' (Muldoon et al., 2023). Their 10-hour working day amounts to an endless series of decisions that are closely monitored and must be made in seconds in order to meet strict performance targets.

To add to the precarious and taxing nature of the job, for the contract signed by Sama with Meta, data workers were required to moderate highly disturbing content, including graphic images or videos depicting dismemberment, murder and rape; causing some of them to develop post-traumatic stress disorder (PTSD), anxiety, and depression (Perrigo, 2022a). In the summer of 2019, the combination of these factors motivated Daniel Motaung and other content moderators to threaten Sama that they would strike within days unless they were given better pay and working conditions. However, as Perrigo (2022a) reported:

> "Instead of negotiating, Sama responded by flying two highly-paid executives from San Francisco to Nairobi to deal with the uprising. Within weeks, Daniel Motaung, the attempted strike's leader who was in the process of formally filing trade union papers,

> had been fired – accused by Sama of taking action that would put the relationship between the company and Facebook at 'great risk'."

Three years later, through the support of Foxglove, a non-profit organisation providing legal representation to tech workers, and following *Time*'s exposé, Daniel Motaung took Sama and Meta to court.

Motaung's move – and the national and global support it received – is an important indication of the changing attitudes among tech workers in the Global South; and more generally of shifting perceptions about the limits of exploitation and extraction, even if couched under the banners of digital innovation and opportunity. It ties up with other experiences seeking to provide new frameworks and processes to protect platform workers and expand their rights (Cano et al., 2023; Graham et al., 2020), but it was the first to emerge from the bottom up, from a coordinated effort among platform workers in Africa. At the same time, Sama and Meta's responses to Motaung's claims as the legal case unfolded reflect the determination of tech giants not to back down, reaffirming and continuing to exploit existing imbalances of power.

Motaung's requests to the court fell into two categories. On the one hand, recognition that he and his fellow workers had rights similar to those granted to Facebook workers and content moderators operating in Europe and the US, including adequate mental health support and better pay. On the other hand, recognising key provisions of the legal frameworks existing in the countries where data workers operate, including the rights to strike and form unions.

Meta's reaction was at once arrogant and ineffective. The company not only resorted to its usual playbook, arguing it had no registered office in Kenya, did not operate in the country, and was thus not a party to the legal challenge against worker exploitation; it also filed a request for a 'gagging order' to prevent Daniel Motaung from speaking about the case. The request was later withdrawn, after a coalition of more than eighty organisations and prominent individuals (including whistle-blower Frances Haugen) signed a petition accusing Meta of discrimination towards an African and black employee, treated as a 'second-class digital citizen' (Rashad Robinson, cited in Perrigo, 2022b). Similar requests had not been made in the past for other Meta employers-turned-critics or whistle-blowers (Perrigo, 2022b). Finally, following the bad publicity surrounding the case, in January 2023 Meta terminated the contract with Sama and switched to Majorel, another outsourcing company operating in Kenya. Overnight, all Sama employees providing content moderation for Facebook not only lost their jobs, but – in apparent retaliation for their actions, criticism, and determination to speak to the press – were covertly barred from gaining employment at Majorel. As Foxglove reported, "messages between moderators and Majorel recruiters reveal that the recruiters were specifically instructed not to hire any moderators previously employed by Sama. One recruiter said: 'Unfortunately they will not accept candidates from Sama, it's a strict no'" (Hegarty, 2023a). In response to these revelations, some of the sacked moderators filed a civil application against Meta, Sama and Majorel.

When asked to adjudicate the cases between the data workers and their employers, Kenya's courts emerged as unanticipated challengers of the status quo. In a series of unprecedented moves, Kenyan judges not only declared Meta a 'proper party' to the case (Dark, 2023), but in June 2023 ruled that Meta, and not Sama, was the 'true employer' of the content moderators in Kenya, meaning it was also legally responsible for them (Hegarty, 2023b). This ruling, the first of its kind in the world, has potential game-changing consequences for tech giants, challenging their ability to exploit imbalances of power and rights while remaining unaccountable for the dire conditions under which their outsourced employees must operate. It also carries an important message for content moderators in Africa and globally, countering the process of their invisibilisation, and illustrating how standing up for better working conditions and the recognition of basic rights, even against some of the world's most powerful companies, can find support in an expanding network of institutions, activists and media.

Internet shutdowns as (extreme) forms of contestation

The second case we address offers an arguably more controversial example of how different actors in Africa are contesting the power of Big Tech, demanding accountability for actions that have profound consequences for a country's political life, but for which tech companies have persistently denied responsibility. Elections are often a time when concerns around the shortcomings and weaknesses of content moderation and factchecking systems are amplified, and rightly so. Recent elections in Uganda offer some insights. Similarly to the previous case, however, it is indicative of new energies and narratives that are animating parts of the continent, and of the willingness of a number of actors in Africa to contest existing imbalances of power, even when their actions come at a cost.

Six days before Uganda's highly contested January 2021 elections, Facebook took down 32 pages, 220 user accounts, 59 groups and 139 Instagram profiles linked to the Ugandan government and the ruling National Resistance Movement (NRM) (Knight, 2021), arguing that these accounts were "engaged in CIB (Coordinated Inauthentic Behaviour) to target public debate ahead of the election" (France24, 2021). This included using "fake and duplicate accounts to manage pages, comment on other people's content, impersonate users, [and] re-share posts in groups to make them appear more popular than they were". The accounts included that of President Museveni's senior press secretary, Don Wanyama, as well as accounts linked to the Citizens Interaction Centre at the Ministry of Information. In response to this move, before election day the Ugandan government blocked Facebook in the country, restoring access only six months later.

This measure, which for the days immediately before and after the elections extended to a full shutdown of the internet in Uganda, was strongly condemned (Association for Progressive Communications, 2021). And rightly so; internet shutdowns violate rights to freedom of expression and access to information, and can have significant economic costs for already fragile economies (Woollacott, 2024). However, these forms of condemnation – which for the most part come from governments and civil society organisations in the Global North – seem unconcerned about the reasons that may motivate such extreme measures. Couched in strong human rights rhetoric, they mostly stop at attaching blame to the governments responsible for shutdowns, extending the long trajectory of framing African countries, as Achille Mbembe has argued, as "a pathological case, as a figure of lack", falling short of expected standards, and resorting to ranking and indices to "measure the gap between what Africa [is] and what we were told it ought to be" (Mbembe et al., 2010, p. 656). These reactions do not create the space to ask different questions, pointing to deeper but largely unexplored motivations driving shutdowns. Below – building on interviews with some of the very actors involved in the removal of the Facebook pages and accounts, as well as in the shutdown itself – we discuss both the structural drivers and the specific circumstances behind the Ugandan shutdown.

At a structural level, even if internet shutdowns are the expression of a power that is at once arrogant and insecure, and are often ordered by ageing leaders who have long overstayed their time in office (CIPESA, 2019), they are also a reflection of the uneven relationships that social networking platforms have with more and less powerful countries. These imbalances have very practical repercussions, along different dimensions: on the quality of the content moderation offered, on the capacity of national governments to interface with companies, and on the very ability of post-colonial states to shape their media systems.

As an increasingly long line of whistleblowers from Meta have vividly illustrated, social media companies have long been aware of the capacity of their platforms to sow division and antagonism – yet they have decidedly not prioritised content moderation in countries seen as more marginal markets (e.g. with a poorer consumer and advertising base). They have similarly been reluctant to acknowledge their responsibilities, or act in ways that are proportionate to the risks generated by their platforms. Despite the fact that hate speech and mis- or disinformation are more likely to intersect with violence in countries in crisis or conflict, content moderation has mostly been tied to financial incentives and disincentives. Investments in content moderation have focused on rich countries; or when they have extended to less lucrative markets, it has been in response to events that are US foreign policy priorities (Russia's invasion of Ukraine, for example), or to stories that have galvanised global public opinion, such as the genocide against the Rohingya in Myanmar (De Gregorio & Stremlau 2023). For low-resource languages, including many across Africa, the investment of resources and time is minimal (Milmo, 2021). As a result, as Meta whistleblower Francis Haugen has stressed, the most fragile countries end up using the least safe version of the platform (Zakrzewski & Albergotti, 2021).

These double standards in dealing with core and peripheral markets are also evident in how Big Tech companies interact with actors deemed powerful and resourceful. While Facebook has been forced to comply with Germany's demanding and costly requests to remove content violating its national laws (Nicola & Jennen, 2017), it has largely dismissed demands originating from African leaders and legislators. While this is not always without merit, Big Tech does not have offices in the vast majority of African countries and could arguably be pursuing an approach of strategic disengagement – seeking to profit from consumers using their products but attempting to stay as uninvolved as possible, in contexts they do not understand or have any intention of investing significant resources to engage with. By not having an office or physical presence, they are able to distance themselves from actually and directly providing a service.

Returning to the Ugandan case, following the block imposed by Facebook on the pro-NRM accounts – but not on accounts managed by the opposition, similarly displaying coordinated inauthentic behaviour – the government expressed its concerns in a letter to Facebook; but no action was taken on that content. As government spokesman Ofwono Opondo argued, a transparent process was not followed: "They have not told us the nature of the complaint. They have not written even to say we are going to switch you off. And so, it's a double standard" (Athumani, 2021). The inaction from Big Tech is underpinned by a powerful discourse on 'digital authoritarianism' and 'internet freedom,' heavily focused on countries such as Russia, Iran and China and their use of technology to "surveil, repress, and manipulate domestic and foreign populations" (Committee on Foreign Relations, 2020, p. 6; Freedom House, 2023). This aligns with a historical pattern in US foreign policy, framing global issues in binary terms. However, this approach overlooks differences in political and technical contexts between major powers and countries such as Uganda, Chad and Zimbabwe, as well as the complex challenges faced by Global South governments and the role of tech companies in moderating content that can impact stability and elections.

This inability to command the attention of and negotiate with tech companies ties in with the broader challenge historically faced by post-colonial states: an inability to shape media systems in ways that are informed by specific state- and nation-building projects. At independence, African governments have all faced demands to combine their sovereign rights with the ability to exercise a monopoly on authority and justice – shaped around the ideal of the Westphalian state, the formation of which took eight centuries in Europe. As Behera describes it, accepting the territorial state as the organising principle of authority meant overlooking how this

> "was an end product of a long and bloody struggle by state builders [in Europe] to extract coercive capabilities from other individuals, groups and organisations with their territories […] The newly sovereign states in the wake of the decolonisation period were expected to master and exercise such monopoly almost immediately after the transfer of power from the erstwhile colonial powers to the local ruling elites" (Behera, 2020, p. 147).

Post-colonial leaders such as Nyerere and Nkrumah envisioned media – print, radio, television – as state-building tools, imposing a form of authority without the 'long and bloody struggle’ seen in Europe. Until recently, African governments could largely control influential media through coercion, co-option or negotiation, except for international broadcasters such as the BBC World Service or Voice of America. However, social media platforms have disrupted this model, offering both popularity and an image of grassroots activism while remaining outside national authorities’ influence. Shutdowns, therefore, should be viewed within this broader state context, not just as isolated incidents.

The decision to block Facebook in Uganda reveals these structural limitations. For the NRM, Facebook's actions seemed one-sided, favouring the opposition before the elections, without a clear process to address the government’s concerns. Interviews highlighted that the decision to remove pro-NRM accounts was based on information flagged by a small fact-checking organisation focused on Africa. One of its employees involved in the Ugandan case shared that they had identified the NRM material only shortly before the election and sent it to Facebook and Twitter/X, which acted swiftly due to the organisation’s connections with those platforms. The employee admitted not having time to investigate the opposition.
From the NRM’s perspective, this appeared biased, leading to complaints that Facebook allowed opposition accounts while blocking pro-NRM content. President Museveni even criticised this perceived partiality, asserting:

> “If it’s [Facebook] operating in Uganda, it should be used equitably by everybody who wants to use it. If you want to take sides against the NRM, then that group will not operate in Uganda. Uganda is ours, it is not anybody’s… there is no way anybody can come [here] and play around with our country and decide who is good [and] who is bad. I’m therefore very sorry about the inconvenience to those who have been using this channel. We cannot tolerate the arrogance of anybody coming here to decide who is good and who is bad” (Monitor, 2021).

As an employee from the Uganda Media Centre – a government institution mandated to facilitate communication of government policies, programmes and projects to the public through the media – explained further, from the NRM’s perspective the actions seemed intended to give an advantage to the opposition:

> “Facebook de-activated the accounts of people who were pro-government/pro-NRM. The opposition were playing dirty… In terms of content, but also incitement and

> insults, opposition activists were ahead. The NRM crowd decided to fight back. When we squared up with them on bad language, our team was targeted. There was a lot of debate before this dirty-tricks team was set up. When Facebook targeted pro-NRM accounts, the government felt attacked, so they decided to shut down Facebook. The measure was 'hit back'. Facebook was seen to play dirty" (Anonymous, 2021).

The thinking behind the government's response was that shutting down the internet would help to equalise the social media influence, as neither the government nor the opposition would have access.

Acknowledging the long trail of events culminating in an internet shutdown, and the multiple responsibilities leading to such an outcome, does not mean siding with or justifying the actions of autocratic leaders. Many internet shutdowns amount to just another form of extraversion, turning ones' weaknesses (in this case, an inability to sustain inclusive processes of state- and nation-building) into strengths (the right to denounce any external interference in the running of state matters). Shutdowns also reflect a broad trend of leaders opportunistically hiding behind legitimate concerns – such as the deep inequalities between wealthy and powerful Big Tech, and poorer countries in the Global South – to support self-serving projects such as minimising the social media influence of opposition parties, or hindering domestic and international coverage of human rights abuses. Seeing shutdowns as a form of contestation, however, rather than simply dismissing them as abuses by despotic leaders, may open alternative avenues to respond to them.

Contestations, sovereignty and policy-making

The two cases discussed in this chapter are significantly different. One is a spontaneous, bottom-up response to a form of exploitation, emerging from individuals who felt deprived of their rights and dignity, and which found possibly unexpected support both in local institutions – Kenyan unions and courts – and international activist networks. The other is a unilateral, top-down decision by an increasingly despotic authority, taking advantage of a growing and widespread criticism of Big Tech and the 'normalisation' of internet shutdowns to turn frustration and impotence towards a greater but distant power into a reassertion of influence and control over a confined community. Taken together, however, they signal a changing trend in how African citizens, labourers and institutions are interfacing with the processes and practices of digital innovation.

In this concluding section we highlight two key features of this trend: one pointing outwards, at the consequences for powerful corporate actors; the other pointing inwards, at the repercussions on African citizens and workers deriving from often contradictory applications of digital sovereignty in post-colonial states in Africa.

Both Daniel Motaung's stand on Meta and the Ugandan government's response to the deletion of pro-NRM accounts are indicative of what we refer to as an expanding geography of accountability, with which tech giants are increasingly forced to come to terms. The actions taken against Meta, and the discourses articulated around them, reveal a new disposition to challenge once-powerful and widely accepted narratives promoted by Big Tech, and uncovering how some of their practices extend forms of domination from centres of innovation and capital accumulation onto African states, labourers and citizens. To date, only a small number of actors have had the willingness and power to stand up to Big Tech. The European Union, above all others, sought to uniquely devise legal instruments forcing tech giants to modify their approaches towards an expanding array of rights and duties, from privacy to taxation (Bradford, 2023). Africa – as evidenced in the leaks by Frances Haugen, in the responses to the challenges instigated by content moderators in Kenya, and in the carelessness of content moderation in Uganda – has until now not featured on the map of the territories from which tech giants would expect pushback, or to be held accountable for their behaviour. This state of affairs may have reached a turning point. In the possibly over-optimistic but impassioned words of one of the former Sama employees, the hurdles of African content moderators, and the attention they received, may become a rallying cry for new transnational forms of mobilisation:

> "My prayer, which has become a daily push, is to see all content moderators across the globe coming together and fighting for their rights. You know, from Africa to Asia, the US to Europe, and worldwide. […] Content moderators are not just workers, but safeguards, protectors who care for us when we enjoy browsing the internet. International workers' solidarity must continue to grow daily, because that is the only way we can change things' (Nkunzimana, 2024).

The Kenyan and Ugandan cases also illustrate the contradictory nature of digital sovereignty in post-colonial states. As Arindrajit Basu (Basu, 2024, p. 19) pointed out:

> "States often abuse the language of sovereignty to evade their responsibilities under international law and justify patterns of digital repression, [but] it is important to remember that sovereignty has also been an instrument for voicing the interests of the powerless, especially in postcolonial times. […] As much as governments exploit digital sovereignty to justify repressive practices, less powerful states and citizens also use the term to challenge existing political, economic, and social power asymmetries."

The experiences of the data workers in Kenya and the internet shutdown in Uganda offer good approximations of the poles of a continuum along which ideas and articulations of sovereignty exist. The first can be considered a case of sovereignty as recognition, where individual contestations of a regime considered unjust – exploiting the power imbalances existing between nation-states – are incorporated into a broader struggle, supported by national institutions. This coalition can force corporations to recognise and abide by national frameworks that limit their ability to exploit the weaknesses of less powerful states and reinforce individual claims. Asserting this type of sovereignty can restore rights that have been suppressed or neglected, in ways that can help to reduce the extraction of value from less powerful actors. It also carries the risk of pushing tech giants out of a specific market, seeking conditions elsewhere that will allow them to continue to benefit from imbalances of power and rights.

The second is a case of sovereignty as fetish, to borrow a terminology proposed by Achille Mbembe, and reassert his criticism of the obsession of postcolonial states with sovereignty, when this construct was foisted on them. As he argued, by adopting and fetishising the concept of 'nation-state' from colonial powers, African governments also "borrowed terms such as 'national interest', 'risks', 'threats' and 'national security', [which] refer to a philosophy of movement and a philosophy of space entirely predicated on the existence of an enemy in a world of hostility, disregarding our own long-held traditions of flexible, networked sovereignty" (Mbembe, 2017, p. 2). Enforcing this type of sovereignty amounts to playing a zero-sum game. It empowers one actor, while disempowering others. Blocking access to a digital platform can be a form of contestation, sending a powerful message that the rules of engagement between the owner of the platform and a government need to be renegotiated or clarified. It also amounts to depriving users – from citizens to businesses – of their ability to make use of that platform to achieve their own goals. Extending Mbembe's argument, African states could gain much greater leverage with tech giants and other states if they were less concerned with displaying their ability to enforce their sovereign rights, and could experiment instead with a renewed version of the networked sovereignty that characterised pre-colonial Africa. This sovereignty could take on different shapes.

One is regional integration. Unable to live up to the visions of Pan-Africanism, many nations have sought to create regional blocs that could at least allow experimenting with localised forms of cooperation and integration. Digital development and digital rights have seldom featured among these areas of experimentation, even if significant benefits could emerge from greater coordination in terms of scale and ability to pull resources. The other form of networked sovereignty is based not on geography, but on the possibility of specific issues to enable new ways of organising. Historically, the African Union has lacked the political backing and credibility a continent-wide institution needs to strip states of their sovereignty in specific areas and legislate on their behalf, in a similar way to what the European Union has done for decades. However, it may be worth remembering that the European Union was not created with a mandate as large as the one it has today; it had a much humbler beginning, in the European Coal and Steel Community (ECSC): a group of six states willing to allow a higher authority to make decisions in a very specific sector in the interest of the community as a whole, rather than responding to national interests. Could digital governance offer similar opportunities for African states to embark on a similar journey? In both cases, forming alliances can reveal unprecedented opportunities to command attention from powerful players in the digital space and counteract existing forms of exploitation.

We want to draw a final conclusion from the material and the arguments presented so far. While distinctive forms of contestation seem to be emerging from parts of the continent, indicative of a new conjuncture in how different actors in Africa are interfacing with processes and practices of digital innovation, the policies that are being developed in this phase seem to be unable to capture these energies, reproducing old tropes of the 'ICT for development' paradigm. As Ndaka points out in Chapter 9 of this volume, by analysing existing African AI policies,

> "These strategies seem to frame their goals around economic growth and technological growth, while muting other contextual economic and socio-ecological concerns that may induce inequality in the region. […] Inevitably, this kind of casual approach

benevolently gives tech companies investing in Africa a pathway to promote their corporate agendas and consolidate power through AI technology development and massive data accrual for profits".

As she acknowledges, "Despite emerging forms of agitation and radical debates about decolonising technology, the old, tired performance of global standards is still visible in the kind of policy framing seen in all the publicly available AI strategies for African countries."

Science and technology policies serve multiple functions, signalling both internally and externally the willingness and power of a state to create value and distribute opportunities. As Warigia Bowman (2023) illustrated, by analysing the evolution of ICT policies in East Africa, ICTs are highly visible in public debates and are able to evoke an image of modernity. Creating favourable conditions for their growth is a way to communicate to foreign corporate and state actors that a country is ripe for investment, and to offer citizens an image of a different, more prosperous future. It would be naïve to think of policies as manifestos, proclaiming radical changes that could frighten or confuse their intended audiences. At the same time, African states may find it difficult, over time, to reconcile developing policies that replicate old tropes; stressing the importance of getting countries ready for yet another digital revolution, but acting in ways that signal a willingness to challenge the status quo and renegotiate their role in the digital economy.

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