

WOMEN'S RIGHTS ONLINE IN GHANA: NATIONAL POLICY GAPS AND RECOMMENDATIONS



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EXECUTIVE SUMMARY

The advances in information and communication technologies (ICTs, i.e. internet, mobile telephony, social media, blogs, etc.) have affected how people interact, access information, communicate, access services, work and live. These technologies provide easier, faster and wider communication and access to information at the local, national, regional and international levels. These developments have a strong potential for empowering all citizens, but pose new challenges in terms of risks and threats, particularly for women.

A baseline study conducted by the Media Foundation for West Africa (MFWA) in 2017 on women's rights online in Ghana showed that online harassment is one of the major challenges facing women in the country's online space. According to the study, online harassments usually manifest in non-consensual distribution of photos and videos, sexual harassment, cyberstalking and hate and offensive comments. While online violence and discrimination against women are increasing, the gender gap in accessing the internet is also increasing.

As part of efforts to curb the issues confronting women online, the MFWA, with the support of Web Foundation, is implementing the second phase of its Women's Rights Online Project. The Women's Rights Online (WRO) Project seeks to improve the situation of women online and secure a safe and conducive internet environment in Ghana, reduce discrimination and combat digitally-enabled violence, and other pertinent factors that limit women's ability to realise their rights online fully.

An enabling policy environment is key in addressing the online challenges mentioned above and others. Therefore, as part of activities under the second phase of the WRO project, the MFWA is undertaking a study to map selected policy documents to identify policy gaps that need to be addressed to make them gender-responsive. Accordingly, a mapping of National ICTs and related policies have been done and gaps have been identified to guide and shape policy discourse and reforms. These will ultimately advance gender-equitable access in the use of the internet and other ICTs. Some of the gaps identified in the policies, conventions and legislations are non-gender-based initiatives and lack of segregated data on women, non-inclusion of ICTs in the policies and lack of specific legislation(s) that deal with women online protection issues. Other gaps include insufficient funding to implement women's rights online projects and the non-inclusion of non-governmental stakeholders such as Civil Society Organisations, the media, academia etc. in the formulation and implementation of policies on women's rights online.

A number of recommendations are made in respect of these gaps. With regard to funding, the institutions generating the policies should clearly indicate the sources of funding in the policy document. Budget estimates prepared by these institutions must be gender-segregated

to show how much would be spent on women's issues and the funds should be released as scheduled and expenditure monitored. The government should hasten the provision of quality communication infrastructure in the underserved communities to ensure access by all with the prioritisation of local content that will cater to the needs and interests of women. In addition to this, the existing scope of legislations and policies should be reviewed to reflect the full range of issues concerning women's activities in the digital space. Furthermore, advocacy and education should be used to equip women with basic ICTs and job-related ICTs skills to function more effectively in the digital space. Stakeholders such as the Civil Society Organisations, the media and others should be proactively engaged in the formulation and implementation of gender-related policies. Roundtable discussions with non-governmental organisations, foundations, world-wide organisations, religious organisations which invest in these initiatives by funding, building infrastructure or supplying equipment will help to coordinate their support so that there can be an even spread of the projects across the country.

1. INTRODUCTION

ICTs are crucial for learning and communication, but their safe use and accessibility are a concern in all societies. It is believed that women are less likely to be online in rural and urban poor communities which leaves them at the peripheries of the digital revolution. In communities where access is provided in public places, socio-cultural factors that prohibit women from sharing common places with men or impose competing demands on their time prevent them from utilising such facilities. Thus, women tend to have less access than men to ICTs facilities that exist for common use in local communities. Such facilities could be information centres or cybercafés. Given gender-defined multiple roles and heavy domestic responsibilities, women's leisure hours are limited. For some women, the challenge could be obtaining permission from their husbands. It is pertinent to identify concrete solutions for mainstreaming gender concerns in ICTs and Internet policy and closing the digital gender gap.

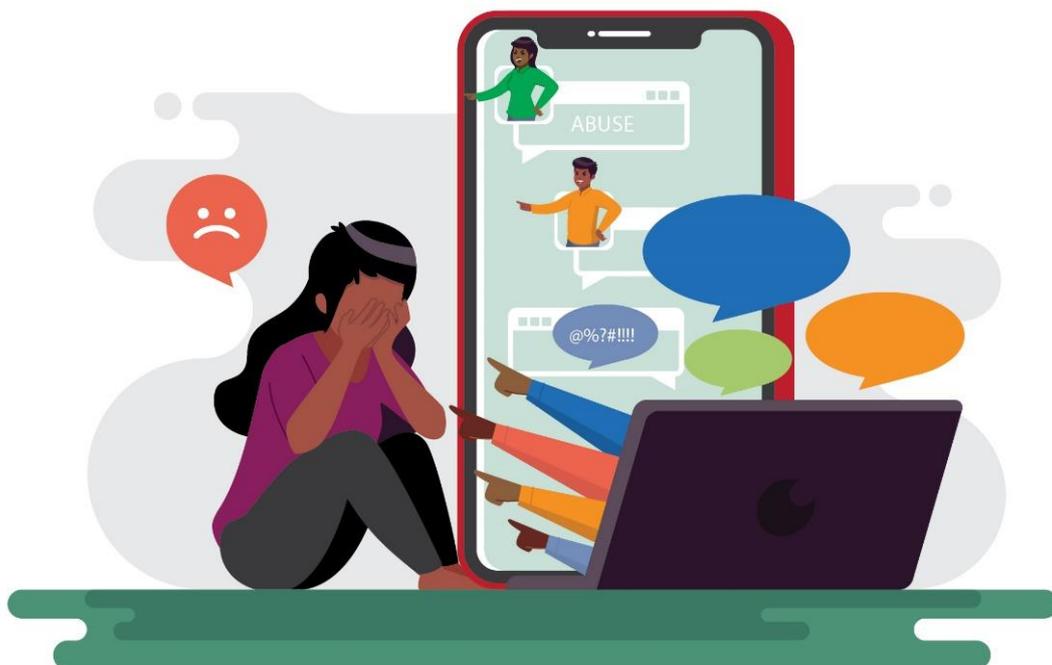
The Government of Ghana (GoG), through the Ministry of Communications is developing a framework to support the digitisation of the economy with the hope of capturing and benefitting every citizen. The Ministry of Communications (MoC) is thus embarking on the Digital Ghana Agenda with the hope of covering as much of the digitally deprived communities and persons as possible. As part of this initiative, the Ministry has embarked on an infrastructure development programme for the ICTs Sector, with national broadband infrastructure and total connectivity for the unserved and underserved as the expected outcome. The government has also indicated that Regional Community Information Centres are to be built across the country to enable citizens to access e-services, including postal services, passport services, birth registrations, among others. With regard to direct interventions aimed at improving females' participation in the digital space, the Ministry has introduced "Miss Geek Contest" and "Girls-in-ICT" programmes to create awareness that women can be ICTs literate and succeed in the field of ICTs. Although these initiatives are helping to bridge the digital gender divide, if the gaps in other national policies and the harassment women face on online platforms are not addressed, the gains made from such interventions may not be sustained.

Online violence against women (VAW) is on the rise. Unfortunately, it has the tendency to ruin the lives of victims as they usually cause offline harms. Some women are often targeted with abuse designed to silence them, including traumatising threats of violence that often lead to emotional and physical harm. To keep users, especially women safe online and to encourage democratic participation in national discourse, national policies need to be streamlined to deal with such abuses. Several policies, frameworks and regulations have been enacted to protect the citizenry, but unfortunately, they are not all-encompassing. The ones being implemented are not adequately enforced. Added to these, is the fact that technology

companies often do not understand or consider the social and cultural contexts of the users. Thus, they do not take into consideration the beliefs, norms and values of the people they serve (their customers). Unfortunately, in many instances, there is little or no global and cross-platform collaboration to fight online gender-based violence.

A report by UN Women on “Why we should take online violence against women and girls seriously during and beyond COVID-19” on July 21, 2020, disclosed that during the pandemic, women and girls were (and still are) using the internet often to stay connected with the world. However, they were (and continue to be) the targets of online violence in the form of physical threats, sexual harassment, cyberstalking, zoom bombing, sex trolling, identity theft, hate speech, cyberbullying, hacking, among others. The UN Women report, therefore, entreats governments to commit to enhancing women’s and girls’ online safety. Consequently, it is crucial to make a distinction between offline and online violence to protect women adequately.

The pandemic has ushered the world into a virtual society. The offline violence that had permeated online spaces before the pandemic, increased during the COVID-19 outbreak when a lot of things had to be done virtually. This made it relatively easier for people to commit violence without consequences. A study by Amnesty International (2018) on experiences of women on the Twitter platform found out that some of these acts resulted in some women opting for self-censorship and some leaving the online space. Online violence is a public health issue and its effects could be detrimental as it could psychologically harm and erode self-esteem. Capacity development in terms of technology and enough attention to the happenings in the online space are both critical to the reduction of discrimination and abuse of women online. Online violence does not in any way make the violence less harmful.



There are existing policies that seek to protect women from online abuses and make provision for improved access to the digital space. However, some of these policies fall short of important provisions and thereby fail to provide the necessary safeguards for women's online activities. In view of these discrepancies, research is important to help identify the gaps and inconsistencies so that recommendations can be made for policy reviews and reforms.

2. OBJECTIVE AND SCOPE OF WORK

The overall objective of this study is to qualitatively analyse Government policies relating to the protection of women's rights online with regard to international standards and to make recommendations for addressing any gaps identified.

The specific objectives of the study were as follows:

- To qualitatively analyse government policies relating to women's rights protection online
- To identify the gaps or shortfalls in these policies in terms of international standards
- To make recommendations for closing the gaps

The findings of the study will help facilitate engagements with stakeholders and advocate for policy reviews, updates and reformulation that will advance gender-equitable access and use of the internet and other ICTs in Ghana.

3. METHODOLOGY

In order to achieve the objectives of this study, policy documents were obtained from selected public institutions whose activities relate to women's rights. These were then content-analysed. For the purpose of complementing the information obtained from these documents, in-depth interviews were also held with officials of these institutions who were selected based on their knowledge of the issues. An interview guide designed for this purpose contained questions about ICTs-related gender policies that had been implemented or were being implemented by state institutions, their level of implementation, challenges that are associated with the policies, the impact of the policies on women and current initiatives being undertaken to improve the situation. The interview responses were transcribed and were content-analysed along with the contents of the documents obtained earlier. The data from both sources were then categorised according to institutions and themes relating to the internet and ICTs and women's rights. The documents reviewed are shown in Table 1.

Table 1: Documents reviewed

Institution	Policies, Legislations, etc.
Ministry of Gender, Children and Social Protection	<ul style="list-style-type: none"> • National Gender Policy • Ghana’s Combined Sixth and Seventh Periodic Reports on the Implementation of United Nations Convention on the Elimination of all Forms of Discrimination Against Women. • Ghana’s Report on Beijing+25, 2015 - 2019
Ministry of Communications	<ul style="list-style-type: none"> • The National Communications Authority Regulations (2019), • National Communications Acts (524, 1996; 769, 2008, etc.), • Electronic Communications Regulations and Amended Acts, • Electronic Transactions Act, 2008; National Information Technology Act 771, • Ghana ICT for Accelerated Development (ICT4AD) Policy (2003), • Commission on Human Rights and Administrative Justice Act, 1993.
Ministry of Education	<ul style="list-style-type: none"> • The ICT for Education Policy
Ministry of Food and Agriculture	<ul style="list-style-type: none"> • Gender and Agricultural Development Policy

Documents from international institutions which were reviewed included the United Nations Convention Reports (such as the Convention on the Elimination of all Forms of Discrimination against Women), the reports on regional women’s conventions such as the Inter-American Conventions, the Council of Europe Convention Reports and African Charter on Human and People’s Rights and Treaties.

4. ANALYSIS AND FINDINGS OF NATIONAL POLICIES AND DOCUMENTS RELATING TO ICTS AND GENDER ISSUES



A content analysis of the national policy documents and interview responses from officials of public institutions were done to assess selected policies and their levels of implementation. A summary of the gap analysis is shown in Appendix A.

4.1 QUALITY OF POLICIES AND LEVEL OF IMPLEMENTATION

Like women in other countries, women in Ghana are experiencing many types of discrimination and abuse online, issues of access to digital devices and the internet, lack of ICTs skills and other challenges that limit their ability to exercise their rights online. While state agencies, businesses and non-governmental organisations are working hard to resolve these challenges, continuous innovations in digital technology appears to be widening the gap.

In the following section, a discussion of public institutions' policies relating to women's rights protection and issues that limit their ability to operate in the online space is done. The documents were obtained from the Ministry of Gender, Children and Social Protection, the Ministry of Communications, the Ministry of Education and the Ministry of Food and Agriculture.

The following criteria were used in reviewing the documents:

- The issues related to the rights of women, as stated in UN reports
- Women's access to and use of digital devices and the internet
- How well the policies are framed in terms of objectives, strategies, implementation procedures and legal/regulatory frameworks
- Availability of indicators for measurement and evaluation of the policy actions

4.1.1 MINISTRY OF GENDER, CHILDREN AND SOCIAL PROTECTION

The Ministry has one overall national policy, the National Gender Policy, which has been designed to promote gender equality and women's empowerment as part of the national development agenda. It identifies the many challenges women face, including the gender gap in terms of access to science and technology, digital knowledge, and skills. The policy objectives cover the following thematic areas:

- Women's empowerment
- Women's rights and access to justice
- Leadership and accountable governance for women
- Women's economic opportunities
- Gender roles and relationships - Improving women's status relative to that of men

The strategies for achieving each of these objectives are elaborately presented in the policy document. Under *Basic Services and Infrastructure*, it indicates the commitment to "Promote ICT friendly environment for all in schools, workplaces, homes, social centres, among others, particularly for women."

In terms of implementation, the institutions and their key roles are clearly stated. The institutions include the Ministries of Agriculture, Finance, Interior, Local Government and Parliament. Others are Non-Governmental Organisations/Civil Society Organisations, Faith-based organisations, the Media, Political/Party Organisations, among others.

Many constitutional and legislative frameworks underlie the national gender policy. They include the 1992 Constitution of Ghana (Article 17), The Domestic Violence Act, 2007 (Act 732) the Domestic Violence and Victims Support Unit (DOVVSU) and the Ghana Labour Act, 2003 (Act 651) Section 68.

The policy indicates the Ministry's intention to use a number of indicators to monitor and evaluate its activities. The indicators include equality of access to education and training, adequacy of resources and budget allocations, quantity and quality of participation in programme governance structures, level of decrease in poverty gap, etc.

4.1.1.1 Quality of Policy

The policy covers the key areas of women's concerns including empowerment, right to justice, leadership and accountable governance, economic opportunities for women, gender roles and relationships. These areas have been identified by the United Nations Human Rights Council and many other international organisations as the areas where most countries, especially less developed and developing ones, have challenges in relation to women's rights and protection.

The policy also spells out in clear terms objectives, strategies and responsibilities of stakeholders. They also reflect women's challenges in the Ghanaian context, including domestic violence, child marriages, trafficking, lack of access to justice, and inequality in employment opportunities. A key area related to ICTs and promotion of women's rights is its commitment to "Promote ICT friendly environment for all in schools, workplaces, homes, social centres, among others particularly for women."

Under the policy, several ICT-related initiatives have been planned to provide women's rights, economic livelihoods, and social protection. These include, among others:

- 50 Million Women's Speak Project (launched in 2019): it is a digital platform that seeks to enable women-owned businesses to address gender-related barriers including poor education and entrepreneurial training, poor access to financial and non-financial services and information.
- Community Call Centres (Helpline of Hope): Women can call the centres to request information or report issues for prompt attention.
- Women's Organisation - Monthly Meetings intended to provide training in the use of computers and how to access information digitally on women's issues.
- Livelihood Empowerment Against Poverty (LEAP) Programme uses technology (E-zwich platform) to transfer cash to beneficiaries who can use mobile phones. An estimated 66% of beneficiaries are women.
- Affirmative Action Bill seeks to eliminate gender inequality and create equal opportunities for all in education, health, and other areas. It seeks to promote gender equality and women empowerment in all spheres. However, it does not make a categorical statement on online issues or situations which may include access and use of the digital space.

4.1.1.2 Level of Implementation

Generally speaking, the projects outlined above are at different stages of implementation. According to the Head of IT at the Ministry of Gender and Social Protection, "*the first phase of the 50 Million Women Speak Project has been completed and the database is being populated in order to establish a directory for the business women.*" Concerning the Call Centre programme, he said: "*over 400 sites have been completed across the country.*" The Affirmative Action Bill, having been amended due to the change of government in 2016, has been resubmitted to Parliament for approval. Though no specific information is available, it is also evident that an increasing number of women can access the benefits of the Livelihood Against Poverty Programme (LEAP) on the E-zwich platform as a result of the increased availability of mobile phones. Those who do not have phones, for now, are paid manually but this gap is closing gradually with the increase in mobile phone penetration.

4.1.1.3 Gaps Identified

Despite these achievements, it was observed that the policy has gaps in terms of content and implementation. First, the policy talks about resource mobilization and lists the sources of funding. However, there are no projections of the amounts that are needed to implement the interventions and there appears to be too much reliance on non-governmental sources. Listing several of these sources such as International Development Agencies, Regional Development Agencies, business organisations, private institutions, financial institutions and fund-raising dinners and events do not guarantee the generation of funds.

In another vein, it has often been alleged that some projects stall because of government's delay in providing counterpart funds. The Ministry respondents indicated that some of the projects have stalled or were not moving as scheduled because of the funding gaps. Even though the policy makes provision, in practice, adequate funds are not made available or nothing is provided. *"Lack of sufficient funds is making most of the projects to delay or stall at the point of implementation,"* a source at the Ministry said.

It is the perception that most public institutions in Ghana have measurement indicators in their policies, but they are often not implemented. Where the indicators are provided, the data is often not gender-segregated. In this specific case, the indicators are provided but are not specifically designed to measure the impact of the policy interventions on women. Another gap is the inability of the interventions to reach more women. It is believed that this could be attributed mainly to their lack of ICTs education. The policy makes provision for the dissemination of information through the media, district assemblies and traditional authorities but much has not been done in this regard.

4.1.2 MINISTRY OF COMMUNICATIONS

The Ministry of Communications (MoC), as indicated in its Mission, was established to facilitate the development of a reliable, cost-effective and world-class communications infrastructure and services with appropriate technological innovations accessible to all citizens to promote economic competitiveness in a knowledge-based environment.

The Ministry has a general policy that includes gender issues with indicators for monitoring and evaluation. The core objectives of the policy are:

- To improve ICTs infrastructure in rural areas
- To promote electronic transactions for public and private businesses
- To provide access to electronic public information and services
- To mitigate the impacts of climate variability and change
- To ensure that there is adequate digital capability to support production and use of ICTs for development.

To achieve these objectives, the Ministry performs six (6) different functions under general management and administration, namely ICTs capacity development, ICTs infrastructure development, meteorological services, postal services and data management and regulations. These activities are implemented by its sector agencies including the National Communications Authority, National Information Technology Agency, Kofi Annan Centre of Excellence in ICT, Data Protection Commission (DPC), Postal and Courier Services Regulatory Commission and Ghana Investment Fund for Electronic Communications (GIFEC).

Strategies for achieving these objectives are implemented through the Ministry's agencies, including the National Communications Authority, the National Information Technology Agency and the Data Protection Centre.

Some of the policies and strategies being implemented by the Ministry and its agencies to advance women's ICTs empowerment include the ICT for Accelerated Development Policy and the Ghana Investment Fund for Electronic Communications.

4.1.2.1 ICT for Accelerated Development Policy

The Ministry of Communications developed the Ghana ICT for Accelerated Development (ICT4AD) Policy in 2003 to aid Ghana's development process by contributing to addressing the nation's key developmental challenges. The overall objective of the policy was to engineer an ICT-led socio-economic development process with the potential to transform Ghana into a middle income, information-rich, knowledge-based and technology-driven economy and society.



The key objective relating to women was to accelerate the development of women and eliminate gender inequalities in education, employment, decision making through the deployment and exploitation of ICTs by building capacities and providing opportunities for girls and women. Some of the strategies were to support and facilitate training of women in key skills required by the information

and knowledge economy, provide accessibility to ICTs in the communities and to provide opportunities for social and economic empowerment.

Challenges with the policy:

The strategies listed in the policy do not show how training of women will be linked to jobs in order to give them vantage positions. Thus, the strategy assumes that once women are given the training which is often not long-term training, they can be employed in ICT-related jobs.

4.1.2.2 Ghana Investment Fund for Electronic Communications

The Ministry of Communications is implementing several projects under the Ghana Investment Fund for Electronic Communications (GIFEC) with the overall purpose of making ICT/internet facilities available to all communities in Ghana. The vehicles for implementing these projects are the Smart Community Programme, ICT for Livelihood, Cyber Laboratory Programme, ICT Education and Rural Telephony Programme. Each of these has a different area of focus, including the following:

- The provision of broadband digital services to the unserved and underserved to provide access to and use of financial services.
- The provision of material support for the development of creative, innovative, and high value ICTs activities within communities across Ghana, which will tap into the resources and knowledge of the local populations.
- Community ICTs Centres located within communities and markets where residents have access to business services and community development information.
- Community Call Centres, popularly referred to as ‘line of hope’ are being provided at certain locations. Individuals based in these locations can call into the centre to request information/directions and to report issues for prompt attention.

Although most of these do not exclusively target women, they are avenues or facilities for women to tap into ICTs and general education, social and economic opportunities, learning about and reporting violence against them.

There are also a number of ICT-based projects that are specifically targeted at women such as Girls-in-ICT, Women-in-Agriculture (WIAD) and the 500 million Peak Project, which are being implemented in collaboration with other Ministries.

In 2019, the National Cyber Security Centre, also under the Ministry of Communications, launched a Cybercrime/Cybersecurity Incident Reporting Point of Contact to enable individuals (including) report cybersecurity incidents. Some of the cases reported so far include sextortion, online impersonation, online fraud, malware attacks, online blackmail, website defacement, among others.

In order to increase access and reduce internet cost, the Ministry is also implementing the National Broadband Infrastructure Expansion Project. This strategy sought to increase a 50% broadband penetration in Ghana by 2015, reduce internet cost by 89% and reduce customer premise cost and personal computer cost by 90%. However, the effects of these strategies are yet to be realised.

The legal frameworks supporting the project include the provisions of the International Communications Union and Section II of the Civil Service Law, 1993 (PNDCL, 327) as amended by the Civil Service (Amendment) Act, 2001 (Act 600) and Executive Instrument (EI) 6,2003. Others are The Electronic Transactions Act, 2008 (Act 772) and the Criminal and Other Offences Act. Although they set the boundaries for the development of online infrastructure and services, they do not focus on or prioritise the promotion of women's rights online nor the associated social and economic development.

The implementation arrangements for all these strategies are well-stated and outline the roles of the various stakeholders. A critical observation of these roles and responsibilities, however, does not show their links to the promotion of women's rights online. This limits the ability of the policy to address the issues at stake.

4.1.2.3 Quality of Policies

The Ministry of Communications' Cyber Security, Girls-in-ICT and the National Broadband Expansion projects are all attempts to safeguard women and the general populace against ICT-related violence, promote their education and provide them with opportunities for their social and economic development. However, in some cases, there is less emphasis on women's online issues. For example, the policy objectives and the strategies do not mention anything relating to women rights online. Being national ICTs policies and considering the special position that women's issues occupy in national development, at least mention could have been made of issues like training and access to digital devices/internet, protection against abuse or social and economic benefits to women while online.

Also, the data is not gender-segregated. This makes it difficult for one to assess the impact of the policies on women and to plan a review of the strategies. For example, whereas there is data on the number of communities provided with broadband services, community call centres and ICTs centres as well as the number of residents using them, there is no data indicating the number of women and girls who are using the facilities.

Another challenge is the cost of entering the digital space in Ghana. Even though the policy purports to help provide access at affordable rates, the cost is considered to be too high. According to Mywage.org/Ghana, most young women are in lowly-paid jobs and therefore earn less than their male counterparts. This data is also confirmed by the Ghana Statistical Service (2019). Their relatively lower income implies that they are less able to afford the cost of using the internet as compared to the men.

4.1.2.4 Level of Implementation

Most of these projects are being tackled in phases. With regard to the Community ICT Centres, information from the Ministry indicates that 243 centres have been constructed in 9 regions of the country as of June 2020. Under the ICT for Schools project, 566 institutions including senior high schools, colleges of education, schools for the deaf, technical institutions, and community development institutes, have been equipped with information and communication technologies (ICTs) laboratories by December 2019. Under the Call Centres project, 400 hundred sites have been deployed within 2 years and over 600,000 people connected in beneficiary communities while 3G data services are also being provided to schools. Despite these efforts to bring ICTs to the people, there are a number of gaps which are described in the next section.

4.1.2.5 Gaps Identified

First, there is no indication that any of the above projects were targeted exclusively at girls/women which makes it difficult to determine the extent to which ICTs are reaching females and empowering girls and young women in the field of ICTs, also because the data is not gender disaggregated. The reach of the projects is another concern. The information provided suggests that many more communities are yet to benefit from these projects and there is no doubt that most of these will be located in remote areas where literacy levels are low and access to electricity is a challenge. The implication is that many women and girls in remote areas may not be benefiting as much as their counterparts in cities and towns. They will therefore not be able to use ICTs to advance their social and economic empowerment.

For the institutions, the policy is to provide data for 2 years, and it is on record that some of the ICTs laboratories are no more running effectively because they cannot afford to purchase data. Perhaps the most important gap in relation to ICTs usage and women is that most of these initiatives are not gender-sensitive. That is, there is no specific consideration in favour of females. This also means that even if they have measurement indicators, the data is not segregated by gender and therefore cannot be used to determine the impact on women.

4.1.3 MINISTRY OF EDUCATION

The Government of Ghana has made commitments to address the current state of inequality between boys' and girls' education. The Free Compulsory and Universal Basic Education (FCUBE) policy currently being implemented in the country is considered by many as the first step towards the major promotion of girls' education. It was designed to provide good quality basic education for all children of school-going age in Ghana by the year 2005. The policy has three components, including improving quality of teaching and learning,

improving efficiency in management and increasing access and participation. Under this programme, the Girls' Education Unit is responsible for increasing enrollment, retention and achievement of girls.

Some education reforms between 2001 and 2010 saw the introduction of ICT into the educational curricula mainly at the pre-tertiary level. This was under the Education Strategic Plan (ESP 2003-2015) which was reviewed to cover the period 2010 to 2020. The plan was to serve as a framework for the country to meet its commitment to achieving the Millennium Development Goals – namely Gender Parity in primary schooling by 2005 and Universal Primary Completion by 2015.

Further to this, the Ministry of Education in 2015 introduced the ICT for Education Policy, which was aimed at improving access, equity and quality of education delivery in Ghana. The overall goal was to enable graduates from Ghanaian educational institutions – formal and non-formal – to confidently and creatively use ICTs tools and resources to develop requisite skills and knowledge needed to be active participants in the global knowledge economy at all times.

The three focus areas in the policy are ICTs as a learning and operating tool, ICTs as integrated into teaching and learning, and ICTs as a career option for students. Four key elements were identified as critical for planning and implementing the policy. These were Equity and Access to ICT, Infrastructure, Capacity Building and Norms and Standards.

Based on this policy, a number of initiatives such as Girls-in-ICT, ICT-based Community Information Centres and others are being implemented with the support of the Ministry of Communication. The Girls-in-ICT project aims at increasing the number of girls studying ICT at all levels of the education system, grow a substantive number of women ICT professionals and encourage women to set up ICT-based businesses. As part of this project, ICT infrastructure is being constructed in all the girls' schools across the country. The ICT-based Community Information Centres (CICs) provide Internet-enhanced computers and software based on local needs and other facilities. At these centres, residents, including students, learn and acquire skills based on what they have learnt in their schools. The software is based on classroom- and home-based activities, thus opening the beneficiaries to more extensive knowledge to build their capabilities.

4.1.3.1 Quality of Policies

Most of the policies include provisions that seek to achieve equity between male and female education through the promotion of girl child education. But whereas some of the policies have provisions relating to ICTs education, they are mostly gender-neutral. In the policy documents, there is no specific focus on the girl child with regard to ICTs training. However, a number of the initiatives such as Girls-in-ICT, have been directed specifically at

girls. Such training is most likely to include how to access and use online facilities or the internet, thereby seeking to reduce the ICT-based gender gap. In terms of measurement and evaluation, the indicators if any, do not show any separation between male and female enrolments.

4.1.3.2 Level of Implementation

The Girls-in-ICT programme has trained more than 4,000 girls from selected basic schools across the country as of August 2019. With regard to the Community Information Centres, more than 200 have been constructed across the country. However, it is obvious that there are many more schools and communities yet to be covered. Kwapong (2008) identifies the rural areas as the most deprived of these interventions as a result of key challenges including lack of electricity, telecommunications infrastructure and low levels of education. Clearly, there are many more girls to train and many more communities to cover.

The gaps are summarised in the following section.

4.1.3.3 Gaps Identified

One of the challenges with the Education policies is that they do not contain specific provisions that aim to close the ICTs gap between males and females. This also means that they do not make provision for measuring the impact of the initiatives on girls. Another gap is the issue of funding. Even though provision is made in the policy documents, the timely release of the funds is a problem. For example, an official at Ghana Education Service (ICT Section) indicated that laboratories planned for construction are yet to be provided to thousands of schools while some of the existing ones have been disconnected from internet service because after the initial service period elapsed the schools were unable to pay for data.

4.1.4 MINISTRY OF FOOD AND AGRICULTURE

The Ministry of Food and Agriculture (MOFA) has implemented a number of policies to improve the production and distribution of food in the agricultural sector, but one notable one which has been targeted at women and has involved the use of the Internet and ICTs is the Gender and Agricultural Development Strategy (GADS). Under this overall policy, the Ministry develops sub-policies and programmes to support women's livelihood and well-being in the agricultural sector. The focus of activities is the delivery of technologies and information on agricultural production and post-production.

The policy identifies some of the key challenges facing agriculture in Ghana including lack of education, low incomes, low yields, poor technologies, lack of access to extension services and the land tenure system.

Among others, the main objectives of the policy are:

1. To strengthen institutional capacity for gender-responsive policies, programmes, projects, budgets and monitoring and evaluation within MOFA;
2. To enhance equitable delivery of agricultural services and access to inputs;
3. To enhance access to land, information on land rights and tenure security;
4. To develop and disseminate gender-sensitive appropriate technology along the agricultural value chain including climate-smart practices;
5. To promote gender-responsive agribusiness, value-addition and market access for livelihood and growth in incomes;
6. To promote gender-sensitive research and extension linkages;

As part of the efforts to achieve these objectives, a number of strategies are being implemented. These include developing a gender-responsive culture and building capacity, providing extension services, facilitating access to land, training and promoting the use of technologies. The strategies are aligned with each of the objectives stated above.

The directorate in charge of the policy, Women in Agricultural Development, provides technical support to regional and district staff to transfer appropriate technologies to farmers. It also collaborates with various divisions in the Ministry, including research, projects and other Ministry of Food and Agriculture Directorates to support dissemination and capacity building efforts to the regions and districts. Much of these activities involve training and providing Internet and ICT-based facilities to farmers in rural and urban communities where a lot of women (nearly half of the total female population; MoFA, 2007) work as farmers and processors. It also monitors and evaluates implemented programmes to assess their impact on women.

4.1.4.1 Quality of Policy

The policy aims at mainstreaming women's economic empowerment and livelihood through agricultural practices, mainly in rural areas. The challenges confronting the agricultural sector in general, are identified including those relating to the use of technology, access to information and discrimination against the vulnerable in society (see 5.1.4). The objectives are clearly stated, each with its corresponding sub-strategies that seek to address a challenge. Particular attention is paid to gender issues while the implementation procedures and measurement indicators are clearly spelt out and gender-disaggregated data is provided.

4.1.4.2 Level of Implementation

Information provided by the Ministry indicates that an e-agriculture system has been set up to provide extension and advisory services to the public. The farmers access the services from a call centre through an Interactive Voice Response (IVR) system, e-agriculture and

e-extension portals and smartphones in extension delivery services. In addition to this, another platform (Essoko platform) has been created to enhance extension delivery services to help actors share market information, communicate with other actors, establish business relationships, and manage the flow of goods and services.

4.1.4.3 Gaps Identified

Despite these interventions, the data provided on access to the various technologies have not been disaggregated by gender and generation as required by UN standards. As a result, it is almost impossible to know how many women have benefited from information through the technologies provided. There is therefore a need to disaggregate data on the beneficiaries to help in monitoring progress while mainstreaming gender into programmes.

5. A REVIEW OF INTERNATIONAL STANDARDS VIS-À-VIS EXISTING LOCAL POLICIES

Various UN Conventions (such as the Convention on the Elimination of all Forms of Discrimination against Women), the regional women's instruments such as the Inter-American Conventions, the Council of Europe Convention and African Charter on Human and People's Rights) and treaties have guidelines (standards) that are expected to be implemented by their member countries to eliminate discrimination against women in the digital space. In this section, the thematic areas covered by these standards are discussed alongside the corresponding policies being implemented in Ghana. The thematic areas include legislations on the protection of women's rights online, protection of private data, independent and well-resourced judiciary, education and access to the internet, roles and responsibilities of stakeholders, policies, and processes for reporting online violence.

5.1 LEGISLATIONS PROTECTING WOMEN'S RIGHTS ONLINE

Countries are enjoined to ensure that they have legislations that comply with their obligations under international human rights law, including those that cover the protection and respect of women's rights online and offline. The International Telecommunication Union's IMPACT programme and the Commonwealth Cyber Initiative seek to guide member countries, including Ghana, to adopt efficient cybersecurity policies and infrastructure. At the African regional level, the African Union has developed a cybersecurity convention which African heads of states have ratified.

Meanwhile, the June 2018 Report of the United Nations Special Rapporteur on Violence Against Women, notes that “States have a responsibility and an obligation under due diligence to enact new laws and measures to prevent, protect, prosecute, punish and redress new emerging forms of online violence against women and girls.”

The legal instruments most frequently used for the protection of women online are cybercrime laws, criminal laws, laws on domestic violence and violence against women, hate speech laws and laws on data protection and privacy.

Existing policies that cover women’s rights issues in the online space in Ghana are generally based on international law and local instruments. Some of the local instruments include the National Communications Authority Regulations (2019), the National Gender Policy, the National Security Act, the Domestic Violence Act, Data Protection Act, the Ghana ICT for Accelerated Development (ICT4AD) Policy (2003) and the Commission on Human Rights and Administrative Justice Act, 1993.

Unfortunately, most of these instruments have not been reviewed and updated to accommodate specific provisions on women’s rights online in Ghana. It must be admitted, however, that some of the existing laws are being broadly interpreted to cover women’s rights online issues during case adjudications while others are being gradually amended to suit this purpose. Meanwhile, a lot of Ghanaians, especially women, are not aware of their rights as guaranteed under existing provisions in the laws of the country as a result of little or non-existent sensitisation.

In view of the foregoing, a speedy amendment of the various laws is recommended to suit the current state of affairs relating to women’s rights in this digital era. More education must be provided to women on what constitutes violations and where to report them. In this regard, the Ministry of Gender, Children and Social Protection should develop appropriate materials and these should be distributed through social media networks, printed as leaflets and distributed and discussed at community gatherings.

5.2 PROTECTION OF PRIVATE DATA OF WOMEN AND GIRLS

At its 73rd Session, the UN General Assembly on Human Rights adopted the resolution on the right to privacy in the digital age (A/RES/73/179). The resolution noted that the right to privacy is important to prevent gender-based violence and other offences like cyberbullying and cyberstalking. It called on stakeholders to implement data protection measures to protect personal data and privacy. While maintaining the standards, the General Assembly warns of the impact that governments’ surveillance and interception of communications may have on human rights. Internet Service Providers (ISPs) are advised to

use encryption and anonymity to protect users' privacy to enable them enjoy their rights online.



The National Communications Authority, National Information Technology Agency, Data Protection Commission (DPC), and National Cybersecurity Centre are working with the ISPs to protect citizens' private data. As required by the standards, the ISPs in Ghana have an obligation to ensure that customers' personal data are protected. Appropriate company policies exist to ensure that this is done, and the supervising agencies are authorised to sanction ISPs who flout the regulations. In addition to this, Incident Reporting Points of Contact (PoC) are being established in communities to receive cybersecurity incident reports. The system is designed to receive reports of the incidents and categorise them in a manner that will make it possible to identify attacks against women. Unfortunately, statistics are not readily available on the number of women who have been victims of these incidents.

Despite these efforts, the gap between international standards and existing local policies remains wide. Women and girls continue to receive threats through digital gadgets and social media and sometimes have their pictures put on social media without their consent. Reports received from the Incident reporting centre suggest that some of the complaints reported are about sextortion against women. The continuous occurrence and frequency of these acts are often attributed to women's low awareness level of ICTs which are the result of low level of education, lack of affordability and cultural inclinations. But there is also sufficient evidence to show that weak data protection measures taken by individuals or data storage companies enable perpetrators to engage in these offences. For example, in Ghana, many incidents occur almost on a daily basis involving data breach either because individuals are not able to secure their information or the service provider does not provide sufficient protection.

5.3 INDEPENDENT, IMPARTIAL AND WELL-RESOURCED JUDICIARY

The United Nations Committee on the Elimination of Discrimination against Women has recommended that countries should maintain an independent, impartial and well-resourced judiciary and police administration so that victims of abuses, including online ones, can seek redress from the courts, including restraining orders and compensation. This calls for the training of magistrates, lawyers and law enforcement agencies to investigate and prosecute perpetrators. This will engender public confidence in obtaining justice for cases of online and ICT-facilitated violence.

In the case of Ghana, in terms of law enforcement, the country has a special police unit (DOVVSU) which is responsible for handling gender-related issues. The Commission for Human Rights and Administrative Justice (CHRAJ) has been created with offices in the regions to adjudicate cases involving human rights abuses against both men and women. Also, judges, magistrates and police officers are receiving ICTs training to improve their skills in handling their responsibilities. There are also independent bodies like the International Federation of Women Lawyers (FIDA), and African Women Lawyers Association (AWLA), which support education and provision of legal services to women victims to enable them seek redress when they are abused.

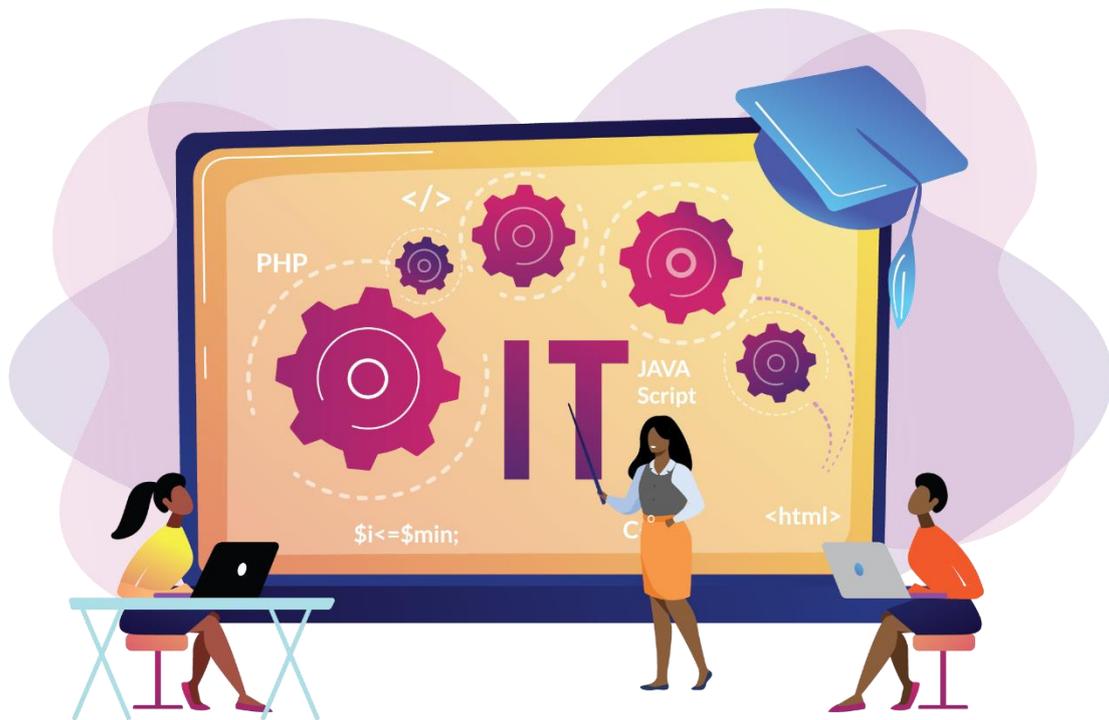
Information gathered from the interviews indicates that most of the implementing agencies lack adequate resources to effectively execute their mandates. *“The biggest problem with the implementation of these initiatives is the lack of resources”*, said an official from the Ministry of Gender, Children and Social Protection. In addition to this, a large majority of judges, magistrates and police officers are yet to receive training in ICTs. According to the UN Special Rapporteur on violence against women, victims of online abuse require prompt remedies, redress and relief from effective legal protection mechanisms. However, the Ghana justice system is slow and sometimes frustrating. Such situations, according to the Rapporteur, reduces access to justice for women victims and a sense of impunity for perpetrators. It is also known that the cost of accessing justice in Ghana is relatively high. At the same time, the state-provided institution (Legal Aid) has only a few lawyers to handle cases for the victims.

5.4 EDUCATION AND ACCESS TO THE INTERNET

Education and access to the internet is considered to be one of the most important solutions to the problem of gender inequality and discrimination against women. The UN General Assembly guidelines for the elimination of discrimination and promotion of women’s right to equal education, propose that countries promote digital literacy in the use of the Internet and ICTs for all, without gender-based discrimination, and promote gender equality at all

education levels, including online education. Equipping women with requisite skills promotes their right to self-expression, builds their capacity, and enables them to participate in social and political discussions online.

In this regard, the government of Ghana and its development partners (including non-governmental agencies) are providing education, outreach and gender-sensitive, ICTs-based training for women and girls in schools and communities. Interventions such as Girls-in-ICTs and Community Information Centres (CICs) are intended to create awareness among women and girls about online violence and provide them with the necessary skills to improve their employment prospects, their social, economic and political status.



Despite these efforts, Ghana appears to be a distance away from achieving equality of access to education and access to the internet. The initiatives focusing on women and the girl-child are still very few and concentrated in urban areas. Secondly, most of these projects are not designed to serve the special (social and cultural) needs of women and girls. This means there is still a lot more to be done to address women's needs in terms of access and use of the internet.

5.5 INTERNET AND ICTs-BASED POLICIES FOR WOMEN

The United Nations Division for the Advancement of Women's publication (2005), 'Women, 2000 and Beyond' on the topic: *Gender Equality and the Empowerment of Women through ICT* calls for the development of internet and ICT-based policies that meaningfully protect women and girls from violence in digital contexts and empowers them to achieve social and economic development. The policies must focus on addressing challenges women face in accessing and meaningfully engaging in online spaces, including strategies, implementation procedures and roles as well as measures for assessing the performance of the policies.

Ghana has some internet and ICTs-based policies that focus on the protection of women's rights. For example, the National Gender Policy seeks to resolve issues of gender inequality and promote women's empowerment while emphasising the need for commitment to promote ICTs-friendly environment for all in schools, workplaces, homes, and social centres for women. The Data Protection Act is an ICTs-based policy being implemented to protect private data of government, citizens and businesses in Ghana while the National Cyber Security Policy is being implemented to address cybercrime issues facing businesses and individuals. As part of the implementation plan, awareness and skill improvement programmes are being developed so that content providers can deliver appropriate contents to different groups, including women. Other initiatives such as those under the Women-in-Agricultural Development and the 50 Million Women projects are intended to provide for the livelihoods and empowerment aspects of women's wellbeing.

Although some of these initiatives are targeted at women, others are not gendered and therefore not tuned to women's specific needs. In most cases, there is no gender-disaggregated data that gives information on the performance of the policies in relation to women.

Considering the fact that over 50% of the population in Ghana (GSS, 2019) is made up of women and that increasingly the internet and ICTs are becoming critical tools for development, the need for more policies that promote affordable access, relevant content, digital know-how and safe online spaces for women cannot be over-emphasised.

5.6 ROLES AND RESPONSIBILITIES OF STAKEHOLDERS

Women's rights online require a perfect definition of roles for implementing agencies including government, CSOs and ISPs. In many cases, government agencies formulate the policies based on the appropriate international conventions and provide some funding; while government agencies like NITA, cybersecurity centre and private sector organisations such as Internet Service Providers and technology companies implement the appropriate policies to protect and empower women in the exercise of their rights.

In accordance with the requirement for internet and ICTs-based policies for women, almost all the existing local policies relating to women's rights online have the roles and responsibilities of stakeholders spelt out. A review of the policy documents studied shows that the design of the policies is done by public institutions sometimes with the support of CSOs. In some cases, the government funds the initiatives with the support of international organisations. However, a large portion of these is also funded by CSOs and ISPs.

One challenge with the policies is that there are often many private stakeholders who get involved in these initiatives and there is often a lack of coordination among them. This amounts to duplication and waste of resources. Therefore, there is a need for the mother institution or agency generating the policy to be cautious in assigning the roles and bringing all implementing agencies under one umbrella to facilitate easy coordination and supervision.

5.7 TRANSPARENT AND EFFECTIVE PROCESSES FOR REPORTING VIOLENCE

Effective processes for reporting incidents should be established as part of measures to prevent discrimination and abuse of women. Intermediaries like the internet service providers must be at the forefront in establishing and managing these processes. They must also publish their terms of service for potential users to read before entering into contracts. Governments must also collaborate with CSOs to establish incident reporting centres where victims can go to report. These are some of the transparent and effective processes for eliminating abuse and discrimination against women.

Through the Ministry of Communications, the Government of Ghana requires ISPs and organisations that collect data on customers to create avenues for victims of violations to report. ISPs such as Vodafone, MTN and Airtel-Tigo have spelt out procedures for lodging complaints.

6. PRACTICES BY INSTITUTIONS TO IMPROVE WOMEN'S RIGHTS ONLINE AND THE CHALLENGES

6.1 CIVIL SOCIETY ORGANISATIONS INVOLVEMENT IN PROMOTING WOMEN'S RIGHTS ONLINE

Civil Society Organisations (CSOs) have been partners in the development of Ghana for many years. They have been involved in advocating for specific policies, providing expertise, and serving on boards and committees to offer independent and non-partisan views on policies and major government interventions.

Many CSOs have been involved in promoting women's rights, including the areas of gender inequality and violence against women.

The Media Foundation for West Africa (MFWA) for example has in recent years been training female journalists, bloggers and activists on women's rights online issues and digital literacy. The trainings have helped many of these women understand their rights online and how to fully tap into the potential of the internet to improve their work and generally their lives. The organisation also continues to work with women's rights groups such as FIDA and the Ark Foundation, digital rights organisations and the media to collectively advocate for the protection of women's rights online. The MFWA has also collaborated with these organisations to hold public convenings where government officials and other relevant stakeholders have strategized on how they can individually and collectively work to promote and protect women's rights online and ensure digital gender equality.

Organisations such as Africa ICT Right and Plan International Ghana have been involved in providing laboratories to schools, creating Community ICT Centers, and inspiring and educating high school girls with skills and resources to pursue opportunities in the field of computing. The fact still remains, however, that many women's rights organisations in Ghana focus less on women's rights online issues.

6.2 THE INVOLVEMENT OF THE MEDIA IN PROMOTING WOMEN'S RIGHTS ONLINE

The UN Council for the Elimination of Discrimination Against Women (CEDAW) proposes that the media should play the role of advocacy in the elimination of discrimination against women and reporting acts of violence including ones committed within the digital space. The International Media Support (IMS) emphasised the crucial role

of media in achieving gender equality when it revealed that children are influenced by the gendered stereotypes that the media present to them from a young age. From traditional media to online media, the media influence perceptions and ideas about the role of girls and women in society. The Global Media Monitoring Project (GMMP)'s survey aimed at measuring gender equality in the world's news media has revealed that women only make up 24% of the persons heard, read about or seen in newspapers, television and radio news; 46% of news stories reinforce gender stereotypes while only 4% of stories challenge gender stereotypes. Hence, the media is crucial in promoting the agenda of protecting women's rights online and women's representation.

All around the world, including Ghana, social media has become a powerful tool for online communities to raise awareness and initiate campaigns on many issues in recent years. In fact, UN Women has been promoting the use of social media to advocate for the elimination of violence against women and promote gender equality. Indeed, women are increasingly taking part in different social media outlets (including Twitter, Facebook, Instagram, Google+, Pinterest, among others), and are sometimes using them as avenues to create awareness and discuss pertinent policy issues and mobilise support for critical issues such as gender equality.

Discussions on radio and television and even social media on women's online issues also go a long way to create awareness and educate the public on issues of privacy and other rights of women.

In spite of these contributions, the media has also paved the way for persistent gender stereotypes in content and violence against women. The prevalence of sexist hate speech, social media sexual harassment, gender-based violence, both digital and physical, pose a threat to freedom of expression and access to information by women including those in the journalism profession. These abuses are perpetrated using the media, including radio, television and social media networks.

CONCLUSION AND RECOMMENDATIONS

6.3 CONCLUSION

The purpose of this mapping (of policy documents) was to assess the efforts that have been made by Government of Ghana with regard to the protection of women's rights online in the area of policy; and to identify the challenges and gaps that need to be addressed in those policies. To achieve this objective, policy documents were analysed, and in-depth interviews were held with officials of selected public institutions.

The mapping of the policy documents revealed that there are some gender-based policies that are intended to promote the rights of women online and reduce violations against them. The policies include the National Gender Policy, the ICT in Education Policy, National Communications Policy and the Gender and Agricultural Development Strategy. Under these policies, a number of gender-based digital initiatives have been implemented, including the 50 Million Speak Project and the Community Information Centres.

Generally, the policies were found to be well-formulated in terms of the objectives, strategies as well as the implementation procedures and they addressed access to the digital space, education and affordability. However, some of them did not contain clear provisions for funding and the measurement indicators were either absent or did not specifically refer to women. There was also non-availability of gender-disaggregated data.

6.4 RECOMMENDATIONS

The following recommendations are made for Government, Ministries, Government Agencies, Telecommunications companies, ISPs and Social Media Organisations, Civil Societies and International Organisations. The recommendations are aimed at improving the policy environment to ensure that women's rights online issues are well streamlined with existing policies to ensure that women can fully participate in online spaces at all times.

6.4.1 GOVERNMENT

Although ICTs could be a marginalising factor in development, a conscious utilisation can make it an enabler for overcoming the gender digital divide irrespective of geographical locations. The government needs to put in place quality ICTs infrastructure in underserved communities to ensure access by all, and strategically ensure prioritisation of local content in the online space that will interest its citizens especially women. As the World Economic Forum pointed out in the 2014 report, *Delivering Digital Infrastructure: Advancing the Internet*

Economy, digital ecosystems that produce local content and apps are vital for building digital literacy, attracting local users and serving local needs.

- The government must put in place measures to improve gender-disaggregated data, indicators and benchmarks. This will aid in assessing the performance of the policies that have provisions for safeguarding the interests of women in online spaces to support equitable access, use and benefits.
- In developing and implementing ICTs policy and regulatory frameworks, gender issues need to be strongly considered. Such frameworks and policies should not only cover a range of issues pertaining to national communication infrastructure, government information services, and tariffs and pricing, which influence women's access to and use of ICTs. Rather, policies and regulatory frameworks, including legal protection and the right to privacy and anonymity in transactions, interaction and expression, (captured in the Data Protection Act and Electronic Transactions act), should also be factored to protect users. In implementing such policies, factors such as time, age, income, among others have to be considered as these are crucial for women and girls to benefit equitably. This is a good starting point for undertaking gender-specific policy initiatives and projects.
- Also, the government has to review the existing scope of legislative and policy responses to sexual harassment. Sexual harassment can occur physically and virtually. The government needs to recognise that it can occur in various settings and can use different media, such as the internet. Therefore, it has to ensure that all the varying settings are considered in the enforcement of policies. The government has already begun establishing local connected facilities in remote or underserved areas to provide centralised venues for communities to gain internet access. These centres provide basic infrastructure and access points (the only access in some instances) for the local populace at a reduced cost. However, it will be appropriate for the government to go beyond just access to provide training and education that help users especially women, gain the skills needed to use the internet and ICTs effectively.
- *Embedding ICTs in National Education Curricula* - The Ministry of Communications and the Ministry of Education in collaboration with international and local organisations, can combine efforts to promote basic skills in the use of ICTs. ICTs has been incorporated in the national education curricula, but it is pertinent that practical skills in this area be pursued and not just the theory. For instance, in the United States, the Schools and Libraries Program, administered under the Federal Communications Commission (<https://www.fcc.gov/general/e-rate-schools-libraries-usf-program>), provides discounts to help schools and libraries obtain

telecommunications equipment and internet access. The Uruguayan government's Plan Ceibal) (<https://www.ceibal.edu.uy/en/institucional>) introduced ICTs learning as part of primary and secondary public education. Students and teachers in more than 2,300 schools have received about 450,000 laptops since 2009, and 1,900 of those schools are connected to the internet in Uruguay.

- The government of Ghana through GIFEC, has made a number of initiatives including training many young girls in coding and distributing laptops (<https://gifec.gov.gh/gifec-to-train-2000-girls-to-commemorate-international-girls-in-ict-day-2020/>) to promising girls in ICTs. It will also be appropriate to extend this strategy to women in remote areas while focusing on their special needs.
- Another crucial element is ensuring the active participation of all stakeholders in the policy process, for the advancement of women and women's groups and networks, and providing adequate resources for their work. This includes supporting research, compiling gender-disaggregated statistics on ICTs use and employment in the ICTs sector, developing gender-specific indicators, and initiating innovative pilot projects to increase women's access to and use of ICTs.

6.4.2 TELECOMMUNICATIONS, ISPS AND SOCIAL MEDIA ORGANISATIONS

- Infrastructure affects the availability, quality, reliability, and affordability of internet access. Many barriers impede infrastructure construction and installation, including lack of electricity, limited mobile network coverage, underdeveloped core networks and the availability of high capacity backhaul. These challenges are especially prevalent in remote areas because of long distances, difficult terrain, large capital investments, high operating costs, and low average revenue per user to compensate for the investment. Telecommunication companies can adopt new business models (such as co-location of masts) to make access more affordable.
- The media needs to strengthen their work with education and communication professionals, promote the use of inclusive non-sexist language, analyse the negative impact that language can have on perpetuating violence against women, as well as working with legislative and judicial bodies to mitigate women's negative representation. The Media should also consider creating gender-sensitive and gender-transformative content and breaking gender stereotypes while challenging traditional, social and cultural norms, attitudes about gender perceptions both in content and in media houses. This should include showcasing women in leadership roles and as experts on diverse topics.

- In breaking traditional gender stereotypes, the media can encourage the construction of new models of society and people who respect the rights of all. This will mean playing a major role in awareness-raising; dissemination and transmission of information; and knowledge and models of inclusive and non-sexist societies.

6.4.3 CIVIL SOCIETY

- Civil society should proactively engage policymakers and policy-making agencies to ensure that gender concerns are addressed at the initial stages of ICTs policies formulation to ensure that the needs and priorities of both women and men are appropriately considered and embedded in policies and their strategies.
- Attention to gender perspectives in existing capacity-building activities and the development of specific training for women's groups and networks for women's advancement, is critical to successfully incorporating gender programmes in all ICTs development areas. Training is needed at national, regional and local levels. Government bodies could support the development of, and fully utilise the training capacity of, NGOs or civil society organisations involved in ICTs. Women of any age have to be involved in training activities and emphasis should be put on young girls to become real actors in public spaces.
- Civil Society should support government interventions aimed at promoting women's rights online by supporting and undertaking research, compiling gender-disaggregated statistics on ICTs use and employment in the ICTs sector.
- Gender equality advocates in civil society need to educate themselves about ICTs policy issues and become more actively involved in the policy process at the national level, including by strengthening their capacity to monitor national actions in ICTs-related areas. A more substantial body of evidence needs to be developed to support this work that can demonstrate the links between gender and ICTs for development.
- An important goal must also be to take every opportunity to sensitise policymakers about the importance of gender issues in ICTs through briefings, consultations and trainings.
- Women advocacy groups should increase the use of ICTs in their work to advance women and gender equality. This will support their role as advocates and catalysts for gender mainstreaming, facilitate the production of relevant information on national priorities, and enhance networking and the sharing of best practices at national and regional levels.

- Women advocacy groups should advocate for relevant content on women and gender issues on all official Government websites, in addition to those websites that specifically address gender equality issues. Proactive influencing of national ICTs policy formulation and implementation should also be prioritised.
- Donors, including those from the private sector, can play a catalytic role by mobilising resources to support innovative projects which promote gender equality in ICTs. For example, they can support the production and/or repackaging of content particularly relevant to women's interests and concerns; the support of women as producers of content, including at local levels; enhancing women's participation and representation in business and professional organisations related to the ICTs sector. Donors should equally promote and strengthen women's entrepreneurship in the ICTs sector, facilitate the creation of networks, mentor programmes, and the development of business support programmes.

6.4.4 INTERNATIONAL ORGANISATIONS

- Gender concerns need to be addressed in the initial stages of ICTs projects by international organisations to ensure that both women and men's needs and priorities are appropriately considered and embedded in project design. Donors should request for gender issues in product design and implementation of ICTs projects. Involving all stakeholders in the target community, including both women and men, is imperative in the earliest phases of project design.
- It is also necessary to foster collaboration with countries and international organisations to make the internet a safe and secure place for women. Ghana has acceded to the Budapest and Malabo conventions, making Ghana ready for collaborations at this front.
- To achieve an online culture that would abhor behaviour and practices that are harmful and violent to women and girls, international organisations can also campaign to create an online environment and culture that affirms everyone's right to safety and security. Such campaigns can include targeted solidarity actions and engagement with young people.
- International organisations can strengthen the institutional capacity of women's rights organisations to become leaders in addressing technology-related Violence Against Women (VAW).

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APPENDIX

INSTITUTION/ POLICIES AND REGULATIONS	ISSUES THAT MAY RELATE TO WOMEN'S RIGHTS ONLINE	GAP ANALYSIS	POLICY / LEGISLATION QUALITY	IMPLEMENTATION LEVEL
National Cyber security Policy and Strategy	<p>The purpose of the policy and strategy is to protect Ghana's critical systems from cyber-attacks, and provide the necessary skills through capacity building. Systems are capable of protecting and tracking attacks on businesses and individuals including women.</p> <p>The National Cybersecurity Policy and Strategy when passed will assist in the investigation of online abuse to gather evidentiary support to protect women's rights online and also reporting of cyber incidents that infringe on the rights of women.</p>	<p>In its current form, the policy does not focus on protecting or addressing violations on women online.</p>	<p>Policy has clearly stated objectives, strategies and implementation procedures</p>	<p>The government of Ghana has ratified a new convention on cyber security and the new Cybersecurity Act when reviewed, is likely to address most of the provisions made in this convention.</p>
Data Protection Policy	<p>Policy seeks to protect the privacy of the individual and personal data by regulating the processing of personal information.</p> <p>The policy criminalises the acquisition of an individual's personal data when there is no consent from him/her except that it is for the individual's personal, family or household affairs. These sections could be applied when handling cases of persons who have</p>	<p>The exclusion of the phrase 'domestic purposes' from the regulations concerning the processing of personal data may give room for persons to process another's data for their own affairs. It is recommended that this section be clarified in order not to give room for its</p>	<p>The Act has clearly stated objectives, functions, governing body and implementation mechanisms.</p>	<p>The data protection policy has been developed and the Data Protection Commission has been established.</p>

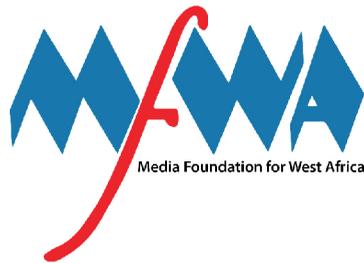
	processed the data (images) of women in a way that infringes on their rights to privacy without their consent.	wrong implementation. Also, the Act does not explicitly make provision for the protection of women's rights online but it implied that the provisions apply to women as well.		
The Ghana ICT for Accelerated Development (ICT4AD) Policy (2003)	<p>This policy aims at transforming Ghana into an information-rich, knowledge-based society and economy through the development, deployment and exploitation of ICTs within the economy and society.</p> <p>The focus areas which relate to women include:</p> <ul style="list-style-type: none"> -Promoting ICTs in Education, -Deploying and spreading ICT Centres in the communities, -Developing ICTs infrastructure, etc. 	Most of the initiatives are not gender-focused. They also do not have gender-segregated data.	The policy has clearly stated vision, mission, strategies and policy goals, commitments which are intended to address women's rights on line and close the gender gap in ICTs. Each focus area has its corresponding policy context, policy statement, policy objectives and strategies, policy measures, instruments and initiatives, key implementation agencies, players and stakeholders.	A number of initiatives are being carried out with the collaboration of other agencies and stakeholders. Projects are at different levels of implementation but most of them are behind schedule.
Electronic Transactions Act, 2008, Act 772	The Act makes provisions for the protection of users of electronic transactions.	Provisions for information location tools only relate to the service provider and customer but not customer to customer. This provision Gives room for take-down notification, but requires too much details.	The Act has clearly stated objectives, application, scope and implementation mechanisms. It makes provision for handling general cyber offences. The provisions of that Act shall apply with the necessary modification to the	The Act is being implemented by government agencies in collaboration with industry players in Ghana.

		Female victims of online sexual abuse may feel shy to give all these details.	person who commits the offence.	
Communications Service Tax (Amendment) ACT 2019	This Act affects the populace in terms of the cost of using online communication. Women are affected more because they are believed to have lower incomes than men.	The increment in the communications service tax from 6% to 9% in 2019 has further widened the already wide gap between men and women who use online communications services that reflects income disparities.	The amended Act does not cover all the important areas including objectives, strategies, and implementation procedures.	This Act has been implemented by government agencies in collaboration with service providers.
National Communications Authority Act 769, 2008	The Act makes provision for the protection of interests and opinions of customers and the vulnerable while they are using digital devices. Women and children are the most vulnerable when it comes to online abuse on communication channels.	Although the Act gives room for investigating and resolving disputes amongst users and operators with respect to rates, billings and services provided, it does not state how the disputes will be settled or victims will be compensated. This has the tendency to leave some doubts in the minds of women in terms of their information security.	Act 769 establishes the National Communications Authority. It has clearly stated objectives, functions and procedures for implementation for some sections.	This Act has been implemented in the establishment of the National Communications Authority.
National Information Technology Act 771 Agency Act, 2008	The Act establishes that the interest of customers be protected which includes women. It also gives room for the	The Act does not clearly state how the interests of the customers will be protected or the	Act 771 establishes the National Information Technology Agency. It has clearly stated	This Act has been implemented in the establishment of the National Information Technology Agency.

	investigation of complaints by all users, including women.	procedures that will allow this to be achieved. Also, investigations based on these are limited to technicalities in their service provision and not based on protecting customer's right or women's rights online.	objectives, functions, governing body among others.	
The Unsolicited Electronic Communications Code of Conduct (2014)	The code promotes effective use of information and communication technologies in line with best international practices and creates a safe communications environment which in turn promotes good customer service for customers (including women).	The code states that licensees shall provide practical protection for their subscribers and provide measures and mechanisms to ensure that the security of their information is guaranteed. It however does not state the type of protection that will be provided as the term 'practical protection' has some form of ambiguity associated with it.	The Code of Conduct has clearly stated purpose, scope and sections on how the code enhances the current regulatory arrangements. It establishes minimum acceptable practices for Service Providers to follow in relation to: Providing useful information to end-users; dealing with reports from end users and complaints from consumers; interacting with Law Enforcement Agencies on Spam-related matters within the context of the requirement to maintain the confidentiality of an End User's personal information.	Implemented by government agencies in collaboration with Mobile Network Operators and Value Added Service Providers.

<p>Malabo Convention on Cybercrime</p>	<p>The Convention has made provision for the reporting of offences against human rights and freedoms, making room for offences related to child pornography but no such reference was made to women's rights online. The provisions made in the convention implies that it relates to both men and women.</p>		<p>The convention has clearly stated aim and is meant to deter action directed against the confidentiality, integrity and availability of computer systems, networks and computer data. It also ensures the protection of human rights and fundamental freedoms.</p>	<p>The government of Ghana has acceded and ratified this convention and is responsible for its application. The new Cybersecurity Act is likely to address most of the provisions made in this convention.</p>
<p>African Union Convention on Cyber Security and Personal Data Protection</p>		<p>It is recommended that provisions made in this convention could be broadened in scope to cover women as this will aid in the protection of the rights of women online.</p>	<p>The Malabo Convention has clearly stated aims at defining the objectives and broad orientations of the Information Society in Africa and strengthening existing legislations on ICTs of Member States and the Regional Economic Communities.</p>	<p>This convention has also been ratified by the Government of Ghana and it is likely the new Cybersecurity Act will adhere to the necessary provisions stated.</p>
<p>National Gender Policy (2015)</p>	<p>Seeks to eliminate gender inequality and create equal opportunities for all in the fields of Education, Health and other areas. A number of initiatives are being implemented under this policy. Some of them focus directly on women rights and others indirectly. These are: -Community call centres -Livelihood Against Poverty Programme (LEAP)</p>	<p>Most of the projects are behind schedule as a result of lack of funding. Some of them (the community call centres and LEAP programme) are also not gender-sensitive and the data is not gender-segregated.</p>	<p>The broad policy objectives and strategies are clearly stated with implementation procedures and measurement indicators.</p>	<p>The formulation part of the policy is complete. With regard to the implementation, some of the projects are on course and women are benefiting. The Affirmation Action Bill is yet be passed.</p>

	-50 Million Women's Peak Project -Affirmative Action Bill			
ICT in Education Policy (2015)	The policy seeks to deploy ICTs and internet facilities in schools across the country in order to facilitate learning and teaching and equip students for jobs.	The policy is not gender-sensitive. It does not focus on women although girls are also beneficiaries. Most of the projects are behind schedule as a result of delays in funding them.	The objectives, strategies and implementation procedures are clearly stated.	Formulation has been completed and the implementation is on course. Over 566 schools have been provided with laboratories. It is obvious that some of the beneficiaries in these schools are girls who will receive training in ICTs.
Gender and Agricultural Development Strategy (GADS)	A department under the Ministry of Agriculture, Women in Agricultural Development (WIAD) is focussing on providing knowledge and modern technology to farmers to help them improve their production and post-production practices. Most of the beneficiaries are women.	The data provided on access to the various technologies have not been disaggregated by gender as required by the United Nation's requirements. As a result, it is almost impossible to know how many women have benefited from information through the technologies provided.	The policy has clearly stated objectives, strategies and implementation procedures. It also has measurement indicators and data is available on the performance of the farmers.	An e-agricultural system has been set up to provide information to the public. Farmers access the services from a call centre, through the use of an Interactive Voice Response (IVR) system, e-agriculture and e-extension portals and smartphones in extension delivery services.



Media Foundation for West Africa

32 Otele Avenue, East Legon,

Telephone: +233 (0) 302 555 327

Twitter: @TheMFWA

Facebook: Media Foundation for West Africa

info@mfwaw.org

www.mfwaw.org



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