



Research Ethics Committee

Reference Number: GCG-REC-2025-003

Date of Determination: 1/04/2025

Principal Investigator: Samuel T. Segun, PhD

Co-Investigators: Patrick Onodje, Ayantola Alayande, Glory Oscar, PhD

Study Title: The Infrastructure Paradox of AI Development in Low- and Middle-Income Countries (LMICs)

Organisation: Global Center on AI Governance (GCG)

Research Ethics Clearance/Exemption Determination

1. Determination

The Research Ethics Committee (REC) of the Global Center on AI Governance has reviewed the above-referenced study and has determined that it qualifies for exemption from formal research ethics approval review and approval. This determination is made on the basis that the study presents minimal risk to participants and falls below the threshold requiring full REC review, consistent with internationally recognised ethical standards for human participants research.

2. Basis for Exemption

The REC considered the following factors in reaching this determination:

2.1 Anonymous Design from Inception: The study will employ a fully anonymous online survey administered via Google Forms. The survey is designed from inception to collect no personally identifiable information whatsoever. Specifically, no names, email addresses, IP addresses, institutional affiliations tied to individuals, or unique demographic combinations that could permit re-identification will be collected at any point during the data collection process. Google Forms' settings will be configured to not collect respondent email addresses or track response metadata. The risk of re-identification is therefore assessed as very low.

2.2 No Sensitive Topics or Vulnerable Populations: The survey will collect professional opinions and practitioner experiences regarding AI infrastructure (electricity, internet, computing hardware, and training data) in low- and middle-income countries. The subject matter concerns professional and technical assessments of infrastructure conditions and does not involve sensitive personal information, health data, financial records, political opinions of a nature that could endanger participants, or information about illegal activities. The target population will comprise adult AI practitioners, researchers, industry stakeholders, and policy-makers, none of whom constitute a vulnerable population under applicable ethical guidelines.

African Observatory on Responsible AI t/a Global Center on AI Governance

Registration number: 2023/218496/08

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2.3 Informed Voluntary Participation: Prior to completing the survey, all participants will be presented with a disclosure statement that clearly communicates: (a) the purpose of the research, identifying the Global Center on AI Governance as the lead institution and describing the study as part of ongoing research into infrastructure capacities and AI innovation; (b) the estimated time commitment (8–10 minutes); (c) the voluntary nature of participation; (d) the confidential and anonymous nature of data collection; (e) that no personally identifiable information would be retained; (f) that data would be used solely for research purposes and would contribute to a peer-reviewed publication; and (g) compliance with GDPR regulations. Voluntary completion of the survey after reviewing this disclosure constituted informed consent to participate.

2.4 Minimal Risk Assessment: The REC assessed the risk profile of this study against internationally recognised criteria. The probability and magnitude of harm or discomfort anticipated in the research are not greater than those ordinarily encountered in daily professional life. Participants were asked to share professional assessments of infrastructure conditions in their countries, information that poses no foreseeable risk of harm, embarrassment, legal liability, or professional disadvantage. The anonymous design eliminates the possibility of linking any response to an identifiable individual.

2.5 GDPR Compliance: As no personal data within the meaning of Article 4(1) of the EU General Data Protection Regulation (Regulation 2016/679) will be collected, the GDPR's data processing requirements do not apply to this dataset. Recital 26 of the GDPR explicitly states that the principles of data protection do not apply to anonymous information, including for statistical or research purposes. Nevertheless, participants will be informed of GDPR compliance as a matter of best practice and transparency.

3. Compliance with Applicable Guidelines

Although not a medical study, The REC confirms that this research has been designed and will be conducted in accordance with the ethical principles of the Declaration of Helsinki (World Medical Association, 2024 revision), with particular reference to the provisions concerning informed consent (Paragraph 26), protection of research participants' privacy (Paragraph 24), and the proportionality of ethical oversight to the risk level of the research. The study will also align with the principles set forth in the Belmont Report (1979) regarding respect for persons, beneficence, and justice, and with the Human Sciences Research Council (HSRC) Research Ethics Policy Framework for minimal-risk social research.

4. Data Handling and Storage



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Data will be collected via Google Forms and stored on Google's cloud infrastructure in accordance with Google's data processing terms. All data are to be anonymous and contain no direct or indirect identifiers. The dataset will be used solely for the stated research purposes. Data cleaning, recording, and analysis shall be conducted using tools such as Python and Stata, with access restricted to the named investigators.

5. Informed Consent Statement

Informed consent will be obtained from all participants.

6. Conclusion

On the basis of the above assessment, the Research Ethics Committee of the Global Center on AI Governance has determined that this study qualifies for exemption from formal REC review and approval. The anonymous survey design, minimal-risk subject matter, absence of vulnerable populations, and informed voluntary participation collectively place this research below the threshold requiring full ethical review. This exemption determination is issued in accordance with internationally recognised ethical standards and is provided to support the publication of the study findings.

Issued by:

A handwritten signature in purple ink, appearing to read "Fola Adeleke", written over a horizontal line.

Prof. Fola Adeleke
Chair, Research Ethics Committee
Global Center on AI Governance
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