



**THE CHALLENGES OF FREEDOM OF EXPRESSION : AN ANALYSIS OF
POLITICAL, SOCIAL AND CULTURAL FACTORS . A COMPARATIVE STUDY
BETWEEN GHANA AND BURKINA FASO**

BY

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**A DISSERTATION SUBMITTED TO THE SCHOOL OF GRADUATE STUDIES
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DECLARATION

I hereby declare that this dissertation is the result of my own original research and that, no part of it has been presented for another degree in this university or any other higher education institute. I further declare that all the sources that I have used or quoted have been indicated and acknowledged by means of complete references.

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Student

Index number

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CERTIFICATION BY SUPERVISOR

This Dissertation has been prepared and presented under my supervision according to the guidelines for supervision and formatting of Dissertation laid down by the University of Media, Arts and Communication, UniMAC.

.....

Supervisor

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DEDICATION

**TO GOD,
MY FATHER,
AND MY FAMILY**

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ABSTRACT

This study explores the challenges of freedom of expression through political, social, and cultural factors in a comparative analysis of Ghana and Burkina Faso. Grounded in Social Constructivism and Political Systems Theories, it examines how cultural norms and political regimes shape the perception and practice of this right. Social Constructivism highlights the role of language and culture, while Political Systems Theories reveal the contrasting impacts of democratic and authoritarian governance on media freedom and public discourse. Using a qualitative approach, the study employed an explanatory survey design, gathering data through in-depth interviews with a purposive sample of journalists, activists, and policymakers from both countries. The study underscores ethical considerations, ensuring confidentiality, informed consent, and voluntary participation. Recommendations include strengthening legal frameworks, promoting media literacy, and fostering dialogue among stakeholders to enhance freedom of expression. The research calls for further studies on the impact of digital media and offers valuable insights for policymakers, media practitioners, and scholars in West Africa.

CHAPTER ONE

INTRODUCTION

1.1 Background of the study

On Wednesday, May 3, 2023, 30 organizations, including Human Rights Watch (HRW) and the Media Foundation for West Africa (MFWA), united in an appeal to the African Union, ECOWAS, UEMOA, the UN, and others to address the situation of the press in Mali and Burkina Faso, which has been severely affected by the actions of the authorities in both countries.

In Burkina Faso, attacks are increasingly being relayed on social networks by 'influencers' supportive of the country's military regime, acting as vigilantes ready to threaten journalists and opinion leaders who they perceive as too independent. The Burkinabe daily *L'Observateur Paalga* reports the establishment of a regime of terror, accompanied by a wave of fake news that floods social networks with lies. The first victims of these influencers are the Burkinabe population, who are deprived of a democratic discourse. (M.Zongo ,2023)

According to the International Federation for Human Rights (2023) the fight against terrorism is now obviously being used as a pretext to impose new standards of information and to restrict the fundamental rights of the Burkinabe population to seek and access information through professional and independent media. In Burkina Faso, the conditions under which journalists must work have become so critical that even the regulatory body has raised concerns. In a press release issued on March 29, 2023, the Higher Council for Communication regretfully noted the recurrence of threats against the press, media, and journalists in the exercise of their profession.

Ghana has a reputation as one of Africa's most democratic countries, with a vibrant and pluralist media environment where journalists expose corruption, highlight incompetence and crime, and demand accountability from the powerful and duty bearers. Ghana achieved sustained

improvement in its press freedom landscape over the years, culminating in its ranking by Reporters without Borders (RSF) as Africa's country with the freest media in 2018.

This rise to press freedom fame was further crowned by the designation of Ghana by UNESCO to host the global event marking the 2018 World Press Freedom Day (WPDF). The impressive rise has since been followed by a steep decline in recent times. The country has been recording violations on a scale and severity that defy its reputation as a democratic model in West Africa. Journalists face risks of arrest, detention, and torture from state agencies like the police, military, secret service, and political operatives of political parties with security agents being the worst perpetrators of violations against journalists. The attacks have been systematic, and in nearly all cases, no one has been held to account. Journalists have been assaulted in the open by police and military officers while they covered national events, and in some cases their equipment has been damaged.

The attacks became such a common feature that in July 2021, the Media Foundation for West Africa (MFWA) mobilised more than 600 journalists and supporters of press freedom, to petition the country's Parliament to do something about the situation. The killing of Ahmed Suale of the Tiger Eye PI on January 9, 2019 in Accra by unidentified persons has been a major blot on Ghana's otherwise clean press freedom sheet. Some of the leading investigative journalists in Ghana have reported receiving threats to their lives and being trailed for various reports they have published (MFWA, 2022).

1.2 Problem Statement

Existing research highlights several important observations about freedom of expression, emphasizing its crucial role in the construction and maintenance of democracies as well as its transformation over time due to various factors. Van Vollenhoven (2015) asserts that case law and legal principles consistently demonstrate that freedom of expression is a fundamental

condition for protecting and promoting democratic values. Alon Harel (2011) further specifies that the central challenge for liberal democracies is not merely to protect freedom of expression mechanically, but to create and maintain conditions that allow expression to truly enhance individual autonomy and promote liberation. However, Nina Goreng (2022) points out that over time, and particularly with the development of media and communication technologies, the concept of "freedom of expression" has begun to reveal its more problematic aspects. These include its misuse to discriminate against and offend certain social groups, their members, or specific individuals. This issue is particularly evident in countries like Ghana and Burkina Faso, which have been constitutionally identified as democratic. Moreover, these nations face significant challenges in protecting freedom of expression.

While there is sufficient work in the area cited above, there is however not enough work in the political, social, and cultural factors that contribute to the challenges facing freedom of expression in African countries, particularly from a journalistic perspective. This study aims to explore these underlying factors to understand how they influence the realization of freedom of expression in these democratic or non-democratic contexts. By investigating the complexities surrounding freedom of expression in Ghana and Burkina Faso, this research intends to shed light on the broader challenges faced by African democracies in fostering an environment where freedom of expression can genuinely contribute to democratic governance.

1.3 Research Questions

The study was guided by the following research questions:

- How is freedom of expression doing in Ghana and Burkina Faso ?
- How do political structures and governance systems in African countries like Ghana and Burkina Faso impact freedom of expression?
- What roles do social and cultural dynamics play in influencing freedom of expression in these countries ?
- How does the presence of media ownership and control by political elites or corporate interests affect freedom of speech?

1.4 Research Objectives

Generally, this study investigates the challenges to freedom of expression in Ghana and Burkina Faso by conducting an analysis of political, social, and cultural factors. The specific objectives of the study are as follows:

- to assess the state of freedom of expression in Ghana and Burkina Faso relating to their realities .
- to outline the impact of political structures and various governance systems on freedom of expression.
- to discuss the scope of social and cultural factors on freedom of expression.
- to address the issue of media ownership by political elites and its impact on freedom of expression.

1.5 Significance of study

This study holds value in understanding the multifaceted nature of freedom of expression in two distinct African countries . By focusing on Ghana and Burkina Faso, this research aims to illuminate the specific challenges that hinder the effective realization of this fundamental right within these countries.

This study is significant as it will provide a nuanced analysis of how political, social, and cultural factors impact freedom of expression in Ghana and Burkina Faso, two nations that, despite their democratic credentials, face ongoing challenges in this area.

The research will employ a qualitative approach with content analysis to delve deeply into the topic. This methodology is chosen to facilitate a comprehensive exploration of the intricate dynamics affecting freedom of expression. Through in-depth interviews with key stakeholders; this approach will enable a rich, contextual understanding of the barriers related to freedom of expression in these countries.

By comparing the experiences of Ghana and Burkina Faso, this study will not only highlight common challenges but also provide insights into unique national contexts. The findings will contribute to the broader discourse on freedom of expression in Africa, offering valuable recommendations for policymakers, advocacy groups, and scholars. Ultimately, this research aims to support the enhancement of democratic practices and the protection of fundamental rights in the region.

1.6 Scope of the study

This study relies exclusively on in-depth interviews with journalists, activists, and policymakers. However, due to time and financial constraints, the research is subject to several limitations. Specifically, the study focuses solely on analyzing cultural, political, and social factors, leaving out other potentially relevant aspects. This narrowed scope is necessary to ensure a manageable and focused investigation, though it may limit the breadth of the findings.

Despite these constraints, the selected approach aims to provide valuable insights into the challenges of freedom of expression within the given context.

1.7 Organization of the Study

This study is organized into five chapters. Chapter One provides an introduction to the research, including an overview, the problem statement, research questions and objectives, as well as the significance, scope, and structure of the study. Chapter Two reviews existing literature on free speech and the realities surrounding it, further explaining the importance of the research and examining previous findings related to the topic.

Chapter Three outlines the theoretical framework that underpins the study.

This chapter also presents the research methodology, detailing the research philosophy, approach, sampling technique, data sources, research instruments, data collection methods, and the approach used for data analysis. Each research technique is justified, and challenges encountered during data collection are discussed. Chapter Four focuses on the analysis of the data collected, presenting the findings from the qualitative content analysis of in-depth interviews on the challenges of freedom of expression in Ghana and Burkina Faso, explored through a comparative lens.

Finally, Chapter Five summarizes the key results and findings of the study, discusses its contributions to the understanding of freedom of speech, and offers a general conclusion. This chapter also provides recommendations based on the findings study.

CHAPTER TWO

LITERATURE REVIEW

2.1 Introduction

This chapter provides a literature review and an overview of different types of research, including studies that have been done in the past. It includes a summary of what other researchers have found, as well as some theories, a knowledge gap, and their findings on freedom of speech .

2.2 Importance of freedom of speech

Freedom of expression is widely recognized as a cornerstone of democratic societies, crucial for fostering open debate, diverse perspectives, and informed decision-making. Nina Gorenc (2022) stated that freedom of expression is the lifeblood of democracy, facilitating the open debate necessary for considering diverse interests and perspectives. This openness enables the negotiation and compromise essential for reaching consensual policy decisions. She emphasizes that for a long time, freedom of expression has been regarded as a fundamental precondition for a functioning democracy, which is why it has enjoyed robust legal protections, albeit with exceptions in particular circumstances.

WJ van Vollenhoven (2015) reinforces the importance of freedom of expression as a pillar of democracy, citing Article 19 of the International Covenant on Civil and Political Rights (ICCPR) of 1976, which explicitly addresses this right. The same article is echoed in the Universal Declaration of Human Rights (UDHR) of 1948, signaling the international consensus on the fundamental nature of freedom of expression. Van Vollenhoven emphasizes that freedom of expression is not just a right but a prerequisite for any democracy. He stresses that democratic rights, including freedom of speech and assembly, are essential for every citizen and that these rights are vigilantly protected by democratic institutions.

Alon Harel (2011) also underscores the centrality of freedom of speech in liberal democracies, noting that it is one of the most cherished constitutional rights. It is enshrined in many contemporary constitutions and international human rights treaties, often categorized as a "first generation right" a right that protects individuals from state interference. Harel acknowledges,

however, that some radical critics of liberalism question the significance of freedom of speech, arguing that it can serve as a tool for repression rather than a genuine facilitator of public deliberation. These critics, labeling it as "repressive tolerance," reject traditional liberal political rights in favor of values such as autonomy and equality. They contend that the liberal protection of speech, regardless of its content, can function as a repressive mechanism designed to stifle rather than promote genuine public discourse. However, Gorenc (2022) also notes that countries interpret and implement freedom of expression differently, often disagreeing on the appropriate boundaries between protection and limitation of this right . She further highlights that hate speech presents a significant challenge to freedom of expression, as it forces a confrontation between two critical values: the right to freedom of expression and the right of individuals to dignity and respect. This tension underscores the complex nature of balancing these competing rights in a democratic society.

2.3 Free speech in modern political systems

In contemporary liberal-democratic societies, freedom of speech is widely recognized as a fundamental right that plays a crucial role in ensuring the health and vitality of democratic governance. Justyna Miklaszewska (2019) argues that modern political systems are built on a political culture developed over time, grounded in a shared set of values, with human rights being central to this framework. Among these rights, freedom of speech stands out as essential, forming one of the key political liberties guaranteed to all individuals. According to the liberal philosophical tradition, the right to express opinions freely is not only self-evident but also a good that should be equally accessible to all citizens of a democratic state. This freedom to voice critical opinions is beneficial to society as it fosters the improvement of the state and is seen as a key component of social justice. Miklaszewska further emphasizes that allowing individuals to freely express their views is crucial for rational governance, as it helps ensure that the state functions effectively.

Frank Cunningham (2002), drawing on John Stuart Mill's defense of civil liberties, particularly freedom of speech, expands on this idea. Mill, writing in 1991, underscores the importance of free expression for an engaged and informed citizenry. He argues that a well-functioning democracy relies on citizens who are empowered to govern themselves from a position of knowledge. Restrictions on speech, Cunningham highlights, stifle open debate and hinder the exploration of new and unconventional ideas, which are necessary for democratic progress. Therefore, freedom of speech must be protected to maintain a vibrant and evolving democracy, as it supports both personal autonomy and collective governance.

Nico Carpentier (2003) adds another dimension to the discussion by focusing on the role of media and journalism in shaping and being shaped by ideological forces. He argues that journalists and media organizations are not neutral actors; they are influenced by prevailing ideologies within the society. These ideologies, in turn, shape the content and direction of public discourse, highlighting the intricate relationship between freedom of speech and the media landscape in modern political systems.

Miklaszewska (2019) also touches on the limitations of free speech by recognizing that it is never absolute. Individuals, she notes, must navigate a range of constraints, including economic conditions, personal capabilities, and the broader political environment. Thus, while freedom of speech is a core democratic value, it operates within specific boundaries shaped by both internal and external factors.

Together, these perspectives offer a comprehensive view of the importance and complexities of free speech in modern political systems. They underscore the idea that freedom of speech is not only central to democratic governance but also intertwined with social justice, rational governance, and ideological influences, all of which are subject to evolving political and economic realities.

2.4 Re-evaluating Research on Freedom of Expression and Media

Edström, Kenyon, and Svensson (2016) emphasize the need for a deeper understanding and innovative approaches to grasp the complexities surrounding freedom of expression in contemporary society. Given the evolving challenges posed by media, digital culture, and societal shifts, they argue that the research community must engage more proactively at national, regional, and international levels. Collaboration among researchers across these levels is essential for testing the capacity to propose and imagine more holistic paradigms that could contribute to new models of civilizational discourse. They stress the importance of shared knowledge and context, advocating for increased learning from one another.

In the context of globalization, it becomes necessary to not only focus on transnational phenomena but also to explore the nuances and differences that arise across regions. Understanding how the principles of freedom of expression and human rights are adopted in vastly different cultures each with distinct state structures and concepts of individual roles in society requires further investigation. This broader exploration would enable the development of more inclusive frameworks for interpreting freedom of expression in diverse sociopolitical contexts.

2.5 Free Speech, democracy and public sphere theory

Justyna Miklaszewska (2019) criticizes the use of media to manipulate public opinion and secure the loyalty of the masses, which she believes harms democratic debate. Similarly, Frank Cunningham (2002) refers to Habermas, in *Between Facts and Norms*, emphasizing the importance of an "unsubverted" political sphere and a public sphere where people can freely express themselves beyond social classes. However, Fraser (1997) critiques this view, arguing that Habermas' concept of the public sphere is too limited, as it only indirectly influences politics through legislators. She also believes that Habermas' vision conceals the existence of "subaltern counterpublics," marginalized groups that organize into social movements to

challenge elite forces within both public and political spheres. Habermas responds to this critique in *Between Facts and Norms* (1998), recognizing the significant role of oppositional social movements and giving the public sphere a greater role in the formation of democratic opinions. Scheuerman (1999) also notes that Habermas devotes a substantial part of his analysis to addressing these critiques. Moreover, the "communicative democracy" proposed by Young (1993) is not so different from deliberative democracy, as the principles of impartiality and fairness, which are central to deliberative democracy, are precisely those needed to prevent the marginalization of oppressed groups in public spheres. These debates clearly highlight the interconnectedness of the public sphere, media, power, and marginalized voices in modern democracies.

2.6 Free Speech and Propaganda

Freedom of expression is a fundamental pillar of democratic societies, but its interpretation and application vary significantly across countries, often reflecting historical and political contexts. Gorenc (2022) underscores that nations differ in defining freedom of expression and cannot universally agree on when it should be protected versus when it might be restricted. For example, post-World War II Germany implemented stringent limitations on speech to counteract the influence of pro-Nazi propaganda, which was seen as a moral imperative in the aftermath of the atrocities committed. This led to specific legal restrictions, such as banning the sale of literature like *Mein Kampf* and prohibiting Nazi propaganda films. Such constraints demonstrate a national response to prevent historical horrors from recurring, framing free speech within a context sensitive to potential harm (Gorenc 2022).

Building on this, Tanvir (2022) highlights how propaganda has historically fueled hatred and violence, citing instances such as Nazi propaganda against Jews, the Pakistani government's inflammatory rhetoric against Bengali people, and similar hate speech that incited violence

against the Tutsi population in Rwanda. Even in modern times, terrorist groups continue to utilize hate speech as a tool for manipulation and recruitment, emphasizing the persistent challenge of balancing free speech with societal safety. Miklaszewska (2019) extends this analysis by examining the mechanisms of propaganda, drawing on George Orwell's concept of "*newspeak*" to explain how totalitarian regimes use language to reshape reality. In Orwell's framework, propaganda distorts truth, claiming that "*white is black and black is white*," thereby reversing established meanings and using deception as a means of control. This manipulation extends to controlling thought and speech, ultimately rendering freedom an illusory concept aligned with state interests. Together, these perspectives illustrate that while free speech is celebrated as a democratic right, its intersection with propaganda reveals the complexities of protecting this freedom in contexts where speech can also serve as a vehicle for harm and manipulation.

2. 7 Free Speech in Contemporary Burkina Faso

A recent report by the Burkinabe Media Observatory (2024) highlights how current insecurity has significantly restricted the freedom of movement for media and communication professionals across Burkina Faso. This insecurity has adversely impacted content broadcast by local radio stations, especially in high-risk regions like the Sahel, and has discouraged, even deterred, guests from appearing on radio and television programs. The government, alongside the Higher Council of Communication (CSC), has also suspended certain media outlets, citing ethical, professional, or fiscal violations. Notably suspended were the bimonthly magazine *L'Événement* and the media group *Savane-médias*. In response, *L'Événement* contested its suspension, appealing to the administrative court, arguing that the decision was unfounded and abusive; the court subsequently lifted the CSC's sanction. These actions by the government and the CSC have been publicly condemned and rejected by Burkinabe professional media

organizations, which have issued statements denouncing these restrictions on press freedom in the country.

2.8 State of Free Speech in Ghana

Ahmad, Corsy, and Pride (2020) discuss how freedom of the press, as an extension of freedom of expression, played a vital role in Ghana's political independence in 1957. This historical context supports the argument that genuine human emancipation and societal democratization depend on open decision-making and the existence of conflicting ideas, without resorting to violence. However, intolerance toward political dissent first by Kwame Nkrumah and later by subsequent military and civilian regimes has posed challenges, undermining natural principles of evolution that allow for divergent views. True democracy, they argue, demands that individuals be permitted to freely gather and express opinions on matters of public concern without undue restrictions. Despite this historical backdrop of political repression, Ghana's current democratic status reflects substantial progress in political tolerance and press freedom, showing a notable contrast to its past. Further democratic achievements could be realized if the Ghanaian press were fully empowered constitutionally to perform its watchdog and advocacy roles, rather than being co-opted into serving as an ideological or commercial tool for the ruling elite to perpetuate political and economic control over the state and its citizens.

CHAPTER THREE

THEORETICAL FRAMEWORK AND RESEARCH METHODOLOGY

3.1 Theoretical framework

This section aims to explore how Social Constructivism and Political System Theories underpin the foundation of this study. The majority of research is grounded in theories that establish the relationships between key concepts.

3.1.1 Social Constructivism theory

Social constructivism, as presented by Deeba (2021), is a learning theory suggesting that individuals construct their understanding of the world through social interactions shaped by

language and culture. Applied to freedom of expression, this theoretical framework emphasizes how cultural and political norms deeply shape the perception and practice of this right within each society. Cultural values and political structures create a context in which freedom of expression can be encouraged, limited, or tolerated. For instance, in societies that prioritize social cohesion, freedom of expression may be considered conditional, regulated to prevent conflicts or preserve national unity, as is the case in Burkina Faso (Konkobo 2024). Conversely, in cultures that value individualism, this right is generally viewed as essential to civic participation and personal expression (Miklaszewska 2023).

Moreover, social constructivism illustrates how language and cultural frameworks shape individuals' understanding of freedom of expression. In societies where language promotes equality and debate, freedom of expression is more widely perceived as a fundamental right. Jegede (2010) complements this perspective by asserting that social constructivism fosters learning by strengthening communication skills and critical thinking, as well as the ability to evaluate opposing viewpoints. Overall, this theory highlights how cultural and political norms shape not only the practice of freedom of expression but also its understanding, making this right more or less accessible depending on the values and ideals of a society.

3.1.2 Political System Theories

Political systems theories provide a useful framework for examining the influence of political regimes on freedom of expression. Democratic theory, for instance, highlights the role of institutions in protecting this right. According to the Inter-Parliamentary Union in Geneva (1998), democracy is based on everyone's right to participate in the management of public affairs. This requires the existence of representative institutions, such as Parliament, which ensure the plurality of opinions and the expression of the popular will. In this context, strong and transparent institutions, like those in Ghana, protect freedom of expression by fostering an

environment where citizens can freely debate and criticize the government, thereby reinforcing political pluralism and social accountability.

In contrast, authoritarian or semi-authoritarian regimes, as analyzed in the case of Burkina Faso, illustrate how political systems can restrict freedom of expression. Massina (2021) defines a coup d'état as an illegal and violent seizure of power that overturns democratic principles, often establishing regimes favorable to military or oligarchic interests. These regimes tend to perceive freedom of expression as a threat to their stability, imposing restrictions on the press, public demonstrations, and criticism of the government. The control exercised by such authorities over public discourse limits access to impartial and pluralistic information, further weakening democratic mechanisms.

The comparison between Ghana and Burkina Faso illustrates these dynamics. In Ghana, where democracy is relatively stable, institutions protect the media and freedom of expression, enabling public critique of policies. In contrast, in Burkina Faso, where coups d'état have frequently disrupted democratic processes, authorities often restrict critical discourse under the pretext of maintaining order or ensuring national security, as highlighted by the current context of insecurity.

3. 2 Research Methodology

3.2.1 Introduction

This section examines the research methodology adopted in this study, addressing key aspects such as sampling, research methods, tools used, and data analysis. Methodology is a central element of any research project as it provides a rigorous framework for data collection and interpretation, thereby enabling the achievement of the study's objectives. This section lays the groundwork on which the subsequent results and conclusions are based, while offering a detailed overview of the methodological approach employed in this study.

3.2.2 Research Design

In general, research can be conducted in three main ways: quantitatively, qualitatively, or using a mixed-methods approach. However, in this study, a qualitative approach was adopted. The fundamental characteristic of qualitative research lies in its exploration of how individuals make sense of their concrete and real-life experiences, in their own words, while analyzing these perceptions from a behavioral science perspective (Cropley, 2023).

The researcher chose an explanatory survey, a type of research that aims to explore causal relationships between variables and explain why and how these relationships occur. This research design was deemed appropriate for this study, as it seeks to understand the underlying reasons and mechanisms behind the phenomena studied, specifically the limitations on freedom of expression.

3.2.3 Population

It is essential to distinguish between a population and a sample. A population refers to the entire group of individuals meeting specific criteria (Shukla, 2020). An individual within this population is referred to as an element. When a study focuses on only a portion of these elements, that selected portion is referred to as a sample. For this study, the target population includes journalists, activists, and policymakers from the two countries under examination, namely Burkina Faso and Ghana. These individuals were selected based on their experience and the quality of their potential contributions.

3.2.4 Sample

It is essential to conduct a meticulous process during the sampling stage of any research. Indeed, the sample serves as a direct representation of the population being studied. Therefore, an inadequate selection of the sample can lead to a misrepresentation of the entire population. A sample is a subset of the population that reflects its general characteristics, thereby enabling the drawing of statistically representative conclusions (Shukla, 2020). The sample was selected in Burkina Faso and Ghana. Specifically, it consisted of actors from the media and political

sectors. The sample included 7 interviewees ; Four from Burkina Faso and three from Ghana, all of whom share the common characteristic of having practiced journalism at some point in their careers, with years of experience in the field ranging from 3 to 35 years.

3.2.5 Sampling Technique

Sampling is a method that allows researchers to obtain information about a population from the results of a subgroup without examining every individual (Sarfo , Debrah , Gbordzoe & Obeng, 2022) The researcher employed a non-probability sampling method known as the purposive sampling technique. This approach involves selecting individuals based on their expertise or relevance to the research topic. In this study, the researcher selected individuals who have been working or involved in the information and media sector for over three years and are above the age of majority.

3.2.6 Research Instrument

The researcher employed a question guide as the primary research instrument for this study, as it was deemed the most suitable tool for gathering responses from participants. The question guide was organized into three sections: A, B, and C. Section A focused on questions related to political factors that could influence freedom of expression. Section B addressed questions concerning social factors, while Section C dealt with cultural factors.

3.2.7 Data Collection Procedure

The researcher visited various locations in Burkina Faso and Ghana to meet with the participants at their chosen venues for in-depth interviews, which were conducted based on the questionnaire. A brief overview of the questionnaire was provided to help the respondents fully understand the purpose of the study. The researcher was available to clarify any unclear elements, ensuring that all interviews were conducted successfully and completed in full.

3.2.8 Unit Of Analysis

The unit of analysis for this study consisted of the interview transcripts of the various selected stakeholders. This research, which examines the limits to freedom of expression from a comparative perspective between Burkina Faso and Ghana, considers the interview transcripts as the most relevant unit of analysis.

3.2.9 Ethical Considerations

Etymologically, the word "ethics" originates from the ancient Greek term "ethos", which initially referred to a place of residence, a location, but also a habit, custom, or convention. Cicero translated this Greek term into Latin as "mores" (ethos, customs), which gave rise to the modern concept of morality (Bartneck, Lütge, Wagner & Welsh, 2021). Ethics can be defined as the analysis of human actions from the perspective of "good" and "evil", or what is considered "morally correct" and "morally incorrect" (2021). In this study, the concept of beneficence was rigorously observed. The researcher ensured that participants fully understood the purpose and relevance of the study. Confidentiality was guaranteed, with respondents' personal information appropriately managed and data securely stored. Moreover, all participants voluntarily took part in the study after providing prior consent. Finally, the decision of participants who wished to remain anonymous was respected, in alignment with fundamental ethical principles.

CHAPTER FOUR

DATA ANALYSIS AND PRESENTATION OF FINDINGS

4.0 INTRODUCTION

Chapter Four presents the analysis of data and the findings of this research, focusing on three core themes: political, social, and cultural dynamics and their impact on freedom of expression in Ghana and Burkina Faso. Theme 1 examines the political landscape, exploring how government structures, stability, and policies influence freedom of expression in both countries. Theme 2 analyzes social factors, including social status and community relationships, highlighting their role in shaping the ability to express opinions freely. Theme 3 investigates cultural contexts, such as traditional norms, values, and practices, and their effect on open dialogue and expression. This comparative analysis offers a detailed understanding of the interplay between these dynamics and their influence on freedom of expression in these two nations.

THEME 1: Political Dynamics and Their Impact on Freedom of Expression: A Comparative Analysis of Ghana and Burkina Faso

4.1 The Role of Government Policies in Protecting Freedom of Expression

In the case of Burkina Faso, Alexis Konkobo, journalist and former advisor to the High Council for Communication, describes a situation where press freedom, although enshrined in laws, faces significant challenges in the current security context. The country, engaged in a war against terrorism, has imposed restrictions aimed at preserving social cohesion. Konkobo highlights the social responsibility of journalists, explaining that disseminating sensitive information, such as inter-community conflicts, could exacerbate tensions and compromise

national unity. These constraints, though initially justified by national security concerns, have significantly limited the exercise of press freedom that was once more robust.

Evariste Kaboré, former editor-in-chief of the national television, emphasizes that historical efforts to broaden press freedom are being eroded by the ongoing conflict. Despite the existence of frameworks such as the Information Code, these laws often struggle to be implemented effectively in a crisis environment, undermining their intent to protect both journalists and the public's right to information. Arnaud Ouédraogo, journalist and Coordinator at Cell for Investigative Journalism in West Africa (CENOZO) further observes that while the decriminalization of press offenses in 2015 marked a major advance, this progress has been offset by heavy financial penalties that threaten the economic sustainability of media organizations.

Adding to this analysis, a senior journalist X who asked for anonymity in Burkina Faso underscores that press freedom in the country is supported by several legal instruments. The Constitution, as the supreme law, guarantees freedom of expression. This is reinforced by specific laws like the Information Code, currently under revision. This code not only structures the practice and speech of journalists but also aims to safeguard society from potential abuses or journalistic misconduct. These legislative frameworks reflect a political intent to regulate freedom of expression by striking a balance between press freedom and the protection of public interest. Ideally, such government policies should ensure that freedom of expression is preserved while fostering journalistic accountability to society.

In Ghana, the dynamics are notably different. Efo Korku Mawutor, multimedia journalist and CEO of EKM Communications Consulting, notes that despite robust constitutional safeguards, freedom of expression is weakened by the concentration of media ownership in the hands of politicians. This situation compromises the independence of journalists and fosters widespread self-censorship. Laws like the Electronic Publications Act, although intended to combat

misinformation, are frequently misapplied to target critical journalists, thereby hindering their work and limiting their capacity to report freely.

Affail Monney, former President of the Ghana Journalists Association and founder of RAM Media Consult, traces Ghana's historical trajectory. The country experienced periods of repression under military regimes before a shift towards greater freedoms with the 1992 Constitution and the passage of the Right to Information Act in 2018. However, outdated legal provisions, such as certain sections of the Criminal Offenses Act, continue to impede press freedom. On his part, Investigative journalist and deputy chairperson of The Africa Editors Forum Emmanuel K. Dogbevi highlights frequent intimidation, arrests, and logistical barriers imposed on journalists covering sensitive issues, illustrating the ongoing challenges faced by the media.

Comparatively, both Burkina Faso and Ghana grapple with restrictions on press freedom, often justified by security or political imperatives. However, the contexts differ significantly. In Burkina Faso, the constraints are exacerbated by an internal war, necessitating self-censorship to preserve national cohesion. The legislative framework, while ostensibly robust, is applied inconsistently due to the crisis, further hampering press freedom. In contrast, Ghana faces challenges rooted in political interference and the misuse of laws aimed at countering misinformation. Media ownership by political actors and outdated legal provisions perpetuate a climate of self-censorship and hinder journalistic independence.

Both countries, despite having legislative frameworks that nominally support freedom of expression, struggle to ensure its full realization. Burkina Faso exemplifies a context where security concerns overshadow press freedom, while Ghana's primary challenges stem from political dynamics and structural issues in media governance. In both cases, achieving a balance between press freedom and societal responsibility remains a complex and ongoing challenge.

4.2 Constitutional Guarantee Of Freedom Of Expression

In the context of the comparative study between Ghana and Burkina Faso, the constitutional guarantee of freedom of expression reveals notable similarities and distinctions. In Burkina Faso, Evariste Kaboré asserts that "*the Constitution indeed guarantees press freedom in Burkina Faso,*" but he highlights practical difficulties arising from the security crisis and a lack of journalist training, thereby compromising ethics and social responsibility within the sector. Alexis Konkobo also emphasizes that "*the Constitution does guarantee press freedom in theory,*" enabling straightforward procedures to establish media outlets. However, he notes that existing laws struggle to be enforced in a crisis context. Arnaud Ouédraogo further adds that the financial penalties imposed on journalists limit their independence, despite a promising legal framework. "*The Constitution clearly and explicitly guarantees freedom of the press. However, in practice, certain laws and actions contradict these constitutional guarantees. For example, specific laws include provisions that restrict this freedom, notably through heavy penalties imposed on media outlets and journalists in the event of infractions. As a media practitioner and head of an organization dedicated to the defense and protection of journalists, I observe that certain aspects require adjustments. It would be important to review legal provisions that impose disproportionate penalties, particularly the fines levied on media outlets and journalists, which are often unaffordable in our economic context.*"

Conversely, in Ghana, Efo Korku Mawutor highlights the paradox between constitutional guarantees and restrictive laws such as the 2008 Electronic Publications Act, which undermine press freedom by creating a climate of fear. He illustrates this point with an attack on a local radio station covering a mining conflict, demonstrating practical obstacles to freedom of expression. Affail Monney acknowledges the robustness of the 1992 Constitution, particularly its Chapter 12, but calls for legislative reforms to prevent misinformation laws from excessively restricting this freedom "*Ghana's 1992 Constitution provides substantial guarantees for media freedom, particularly in Chapter 12, which is dedicated to the subject. Article 162 further*

allows for rejoinders, enabling individuals to correct false reports and restore their reputations. However, practical challenges persist, such as the application of Act 29 of the Criminal Offences Law, which penalizes the spread of false information. While the constitution is robust, it is also a living document that requires periodic reforms to address such issues” . Finally, Emmanuel K. Dogbevi underscores the crucial role of behavioral attitudes, pointing out that the issue lies not in the legal framework but in the intimidation exerted by authorities. “To improve the situation, there must be a shift in attitude among those in power. They need to accept that journalism strengthens democracy and exists to report facts, not to serve the preferences of public officials. The role of journalists is to uncover and report the truth, and officials must respect and support this vital function instead of using coercive measures to control the narrative”

Thus, although both countries have constitutions that guarantee freedom of expression, Burkina Faso faces challenges related to war and the enforcement of laws, while Ghana contends with political and legislative pressures that hinder journalistic practice.

4.3 Necessary political reforms to improve the protection of freedom of expression

In comparing Ghana and Burkina Faso, several commonalities and contrasts emerge regarding necessary political reforms to enhance the protection of freedom of expression.

In Ghana, Efo Korku Mawutor highlights the urgent need for reforms that improve the clarity and specificity of laws governing freedom of expression. He points out that vague laws, such as the *Electronic Publications Act*, leave journalists vulnerable to arbitrary enforcement and suppression of transparency. Mawutor emphasizes reforms focused on explicitly defining permissible speech and the conditions under which national security concerns can override press freedom. Similarly, Emmanuel K. Dogbevi argues against political reforms, suggesting

that Ghana's legal framework is robust. Instead, he stresses the need for a behavioral shift among authorities to address intimidation tactics like physical violence or denial of access to information, which undermine journalistic integrity.

In Burkina Faso, Alexis Konkobo notes the positive impact of recent reforms, such as amendments to the penal code that decriminalized press offenses like defamation, replacing imprisonment with financial penalties. However, he stresses the need for further improvements, particularly in balancing press freedom with individual rights, while maintaining accountability for media practices. Arnaud Ouédraogo underscores the detrimental effects of recent political changes on the independence of regulatory bodies. He criticizes reforms that have centralized control of the media regulator under the presidency, which compromises its impartiality and exposes journalists to political influence.

The senior journalist X from Burkina Faso provides a nuanced perspective, suggesting that any reforms will depend on the priorities of those in power and the public's sentiment toward freedom of expression. He acknowledges the challenges posed by the country's war-torn context and argues that journalism, while aspiring to neutrality and objectivity, must adapt to these realities. He also questions whether a shift toward "*positive journalism*," focusing on achievements alongside failures, might align better with current societal needs.

Both countries grapple with the tension between theoretical guarantees of freedom of expression and practical challenges in implementation. In Ghana, vague legal provisions create space for abuse, while in Burkina Faso, political influence undermines the independence of regulatory institutions. In both contexts, reforms are suggested to ensure the application of laws aligns with constitutional principles and protects journalistic independence.

The nature of the proposed reforms diverges. Ghana's issues center on refining existing laws to remove ambiguity and ensuring behavioral changes among authorities. Conversely, Burkina Faso's reforms focus on reversing detrimental political changes and strengthening institutional

independence. The senior journalist X emphasises adapting journalistic practices to societal contexts adds a unique dimension to the Burkinabe discourse, reflecting the influence of the country's ongoing conflicts.

Both cases underscore the need for reforms that respect constitutional guarantees while addressing the distinct challenges posed by their respective political and societal landscapes.

4.4 Recent Political Changes and Their Influence on Freedom of Expression in Ghana and Burkina Faso

The impact of recent political changes on freedom of expression in Ghana and Burkina Faso demonstrates both striking differences and nuanced similarities.

In Ghana, recent political changes have had a profoundly negative impact on freedom of expression, particularly for journalists. According to Emmanuel Dogbevi, actions by government authorities, such as the abduction and torture of journalists critical of officials, have created a chilling effect. Incidents like the late-night kidnapping of a journalist after publishing an op-ed about the national security minister highlight the growing use of intimidation tactics. Similarly, journalists investigating sensitive issues, such as the misuse of government vehicles, have been arrested and tortured, he stated *“a journalist was abducted late at night after writing an op-ed about the national security minister and was tortured while in custody. International pressure eventually led to his release, though his phone and laptop were never returned, despite court orders... In another instance, a reporter investigating the misuse of government vehicles was arrested and tortured, even though his status as a journalist was known”* .

Mawutor adds that the politicization of media ownership exacerbates the situation. Political parties and individual politicians increasingly control media outlets, blurring the line between

journalism and propaganda. This development raises serious ethical concerns, as journalists are sometimes "bought" with political appointments, compromising their independence. These issues, coupled with physical attacks on journalists and overt suppression of critical reporting, mark a troubling decline in the state of press freedom.

However, there have been some positive strides, as noted by Monney. The *Right to Information Law*, passed in recent years, has empowered citizens to access government information more freely. This law bolsters transparency and accountability, enabling citizens to question financial allocations and track public projects. Yet, challenges in implementation persist, limiting the full realization of these reforms.

In Burkina Faso, the evolution of freedom of expression has been shaped by the country's political transitions and current security challenges. According to the anonymous senior journalist X, the 2014 political transition following Blaise Compaoré's 27-year rule brought both hope and limitations. While reforms during the transitional period, such as removing ministerial control over state media, slightly loosened constraints, subsequent developments have eroded these gains.

Today, the press operates under significant constraints due to the war-torn context. Government officials restrict journalists from reporting freely, especially on sensitive matters such as intercommunal violence. The senior journalist recounts that ministers have explicitly instructed reporters accompanying the president to present only favorable narratives, further limiting journalistic independence. Journalists often rely on official communication channels for information, undermining their ability to independently verify or contextualize reports.

Alexis Konkobo highlights the delicate balance between press freedom and social responsibility during times of conflict. Reporting on incidents like ethnic clashes requires caution to avoid inflaming tensions. The emphasis on journalists "accompanying" government recovery efforts reflects the priority given to national security over unrestricted press freedom. Konkobo's

perspective underscores the tension between the journalist's duty to inform and the state's aim to maintain stability

Both countries share challenges related to government interference and restrictions on journalists. In Ghana, this takes the form of physical violence, intimidation, and politically driven media ownership. In Burkina Faso, it manifests as subtle but insidious pressures, especially in the context of a national conflict. In both nations, the media's role as a watchdog is undermined by political and security priorities.

The contexts shaping these challenges differ significantly. In Ghana, the deterioration of press freedom is driven by partisan politics, with the ruling class using state machinery to suppress dissent. Conversely, in Burkina Faso, the war-torn environment has necessitated restrictions framed as essential for national unity and recovery. Ghana struggles with the ethical compromises arising from political ownership of media, while Burkina Faso faces a crisis of journalistic independence influenced by survival in conflict zones.

In both cases, the role of journalists as neutral informers is under threat, albeit for different reasons. The juxtaposition of Ghana's partisan dynamics with Burkina Faso's security-driven constraints highlights the complexity of safeguarding freedom of expression in diverse political landscapes.

4.5 Elections and campaigns impacts on freedom of expression

The impact of elections and campaigns on freedom of expression reveals both similarities and differences between Ghana and Burkina Faso, reflecting distinct political dynamics and challenges. In Ghana, as highlighted by Mawutor and Dogbevi, election periods often heighten tensions, creating a challenging environment for journalists. Misinformation and disinformation, amplified by technological tools such as AI-generated deepfakes, undermine the credibility of the media and complicate the work of journalists. Monney emphasizes the

growing influence of technology, requiring journalists to employ rigorous fact-checking and scrutiny to combat falsehoods and ensure accountability *“Tools like deepfakes, which can mimic voices and alter videos, have been used to manipulate public perception during elections, as seen in both Ghana and globally. These technological advancements exacerbate the spread of false information, undermining informed decision-making and trust in the media... Journalists play a critical role in addressing these challenges by acting as a scrutinizing force. They are trained to doubt, cross-check, and verify all information, even from trusted sources”*

Dogbevi highlights the physical risks journalists face, including harassment and intimidation, particularly by political foot soldiers aiming to silence critical reporting. Such threats pressure journalists to self-censor or avoid covering sensitive political issues, a situation that discourages impartial reporting. Similarly, public officials and political party communicators, as Mawutor notes, often spread partisan narratives or refrain from engaging with the media candidly, adding to the difficulties of election-year reporting.

In Burkina Faso, the dynamics differ, but challenges persist. Konkobo underscores the positive role of the High Commission of Communication (CSC) during elections, which ensures equitable access to media for all candidates and monitors content to prevent favoritism. This regulatory framework, alongside financial support for the press, fosters a relatively fair media environment. However, as highlighted by Journalist Senior X and Kabore, deeper issues remain, such as political influence and corruption within the media. Kabore stated *"Many journalists entered the profession without adequate training, making them more vulnerable to these pressures. As a result, some easily succumb to the influence of money and political interests, which affects the quality and objectivity of information. This situation contributes to weakening freedom of expression and the credibility of the media in Burkina Faso."*

Politicians often attempt to sway journalists by financing campaign coverage, leading to biased reporting. Despite the presence of independent institutions like the Independent National

Electoral Commission (CENI), which helps maintain order during elections, media viability remains a significant challenge due to economic hardships and the reliance on government support. Ouedraogo further points out that election campaigns, while fostering vigilance in journalism, also bring intense pressures from political actors seeking favorable coverage, thereby testing journalistic ethics and professionalism.

Both countries experience periods of heightened tension and influence on the press during elections, but the nature and extent of these challenges vary. In Ghana, the growing role of misinformation and direct threats against journalists, as noted by Dogbevi, Mawutor, and Monney, creates an environment where the freedom of expression is under siege. Burkina Faso, on the other hand, faces more systemic issues, such as economic constraints and the entanglement of media with political agendas, as described by Journalist Senior X and Kabore. Despite the regulatory frameworks in place, highlighted by Konkobo and Ouedraogo, these structures are insufficient to fully shield journalists from the pressures and manipulations of election periods.

In summary, while both Ghana and Burkina Faso struggle with the interplay between politics and media during elections, Ghana's challenges are more centered on the immediate threats of misinformation and physical intimidation, whereas Burkina Faso's issues are deeply rooted in structural and economic factors influencing media independence and sustainability. Both contexts highlight the critical need for stronger protections and support for journalists to ensure freedom of expression in the face of electoral pressures.

4.6 The Role of Political Parties in Freedom of Speech

In Burkina Faso, the role of political parties in relation to freedom of speech has evolved over time, particularly following the suspension of many political activities under the Patriotic Movement for Safeguard and Restoration MPSR2 , the military junta that has been ruling the country since September 2022 . According to Kabore, while political parties have been

sidelined, they still share a responsibility with the government in defending press freedom. However, this often comes with ulterior motives parties tend to support press freedom only when it aligns with their interests. As a result, press freedom becomes conditional, influenced by the prevailing political alignment and interests.

Senior journalist X highlights the dual role of political parties as both protectors and restrictors of freedom of expression. Parties in power, if inclined to suppress dissent, can curtail press freedom, while those supportive of the media's rightful place can foster greater transparency. Drawing on historical examples, X notes that during Blaise Compaoré's 27-year rule, the ruling Congress for Democracy and Progress (CDP) implemented mechanisms to ensure some level of journalistic freedom while simultaneously creating a climate of fear, intimidation, and self-censorship. This paradox underscores the selective nature of press freedom under a so-called democratic regime.

Ouédraogo reflects on the historical dynamics of political parties, emphasizing their central role in shaping freedom of expression. He explains that the policies and laws enacted are typically influenced by the vision of the ruling party, especially those holding parliamentary majorities. While some political parties have introduced initiatives to enhance press freedom, others have used intimidation or restrictive legislation to suppress it. This dichotomy demonstrates how the actions and visions of political parties directly influence the legal and practical frameworks of freedom of expression in Burkina Faso.

In Ghana, political parties also exhibit a dual nature in their approach to freedom of expression. Mawutor describes them as a "*double-edged sword*." On one hand, parties, particularly those in opposition, support journalistic efforts to expose corruption and hold power accountable. They provide leads, research, and engage with the media to promote transparency. However, when in power, these same parties often undermine journalistic independence by controlling media outlets, bribing journalists, and dictating content. For example, Mawutor mentions a

parliamentarian who owns multiple media houses, using them to advance personal political agendas.

Monney highlights the influence of key political leaders on media freedom in Ghana. Some leaders have taken notable steps to expand media liberties, such as repealing restrictive laws. These efforts have fostered a more open environment for free expression. However, Monney emphasizes the importance of balancing freedom with responsibility. Ethical boundaries and accountability are essential to maintain trust and ensure that media freedom does not lead to defamation or misinformation. Political leaders play a crucial role in shaping this balance.

Dogbevi focuses on restrictive measures employed by the ruling government in recent years. He points to the systematic online harassment of journalists by government-affiliated "*foot soldiers*" who target media practitioners with insults and personal attacks. This strategy undermines press credibility and discourages critical reporting. By fostering a climate of fear, the ruling government has hindered press freedom, particularly in areas of investigative reporting on corruption and governance.

Both Burkina Faso and Ghana reveal the multifaceted role of political parties in shaping freedom of speech. While opposition parties in both countries often align with journalists to expose government shortcomings, ruling parties tend to prioritize control and suppression of dissent. In Burkina Faso, this dynamic has historically manifested through legislation and intimidation, while in Ghana, it includes media ownership and online harassment. Despite these challenges, efforts by key leaders and journalists in both nations have sought to balance freedom with accountability, striving to uphold the integrity of press freedom amidst political opportunism.

4.7 The Impact of the Relationship Between Media and Government on Freedom of Expression

In Burkina Faso, the relationship between the media and the government significantly influences freedom of expression, with political pressures playing a major role. Konkobo explains that while the media is supposed to support government actions that benefit citizens, this support does not equate to endorsing a particular political party. However, this principle becomes complex during election periods. When the government is involved in public initiatives such as the construction of infrastructure, media coverage is expected to be neutral. However, during pre-election times, such government actions are closely scrutinized to avoid perceptions of political campaigning. In these periods, media coverage must be carefully regulated to ensure that government actions are not seen as party-political endorsements.

The relationship between the media and the government in Burkina Faso, as Kabore points out, is fraught with political influence. Some media outlets have been created with political motives, which can lead to a media landscape that serves partisan interests rather than fostering independent journalism. Kabore highlights that media outlets established in politically charged environments are more likely to be influenced by party agendas rather than prioritizing objective news reporting. This dynamic complicates the role of the media in ensuring the public's access to impartial information and undermines press freedom.

Senior Journalist X offers a critical view of the media-government relationship in the context of the financial dependence of the media. Many media outlets in Burkina Faso face closures due to financial struggles, with some depending on the government for survival. This dependency undermines the media's independence, as government-affiliated media may be reluctant to criticize the administration, further stifling freedom of expression. According to X, a compromised media sector, particularly when politics and journalism are intertwined, results in a lack of transparency and objectivity, which in turn harms the broader principles of freedom of expression and press independence.

Ouédraogo reflects on the broader implications of this relationship, especially under the current military government. He observes that the government's approach to media is often hostile, particularly when media outlets criticize the administration. In such circumstances, media practitioners face the challenge of balancing their role as critics of the government while maintaining their ability to operate freely. When the government views critical media as destabilizing, this naturally limits the ability of journalists to freely perform their watchdog role, directly impacting the quality of information available to the public and restricting freedom of expression.

In Ghana, the relationship between the media and the government has a significant impact on freedom of expression. Mawutor explains that when the relationship between the media and the government is positive, it fosters an environment where journalists can work freely without fear of retaliation. This ideal scenario is more likely to occur when the government supports media independence and recognizes the importance of a free press in holding power to account. However, when this relationship becomes strained, it can hinder journalists' ability to report critically on government actions, limiting freedom of expression.

Mawutor further observes that the practical relationship between the media and government is shaped largely by the president's attitude. If the president is media-friendly, this encourages a government-wide openness towards media freedom. On the contrary, if the president fosters hostility towards the media, this tone is mirrored by government ministers and officials, creating a restrictive environment for journalists. Currently, in Ghana, there is a perception that the government under the current administration has become increasingly hostile to the media, especially when it comes to critical reporting. This antagonism has created a tense atmosphere that limits the media's ability to perform its democratic role. The pressure placed on journalists and media outlets to conform to the government's wishes significantly undermines press freedom and the space for open public discourse.

Monney explains that the government's control over key media outlets, such as Ghana Broadcasting Corporation and the Ghana News Agency, further complicates this relationship. These state-owned outlets, which rely on government resources, are often at risk of bias, particularly when critical reporting is involved. The potential for retaliation through resource withholding means that these media outlets may suppress critical reporting, which further limits the media's ability to act as a check on power. Despite these challenges, Monney stresses the importance of a balanced relationship, where the media remains independent but still engages with the government in a manner that supports transparency and accountability. When this balance is maintained, media freedom can flourish, benefiting the public by promoting transparency and ensuring that journalists can perform their duties without fear of censorship.

Dogbevi underscores the role of favoritism in Ghana's media landscape, with the government often granting preferential treatment to friendly outlets. Critical media outlets, on the other hand, face exclusion or limited access. This dynamic exacerbates the problem of media bias, as politically connected individuals often own or control media outlets. This alignment of media with political parties undermines the independence of the press, as media outlets prioritize partisan interests over unbiased reporting. The resulting media landscape becomes more polarized, and the capacity for journalists to report freely on government activities becomes constrained, ultimately curbing freedom of expression.

In both Burkina Faso and Ghana, the relationship between the media and the government plays a critical role in shaping the freedom of expression. In Burkina Faso, the government's control over media coverage during election periods and its influence over media outlets creates a complex environment where the press struggles to maintain its independence. Political parties and government-affiliated media further complicate the situation, with some outlets prioritizing partisan interests over objective reporting.

In Ghana, while the relationship can be more positive when the government is media-friendly, the increasing antagonism from the current administration has created a tense climate for the media. State-owned media outlets are at risk of compromising their independence due to government influence, and critical outlets often face exclusion or marginalization. This dynamic limits the ability of journalists to report freely and holds back the media's potential to act as an independent check on power.

Ultimately, in both countries, the media's ability to operate freely and independently is heavily influenced by the nature of its relationship with the government. When this relationship is positive, it can foster transparency and accountability, but when it becomes hostile or politically charged, it restricts freedom of expression and undermines press independence.

THEME 2 : Social Dynamics and Their Influence on Freedom of Expression: A Comparative Study of Ghana and Burkina Faso

4.8 The Influence of Social Tensions and Ethnic Differences on Freedom of Expression

In Ghana, freedom of expression is significantly shaped by the intricate web of social tensions and ethnic differences. As Dogbevi highlights, ethnic sensitivities often constrain media discourse, particularly when powerful traditional leaders like the Asantehene are involved. Reporting on such figures, perceived as infallible, invites severe repercussions, as illustrated by the backlash against a BBC correspondent who announced the death of an Asantehene before an official statement. Such constraints raise questions about whether Ghana prioritizes journalistic accountability or traditional norms.

Monney emphasizes that while ethnic affiliations can unite for positive mobilization, they often influence journalistic narratives, especially during elections. Ethnic bias can lead to misrepresentation and misunderstandings. For instance, the media must navigate conflicts like those in Bawku with caution to avoid escalating tensions. The responsibility falls on journalists to promote inclusivity and avoid inflammatory reporting.

Mawutor further elaborates on the risks for journalists covering sensitive topics, including ethnic and religious disputes. Incidents such as the backlash against reporting a pastor's family involved in a car accident highlight the challenges of balanced reporting in Ghana. Sensitive issues, including LGBTQ+ rights and mental health, pose additional hurdles due to societal stigmas and reluctance to engage openly. These dynamics underline the precarious balance journalists must strike between ethical reporting and personal safety.

In Burkina Faso, social tensions and ethnic differences similarly influence freedom of expression but are approached differently. According to Ouédraogo, media often resort to self-censorship during crises to avoid exacerbating conflicts or being misinterpreted. While striving for balanced reporting, journalists face pressures from both societal groups and political actors, who may attempt to manipulate narratives for their benefit. Such pressures can manifest as threats or intimidation, further constraining journalistic freedom.

Senior journalist X note that societal divisions, such as xénophobia or regionalism, frequently limit the topics media are willing to cover. For instance, criticism of a specific community or region may be perceived as biased and provoke backlash, discouraging open discussion on sensitive issues. This societal dynamic challenges the objectivity and freedom of the press.

However, as Kabore points out, Burkina Faso benefits from practices like “Joking kinship” that is a cultural practice widespread in West Africa, notably in Burkina Faso. It refers to a social relationship between ethnic groups or families, characterized by humorous or teasing exchanges, but always in a spirit of respect and conviviality which fosters social cohesion and reduces interethnic tensions. Community radios play a pivotal role in maintaining harmony, providing platforms for dialogue and promoting unity among diverse groups. These efforts demonstrate how media can act as a force for social cohesion despite underlying tensions.

"Burkina Faso was among the first countries to develop an extensive network of rural radio stations, and these media have contributed positively to social cohesion. Through their

programs, they promote ideas of unity, ensuring that all ethnic groups within each community have a voice".

Konkobo underscores the delicate nature of discussing ethnic issues publicly. Open discourse on intercommunity conflicts often risks aggravating tensions, particularly regarding communities like the foulani , who face stigma and marginalization. Journalists are thus tasked with navigating these complexities to ensure fairness without inflaming sensitivities.

While both Ghana and Burkina Faso face challenges stemming from social tensions and ethnic differences, their responses vary. In Ghana, traditional and ethnic loyalties create an environment where freedom of expression is often stifled by cultural reverence and fear of backlash. Burkina Faso, on the other hand, demonstrates a tendency toward self-censorship and community-focused media as strategies to manage tensions.

Both countries highlight the critical need for journalistic sensitivity and ethical reporting in multicultural societies. Media platforms must balance freedom of expression with societal cohesion, acknowledging the role of ethnic and social dynamics in shaping discourse.

4.9 The Impact of Social Media and Online Platforms on Freedom of Expression

In Burkina Faso, Kabore highlights that social media serves as both a boon and a hazard. Properly utilized, it can strengthen public discourse, but its misuse undermines press freedom. The rapid dissemination of information often pressures traditional media to prioritize speed over accuracy, leading to the spread of misinformation. This, in turn, provokes governmental interventions, such as sanctions, which inadvertently limit press freedom. Moreover, unregulated influencers with limited education disseminate unchecked content, compounding the issue. Efforts to label certain accounts as "influential" have not resolved these challenges. Kabore suggests limiting follower counts for certain accounts to mitigate risks to journalistic credibility.

Ouedraogo observes that social media democratizes freedom of expression, granting marginalized groups a platform for public discourse. However, this freedom is increasingly tempered by self-censorship. Fear of backlash, orchestrated by influential or politically connected groups, discourages open criticism. In extreme cases, dissenting voices face arrest or intimidation. Thus, while social media expands freedom of expression in theory, societal and political dynamics often restrict its practical application.

Senior Journalist X notes that social media bypasses traditional media's gatekeeping, enabling instantaneous dissemination of information. While this democratization promotes free expression, it also fosters challenges like fake news, propaganda, and targeted abuse. These risks complicate social media's role, positioning it as both a promoter and a potential adversary of press freedom.

In Ghana, Mawutor emphasizes social media's dual nature: it amplifies freedom of expression by providing individuals, including marginalized groups, with platforms to share information. However, the unregulated rise of bloggers and influencers blurs the lines between professional and amateur reporting, undermining journalistic credibility. Government responses, such as restrictive laws targeting misinformation, often disproportionately affect legitimate journalists rather than addressing the root issues of misinformation online.

Monney points out that while radio and television remain dominant in Ghana, social media is growing, particularly among younger generations. It complements traditional media, creating an alternative communication channel, but also contributes to the spread of misinformation. The financial struggles of traditional media outlets further complicate the landscape, with many transitioning to online platforms without sustainable models. This duality highlights the promise and pitfalls of social media in shaping freedom of expression. *“The media sector in Ghana is facing financial challenges, especially print media, which struggles with low revenue. Many print houses and media outlets are shifting to online platforms to stay relevant...”*

Dogbevi underscores how social media enhances press freedom by allowing journalists to bypass traditional gatekeepers. Investigative pieces rejected by mainstream outlets often find audiences online, as seen with whistleblowing cases gaining traction on platforms like X (Twitter). Conversely, social media can restrict freedoms through cyber laws used to penalize journalists. This dual role exemplifies the complexity of social media's impact on freedom of expression.

Across Ghana and Burkina Faso, social media both expands and constrains freedom of expression. In both countries, it democratizes public discourse, providing accessible platforms for marginalized voices. However, challenges such as misinformation, government surveillance, and legal restrictions limit its potential. While social media can circumvent traditional gatekeeping, its unregulated nature poses risks to journalistic integrity and societal cohesion. Balancing these dynamics requires thoughtful regulation, media literacy, and strategies to combat misinformation without stifling free expression.

4.10 The Role of Civil Society Organizations (CSOs) and NGOs in Protecting Freedom of Expression

In Ghana, Monney emphasizes the pivotal role of civil society organizations (CSOs) and NGOs in advocating press freedom, with organizations like the Media Foundation for West Africa (MFWA) leading efforts to train journalists and defend their rights. The Ghana Journalists Association also collaborates with NGOs to ensure that media freedoms are upheld. While the constitution protects freedom of the press, these organizations are crucial in ensuring that these protections are actively maintained in practice. They also promote media responsibility and ethical standards. However, Dogbevi raises concerns about the effectiveness of civil society in fully supporting journalists. He notes that CSOs often fail to act decisively when crucial investigative reports are at risk or when legal action is required to protect journalists. The political affiliations of some civil society leaders further complicate their objectivity, limiting

their effectiveness in defending press freedom. Despite these challenges, Mawutor highlights the significant contributions of CSOs and NGOs, especially the MFWA, in holding public officials accountable, fact-checking public statements, and providing training for journalists. These organizations play an important role in combatting misinformation and ensuring transparency, although some NGOs are accused of bias due to their political ties. Nonetheless, the overall impact of CSOs in Ghana has been positive, fostering a freer and more accountable media environment.

For the case of Burkina Faso, Konkobo recognizes the critical role of CSOs and NGOs in denouncing abuses and highlighting situations where freedom of expression is severely restricted. These organizations serve as regulators, providing external oversight and holding the state accountable. However, the reliability of some NGOs is questioned, particularly when they are influenced by powerful external forces, which can compromise their objectivity. Senior Journalist X discusses how CSOs and NGOs have historically been central to defending and promoting freedom of expression in Burkina Faso. Despite their key role, the ongoing political instability and social tensions in the country have complicated their ability to fully advocate for press freedom. The situation is further complicated by the rise of online media and social networks, where traditional control mechanisms are less effective. Kabore acknowledges the efforts of CSOs and NGOs in Burkina Faso, but points out that their actions are often limited due to a lack of resources and the increasing challenges posed by the digital landscape. Ouedraogo provides a historical perspective, noting that civil society in Burkina Faso has played an essential role in defending freedom of expression, especially during key moments like the 1998 assassination of journalist Norbert Zongo *"In 1998, the assassination of journalist Norbert Zongo marked a turning point. This tragic event galvanized civil society, which mobilized massively to demand justice. This mobilization put pressure on the authorities of the time, forcing them to strengthen the legal framework in favor of freedom of expression and press freedom."*

However, in the current political climate, the ability of these organizations to take concrete actions has been significantly reduced. The increasing repression and constraints on civil society limit their ability to organize effectively or take action to improve the situation. Across both Ghana and Burkina Faso, civil society organizations and NGOs play indispensable roles in protecting and promoting freedom of expression, but their effectiveness is often hindered by various challenges. In Ghana, while CSOs like the MFWA have had a positive impact, especially in training journalists and advocating media rights, their efforts are sometimes undermined by political biases and a lack of decisive action when journalists face legal or physical threats. The political environment can also affect their ability to operate effectively. Similarly, in Burkina Faso, although CSOs have historically been crucial in defending press freedom, the current political instability and the dominance of social media present new obstacles that limit their capacity to act. The growing influence of online platforms and the challenges of regulating them complicate the role of CSOs in maintaining press freedom. Furthermore, both countries face challenges in ensuring that CSOs remain independent and unbiased, as political alignments can undermine their credibility and hinder their advocacy work. In both contexts, while CSOs and NGOs continue to play an essential role, their capacity to protect freedom of expression is increasingly constrained by political, social, and technological factors. The need for greater resources, independence, and political will remains paramount to enable these organizations to fulfill their mission effectively.

4.11 The Role of Public Opinion in Protecting or Restricting Freedom of Expression

Mawutor emphasizes that public opinion in Ghana serves as a double-edged sword in safeguarding or limiting freedom of expression. Social media acts as a modern public sphere, where opinions shape public discourse and hold authorities accountable. Mawutor cites the release of Oliver Bakavomawo and his group following public outcry as an example of how public opinion can influence legal outcomes. However, he warns that public opinion only becomes impactful when it translates into action, such as protests or civil movements.

Governments often exploit this by manipulating public focus through distractions, undermining the power of public sentiment.

Monney views public opinion as vital to protecting freedom of expression, particularly in informing authorities and holding power accountable. However, he highlights the need to discern between genuine and manipulated opinions. He underscores the media's responsibility to present public sentiment thoughtfully and alert authorities to societal concerns, cautioning that neglecting public opinion can lead to unrest. For Monney, public opinion plays a critical role in ensuring freedom of expression remains responsive to societal needs.

Dogbevi argues that public opinion's impact is often indirect, largely influenced by the public's perception of media organizations. He provides the example of Joy FM in Ghana, which has faced accusations of being “regime changers” by the government. Such public narratives, often fueled by political supporters, can hinder journalists' freedom to operate. Dogbevi notes that while the exact impact on operational freedom remains unclear, negative public opinion shaped by political manipulation can restrict journalistic work.

In Burkina Faso, Kabore highlights how public opinion, particularly through the actions of activists and social influencers, can limit freedom of expression. He points out that events like press conferences are increasingly dominated by non-journalists dubbed “wayiyan” that means “*come out*” in Mossi defined a spontaneous movement that arose in 2023, initiated through a call for citizen mobilization. Participants of this movement strategically assembled at key locations in Ouagadougou with the objective of monitoring and preventing any actions that could destabilize the government or the nation as a whole (Source: Right for Education) who pressure organizers and restrict journalistic freedom. This dynamic, he argues, negatively impacts the free and independent flow of information.

Ouedraogo frames public opinion as a double-edged sword in Burkina Faso. He notes that while public sentiment can hold authorities accountable, it is often shaped by those dominating the

media space, including political leaders and journalists. In contexts where freedom of expression is restricted, public opinion tends to align with those in power, undermining its role as a protector of freedom. However, in environments of open expression, public opinion can serve as a pressure mechanism for safeguarding liberties. Ouedraogo also highlights the global trend of governments controlling media to manipulate public opinion, emphasizing its critical role in shaping freedom of expression dynamics.

The senior journalist X from Burkina Faso echoes the dual role of public opinion. On one hand, it can safeguard media freedom, as seen when citizens protected journalists during post-insurrection movements. On the other hand, it can restrict freedom by supporting limitations, such as discouraging criticism of leaders. He argues that this reflects a lack of understanding of democratic principles, where critique and debate are essential tools for holding power accountable. The journalist warns that public opinion's role as a "*poison*" emerges when it perpetuates authoritarian tendencies under the guise of loyalty to leadership.

Konkobo views public opinion as a critical factor in the survival of journalistic freedom. He argues that public consumption of news empowers journalists by validating their work and ensuring their voices are heard. Conversely, public disinterest renders journalistic efforts futile. Konkobo draws comparisons to countries like the United States, where public opinion acts as a regulator of expression, contrasting this with states where government agencies dominate regulation. He stresses that a sovereign public opinion is crucial for maintaining media independence and freedom of expression.

Across Ghana and Burkina Faso, public opinion is recognized as a powerful yet ambivalent force in shaping freedom of expression. While it can protect freedoms by holding authorities accountable and supporting media independence, it can also restrict them when manipulated by governments or misdirected by societal influences. The dynamics of public opinion highlight

the need for active and informed citizen participation to safeguard the principles of free expression.

THEME 3 : Cultural Factors and Their Impact on Freedom of Expression in a Comparative Analysis of Ghana and Burkina Faso

4.12 The impact of cultural norms on freedom of expression

The impact of cultural norms on freedom of speech is multifaceted, as highlighted by perspectives from Burkina Faso and Ghana. Cultural values shape the societal framework within which freedom of expression operates, sometimes serving as a source of support but often functioning as a restriction.

In Burkina Faso, cultural norms often impose significant restrictions on freedom of expression. Ouedraogo observes that societal reverence for figures of authority, such as chiefs and elders, discourages open criticism, as these individuals are perceived as sacred. This dynamic limits individuals' willingness to express dissenting opinions, particularly in addressing those in power. Senior journalist X echoes this sentiment, highlighting how cultural taboos and the sanctity attributed to traditional figures like the Mogho Naaba , who is the traditional king of the Mossi people, the largest ethnic group in Burkina Faso restrict journalistic freedom. Criticism directed at such figures often triggers backlash, conflating legitimate public discourse with disrespect for cultural heritage.

Kabore further elaborates that cultural taboos create barriers to addressing sensitive topics. Respect for elders, local leaders, and royal families often results in self-censorship, as individuals fear social consequences. Konkobo underscores that cultural restrictions extend to specific topics, such as homosexuality, which are deemed unacceptable in the cultural framework. Journalists must navigate these constraints to avoid sanctions, reflecting the tension between cultural preservation and freedom of expression.

Ghana faces similar challenges, though the influence of cultural norms manifests differently. Dogbevi highlights that criticism of elders, chiefs, and powerful figures often invites severe repercussions, including attacks on journalists and media outlets. The secrecy embedded in cultural traditions obstructs transparency, making it difficult for journalists to report on sensitive issues like corruption or misconduct by traditional and political leaders.

Monney and Mawutor discuss the dual role of cultural norms in both enabling and restricting expression. While respect for traditional authorities fosters societal harmony, it simultaneously stifles criticism of influential figures like the Asantehene in the Ashanti region, who is their king and spiritual leader. This tension underscores the delicate balance between preserving cultural values and upholding journalistic freedom.

Mawutor also emphasizes the intersection of cultural norms and gender. Patriarchal traditions limit women's participation in public discourse, journalism, and politics. Societal expectations and institutional barriers prevent women from fully exercising their right to freedom of expression, reflecting deeply entrenched biases. *“In politics, Ghana still struggles with underrepresentation of women. Despite the introduction of an affirmative action bill requiring that at least 30% of political appointments and nominations must be women, cultural biases persist. Male politicians often argue that the space has been made for women, but they claim that not enough women are willing or capable of taking on these roles, reflecting deep-seated gender biases in society”*

Both Burkina Faso and Ghana illustrate that cultural norms profoundly shape the practice of freedom of speech. While cultural values often preserve social order and community respect, they frequently clash with the principles of democratic governance and the free exchange of ideas.

In Burkina Faso, the weight of tradition and reverence for authority suppresses dissent and critical dialogue, curbing the ability of citizens and journalists to challenge those in power.

Similarly, in Ghana, traditional hierarchies and patriarchal structures restrict freedom of expression, particularly for marginalized groups like women, while societal norms prioritize collective reputation over individual transparency.

4.13 Navigating the Boundaries: Journalists' Freedom to Critique Government Authority

The ability of journalists to freely critique authority and societal issues is a cornerstone of press freedom, yet this right is often undermined by cultural norms, political pressures, and societal expectations. This dynamic is evident in the cases of Burkina Faso and Ghana, where journalists navigate significant challenges in their efforts to hold power accountable.

In Burkina Faso, journalists face increasing restrictions on their ability to express critical opinions, exacerbated by cultural norms and the political context. According to Konkobo, while journalists have the responsibility to critique constructively and ethically, their critiques are often constrained by societal reverence for powerful figures. These cultural restrictions, compounded by fears of retaliation, inhibit the press's ability to challenge authority freely.

Kabore highlights additional barriers, noting that the government imposes strict controls on sensitive information, particularly in matters related to national security. The ongoing conflict with terrorism has led to a blackout on topics such as military operations and casualty figures. Journalists attempting to report on these issues face interrogation and legal threats, signaling a decline in press freedom.

Senior journalist X confirms that the current environment is far less permissive than in the past. They assert that journalists are increasingly expected to align their narratives with the government's agenda, stifling independent critique. Ouédraogo echoes this sentiment, emphasizing that expressing critical opinions against the government now comes with severe

consequences, effectively silencing dissent. *"Today, if you choose to express a critical opinion towards the current government, you must be prepared to face the consequences, unless your opinion is favorable. In reality, journalists are not free to express critical opinions about the current government."* He said .

In Ghana, journalists operate in an environment where constitutional protections for press freedom coexist with significant cultural and societal limitations. Mawutor describes how cultural norms and the authority of traditional and religious leaders restrict journalists' ability to critique these figures. Instances of backlash, such as the case of a pastor criticized for his remarks about the traditional practices of Nogokpo, demonstrate the delicate line journalists must tread when addressing sensitive cultural issues. *"A notable example is when a pastor criticized the town of Nogokpo during a sermon. He made a statement that upset the people of Nogokpo, a town known for its traditional religious practices. His comments were perceived as disrespectful, and the people demanded an apology. The media then had to navigate this sensitive situation, and journalists, especially those with religious or traditional affiliations, found themselves in a dilemma about how to report the issue. The situation highlighted how criticism, even if directed at specific practices or beliefs, can lead to backlash and conflict"*.

Dogbevi and Monney highlight the pressures journalists face from political figures and institutions. While there are notable successes in challenging authority, such as Monney's organized opposition to judicial overreach, Dogbevi notes that investigative journalism often meets resistance through legal and institutional mechanisms. These include court injunctions and threats, which undermine the practical realization of press freedom.

Nevertheless, Monney acknowledges progress in Ghana, where journalists have increasingly exercised their right to critique government actions *" I'll give the Ghanaian media an A+. It takes courage and orientation to take on the government. I've been through this; we even had*

to challenge the Supreme Court when they ordered negative stories to be removed. I organized a press conference against them, even though they had charged a lawyer for criticizing them. We had the power to criticize the government, and we poured it out against the ruling government... We now have the freedom to criticize anyone, but it comes with dangers as certain forces will push back. Still, our freedom has reached a point where we can criticize anyone, no matter who they are.”

While Burkina Faso and Ghana share common challenges in balancing press freedom with societal norms and political pressures, their contexts differ significantly. In Burkina Faso, the wartime political climate severely limit critical expression. Journalists face direct government intervention when reporting on sensitive issues.

In contrast, Ghana offers a more complex landscape. Legal protections for press freedom coexist with societal norms that constrain critical reporting. Journalists in Ghana can critique the government more openly.

4.14 cultural practices, customs, and traditions influence public discourse

In both Ghana and Burkina Faso, cultural practices and traditions heavily influence public discourse and the freedom of journalists to express critical opinions. In Ghana, Mawutor explains that the deep respect for traditional rulers, such as chiefs and kings, often limits journalists' ability to critique or report on them. For instance, a journalist who criticized a prominent chief faced severe backlash, including forced apologies, highlighting how cultural reverence for traditional authority figures stifles critical reporting, especially for women journalists. Additionally, the respect for chiefs can overshadow political leaders' legitimacy,

complicating political discourse where criticisms are often less accepted. This influence is rooted in the colonial history that integrated chiefs into the political sphere, making it difficult to challenge both traditional and political authority without stirring polarized reactions. Monney adds that in Ghana, the cultural norm of respecting authority, influenced by Christian teachings, creates a tension for journalists. They must balance their professional duty to expose corruption and hold those in power accountable with the cultural expectation to maintain societal harmony and order. This delicate balance sometimes forces journalists to compromise their journalistic integrity to align with cultural norms. Moreover, Dogbevi notes that cultural practices, such as the belief in "*not speaking ill of the dead*," further restrict open discourse in Ghana. Sensitive topics, particularly involving deceased individuals, are often left unreported, limiting transparency and hindering the media's role in holding authority accountable.

In Burkina Faso, Kabore highlights how the deeply ingrained respect for authority figures similarly impacts journalists' freedom of expression. The fear of authority can lead journalists to hesitate or self-censor, avoiding critical questions or reporting that might jeopardize the reputation or power of those in authority. This cultural respect creates significant barriers to critical journalism, limiting the scope of public discourse. However, Senior Journalist X suggests that some cultural practices in Burkina Faso, like the Joking kinship, can sometimes promote freedom of expression by allowing journalists to express criticisms in a more acceptable or humorous manner. Despite this, Ouédraogo points out that the cultural norm of respecting authority, particularly towards leaders and chiefs, often leads journalists who attempt to challenge power to be seen as disrespectful. Even when journalists are simply reporting the truth, they risk being perceived as undermining cultural norms, which restricts the space for critical journalism. This respect for authority further limits the media's ability to function as a counterbalance to power and diminishes its impact on promoting societal accountability.

In both countries, these cultural norms around respect for authority create a challenging environment for journalists. The tension between their professional responsibility to provide

critical, independent reporting and the societal expectations rooted in cultural practices leads to self-censorship and limits the space for open discourse. As a result, journalists in both Ghana and Burkina Faso often face constraints that restrict their ability to fully exercise journalistic freedom and contribute to a robust, transparent public discourse.

4.15 The Manifestation Of Cultural Censorship In The Media

Cultural censorship in the media is a pervasive issue in both Ghana and Burkina Faso, often manifested through direct and indirect pressures that restrict the ability of journalists to report freely. In Ghana, Dogbevi highlights that journalists face significant pressures, including phone calls, threats, and even bribes, urging them to refrain from covering certain stories or to remove content that negatively impacts individuals' lives. This is especially prevalent when the stories touch on sensitive topics or those involving influential figures. Journalists who resist these cultural pressures may find themselves facing hostility, showcasing the tension between cultural norms and media transparency. Mawutor adds that cultural censorship in Ghana also takes on a more subtle form, particularly around traditional customs. For example, the death of a king is typically not reported publicly until after the burial, which creates a dilemma for journalists who must choose between respecting cultural practices and fulfilling their ethical duty to inform the public. Similarly, the health of political leaders is often withheld from the public due to unwritten cultural rules of maintaining privacy around the health of figures in power, which can limit the media's ability to provide crucial information to the public. These forms of cultural censorship are not legally enforced but are deeply ingrained in societal norms and expectations.

In Burkina Faso, Ouédraogo notes that cultural censorship often manifests through self-censorship by journalists, who weigh the potential reaction of the public and authorities before deciding whether to publish certain stories. This leads to a situation where media outlets may avoid covering sensitive topics, and some even become mere echo chambers for dominant

voices rather than providing platforms for open debate. The pressure to conform to cultural expectations limits the capacity of journalists to fulfill their role as independent truth-tellers. Senior Journalist X similarly observes that self-censorship plays a critical role in Burkina Faso's media landscape, with journalists being constrained by cultural norms and the fear of repercussions for challenging authority. Kabore and Konkobo both highlight that cultural censorship in the media can also occur during broadcasts, where certain topics or questions are deliberately avoided, leaving gaps in the information provided to the audience. These omissions often stem from respect for cultural authorities, and when these taboos are imposed, it leads to incomplete and skewed reporting. This censorship limits the media's ability to provide impartial and comprehensive coverage, frustrating audiences who are aware of the missing information.

In both countries, cultural censorship restricts the media's ability to fully serve its role in society. Whether through direct pressures or more subtle forms of self-censorship, journalists face significant challenges in navigating the tension between societal expectations and their professional responsibility to inform the public. As a result, the media's capacity to provide transparent, comprehensive, and critical coverage is often compromised, with important issues left unaddressed due to cultural constraints. This situation highlights the complex relationship between media freedom, cultural practices, and the challenges journalists face in fulfilling their role as agents of accountability in society.

4.16 Traditional and Religious Influences on Tolerance of Controversial Speech

The excerpts provided from Kabore, Konkobo, Senior Journalist X, Ouédraogo, Mawutor, Monney, and Dogbevi offer a comprehensive exploration of how traditional and religious beliefs shape tolerance towards controversial speech in Burkina Faso and Ghana. While both countries share a common thread of societal pressures that limit freedom of expression, there are also notable differences in the specific dynamics at play.

All the respondents highlight the significant impact of religious and traditional beliefs on attitudes towards controversial speech. In both countries, individuals and institutions perceived as embodying these beliefs are often shielded from criticism. Kabore and Ouédraogo emphasize the role of religion in shaping societal norms, particularly in the context of terrorism and political discourse in Burkina Faso. Konkobo delves into the personal dilemmas faced by journalists who grapple with reconciling their religious beliefs with the demands of their profession. Senior Journalist X underscores the importance of finding a balance between freedom of expression and the need to protect the rights of others.

Mawutor and Monney provide specific examples from Ghana, demonstrating how traditional and religious beliefs influence media coverage of sensitive issues. “ *For example, when a journalist compared the wealth of the Asantehene (Othumfuo) to that of the Emir of Dubai, showing a disparity between the riches of the leaders and the state of their respective cities, the journalist faced severe consequences*” Mawutor said . Dogbevi further highlights the untouchable status often accorded to religious and traditional leaders, making it difficult to hold them accountable for their actions or inactions.

While both countries face similar challenges, there are also key differences. In Burkina Faso, the influence of radical interpretations of religion, particularly in the context of terrorism, has created a more volatile environment for journalists. In Ghana, the focus is more on the interplay between traditional and religious beliefs and the power dynamics within society.

Furthermore, the respondents offer varying perspectives on the potential for positive change. Some, like Senior Journalist X and Monney, emphasize the importance of dialogue and education in fostering greater tolerance. Others, like Dogbevi, highlight the structural challenges that impede progress.

The excerpts offer a rich and nuanced understanding of how traditional and religious beliefs shape the tolerance of controversial speech in Burkina Faso and Ghana. While there are

commonalities between the two countries, there are also unique factors that influence the specific dynamics at play. The respondents collectively demonstrate that the interplay between culture, religion, and politics creates a complex environment for journalists, who must navigate these sensitivities while upholding their commitment to truth and accountability.

CHAPTER FIVE

DISCUSSION OF FINDINGS, CONCLUSION AND RECOMMENDATION

5.1 Introduction

This chapter presents a summary of the findings of the study, conclusions and recommendations. All these are discussed in relation to the literature review and findings of the research in the earlier chapters .

5.2 Discussion Of Findings

The comparative analysis of freedom of expression in Ghana and Burkina Faso reveals a complex interplay of political, social, and cultural factors that both enable and constrain this fundamental right. While both countries enshrine freedom of expression within their constitutions, significant contextual differences shape their practical realization.

In Burkina Faso, the ongoing insecurity, particularly in regions like the Sahel, has severely restricted journalistic freedom. As highlighted by the *Burkinabe Media l'Observateur* (2024), media professionals face threats that limit their ability to report freely, compounded by government-imposed sanctions against outlets such as *L'Événement* and *Savane-médias*. These actions underscore the broader pattern of state intervention in press freedom, often justified by ethical or security concerns but perceived by civil society as suppressive. Cultural reverence for authority and the influence of radical religious interpretations further exacerbate self-censorship and stifle dissent, creating an environment where critical discourse is significantly curtailed.

In contrast, Ghana, despite its democratic advancements and relatively stable press freedoms, struggles with political interference and structural challenges in media governance. Ahmad, Corsy, and Pride (2020) illustrate that while the press played a pivotal role in Ghana's

independence, successive regimes both civilian and military have maintained an uneasy relationship with dissenting voices. Additionally, media outlets often face co-optation by political and economic elites, which undermines their role as watchdogs and perpetuates narratives favoring those in power.

Both countries illustrate the dual-edged nature of social media in expanding and constraining freedom of expression. Social media democratizes public discourse, as noted in both contexts, providing platforms for marginalized voices. However, misinformation, government surveillance, and the lack of robust regulation pose significant threats. In Ghana, social media has been weaponized for online harassment, particularly during elections, while in Burkina Faso, the platform's unregulated nature exacerbates the risks journalists face in already volatile environments.

The cultural dynamics further complicate the realization of freedom of expression. In Burkina Faso, traditional norms emphasizing respect for authority and community cohesion discourage dissent and critical dialogue. Similarly, in Ghana, the interplay of traditional and religious beliefs often prioritizes collective reputation over individual transparency, leading to self-censorship among journalists and citizens alike. As a result, cultural censorship in both countries limits the media's ability to fulfill its role as a conduit for accountability and societal progress.

The role of propaganda in manipulating public opinion and suppressing dissent emerges as a shared challenge. Tanvir (2022) and Miklaszewska (2019) point to historical and modern examples where speech has been co-opted as a tool of repression rather than liberation. In Ghana, the consolidation of media ownership by elites parallels the use of propaganda in Burkina Faso to justify restrictive measures, creating significant barriers to objective reporting. Despite these challenges, civil society organizations (CSOs) and international frameworks remain vital in safeguarding freedom of expression. In Ghana, the Media Foundation for West

Africa (MFWA) and similar organizations have made strides in training journalists and advocating media rights. However, their efforts are often hindered by political biases and insufficient resources. Similarly, in Burkina Faso, CSOs face obstacles stemming from political instability and the dominance of unregulated online platforms, limiting their effectiveness.

Finally, the relationship between governments and media in both countries underscores the complexity of achieving a balance between freedom and accountability. As Gorenc (2022) and Miklaszewska (2019) argue, democratic systems thrive on open discourse, yet the political realities in Ghana and Burkina Faso often prioritize control over transparency. In Burkina Faso, the war-driven political climate restricts critical expression, while in Ghana, the nuanced interplay of political, cultural, and economic pressures shapes a more covert form of suppression.

The findings highlight that freedom of expression in both nations is shaped by a multifaceted interplay of security concerns, political dynamics, cultural norms, and economic pressures. Efforts to protect this freedom require addressing these diverse challenges through structural reforms, greater support for independent journalism, and fostering a culture of tolerance and accountability. Only by navigating these complexities can freedom of expression be effectively safeguarded as a cornerstone of democracy in both Ghana and Burkina Faso.

5.2 Limitations

The study could not make broad generalizations due to the limited availability of respondents. This challenge was exacerbated by the intensity of political activities in Ghana during the

election period, which diverted the attention of key stakeholders and potential respondents, and even led to a reduction in the number of participants on Ghana's side. Additionally, time constraints prevented the inclusion of other variables that could have provided a more comprehensive understanding of the issues examined. Future research could benefit from a broader exploration of diverse factors and the engagement of a more varied sample of respondents to capture a wider range of perspectives. Nevertheless, the findings of this study are valuable for governments, policymakers, and civil society organizations, offering insights to guide interventions and strategies during politically sensitive periods or other major national events.

5.3 Suggestion for Further Studies

Future research could expand by including a more diverse range of respondents from various regions and media platforms across Ghana and Burkina Faso. This would offer a more comprehensive and representative understanding of the national landscape concerning freedom of expression. Additionally, examining rural areas, where access to media and freedom of expression may be more restricted compared to urban centers, would be valuable.

Considering the increasing influence of digital platforms, future studies should explore how social media and online communication shape freedom of expression in both countries. This could include examining the role of digital activism, government surveillance, and online censorship, offering insights into how freedom of speech is influenced in the digital era. Furthermore, studying the challenges of misinformation and the regulation of online content during politically sensitive times, such as elections, would be essential.

A longitudinal study could also be valuable in understanding how freedom of expression evolves in response to shifting political, social, and cultural contexts over time. This would be

especially important to assess the impact of electoral cycles, government changes, and national crises, such as the security challenges in Burkina Faso, on the media environment and public discourse.

Additionally, a more focused comparative analysis, perhaps incorporating other West African nations, could further illuminate how political, social, and cultural factors influence freedom of expression. This would offer a broader regional perspective and could help identify best practices for safeguarding media freedom and promoting citizen participation in governance.

Finally, given of this study findings, future research could concentrate on developing policy recommendations to enhance freedom of expression in both countries. This might involve evaluating existing legal frameworks, media regulations, and the role of civil society in holding governments accountable for press freedom and the protection of journalists.

5.4 Conclusions

This study, has aimed to explore the complex dynamics influencing freedom of expression in two West African countries. By analyzing the political, social, and cultural factors, this research has highlighted the significant role these elements play in shaping the media landscape and the exercise of free speech in Ghana and Burkina Faso.

The comparative approach taken in this study has revealed both shared and distinct challenges faced by the two nations in safeguarding freedom of expression. In Ghana, a relatively stable democratic environment has fostered an active media sector that provides a platform for public discourse. However, political polarization, media ownership concentration, and occasional government attempts to control media narratives present ongoing challenges to media freedom. Despite this, Ghana remains one of the more progressive countries in the region in terms of press freedom, with a diverse media environment and active civil society.

In contrast, Burkina Faso, while having made strides in promoting democratic governance, faces significant challenges that hinder the full exercise of freedom of expression. These

challenges include political instability, limited media resources, governmental censorship, and an increasingly restrictive legal environment. In particular, the ongoing security crisis in the country, exacerbated by terrorist threats, has made the media environment even more hostile, with increased risks for journalists and restrictions on certain forms of reporting. The impact of this instability has placed substantial pressure on media practitioners, limiting their ability to report freely and openly.

Social and cultural factors also play a crucial role in shaping the discourse around freedom of expression in both countries. In Ghana, where the media is more pluralistic, cultural considerations, including the importance of ethnic and social cohesion, often influence the way sensitive political issues are addressed. In Burkina Faso, social dynamics such as the role of traditional and community leaders further complicate the media's ability to freely express diverse viewpoints. These cultural factors affect how media outlets choose to cover political and social issues and how freely individuals can express their views in public forums.

This study highlights that both Ghana and Burkina Faso have made important strides toward enhancing freedom of expression, but substantial challenges remain. While Ghana benefits from a relatively vibrant media environment, it still faces issues related to media ownership, political interference, and occasional government censorship. On the other hand, Burkina Faso's media landscape is more constrained, particularly due to ongoing political instability and security challenges. Both countries face the broader issue of balancing the right to free speech with national security concerns, particularly in times of political and social unrest.

The findings underscore the importance of protecting press freedom and ensuring that political, social, and cultural factors do not compromise the essential democratic right to free expression. It is clear that in both Ghana and Burkina Faso, fostering a media environment that is independent, diverse, and free from political interference is key to promoting transparency, accountability, and good governance. This comparative study has illuminated the critical

challenges faced by both Ghana and Burkina Faso in the realm of freedom of expression. It offers valuable insights into the ways in which political, social, and cultural contexts shape the media landscape and public discourse. Ultimately, the findings highlight the need for continued efforts to protect and strengthen freedom of expression in both countries, ensuring that it remains a cornerstone of democracy and governance.

APPENDIX

INTERVIEW GUIDE FOR THE STUDY:

Questions for each point (political, social, and cultural) within the framework of a comparative study on 'The Challenges of Freedom of Expression: An Analysis of Political, Social, and Cultural Factors – Comparative Study between Ghana and Burkina Faso

I. Political Factors:

- How do you assess the role of government policies in protecting freedom of expression in Ghana/Burkina Faso?
- To what extent have recent political changes influenced freedom of expression in your country?
- Do you believe your country's constitution sufficiently guarantees the freedom of expression for the media? Why or why not?
- Are there political reforms needed to improve the protection of freedom of expression in Ghana/Burkina Faso?
- What role do political parties play in promoting or limiting freedom of expression in your country?
- How is freedom of expression affected by elections and political campaigns?
- What impact does the relationship between the media and the government have on freedom of expression in your country?

II. Social Factors:

- How do social tensions and ethnic differences influence freedom of expression in Ghana/Burkina Faso?
- How do social media and online platforms contribute to or restrict freedom of expression in your country?
- To what extent do civil society and NGOs play a role in protecting freedom of expression?
- What role does public opinion play in the protection or restriction of freedom of expression?
- How do social activists and movements influence freedom of expression in your country?

III. Cultural Factors:

- Do cultural norms in your country favor or restrict freedom of expression? Why?
- How do local cultural practices (customs and traditions) influence public discourse?
- Are journalists free to express critical opinions about society or the government? Explain.
- How do cultural practices related to respect for authority affect the ability of the media and journalists to express themselves freely?
- How does cultural censorship manifest in the media?
- How do traditional and religious beliefs influence tolerance towards controversial or offensive speech?

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