

Ethical Journalism in the Age of Artificial Intelligence: A Critical Content Review of the Media Council of Kenya's Handbook for Reporting on Artificial Intelligence

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ABSTRACT

This study critically examined the Media Council of Kenya's (MCK) Media Handbook for Reporting on Artificial Intelligence in Kenya as an institutional framework for governing ethical AI use in journalism. Although there has been an increasing amount of research into AI governance in the West, empirical research on AI governance on the African continent is relatively underdeveloped. This study aims to fill that gap by systematically analyzing the MCK handbook using qualitative content analysis that focuses on five ethical dimensions of accountability, transparency, human oversight, structural equity and enforcement capacity. Secondary empirical data was collected through peer-reviewed research on Kenyan journalism, on African media systems and on what is happening in the world of AI and journalism, and was fed in to examine the claims made in an existing handbook against the documented newsroom realities. Based on Social Responsibility Theory and Critical Political Economy of Media, the findings show that there are three significant patterns. First, the handbook shows a high level of normative consistency with internationally accepted principles of AI ethics, such as "Human-in-the-Loop" oversight and verification. Second, it has substantial gaps, most significantly because of the lack of enforcement mechanisms, poor considerate engagement with the political economy of AI in African media and the lack of contextualization in the Kenyan socio-political context. Third, the governance assumptions are often at odds with what is realistically found in Kenyan newsrooms, such as the economic precarity, reliance on technology and lack of equal access to verification tools. The study provides a framework for analyzing AI journalism governance documents from an African perspective using an empirical approach and offers concrete evidence-based suggestions for enhancing the usefulness and practicality of the MCK handbook.

Keywords: Artificial Intelligence, journalism ethics, AI governance, Media Council of Kenya, African media, content analysis, Human-in-the-Loop

INTRODUCTION

The integration of Artificial Intelligence into journalism has accelerated significantly across global media systems over the past decade. The use of technologies such as machine learning, natural language processing, automated content generation, and algorithmic audience targeting have become part of newsroom processes that used to be done entirely by people (Diakopoulos, 2019). The rise of generative AI has accelerated this shift, as it can generate synthetic text, images, audio and video to a degree that threatens to raise some fundamental questions about authorship, authenticity, and editorial accountability in journalism (Carlson, 2023).

These are especially important in African media systems. In recent years, journalism on the continent is taking place more and more in digital communication settings shaped and governed by foreign-owned technology platforms and AI infrastructures that are not grounded in African socio-cultural contexts (Wasserman, 2020). Kenya offers a good lesson as an example in this context. The Kenyan media industry has been digitally

transformed on an unprecedented scale, with newsrooms at big television houses such as Citizen TV, NTV, KTN and K24 implementing AI tools in analytics, content recommendation, moderation and production (MCK, 2021). These developments have come against a backdrop of on-going structural issues such as weak professional enforcement, underpaid journalists, and a high reliance on foreign digital platforms for audience engagement and revenue.

The Media Handbook for Reporting on Artificial Intelligence in Kenya, first of its kind by a Kenyan media regulatory body, came out of this context in 2024. The handbook spells out ethical guidelines such as accountability, transparency, fairness, diversity, protecting privacy, respecting human dignity, and editorial control, and outlines main risks of AI technologies for journalism (MCK, 2024). Even though the handbook is institutionally important, it has not been systematically studied by scholars. Most of the existing research on AI governance in journalism has tended to be conducted within Western media contexts (Beckett, 2019; Jobin, Ienca, & Vayena, 2019) and yet there remains a degree of lack in analyses of AI governance in Africa that take into account the documented realities of journalism in Africa. This study seeks to fill that gap by systematically analyzing the qualitative content of the MCK handbook using AI governance models in global countries, empirical evidence from peer-reviewed studies on Kenyan journalism practice, and media systems in Africa.

The book's central argument is that, although the handbook is an important institutional effort, its governance assumptions are at odds with the empirical evidence in Kenyan newsrooms, and as a result reduce its practical usefulness. These differences are not simply "accidental" in the sense that they are not necessarily found throughout the document, they are an inherent limitation in how the document discusses the concept of AI governance, and unless this is addressed, the handbook will have a limited impact on the reach of its distribution.

Statement of the Problem

The MCK handbook represents Kenya's primary institutional response to AI-driven transformation in journalism. Yet no systematic evaluation of the document's empirical grounding, internal consistency, or alignment with documented Kenyan newsroom realities has been conducted. This is a significant gap because governance frameworks that are not grounded in the actual conditions of the systems they seek to govern have historically demonstrated limited effectiveness in African media contexts (Okoro & Onuoha, 2013; Skjerdal, 2010).

Past studies on journalism practice in Kenya have been consistent in documenting conditions that hinder ethical governance: underpayment of journalists, high dependency on foreign owned digital platforms for content distribution, high level of source-journalist relationship that creates conflicts of interest, and weak institutional enforcement of professional standards (Irer, 2016; Harwood et al., 2017). Whether the MCK handbook's governance framework adequately accounts for these documented conditions is an empirical question that this study systematically addresses.

Research Objectives

The primary goal of this study was to critically assess the Media Handbook for Reporting on Artificial Intelligence in Kenya with reference to ethical journalism and AI governance. The specific objectives were to analyze the ethical principles underpinning the handbook against established international AI governance frameworks; to examine how the handbook conceptualizes and addresses documented risks associated with AI in journalism; to evaluate the handbook's strengths and limitations through systematic content analysis; and to assess the handbook's implications for journalism practice and AI governance in Kenya based on empirical evidence.

THEORETICAL FRAMEWORK

This study is anchored on two complementary theories, which can explain both the ethical aspirations, which are embedded in the handbook and the structural environment in which it is implemented.

Social Responsibility Theory, as proposed by Siebert, Peterson, and Schramm (1956), is a theory of press freedom with a set of corresponding obligations to society, obligations of accuracy, fairness, accountability and commitment to public interest. The argument that journalists have ethical responsibility for the use of AI tools in the editorial process, whether or not they are technically sophisticated, is the guiding theory behind the MCK handbook, which is why it is directly applicable to the elements of the framework. Social Responsibility Theory provides the normative baseline against which the handbook's ethical principles can be evaluated. Social Responsibility Theory provides the normative baseline against which the handbook's ethical principles can be evaluated.

There is, however, a documented weakness of Social Responsibility Theory, it makes the assumption that media practitioners will act on their professional duties when those are clearly defined, but doesn't fully explain the structural pressures that often over-ride individual moral obligations (Nordenstreng, 1997). Research on journalism practice in Kenya has consistently demonstrated this gap, professional codes of conduct exist and are known to journalists, yet structural conditions including poor remuneration, weak enforcement, and economic dependency significantly constrain their practical impact (Ileri, 2016; Skjerdal, 2010).

Critical Political Economy of Media, as developed by Mosco (2009) and applied to African media contexts by Wasserman (2020), provides the structural corrective. This angle explores how the ownership structure, economic incentives, technological infrastructure and global power relations create what is possible in media systems, and focuses analytical effort on the material conditions that are being managed by the governance frameworks. When adapted to the context of AI governance in Kenyan journalism, this structure leaves a number of questions unanswered by the handbook, whose infrastructure is being governed? What is the benefit to the audience of an AI system gathering audience data? Under what conditions do foreign technology companies invade African media markets? They are not merely side issues, but core aspects of the potential for AI governance to be effective in practice.

Put together, these sets of frameworks create a dialectic which pulls the handbook's normative expectations into a relationship that is productive and in tension with the structural contexts in which it is being implemented, just the sort of evaluation that governance documents in the context of developing media require.

METHODOLOGY

Research Design

This study used systematic qualitative content analysis as the main methodology. Qualitative content analysis can be used for the interpretive analysis of institutional documents because it can go beyond description of what is contained in the documents to examine the underlying assumptions, internal consistencies, and omissions in the structure of the documents (Creswell & Creswell, 2018; Krippendorff, 2004). What it does is more than a descriptive content analysis, as this goes beyond simply describing the document to questioning its framing and what it tells us about institutional assumptions and the priorities in governance.

Analytical Framework

To overcome the methodological disadvantage of impressionist document critique, this study created a structured analytical framework with five evaluative dimensions based on the existing literature on AI governance (Jobin, Ienca, & Vayena, 2019; UNESCO, 2021) and journalism ethics scholarship (Ward, 2018):

Dimension 1, Ethical Foundations: Do the ethical principles in the handbook make sense and are they carefully explained? Do these principles align with globally accepted ethical guidelines for AI?

Dimension 2: Risk Conceptualization: Is documented risks with AI in journalism captured and covered correctly in the handbook? Do identified risks have roots in empirical evidence from similar media contexts?

Dimension 3: Human Oversight Mechanisms: Does the handbook offer concrete guidance on how to oversee the operations of AI systems? Are there reasonable oversight needs in light of reported newsroom practices?

Dimension 4: Structural Equity and Political Economy: Is there any discussion of documented structural inequities in the development and deployment of AI in the handbook? Does it cover technological dependency, platform power and the global political economy of AI?

Dimension 5: Enforcement and Implementation Capacity: Are enforcement mechanisms, monitoring procedures, or accountability structures outlined in the handbook? Are requirements for implementation matched to documented institutional capacities?

Data Sources and Analysis Procedure

The main analytical document used was the Media Handbook for Reporting on Artificial Intelligence in Kenya (MCK, 2024). The document was read and re-read to analyze it in its entirety. For the first reading, the handbook was themed to discover explicit claims, principles and recommendations. Each coded theme was assessed on each of the five analytical dimensions in the second reading. The claims made in the handbook were systematically cross referenced with empirical evidence based on secondary sources in the third reading.

Secondary data sources included peer-reviewed articles from journals, book chapters and policy documents related to Kenyan journalism practice, the African media systems and AI governance that were published from 2010 to 2024. These sources were purposively sampled in order to be directly relevant to each of the five analytical dimensions. Secondary sources were used in two ways: to offer empirical evidence for the comparison of the claims in the handbook, and to offer comparative evidence of governance from similar media contexts.

The findings from the analytical process were structured around the five evaluative dimensions so that a structured assessment of the handbook could be made in every evaluative dimension instead of a general impressionistic critique. This method both increases the system and verifiability of analysis and supports the use of documented evidence in making evaluative claims.

ANALYSIS AND DISCUSSION

Ethical Foundations: Normative Alignment and Internal Coherence

Across the first analytical dimension, ethical foundations, the handbook demonstrates genuine strengths. The principles of accountability, transparency, fairness, diversity, protection of privacy, respect for human dignity and editorial responsibility are clearly stated at the outset and put into practice throughout the document (MCK, 2024). The handbook's structure and ethical principles are highly aligned with the UNESCO Recommendation on the Ethics of Artificial Intelligence (2021): For every one of the seven key ethical principles of the Recommendation, there is a corresponding principle in the handbook. This alignment is important as it places the handbook in the context of a global governance discussion and offers a philosophical basis upon which further and more detailed and concrete standards may be drafted.

The handbook's framing of AI as an ethical and democratic issue, rather than purely a technical one, reflects a governance maturity that Jobin, Ienca, and Vayena (2019) identify as characteristic of more sophisticated AI ethics frameworks globally. Their comparative analysis of 84 AI ethics documents from 38 countries found that the most effective frameworks share precisely this orientation: treating AI governance as fundamentally about human values and democratic accountability rather than technical compliance. The MCK handbook's alignment with this approach is a genuine contribution.

Yet when the handbook is critically examined in a systematic way, there is a tension that undermines the ethical foundation of the handbook. At the same time, AI is portrayed as a solution to boost the efficiency and innovation of the journalism profession, while also holding significant risks that demand thorough human control and supervision (MCK, 2024). The dual positioning is not an inherently contradictory one, AI indeed carries both

opportunities and risks, but this handbook does not consider the practical implications of holding both positions. The adoption of AI becomes much less efficient when journalists are asked to verify every piece of AI-generated content, have Human-in-the-Loop oversight at each step of the editorial process and be mindful of bias and manipulation. This tension, unacknowledged in the handbook, creates practical ambiguity that limits the document's operational usefulness.

Risk Conceptualization: Documented Risks and Governance Gaps

The handbook defines three broad types of AI-related risk on the second analytical dimension which is risk conceptualization: misinformation and deepfakes, algorithmic bias and opacity, and privacy violations (MCK, 2024). A systematic analysis of each of them against the empirical evidence shows both adequate identification and major governance shortcomings.

The section on misinformation and deepfakes is the best in the handbook with respect to risks identified. While the document acknowledges the potential of generative AI technologies to generate content that can match or surpass the quality and quantity of traditional verification methods, it also identifies the challenges these tools pose for verification processes. The recognition is based on empirical evidence: Vaccari and Chadwick (2020), in an experimental study on synthetic political video, found a significant decrease in trust of the authentic media after exposure to deep fake, even if the viewers recognize it as fake. The handbook's focus on verification is pertinent to the Kenyan context, especially when digital misinformation has been weaponized in electoral environments in Africa (Mare, 2020).

But the handbook's governance response to misinformation, which focuses on journalists' verification and editorial review, fails to sufficiently address the structural dynamics that drive misinformation. In the case of social media platforms, "Couldry and Mejias (2019)" show empirical evidence that these platforms are designed to promote engagement rather than accuracy, and that misinformation is consistently better than verified information in terms of distribution measures. This is a structural issue on the platform that cannot be addressed by the verification practices of individual journalists. The handbook's exclusive attention to journalist-level response to a structurally generated problem is a notable weakness in the risk governance of the handbook.

The handbook correctly notes algorithmic bias as an issue, but it focuses mostly on a journalists' awareness that AI systems could be biased, and therefore the journalist can take steps to avoid it (MCK, 2024). This perspective is not in line with the empirical understanding of the workings of algorithmic bias. In this systematic analysis, Noble (2018) illustrates algorithmic bias is not an accidental technical glitch, but a structural artifact of the data, priorities, and social worlds informing the design of AI systems. Building on this, Birhane (2020) applies the same analysis to the African context and demonstrates the systematic misrepresentation of African languages, cultures and experiences through the construction of AI systems based on primarily Western datasets, which she labels algorithmic colonization. These are design level structural issues which cannot be addressed by simply raising awareness among journalists. The handbook's lack of a discussion of the structural drivers of algorithmic bias means that its risk governance approach is not truly a prevention strategy, but rather a symptom management approach.

Human Oversight: Principles and Operational Feasibility

The third analytical dimension, human oversight mechanisms, highlights the biggest gap between principle and practice in the handbook. Overall, the document's emphasis on Human-in-the-Loop (HW) monitoring is its most positively stated and consistently repeated moral stance (MCK, 2024). This seems to be a solidly established practice, as Diakopoulos (2019) shows how the incremental steps taken to automate human editorial work in AI-driven newsrooms align with lower levels of content quality, accuracy, and contextual awareness. Similarly, Carlson (2023) shows that editorial responsibility fades into a state of confusion in fully automated journalism contexts. The handbook is not fully automated because it is principled and based on empirical evidence.

There is, however, a significant feasibility gap when it comes to systematically assessing the oversight guidance in the handbook against documented conditions in Kenyan newsrooms. In a detailed analysis of Kenyan

journalism practice, Harwood et al (2017) identified that journalistic editors in key television newsrooms in the country are always overmanned, with editors overseeing far more journalists and story production than the international professional standards would allow. But, as Ireri (2016) recorded, many Kenyan newsrooms face economic pressures such as delayed salaries and lack of resources, among others, which often lead editorial shortcuts even when journalists know and acknowledge the standards normatively. In fact, these documented challenges imply that meaningful Human-in-the-Loop (HWIL) supervision, as envisioned in the handbook, will need more institutional resources and editorial capacity than many newsrooms in Kenya currently have.

The handbook does not offer suggestions for newsrooms that are facing similar constraints documented above to prioritize their oversight responsibilities, what minimum standards of oversight are acceptable in such conditions, or how the MCK will be able to help newsrooms build the capacity necessary for effective oversight. This gap between the handbook's oversight aspirations and the documented realities of its implementation environment significantly limits its practical applicability.

Structural Equity and Political Economy: The Governance Blind Spot

Structural equity and political economy is the fourth analytical dimension in the handbook, and it shows the most significant analytical fault. The document is analyzed in a systematic way, revealing that there is limited discussion of the structural conditions that shape the ways in which AI technologies gain entrance into Kenyan journalism, under what conditions, and for which purposes.

The empirical evidence on the development and deployment of AI in Africa shows a clear trend of structural inequality. Birhane (2020) shows that the African countries are mainly represented as users rather than researchers or collectors or designers of AI systems, in the global AI ecosystems. Wasserman (2020) builds on this work, providing a more detailed exploration specifically of how digital communication systems are used in African media contexts, which vary widely in their social, political and economic makeup. In this context, Srnicek (2017) highlights the empirical evidence of how a few technology companies have cornered the market for global digital infrastructure and put it under the control of those firms, putting media systems around the world in a state of dependency.

The following structural conditions are documented and are directly related to the governance project in the MCK handbook but treated lightly. The handbook recognizes the possibility of algorithmic bias and urges fairness but does not delve into the question of ownership of the AI systems that are being used in Kenyan newsrooms, the data collection procedures that the systems use or how the design of the systems do or do not meet Kenyan values of journalism and public interest. That is because, as Mosco (2009) demonstrates with extensive empirical analysis, the political economy of communication infrastructure, such as ownership and profit motives, dictates actual constraints on national media governance that go beyond moral principles.

Kenyan journalism's documented dependence on foreign-owned platforms for content distribution and audience reach (Harwood et al., 2017) further complicates the governance picture. When editorial visibility is determined by algorithms owned and configured by corporations operating beyond MCK regulatory jurisdiction, the practical reach of any MCK governance framework is structurally constrained in ways the handbook does not acknowledge. This is not merely a theoretical concern; it is an empirically documented feature of the environment the handbook is designed to govern.

Enforcement and Implementation Capacity: The Accountability Gap

The fifth analytical dimension, enforcement and implementation capacity, highlights perhaps the most practically consequential limitation of the handbook. There is no systematic review of enforcement mechanisms, monitoring procedures, compliance assessment processes or consequences of compliance of violations (MCK, 2024). The handbook does not require any compliance or professional self-regulation.

This is economically unsound in the Kenyan media governance setting because it assumes voluntary compliance. A national survey of 504 journalists by Ireri (2016) revealed that seven out of every 10 journalists felt that

corruption was prevalent or very prevalent in the Kenyan media, while there was generally low adherence to the existing MCK code of conduct. In many different African journalism environments, Okoro and Onuoha (2013) report that professional codes of conduct have never succeeded in altering the practice of journalists without credible enforcement mechanisms. In comparative studies of journalism systems in Africa, Skjerdal (2010) identified a lack of professional accountability structures as one of the key factors in ethical failure in newsroom environments, if not more important than individual media professionals' ethical commitments.

The results of these studies come together to a clear empirical conclusion: governance structures that are voluntary and not backed by enforcement systems are found to be somewhat ineffective in the journalism sector in Kenya. This is an important gap in the analysis of the handbook, which replicates this method for governing AI, but doesn't recognize or engage with this documented trend.

Absence of Enforcement and Accountability Mechanisms

The governance structure of the handbook does not mention documented economic conditions of Kenyan journalism practice. According to Skjerdal (2010), poor compensation of journalists is the most prevailing structural cause of ethical problems in the African context. In particular, Harwood et al., (2017) report that financial pressure has emerged as one of the key factors influencing editorial decision-making in Kenyan newsrooms. If this is the context, then it is impossible to expect the same moral climate to be maintained throughout a system of governance.

Neglect of Newsroom Working Conditions and Economic Pressures

The handbook's governance framework makes no reference to the documented economic conditions of Kenyan journalism practice. Skjerdal (2010) identifies poor journalist remuneration as the dominant structural driver of ethical failure in African journalism contexts. Harwood et al. (2017) specifically document financial pressure as a primary determinant of editorial decision-making in Kenyan newsrooms. A governance framework that does not account for these documented conditions cannot realistically expect its ethical standards to be consistently applied.

Limited Practical Guidance on Implementation

Systematic analysis of the handbook shows that the advice provided is more at the principal level than practice level. The document outlines what outcomes are desired, but very little practical direction as to how they can be realized in the resource and capacity limits of real Kenyan newsrooms. This disconnect between the ideals on which AI ethics frameworks are built, and instructions on how to implement them in practice, has been observed consistently in the various ethics frameworks around the world (Jobin, Ienca, & Vayena, 2019).

Insufficient Attention to Local Language and Cultural Diversity

The handbook does not consider the documented limitations of AI systems in Swahili and Kenya's other local languages. Underrepresentation of African languages in AI training data exacerbates compounded risks of error and cultural misrepresentation when applied in African contexts, as Birhane (2020) argues. The handbook's lack of information about the risks to journalism in Swahili is a gap in empirical research on the challenges facing journalists in Kenya.

Limited Engagement with Kenya's Specific Political Communication Environment

The Handbook does not discuss Kenya's documented history of political communications and disinformation, which has been ethnically charged. In particular, the work of Mare (2020) gives empirical detail of the use of AI-powered synthetic media and algorithmic amplification in an African electoral setting to disseminate targeted disinformation. A governance framework for AI in Kenyan journalism that does not engage with these specific documented risks is insufficiently contextualized for its operating environment.

Strengths of the Handbook

Timely and Proactive Institutional Recognition of AI as an Ethical Issue

Despite the aforementioned weaknesses, there are also certain true merits to be highlighted in this handbook. The fact that it is an institutional document is important enough. Beckett's (2019) worldwide survey of journalism and AI governance revealed that differently preparedness for AI governance differs a lot between the different national media systems, with many regulatory bodies not being able to catch up with the pace of technological development. The MCK's development of a formal handbook puts Kenya in front of most of the other media regulatory bodies in Africa on this dimension and lays the groundwork for more detailed and robust governance to emerge.

Strong Ethical Orientation Grounded in International and Local Frameworks

The ethical principles in the handbook are aligned with internationally recognized AI governance standards with a high level of congruence, such as the framework for UNESCO (2021). At the same time, the document puts these principles into the context of existing laws and regulations in Kenya namely the Constitution of Kenya (2010), the Data Protection Act (2019), the Media Council Act (2013) and the Computer Misuse and Cybercrimes Act (2018). The dual anchoring of global ethical requirements to particular legal obligations is a governance approach that other authors, Jobin, Ienca and Vayena (2019), describe as being typical of good national AI ethics policies, as it creates entrenched mechanisms by which principles could be made binding.

Robust Commitment to Verification and Human-in-the-Loop Oversight

The most practical contribution of the handbook is its persistent emphasis on human editing. Throughout, the document has maintained that the editorial responsibility is and should always be a human responsibility, even if AI is involved in the production process or not. This is a position that can be backed up by actual evidence: Diakopoulos (2019) points out the quality losses in editorial processes when automation takes over, while Carlson (2023) illustrates the accountability problems that arise when AI systems are used to perform tasks traditionally performed by human editors. This handbook's explicit institutional stance on the matter offers a useful normative benchmark for measuring the practices of newsrooms.

Accessible Language and Practical Orientation for Practicing Journalists

The handbook is written in language accessible to practicing journalists without specialist technical knowledge. This accessibility is a genuine governance asset. Research on the implementation of professional ethics frameworks consistently finds that the gap between documented standards and practice is partially explained by inaccessibility, frameworks written for regulators and academics rather than practitioners have limited uptake at the operational level where ethical decisions are made (Okoro & Onuoha, 2013). The handbook's practical orientation mitigates this risk.

CONCLUSION

This research used a systematic five-dimensional analytical framework to critically analyze and rate the Media Handbook for reporting on Artificial Intelligence in Kenya for adherence to the empirical findings from peer-reviewed literature on Kenyan journalism practice, African media systems and global governance on AI. This analysis yields three key results.

First, the handbook has a number of genuine strengths in the normative sense. It has clear ethical principles that are well-explained and closely aligned with internationally agreed norms for AI governance. It is a resistance to losing accountability which full automation brings, with its empirically-based call for Human-in-the-Loop oversight. Its incorporation of international ethical concepts into the Kenyan legal landscape offers a lawful institutional basis for deepening the governance process in the country.

Second, the handbook has systematic structural shortcomings that hamper its usefulness. These gaps are not an accident but part of an analytical pattern: the governance model of the document is for an idealized newsroom context, not the realities of Kenyan journalism as documented. The lack of enforcement mechanisms, failure to pay attention to economic pressures on journalists, lack of attention to platform dependency and algorithmic colonization, and lack of contextualization within the Kenyan political communication context all spell trouble points where the handbook's aspirations are likely to be frustrated in real practice.

Thirdly, the handbook's emphasis on voluntary compliance is similar to a governance model that has been shown to be less effective in the African journalism context. The handbook may end up in a long list of professional ethics frameworks that are well known and seldom observed in Kenyan newsrooms if there are no credible mechanisms and institutional structures in place to enforce them in a manner that corresponds to newsroom realities.

The results of this study have implications that go beyond the MCK handbook. The analytical framework developed in this study can be used to systematically compare AI governance documents across African media systems for use in future research.

RECOMMENDATIONS

The following recommendations represent those that emerged directly from the five-dimension analytical framework used in this research and based on the empirical evidence gathered in each of the five dimensions.

Establish Clear Enforcement and Accountability Mechanisms

The most empirically urgent recommendation, derived from findings on the fifth analytical dimension, is the development of a credible enforcement architecture. The MCK should specify what constitutes a violation of AI ethics standards, establish investigation and adjudication procedures, and define graduated consequences for non-compliance. This recommendation is based on reported evidence of poor impact on behavior change in voluntary compliance frameworks in Kenyan journalism in the past (Ireri, 2016; Okoro & Onuoha, 2013).

Address Newsroom Working Conditions as a Governance Variable

The third analytical dimension reveals that feasibility of Human-in-the-Loop oversight is directly limited by reported newsroom working conditions. The MCK should create minimum standards for institutional capacity, such as the ratio of editorial staff, training of AI tools and provision of verification resources, which media houses must comply with to be considered eligible for MCK accreditation. This recommendation is based on empirical evidence from Harwood et al. (2017) on the capacity constraints in Kenyan newsrooms.

Develop Operationalizable Verification Protocols

Findings on the second analytical dimension reveal a gap between the handbook's verification aspirations and its operational guidance. The MCK should fund the development of verification protocols specific to the creation of AI-generated text, images, audio and video content, differentiated guidance for large and small newsrooms. This recommendation comes in response to the reported gap between the available tools and verification requirements in media organizations in Kenya.

Engage Structurally with Platform Dependency and Algorithmic Colonization

The fourth analytical dimension finding is that the handbook's analysis was weak in its implications for structural inequalities in the development of AI. The MCK should formally consult with the Communications Authority of Kenya, the Office of the Data Protection Commissioner, and regional regulatory bodies such as the African Union to craft regulations that will tackle the unique governance challenges stemming from foreign owned AI infrastructure in Kenyan journalism. The recommendation is based on the empirical evidence presented by Birhane (2020) and Mosco's (2009), which shows how technological dependency poses governance constraints.

Develop Kenya-Specific AI Risk Frameworks

The results from the second analytical dimension reveal that the handbook's risk framework misses Kenya's political communication context. The MCK should fund empirical research to understand the role of AI in the spread of misinformation in Kenyan electoral and political contexts, and establish Kenya-specific risk assessment and response frameworks based on the research. This recommendation is grounded in Mare's (2020) documentation of AI-enabled disinformation in African electoral contexts.

Address Local Language AI Performance Gaps

Findings on the fifth analytical dimension identify the absence of local language guidance as a significant gap. The MCK should research and create specific guidelines for the use of AI tools in the context of journalism in Swahili and other Kenyan languages with clear warnings on known limitations and increased misrepresentation risks. This recommendation is based on Birhane's (2020) empirical input on the current bias of African language in the training sets for AI.

Institutionalize Regular Review Cycles

In light of the rapid pace at which AI technologies are evolving, the MCK should consider reviewing and updating the handbook every 2 years, adding empirical evidence of the use of AI in Kenyan news media and potential ethical issues that are being faced in practice. Practicing journalists, editors, civil society and independent technical experts should all be involved in review processes.

Suggestions for Further Research

This study's analytical framework, that is, evaluating AI governance documents across dimensions of ethical foundations, risk conceptualization, human oversight, structural equity, and enforcement capacity provides a replicable tool for comparative analysis across African media regulatory contexts. Future research should apply this framework comparatively across multiple African national AI journalism governance frameworks as they emerge, generating an empirical basis for continent-level governance learning. Additionally, ethnographic and interview studies of the adoption and use of AI in Kenyan newsrooms will give the operational evidence base which is currently missing from governance frameworks in this area.

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