

Comparing the State of Democratic Elections Among South Africa (2019), Tanzania (2020), and Ghana (2020)

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Abstract: The Economist Intelligence Unit (EIU) (2021) indicates that Tanzania has scored lower democratic performance than Ghana and South Africa, however, the criteria used for ranking democratic performance are general and not specific enough to justify the state of democratic elections in comparative terms, between South Africa, Ghana, and Tanzania. These countries share some features, for instance, the adoption of international instruments for governing democratic elections, however, they have different scores in democracy, with Tanzania being at the low level, as indicated by the EIU. These observations warrant the need to compare their state of democratic elections and explore why Tanzania earned a low democratic performance in its 2020 elections compared to Ghana and South Africa. The Most Similar Systems Design was used in case selection. The methodologies applied are secondary qualitative research. Findings indicate that Tanzania's level of democracy in its 2020 elections was low compared to South Africa (2019) and Ghana (2020). This is due to the number of challenges that Tanzania faced in its 2020 elections compared to Ghana and South Africa. Challenges range from the design of an electoral legal framework to the election administration. Recommendations for improving democracy in Tanzanian future elections are also provided.

Keywords: The state of democracy, democratic elections, Tanzania, Ghana, South Africa.

Introduction

Democratic elections have long been a subject of philosophical, political and legal discourse. They were first recognised as international human rights standards by the 1948 Universal Declaration of Human Rights, which affirmed that: “The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.”¹ These standards became enforceable by several international and domestic instruments in individual countries to varying degrees. Therefore, democratic elections may also represent the political practice of democratic countries (Giorgip, 2015, p. 49).

The empirical and theoretical studies, discussions and analyses of any social phenomenon like democratic elections often emerge because of the implications of that phenomenon in the development of the community or functioning of the state. Likewise, several studies and discourses on democracy and the implications of democratic elections on the development of the state have a historical legacy (see Hadenius, 1992, p. 39; Olson, 1993; Adejumobi, 2000). For instance, Khemani (2004) states that with regard to public service delivery, elections have a positive and significant effect on road construction by state public works departments. This is a valid assertion because democratic elections bring different political parties to power to influence a nation’s development. However, not every democratic election will put into power a credible politician driven with interest to influence positive changes in the nation; rather, others will seek to fulfil and maximise their personal preferences (as stated by rational choice theorists), and others may behave dictatorially. Therefore, democratic elections in themselves are not likely to guarantee development (Diamond, 2002; Schedler, 2002; Bratton, 1998); rather, other factors should also be considered.

Efforts established to conduct democratic elections are not geared only to achieve visible developments of the nation but also to ensure normative ones are realised. For instance,

it has been argued that a well-conducted democratic election entails that sovereignty is bestowed on the people (Mude, 2022), which constitutes the idea that citizens will have freedom and a peaceful state of mind in casting ballots on voting day (Tlakula, 2007, p. 3); multiple stakeholders engaged in imparting civic education and election awareness feel a sense of ownership of the process; political parties enjoy the freedom of expressing their message to their respective constituents and to organise assemblies and demonstrations without restrictions. Besides, political parties are satisfied with how the state-owned media cover their issues of political importance; the news media (the government and non-government-owned) appreciate the adequacy of press freedom granted to them in gathering and disseminating election-related information. For the democratic elections to yield the positive outcomes mentioned, a sound legal framework and impartial and effective election administration activities should be conducted openly, including counting and publicly reporting accurate election results (National Democratic Institute, n.d.).

It is evident through several sources that some nations have such a sound legal framework and an impartial election administration in the world. For instance, in Western Europe, Norway, Sweden, and Denmark are indicated by the report of the Economist Intelligence Unit (EIU) (2021, p. 62) as the fully democratic nations, which entails the best democratic performers. In Sub-Saharan Africa, the report identifies Mauritius as a fully democratic nation (EIU, 2021, p. 57). Notwithstanding, several studies have cited Mauritius as an African model for conducting credible democratic elections (IDEA, 2016, p. 29; Mahadew & Mendy, 2022; Dixon et al., 2022, p. 137). Other African states identified by the EIU (2021, p. 57) to have good scores in democracy, electoral process, and pluralism are Ghana, which scored 6.5, and South Africa scored 7.05. The report identified Tanzania to have scored 5.1 performance, below Ghana (6.5), South Africa (7.05) and several other countries, however, the criteria used by the EIU for ranking these countries in democratic performance are general and not specific enough

to justify the state of democratic elections in comparative terms, between South Africa, Ghana, and Tanzania.

Given the scores of the above three countries presented, and the long-standing concern about the role of democracy and democratic election in development, warrant the need to inquire into factors differentiating their levels of democratic performance despite that they are in the same continent and somehow share some cultures; they have adopted international treaties, principles and guidelines for governing democratic election (Tanzania Elections Watch, 2021, pp. 26-27; EUEOM, 2020, p. 12; Zamfir, 2021, p. 3); claimed to be democratic states; have average resources to conduct a fair and democratic election; and their population sizes which are assumed to play a critical role in democratic performance are not much different;² however, they have different scores in a democracy which is justified by many variables including the free and fair election.

The motive to explore the question of why Tanzania earned a low democratic performance in its 2020 elections compared to Ghana and South Africa despite that all three countries share similar features, as alluded to above, implies the use of the logic of the Most Similar Systems Design (MSSD) of comparative political studies. Applying this study design requires the researcher to choose objects of research systems that are as similar as possible, except with regard to the phenomenon, the effect of which the researcher is interested in assessing (Anckar, 2008, p. 389).

The dimensions for comparison are the international standards for democratic election recommended by the National Democratic Institute (NDI), the Southern African Development Community (SADC) and the Economic Community of West African States (ECOWAS), of which South Africa, Ghana, and Tanzania are member states. These dimensions are universal and local and, therefore, can easily be compared across the countries. These dimensions involve the following: (i) the freedom of the electorate to make political choices in a peaceful environment; (ii) awareness of the electorate about election and electoral contestants in order to make a genuine choice; (iii) voting by secret

ballot and a genuine right to exercise this right without restrictions and discrimination; (iv) a sound legal framework and an impartial and effective election administration; (v) freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations; (vi) freedom of news media to gather and impart information about political contestants and issues of political importance; and (vii) the ability of the government-owned media to provide political contestants a fairly and equitable media coverage and freedom to express their message to their respective constituencies.

The study findings will add knowledge to the current stock of literature about democratic elections in Africa. Also, by comparing the state of democracy during 2020 Tanzania's elections and that of Ghana (2020) and South Africa (2019), it is expected that Tanzania will get new reflections, insights and lessons for improving democracy in future elections. General elections of the compared countries, as indicated by years in the study title, are taken as case studies.

Objectives of the study

The objectives of the study are to compare the state of democratic elections between South Africa (2019), Tanzania (2020), and Ghana (2020); to identify factors differentiating the level of Tanzania's democratic election from that of Ghana and South Africa, and to provide valid recommendations for improving the state of democracy in the forthcoming Tanzanian elections.

Analytical framework

The concept of a democratic election is as wide as democracy. Attempts to understand and compare the state of democracy during the 2020 Tanzanian elections and Ghana (2020) and South Africa (2019) and to find out factors differentiating the performance of 2020 Tanzania's election from that of South Africa and Ghana faced challenges in selecting the proper theory that could at least account for more than one study objective and reflecting all standards of democratic elections selected to be applied in the present comparative study. Therefore, given that theoretical and analytical frameworks play

almost the same functions in scientific research and that democratic election is a complex phenomenon, this study applied the analytical framework tool of guiding scientific study. With an analytical framework, a researcher can develop a model or a conceptual framework that can guide the conduct of the study, data analysis and interpretation, discussion of findings, and generate recommendations. In this regard, it was proper to construct a framework of analysis for guiding the whole research process.

Therefore, in this study, the analytical framework for comparing the state of democratic elections between South Africa (2019), Tanzania (2020), and Ghana (2020) constituted the following set of international standards of democratic election adopted from the National Democratic Institute (NDI) and amended. These standards also reflect Article 2 of the SADC and several others of the ECOWAS, to which the compared cases are member states. The criteria involve (i) the freedom of the electorate to make political choices in a peaceful environment; (ii) awareness of the electorate about election and electoral contestants in order to make a genuine choice; (iii) voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination; (iv) a sound legal framework and an impartial and effective election administration; (v) freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations; (vi) freedom of news media to gather and impart information about political contestants and issues of political importance; and (vii) the ability of the government-owned media to provide political contestants a fairly and equitable media coverage and freedom to express their message to their respective constituencies. This set of international standards of democratic election, which served as an analytical framework for this study, was instrumental in identifying the state of democratic election for each country, generating conclusions, and uncovering factors differentiating the performance of the 2020 Tanzanian elections from that of Ghana (2020) and South Africa (2019) as well as to establish conclusion and providing recommendations for promoting democracy in the forthcoming Tanzanian elections.

Materials and Methods

The logic of Most Similar Systems Design (MSSD) was applied to select South Africa, Ghana and Tanzania in the current study. The application of MSSD involves matching cases that experience different outcomes while appearing similar in many respects (Huang et al. 2016, p. 38). Similarly, the logic of MSSD motivated us to explore why Tanzania earned a low democratic performance in its 2020 elections compared to Ghana and South Africa, although all three countries share some features, as mentioned in the previous sections.³ Therefore, after the selection of cases, the study objectives were formulated. The next step was to establish the criteria for comparing the state of the democratic election between Tanzania, Ghana, and South Africa. The criteria for comparison were adopted from the National Democratic Institute (NDI) and modified. The criteria also reflect Article 2 of SADC and several others of ECOWAS, to which the compared cases are member states. Then, based on the study's objectives and the fact that there is plenty of empirical and theoretical literature about democracy and elections in all three countries, the decision was to adopt descriptive and explanatory research designs. The application of these research designs was guided by the established comparative analysis criteria. Informing by the established criteria of analysis, it was possible to identify, describe and account for the characteristics of elections and the electoral legal framework of each country and to establish a conclusion regarding the democratic performance of the country on every criterion of analysis. The successful completion of this task enabled the study to establish the general conclusion on which country is more or less democratic in elections and for what reasons. The conclusion was reached through a thorough and unbiased textual analysis of the established qualitative data set. The study objectives and the adequacy of empirical and theoretical literature about democracy and elections in all three countries convinced the decision to use documentary review methods of data collection, implying that the data used for the present study are secondary, empirical and valid. Many data were collected through internet searches in

various blogs, research and academics and were analysed using the thematic method of data analysis recommended by Braun and Clarke (2006). With this method, the researcher familiarised with the data and generated initial codes; then, a thorough reading of each transcript to immerse in the data was made, themes were reviewed, defined and named, and the report was produced. Sources of evidence in this study are provided to ensure rigour.

Findings and Discussions

The state of democratic elections in South Africa (2019), Tanzania (2020), and Ghana (2020)

This section presents findings on the state of democracy during elections of each country. Findings are organised in the following themes: (i) the freedom of the electorate to make political choices in a peaceful environment; (ii) awareness of the electorate about electoral contestants in order to make a genuine choice; (iii) voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination; (iv) a sound legal framework and an impartial and effective election administration; (v) freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations; (vi) freedom of news media to gather and impart information about political contestants and issues of political importance; and (vii) the ability of the government-owned media to provide political contestants a fairly and equitable freedom to communicate their message to the electorate.

Ghana

(i) The freedom of the electorate to make political choices in a peaceful environment

The Constitution of Ghana, as well as its enabling legislation, guarantees the right to vote and to be registered as a voter to all citizens of Ghana aged at least 18 years and of sound mind. In practice, there are no unreasonable restrictions on the right to vote, and universal suffrage is generally respected (EUEOM, 2020, p. 18). Therefore, this implies that the electorates were free to make political choices during the December 7, 2020,

elections. Several sources reported that thousands of Ghanaians went to their various polling stations to cast their ballot in a generally peaceful atmosphere in all the 50 registration centres (EUEOM, 2020, p. 39; Adams, 2020). Voting procedures were mostly followed, including the biometric verification of voters (p. 39). Voter turnout was 79 per cent (compared to 69.25 per cent in 2016) despite COVID-19 (Gyampo & Graham, 2022), translating into higher electorate participation in 2020 Ghana's general elections than in 2016.

Despite the generally calm and peaceful elections, some reported instances of electoral malpractices and violence dented the election process (Gyampo & Graham, 2022). For instance, at the Awutu Senya Constituency, an official of the Electoral Commission was caught on camera tampering some of the ballot papers and was arrested by the police (GhanaWeb, 2020a). Also, two people were reportedly shot at the Church of Christ polling station at Kasoa in the Awutu Senya East constituency of the Central Region (2020b). Again, one man was shot dead for snatching the ballot box at Awutu Senya West (2020c). Evidence from these findings and several others show that the civilised electorate and those who abide by the election's rules and regulations were not harassed and intimidated. Instead, harassment/intimidation and violence by the state apparatuses were directed at those who violated the election rules and regulations. It can be established that the low rate of violence during the 2020 Ghana elections was due to the established strong channel – negotiations coupled with identifying potential hotspots, early monitoring and observation, and conflict resolution mechanisms created a robust electoral violence prevention framework that reduced tensions and produced a relatively peaceful political transition (Bekoe & Burchard, 2021).

(ii) Awareness of the electorate about the election process, electoral contestants and right to vote

In Ghana, voter education to impart the electorate with awareness about the election process, their rights to vote, and the electoral contestants in order to make a genuine

choice is administered primarily by the two constitutional bodies, the Electoral Commission (EC) and the National Commission for Civic Education (NCCE), and to a lesser extent by some civil society organisations (EUEOM, 2020, p. 17). It can be established that in Ghana, the level of awareness of the electorate about the election process, electoral contestants and the right to vote was high. This is a relevant assertion as the European Union Election Observation Mission (2020, 17) reported that the EC conducted a fairly large voter education campaign in the society. According to the Mission's report, campaigns were mainly conducted in electronic and social media, with educational spots available in English, six local languages and sign language in the case of social media spots. At the grassroots level, the NCCE was the dominant player in providing voter education in local languages to marginalised and remote communities (p. 17). Other findings revealed that radio, as a mass media tool, was a crucial communication medium in providing citizens with information during elections. The radio also used music and drama to entertain and persuade the audience with important messages of peace and tolerance during elections (Abdulai et al. 2020, p. 267). It was reported that 81 community radio stations operated in 16 regions and broadcasted in local languages (EUEOM, 2020, p. 26). This entails that most citizens living in rural and remote areas accessed the information (p. 26). From these findings, it can be established that in Ghana, the level of awareness of the electorate about the election process, their rights to vote, and the electoral contestants was high.

(iii) Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination

In Ghana, The Data Protection Act (2012) provides for privacy rights and protection of user data. The Act established the Data Protection Commission as an independent statutory body to implement its provisions and monitor and enforce compliance. One of the roles of the Commission is to protect the privacy of individuals and their data by regulating the processing of personal information and by providing a process by which

personal information is obtained, held, used and disclosed (EUEOM, 2020, p. 30). Likewise, the polling stations were said to have contained several safeguards to ensure a credible voting process (p. 26). However, observers of the European Union Election Observation Mission reported that voters did not always make their ballot in secrecy, mainly due to poor layout of polling stations, biometric verification devices (BVDs) not always being able to verify the voters successfully, the presence of unauthorised persons inside the polling stations who interfered the work of the polling station staff (p. 39). This finding reduces the confidence rate that the voting process in Ghana was fully conducted confidentially, despite a wide recognition that there were neither restrictions nor discriminations for the electorates to cast their ballots.

(iv) A sound legal framework and an impartial and effective election administration

This section presents findings about the quality of the legal framework and an impartial and effective election administration. It also provides information on how the legal framework and the election administration conducted activities openly, including counting and publicly reporting accurate election results.

The legal framework generally provides for credible and competitive elections. Ghana's 1992 Constitution, as amended in 1996 (Ghana Constitution), Acts of Parliament and subsidiary legislation provide the legal foundation for elections in Ghana. They incorporate all relevant international legal instruments for the conduct of credible elections in a democratic society (EUEOM, 2020, p. 12). It was reported that the Electoral Commission of Ghana (EC) put in place robust transparency measures at the polling stations and collation centres for vote counting and collation of results (Asekere, 2021, p. 19), namely the public display of polling stations and collation centre result forms as well as the distribution of signed copies of result forms to all party agents present (EUEOM, 2020, p. 17). To reduce the risk of spreading COVID-19 at polling stations on election day, the EC significantly increased the number of polling stations throughout the country, thus reducing the number of registered voters assigned to one polling station (p. 17).

According to the EC, the National Democratic Congress (NDC) and New Patriotic Party (NPP) had party agents who had access to monitor the election process, from printing ballot papers (p. 16) to transportation, distribution and storage of sensitive materials, including ballot papers, voting, counting, collation and final declaration (Asekere, 2021, p. 19). This phenomenon implies the presence of an impartial election administration where the agents of the ruling party and the opposition parties participate in election administration.

It was also found that polling, counting and results collation procedures contained several safeguards to ensure a credible process (EUEOM, 2020, p. 16). Therefore, they were conducted largely transparently and in the presence of party agents (p. 39). The overall conduct of the counting process was assessed positively by the European Union Election Observation Mission (p. 39). However, they reported procedures, such as counting unused ballots and counting ticks in the voter register and names reference list (p. 39).

It was also revealed that in election administration, the main opposition party, the National Democratic Congress party (NDC), frequently accused the Electoral Commission's national headquarters of incompetence and bias and declared it had no confidence in the Electoral Commission leadership (EUEOM, 2020, p. 16). The European Union Election Observation Mission found the Electoral Commission's national, regional and district structures competent, well-resourced, transparent and practised democratic culture (p. 16). Observations and analyses of some scholars have concluded that the transparent electoral management system and solid democratic culture in Ghana, the improved electoral management system, and the personality of the incumbent president in Nigeria have been the most significant influences on power alternation and the democratic process in these countries (Idowu & Mimiko, 2020, p. 161). Based on the findings presented it can be concluded that Ghana has a sound legal framework and an impartial and effective election administration which practices democratic culture.

(v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations

Like in other democratic states, Ghana's 1992 Constitution, as amended in 1996,⁴ and the Political Parties Law Act 574, 2000,⁵ provide all citizens with the right and freedom to form and join political parties and freedom of peaceful assembly, speech and expression.⁶ Ghana has also signed and ratified several international legal instruments that promote good governance, democracy and freedom of association and expression. Such instruments include the ECOWAS Protocol on Democracy and Good Governance and the Declaration of Principles on Freedom of Expression in Africa. Besides, Ghana is also a signatory to the African Charter on Democracy, Elections, and Governance (ACDEG). It was found that during campaigns, political parties had adequate access to and established dependent relationships with their target audience to achieve their political ambitions (Abdulai et al. 2020, p. 264). The political parties employed several measures, including the use of the power of the media to disseminate their policies and programs to influence electorates to either win power or consolidate power (p. 264). Several researchers (Owusu Kyei & Berckmoes, 2021, p. 330; EUEOM Ghana, 2020, p. 23) witnessed frequent large rallies and house-to-house, door-to-door campaign activities. According to the European Union Election Observation Mission (2020, p. 23), the campaign activities were generally conducted freely, and all contesting parties enjoyed equal rights to freedom of expression, assembly and movement. Therefore, from these findings, it can be established that, in Ghana, political parties had adequate freedom to express their messages and to organise peaceful assemblies and demonstrations.

(vi) Freedom of news media to gather and impart information about political contestants and issues of political importance.

The National Communication Authority (NCA) and The National Media Commission (NMC) in Ghana are the independent bodies mandated to promote and ensure free and independent media and high journalistic standards; hence, the media landscape in Ghana

was observed to be vibrant and diverse (EUEOM, 2020, p. 7). During the election, the media reported freely and in a polarised environment where many partisan radio stations and a few independent and professional outlets coexist (p. 25). The study by Abdulai et al. (2020, p. 264) reported that media in Ghana has the freedom to the extent that private media personnel could publish whatever information they feel is relevant for the end users. Given this, audiences and politicians depended on the media to express themselves to gain satisfaction and win and consolidate power. Also, Abdulai et al. (2020, p. 267) asserted that the radio was the most used communication medium during Ghana elections because it instantly reached out to the general public. The state broadcaster Ghana Broadcasting Corporation (GBC) provided a fair opportunity to all political contestants through programmes aired by Ghana TV and Uniiq FM (EUEOM, 2020, p. 7). Overall, the media environment in Ghana is reported to be largely conducive. In other words, Ghana has increasingly enjoyed a vibrant, diverse, pluralistic and relatively independent media (Asekere, 2021, p. 24). Also, the European Union Election Observation Mission (2020) concluded that the media practitioners in Ghana enjoy a high degree of freedom, and analysts consider the media environment to be strong. Moreover, the Reporters Without Borders' 2020 World Press Freedom Index ranks Ghana in position number 30 out of 180 countries (EUEOM, 2020, p. 25).

(vii) The ability of the government-owned media to provide political contestants with fairly and equitable freedom to communicate their message to the electorate

In Ghana, there are no specific legal provisions on media electoral coverage by state-owned media; however, the Ghana Constitution (Article 55/11-12) establishes that the state shall provide a fair opportunity to all political parties in the state-owned media and that all presidential candidates shall be given the same amount of airtime and space to present their programmes (EUEOM, 2020, p. 27). The study of the European Union Election Observation Mission (2020) found that State broadcaster Ghana Broadcasting Corporation (GBC) overall provided a fair opportunity to all political contestants through

various programmes aired by both Ghana TV (GTV) and Uniiq FM.⁷⁴ Nevertheless, GTV favoured the New Patriotic Party (NPP) by allocating it 26.2 per cent of airtime in its election-related news and programmes, compared to 15.8 per cent allocated to the NDC. (EUEOM, 2020, p. 28). The GBC Radio or Radio Ghana, with its most powerful Greater Accra FM Uniiq FM, was said to have provided fair electoral coverage to all political parties; 34.2 and 28.6 per cent of airtime allocated to NPP and National Democratic Congress (NDC), respectively (Asekere, 2021, p. 24). Generally, it can be established that through various programmes, Ghana's government-owned media provided fair opportunities to all political contestants to express their messages during the election.

South Africa

(i) The freedom of the electorate to make political choices in a peaceful environment

Like in other democratic states, the legal framework of South Africa has established South Africa as a democratic state founded on universal suffrage and multi-party politics, with every citizen having the right to participate in free, fair and regular elections. Freedoms of expression, assembly, association, and access to information are also guaranteed (AUEOM, 2019, p. 9). The African Commission on Human and Peoples' Rights characterised the 2019 South African elections as a healthy democracy (Center for Human Rights, 2020, 17). The African Union observer mission noted that the people of South Africa were given the democratic right to select leaders of their choice and that although voter turnout was the lowest in South Africa's democratic history, which entails declining public participation (Kersting, 2007, p. 147). The elections on May 8, 2019, were peaceful, transparent, inclusive and credible (Center for Human Rights, 2020, 17), except few areas in KwaZulu-Natal where community unrest derailed operations at some polling stations (AUEOM, 2019, p. 5). The African Union Election Observation Mission (2019) asserted that the 2019 South Africa elections satisfied the African Union and international standards for democratic elections. The Southern African Development Community (SADC) observer mission concurred, stating⁷ that the elections "were conducted in an

orderly and professional manner and within the requirements of the legal framework of the Republic of South Africa and further, in accordance with the revised SADC Principles and Guidelines Governing Democratic Elections (2015).” Generally, such performance was considered a unique scorecard in the region (Center for Human Rights, 2020, 17), so far as democratic elections are concerned.

(ii) Awareness of the electorate about the election process, electoral contestants and right to vote

Section 32(1) (a) of the Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996) provides South African citizens with the right to access any information held by the state. Also, South Africa was the pioneer in adopting the access to information legislation in Africa, with its enactment in 2000 of the Promotion of Access to Information Act (PAIA) (Center for Human Rights, 2020, 17). Such legislation also actively promotes the people of South Africa to have effective access to information to enable them to exercise and protect all of their rights more fully.⁸ Moreover, one of the roles of the South African Independent Electoral Commission (IEC) is to provide voter education to citizens. Therefore, all these legal frameworks were among those responsible for promoting awareness of the electorate about the election process, electoral contestants, and the right to vote. For instance, the IEC’s website contained information about the work of the Commission, the electoral laws and regulations, the history of election results, election reports, lists of political parties and candidates, the voters’ roll statistics, and other information on exercising the right to vote (Center for Human Rights, 2020, 17).

The IEC primarily used radio, alongside other media, for information dissemination, given the public’s preference for radio as a primary source of information in their languages (Center for Human Rights, 2020, 17). The AUEOM observers commented that the media in South Africa were free and vibrant and played a critical role in informing and educating the general public and communicating the messages of political parties (AUEOM, 2019, p. 13). The observers also appreciated how state broadcasters accorded

fair coverage to the political parties throughout the electoral process (p. 13). It was also a way of increasing election awareness. Additionally, the IEC worked with churches, political parties, local NGOs, and the South African Broadcasting Corporation (SABC), which holds high public trust to disseminate relevant information.

Furthermore, the IEC conducted voter education in prisons. However, they did not distribute leaflets for security reasons (Center for Human Rights, 2020, 33). Based on these findings, it is confident that the level of awareness of the South African citizens about the election process, electoral contestants, and the right to vote was high and satisfactory.

(iii) Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination

In South Africa, every adult citizen has the right to vote in elections and do so secretly. For this process to be successful, several issues were considered, including the Electoral Commission to have internal guidelines that ensured the location of voting stations eases the voters' ability to exercise the right to vote, considering geographic, population and demographic changes (Center for Human Rights, 2020, 31). The South Africans had the right to vote in elections, and they had the opportunity to do so in a secret manner; however, on the challenges, the Friedrich Naumann Foundation observed that there were issues with the sealing of ballot boxes, the use of forms for voters to vote outside their designated voting stations, which sometimes led to chaotic situations and polling stations running out of ballots, and with the positioning of voting booths, which did not guarantee a secret vote.⁹ It can be concluded that, in South Africa, people had the right to vote in elections and by secret ballots; however, minor challenges were observable.

(iv) A sound legal framework and an impartial and effective election administration

The study of the African Union Election Observation Mission noted that the South African legal framework and the IEC's handling of the registration process were competent and provided a conducive environment for political parties to function (AUEOM, 2019, p. 11). It further noted that political parties and candidates in the 2019

elections were allowed to operate freely without inhibition (p. 11). This implies that the electoral system ensured inclusivity and guaranteed every vote count (p. 10). However, the system does not allow independent candidates to contest the elections, although section 19 (3) (b) of the Constitution guarantees the right of every citizen to stand for public office and, if elected, to hold office (p. 10). It was also revealed that the IEC performed its mandate professionally and independently. It enjoyed broad satisfaction among stakeholders. It had sufficient resources to implement all phases of the election process (p. 10). The opening, voting, closing and counting procedures were generally adhered to by polling staff, and the process was done accurately, transparently and in accordance with the IEC procedures. Staff competence and professionalism were assessed positively (pp. 5-6). Despite concerns about the competence of the IEC's temporary staff at the local level to deliver electoral materials and conduct voting, counting and transmission of results, it was observed that elections were well administered. Moreover, there was a conducive environment where fundamental freedoms were upheld, enabling voters to make free and informed choices (p. 10).

(v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations

The African Union Election Observation Mission (2019, p. 11) revealed that the South African legal framework provided a conducive environment for political parties and candidates to operate freely without inhibition in the 2019 elections. That culture has led to the proliferation of political parties willing to compete in the national race. Researchers revealed that the list of contenders roughly tripled since the contests' inauguration, indicating a boom in political party supply in South Africa (Nyenhuis & Krönke, 2019), with 48 political parties participating in the 2019 national elections (19 more than in the 2014 elections) (AUEOM, 2019, p. 18). Generally, the study of the African Union Election Observation Mission (2019) observed that political parties' campaign activities were peaceful but competitive and had the opportunity to communicate their messages

without hindrance. Most campaigning was done through rallies, distributing leaflets and flyers, and on the media. It was also observed that the campaign messages of the political parties were primarily based on policy issues that reflected the needs and expectations of the electorate (p. 13). From the findings, it can be concluded that political parties in South Africa had adequate freedom to express their messages and to organise peaceful assemblies and demonstrations during the 2019 elections.

(vi) Freedom of news media to gather and impart information about political contestants and issues of political importance.

The Constitution of South Africa section 16(a) stipulates that access to information is an independent, stand-alone right, alongside the right to freedom of expression, which includes press freedom. The National Association of Broadcasters (NAB) and the Press Council of South Africa (PCSA) are among the key bodies to ensure that those rights are fulfilled. The objective of the former organisation is to promote a pluralistic and diverse broadcasting system and favourable operating climate founded on 'principles of democracy, diversity and freedom of expression,¹⁰ whereas that of the later body is stated to uphold and protect the constitutional rights of freedom of expression and media freedom (Constitution of the Press Council of South Africa Sec 2.2). South Africa's online and offline media were diverse and vibrant during the election (Center for Human Rights, 2020, p. 19). The Electoral Commission does not accredit the media to cover elections but requires media accreditation to access the result operations centres during elections (p. 34).

The Electoral Commission also gave media platforms open access to selected election and results datasets through APIs (Application Programming Interfaces), allowing the media to analyse and disseminate the information (Center for Human Rights, 2020, p. 28). The impartial and democratic well-informed legal framework and bodies made the media in South Africa diverse, free and vibrant to the extent that both offline and online media platform providers confidently ensured South African audiences had meaningful access

to information during the election period (p. 79). The study of the African Union Election Observation Mission (2019, p. 13) revealed the prevalence of press freedom in South Africa and that it played a critical role in informing and educating the general public and communicating the messages of political parties. Generally, it can be concluded that the freedom of news media to gather and impart information about political contestants and issues of political importance during the 2019 South African election was adequate.

(vii) The ability of the government-owned media to provide political contestants fairly and equitable freedom to communicate their message to the electorate

During the 2019 South African election, the African Union Election Observation Mission observed that the state broadcaster played a critical role in the electoral process professionally and unbiasedly (AUEOM, 2019, p. 5). The Mission also lauds the general appreciation of how state broadcasters accorded fair coverage to the political parties throughout the electoral process. Moreover, the Mission also commended efforts made by the Electoral Commission in ensuring effective communication with political parties and electoral stakeholders (p. 13). Therefore, it can be established that the government-owned media in South Africa provided political contestants with fair and equitable freedom to communicate their messages to the electorate.

Tanzania

(i) The freedom of the electorate to make political choices in a peaceful environment

In Tanzania, the election administration is conducted by the National Electoral Commission (NEC) and the Zanzibar Electoral Commission (ZEC). The NEC was established in accordance with Article 74(1) of the Constitution of Tanzania, and the ZEC in accordance with Article 119(1) of the 1984 Constitution of Zanzibar. The NEC manages and administers elections and referenda on the mainland of Tanzania, and the ZEC conducts the same responsibilities in Zanzibar.

Compared with the previous Tanzania elections, the 2020 election saw considerable improvements in the logistics management of the elections by the NEC and ZEC. This

contributed to the peaceful environment and calm in polling stations on Election Day, October 28 2020 (AUEOM, 2020, p. 7). Several studies report that the atmosphere inside and outside the polling stations was generally orderly and peaceful (EISA, 2020, p. 5), and the citizens exercised their constitutional right to vote in an orderly manner despite the low participation (AUEOM, 2020, p. 27) compared with the previous elections. Notwithstanding, other studies report on the use of violence and intimidation by police at polling stations (Collord, 2021, p. 29). For instance, the Tanzania Elections Watch (2021, p. 10) reported that the army and the police deployed heavily in many polling stations across Zanzibar and Pemba and that some 11 people were killed by gunshot on election night, the situation which prompted massive protests in public and on social media. From these observations, it can be established that, during the 2020 elections, Tanzania's citizens freely exercised their constitutional right to make political choices in peaceful environments; however, other polling stations experienced some violence, as reported by some studies.

(ii) Awareness of the electorate about the election process, electoral contestants and right to vote

In Tanzania, voter education to impart the electorate awareness about the election process, their rights to vote, and the electoral contestants to make a genuine choice is administered primarily by the National Electoral Commission (NEC). This responsibility is stipulated in Tanzania's National Election Act Cap 343, Section 4 C. The NEC is also responsible for coordinating and supervising persons who conduct voter education. In fulfilling those legal responsibilities, in November 2019, NEC invited organisations interested in providing such education to apply for accreditation (REDET, 2021, p. 49). 245 Civil Societies Organizations (CSOs) were accredited to provide voter education countrywide (The Citizen, 2020). Therefore, NEC conducted the national voter education for the 2020 elections in collaboration with various stakeholders. Voter educators were deployed at the ward level and provided voter education materials, including posters,

billboards, and flyers, ensuring consistency in civic and voter education. NEC also ran print and electronic media advertisements and set up a call centre at its offices in Dar-Es-Salaam (AUEOM, 2020, p. 19).

Other modalities and strategies used in spreading voter education included social media platforms, text messaging, mainstream media, celebrities—especially from the music and entertainment industry, billboards, leaflets, standing banners, posters, and the use of local dancers and mobile vans (REDET, 2021, p. 77). Despite the NEC’s attention to collaborating with the non-government stakeholders in voter education provision, the AUEOM election observers, in consultation with stakeholders, noted that some CSOs were denied permission to undertake voter education without formal reasons (AUEOM, 2020, p. 19). Based on these findings, it can be established that the electorate gained important awareness about the election process, their rights to vote, and the electoral contestants for making genuine choices. However, some CSOs who could participate to increase the awareness of the election process and the voting rights of the citizens were not accredited the permission to perform such a role without formal reasons. Notwithstanding, the NEC Director of Information and Voter Education, during the 2020 election, admitted that “lack of civic education has led to many people not showing up on the election day...” and “most Tanzanians lack civic education (The Guardian, 2020, October 3, as cited in REDET, 2021, p. 100).

(iii) Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination

The African Union Election Observation Mission (2020) states that during the election, the layout of the polling stations was generally conducive to allow an easy flow of voters and secrecy of the ballot. Ballot boxes were transparent per international best practices and colour-coded to make voters easily distinguish between the different elections (AUEOM, 2020, p. 27). However, despite such an observation, the Tanzania Elections Watch (2021, p. 8) reported that a significant number of opposition candidates were

excluded from the ballot in processes that did not meet universal standards for fair administrative action, and appeals were not disposed of in accordance with the rules of justice (p. 8). The report also states that the opposition political party agents were allowed to watch election processes at the tail end because they refused to swear to secrecy as required by law. The Constitution of the United Republic of Tanzania guarantees a right to privacy under Article 16. This Article and other legal frameworks of the country stipulate the right to access the polling station and to exercise the right to vote by secret ballot without restrictions and discrimination. Tanzanian citizens exercised their right to vote by secret ballot; however, a significant number of opposition candidates were excluded from the ballot voting processes because they refused to swear to secrecy as required by law (Tanzania Elections Watch, 2021, p. 8).

(iv) A sound legal framework and an impartial and effective election administration

The Constitution of Tanzania, 1977; and the National Elections Act, 1985, provide the legal framework for conducting elections in Tanzania. Governments have been advised to ensure that the legal framework for election management is well-consolidated, streamlined and consistent. It should also respect and adhere to the principles of good governance and democracy, the rule of law, accountability, transparency, justice, equal opportunities, and the promotion and protection of human rights (AUEOM, 2020, p. 14). Observers of the African Union Expert Mission saw a considerable improvement in the management of the elections by the National Electoral Commission (NEC) and Zanzibar Electoral Commission (ZEC) compared to the previous years (AUEOM, 2020, p. 14). The polling station environment was reported as orderly (EISA, 2020, p. 5). All these arrangements contributed to the peaceful environment and calm that prevailed in polling stations on Election Day (AUEOM, 2020, p. 7). However, despite such good attempts by NEC and ZEC, and the peaceful environments reported to exist, several observations reported on the existence of several acts of violence, restrictions of opposition party candidates and agents to access the polling stations, and restriction of the freedoms of the

media and internet during the elections. For instance, the study by Collord (2021, p. 29), Tanzania Elections Watch (2021, p. 10) and AUEOM (2020, p. 22) noted that although the law requires political parties and candidates to be authorised to enter the polling stations; and despite that, political parties adhered to the campaign programme, many opposition political party agents were unable to access the stations. Besides, clashes among supporters of political parties at rally grounds and the use of teargas by the police to stop unscheduled rallies existed.

According to AUEOM (2020, p. 22), all those phenomena raised questions about the enforcement of the Code of Conduct for Political Parties and Candidates. Moreover, elections were also characterised by negative campaigns ranging from character assassination, fear-mongering, disinformation, vandalism of campaign materials, violence and tribalism (REDET, 2021, p. 80). Notwithstanding, there were also limitations to access to information during the voting process in the 2020 elections, which involved restrictions on freedoms of the media and internet restrictions (EISA, 2020, p. 7).

From the findings presented, it can be seen that the Tanzanian electoral legal framework reflects principles of good governance and democracy, the rule of law, accountability, transparency, justice, equality, and promotion and protection of human rights. The administration of the 2020 elections was well improved compared to the previous ones; however, there were several negative characteristics ranging from violence, restrictions of opposition party agents and candidates, vandalism of campaign materials, to restrictions on the media and internet restrictions.

(v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations

In Tanzania, political parties are registered by the Registrar of Political Parties established by the Political Parties Act, 1992.19 (p. 19). Section 3 (1) of the Constitution of the United Republic of Tanzania declares that Tanzania is a democratic, secular and socialist state that adheres to multi-party democracy. Section 20 (1) allows persons to form and join

associations and organisations, including political parties, to express messages to the public and to organise peaceful assemblies and other demonstrations in an environment free of undue restrictions. In that recognition, the National Electoral Commission (NEC) and Zanzibar Electoral Commission (ZEC) prepared the ground for the political parties to exercise such constitutional rights during the 2020 elections. Therefore, in consultation with the contesting political parties, NEC prepared a campaign timetable for presidential, parliamentary and councillorship elections (REDET, 2021, p. 77). Campaigns were launched on August 26 2020, and were conducted for about two months until October 27 2020. Most campaigning was done through public rallies, distribution of leaflets and flyers, and on social media platforms and mainstream media, especially TV stations (p. 79). The two election commission bodies encouraged non-violent campaigns and those that abide by the election's laws and general laws of the country and established measures to address cases of misconduct of candidates during campaigns (p. 151).

During the election campaigns and as the polling day neared, international campaign groups, including Human Rights Watch, Amnesty International and Reporters Without Borders, claimed the increase of repression of the opposition and activist groups (Walker & Robson, 2020, p. 9). In the elections' run-up, opposition parties complained of threats and repression as the NEC disqualified dozens of opposition parliamentary and councillor candidates (AUEOM, 2020, p. 11). On October 2 2020, NEC's ethics committee suspended the presidential candidate of the Chama cha Demokrasia na Maendeleo (CHADEMA), Tundu Lissu, from campaigning for seven days for allegedly violating election rules during his campaign rallies (Walker & Robson, 2020, p. 9). Then, on October 23, his campaign rally in Somanga was teargassed by state police. Similarly, Maalim Seif Sharif Hamad, the ACT Party candidate for Zanzibar's presidency, was arrested on October 27 morning while attempting to participate in early voting. Also, several ACT-Wazalendo supporters were reportedly arrested the same day on the island of Pemba and

detained by state security for attempting to interfere with the electoral process (AUEOM, 2020, p. 23).

Nevertheless, there were media and internet restrictions – including blocking many social media and messaging platforms – in the days leading to the poll and election, which probably minimised parties to express their messages and organise and implement their political activities. Moreover, during campaigns, the AUEOM observers received reports about the use of derogatory language, harassment and violence against female candidates, with the sole purpose of deterring them from participation (AUEOM, 2020, p. 23).

Based on the above findings, it can be established that political parties exercised their rights of freedom of expression and organising assemblies and demonstrations; however, there was a concern among opposition parties and election observers about the restrictions and weakening of opposition campaigns by state authorities; restrictions of media and internet which could strengthen the spread of party messages to the public; and few acts of violence during campaigns.

(vi) Freedom of news media to gather and impart information about political contestants and issues of political importance

In Tanzania, communications and media are regulated by the Tanzania Communications Regulatory Authority (TCRA), the Media Council of Tanzania (MCT), and, in part, the Tanzania Editors' Forum (TEF). These regulatory bodies played a crucial role in guiding the conduct of the media during elections. The REDET's report released after the 2020 Tanzania election stated that the legal framework in Tanzania has continued to be tough on media, usually being restrictive more than protective of media and its functions (p. 95). For instance, TCRA amended its Electronic and Postal Communications (Radio and Television Content) Regulations in 2020 by introducing additional sub-sections to Section 37, among others, which compel licensed local broadcasters to seek the regulator's approval before airing either national or international content, which they generate in

collaboration with other content providers (p. 96). Other most notable restrictive laws include the Media Services Act 2016. Its sections on sedition, criminal defamation and false news publications were found by the East African Court of Justice to restrict press freedom and freedom of expression (REDET, 2021, p. 95).

Moreover, it was noted that the enforcement of Tanzania's Cyber Crime Act of 2015 infringed the freedom of expression and restricted many practices during elections, such as people airing free opinions about candidates on social media (REDET, 2021, p. 95). Other legislations perceived by different stakeholders to undermine the freedom of independent media during the election include the Statistics Act 2015 and the Electronic and poster communication Act 2018 (AUEOM, 2020, p. 25). REDET (2021, p. 96) also exposed that on August 10 2020, TCRA summoned the management of Radio Free Africa for interrogation, accusing the local radio station of violating sections 15(2) (b), (c) and 16 of the Electronic and Postal Communications (Online Content) Regulations, 2018. This development followed the infamous Amka na BBC interview with Tundu Lissu on July 29, 2020.

In August 2020, TCRA banned Clouds TV and FM Radio for allegedly violating the electoral code by announcing statistics NEC had not endorsed. Also, TCRA suspended some local FM stations and Mwananchi Online papers for allegedly breaching the Electronic Communications and Postal Code of 2018 (REDET, 2021, p. 96). Moreover, it imposed an Internet chokehold on Mainland Tanzania and Zanzibar. Twitter, WhatsApp and other social media platforms were shut down, and mobile phone service providers limited the use of short text messages and voice calls (Tanzania Elections Watch, 2021, p. 10). Some studies assert that there has been a decline in press freedoms in the country since 2015 (Konrad Adenauer Stiftung, n.d., p. 4) and that over a dozen media outlets have been shut down (p. 4). From the findings presented, it can be seen that news media gathered and imparted information about elections, political contestants and issues of political importance; however, there was widespread concern about the obstruction of

the freedom of such media to exercise their rights and fulfil their responsibilities as reported by several studies.

(vii) The ability of the government-owned media to provide political contestants fairly and equitable freedom to communicate their message to the electorate

The Tanzania Police and Auxiliary Forces Act, 2002, and the National Elections Act, 1985, which have media-related provisions, require government-owned media to provide fair and balanced reporting on all political parties. The study by REDET (2021, p. 193) on the 2020 Tanzanian Elections found that the government news media was biased against major opposition political parties, particularly CHADEMA and ACT-Wazalendo, in dedicating space for reporting their political issues. When the government's media covered the opposition, it elevated some minority parties while ignoring the positions of major opposition parties, especially CHADEMA and ACT-WazaleWazalendo (REDET, 2021, p. 104). Where the space was allotted to the major opposition parties such as CHADEMA and ACT-Wazalendo, it was often for a negative story or coverage. These situations raised complaints from social media users who often commented that news media favoured the ruling Chama Cha Mapinduzi (CCM) over other parties (p. 104). Concerning television stations, it was reported that the government broadcaster TBC1 ran stories from CCM campaigns before the rest of the candidates in most of their primetime news bulletins (p. 11). Based on these observations, it is clear that the government-owned news media provided political contestants with space to cover their political issues; however, it was reported to be biased in covering the major opposition political parties. Even if opposition parties were covered, stories from the ruling party CCM were first to be run.

Comparing the state of 2020 Tanzania's democratic elections and that of Ghana (2020) and South Africa (2019)

The task of comparing the state of 2020 Tanzania's democratic elections and that of Ghana (2020) and South Africa (2019) is based on the following dimensions of democratic

election as appeared in the previous subsections: (i) The freedom of the electorate to make political choices in a peaceful environment; (ii) Awareness of the electorate about election process, electoral contestants and right to vote; (iii) Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination; (iv) A sound legal framework and an impartial and effective election administration; (v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations; (vi) Freedom of news media to gather and impart information about political contestants and issues of political importance; and (vii) the ability of the government-owned media to provide political contestants a fairly and equitable freedom to communicate their message to their respective constituencies. The comparison exercise is done by textual analysis method where the researcher gets informed of the collected data in themes (i) - (vii) in this study, and are interpreted without biases to understand how they make sense as far as democratic election is concerned, and how can they help to understand differences in the performance of democratic election between Tanzania (2020), Ghana (2020), and South Africa (2019).

(i) The freedom of the electorate to make political choices in a peaceful environment

The legal framework of Ghana, Tanzania and South Africa guarantees eligible citizens the right to vote and to be registered as a voter. In all three countries, the electorate freely made political choices in a peaceful environment. However, some instances of electoral malpractices and violence that dented the election process were reported in Ghana and Tanzania (see Gyampo & Graham, 2022, p. 7; Collord, 2021, p. 29; Tanzania Elections Watch, 2021, p. 10). Notwithstanding, for the case of Ghana, it was reported that the low rate of violence in its 2020 elections was due to the established strong channel – negotiations coupled with identifying potential hotspots, early monitoring and observation, and conflict resolution mechanisms created a robust electoral violence prevention framework that reduced tensions and produced a relatively peaceful political

transition (Bekoe & Burchard, 2021). Therefore, it can be established that there was a higher rate of violence during the elections of Ghana and Tanzania than in South Africa.

(ii) Awareness of the electorate about the election process, electoral contestants and right to vote

Based on the findings collected from the several empirical studies identified in this study, it is clear that the level of awareness of the electorate about elections, electoral contestants, and voting rights was higher in Ghana and South Africa than in Tanzania. This statement is valid and concurs with the findings of the European Union Election Observation Mission, which acknowledged Ghana's Electoral Commission to conduct a fairly large voter education campaign for the society during its 2020 elections. Voter education and campaigns were mainly conducted via electronic, social media, and radio stations, which were free to gather and disseminate information to the majority of citizens in urban and remote rural areas. Notwithstanding, political parties had adequate freedom to express their messages and organise peaceful assemblies and demonstrations. This is also among the factors that strengthened the level of the electorate's awareness about elections, electoral contestants, and voting rights in Ghana. In the case of South Africa, likewise, the media were free and played a critical role in informing and educating the general public and communicating the messages of political parties. The state broadcaster accorded fair coverage to the political parties throughout the electoral process, which increased election awareness. Independent Electoral Commission of South Africa cooperated well with churches, political parties, local NGOs, and the South African Broadcasting Corporation in disseminating election information. Furthermore, voter education was conducted even in the prisons. However, they did not distribute leaflets for security reasons.

Based on the findings of this study, in Tanzania, the electorate's level of awareness about elections, electoral contestants, and voting rights was not higher than in Ghana and South Africa because the voter education process in Tanzania experienced several challenges

compared to the two mentioned countries. Unlike in Ghana and South Africa, in Tanzania, several CSOs that could participate in increasing awareness of the election process and the voting rights of the citizens were not accredited the permission to perform such a role without formal reasons. The legal framework of Tanzania contains several legislations that were more restrictive on the information gathering and dissemination roles of the media. The Tanzania Communications Regulatory Authority (TCRA) banned Clouds TV and suspended several other radio stations and Newspapers, accusing them of violating the electoral code. Also, the authority imposed an Internet chokehold on Mainland Tanzania and in Zanzibar, and Twitter, WhatsApp and other social media platforms were shut down, and mobile phone service providers limited the use of short text messages and voice calls.

Moreover, some opposition election campaigns and activist groups that could bring awareness of the ideas of the political parties and electoral contestants were repressed by the state authorities allegedly violating election rules during campaign rallies. Notwithstanding, the National Electoral Commission's Director of Information and Voter Education, during the 2020 election, admitted that "lack of civic education has led to many people not showing up on the election day..." and "most Tanzanians lack civic education. Banned Television, internet, radio stations, social media platforms and newspapers could contribute to strengthening the level of awareness of the electorate about elections, electoral contestants, and voting rights.

(iii) Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination

In Tanzania, Ghana and South Africa, citizens exercised their right to vote by secret ballot, however, every country faced minor challenges in ensuring secrecy and freedom of political choice without restrictions. For instance, in Ghana, some locations had poor layouts/arrangements of polling stations, biometric verification devices (BVDs), and unauthorised persons inside the stations. In South Africa, there were issues with the

sealing of ballot boxes, the use of forms for voters to vote outside their designated voting stations, which sometimes led to chaotic situations and polling stations running out of ballots, and with the positioning of voting booths, which did not always guarantee a secret vote. In Tanzania, the arrangement of polling stations ensured the secrecy of the ballot in many polling stations (REDET, 2021, p. 167); hence, minor challenges affected the voting by secret ballot were reported, unlike in Ghana and South Africa, as shown above. Notwithstanding, unlike in Ghana and South Africa, where there was adequate freedom for opposition candidates to access the polling stations, in Tanzania, however, many opposition candidates were excluded from the ballot processes because they refused to swear to secrecy as required by law.

(iv) A sound legal framework and an impartial and effective election administration

From the findings presented, it can be seen that the electoral legal framework of Tanzania, Ghana and South Africa reflects principles of good governance and democracy, the rule of law, accountability, transparency, justice, equality, and promotion and protection of human rights. The administration of elections was improved compared to the previous ones in all three countries. However, Tanzania's election administration faced several negative characteristics compared to Ghana and South Africa. Those characteristics ranged from violence, restrictions of opposition party agents and candidates, restriction of many CSOs to participate in voter education, vandalism of campaign materials, to restrictions on freedoms of the media and internet restrictions. With regard to independent candidature, the legal system of Ghana allows the independent candidate; however, in South Africa and Tanzania, it is not allowed. This exclusion amounts to a democratic deficit as those wishing to stand as independent candidates cannot exercise their democratic rights (REDET, 2021, p. 55).

(v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations

The legal framework of Ghana, Tanzania, and South Africa provides for the establishment of political parties and guarantees them the freedom of expression and organising peaceful assemblies and other demonstrations. It was reported that campaign activities in Ghana were conducted freely, and all contesting parties enjoyed equal rights to freedom of expression, assembly and movement. In South Africa, it was reported that the legal framework and the handling of the registration process provided a conducive environment for political parties to function and that political parties and candidates in the 2019 elections were allowed to operate freely without inhibition. In Tanzania, political parties exercised their rights of freedom of expression and organising assemblies and demonstrations. However, there were widespread concerns among opposition parties and election observers about the restrictions and weakening of opposition campaigns by state authorities, restrictions of media and internet, which could strengthen the spread of party messages to the public, and few cases of violence during campaigns. Therefore, based on the present findings, it can be concluded that political parties in Ghana and South Africa had more freedom of expression and organising assemblies and demonstrations than those in Tanzania.

(vi) Freedom of news media to gather and impart information about political contestants and issues of political importance.

The present study and several others mentioned in the previous sections have revealed that in Ghana, the media environment is largely conducive. The private media has adequate freedom to the extent that independent media personnel can publish whatever information they consider relevant for the end users. Also, the European Union Election Observation Mission in Ghana (2020) concluded that the media practitioners in Ghana enjoyed a high degree of freedom during the elections. In South Africa, the impartial and democratic, well-informed legal framework and bodies made the media diverse, free and vibrant. The media was free to collect, analyse and disseminate election-related information to the public and communicate political parties' messages, a phenomenon

which the African Union Election Observation Mission (2019) also reported. In Tanzania, the freedom of news media to gather and impart information about elections, political contestants, and issues of political importance is well acknowledged; however, the legal framework in Tanzania was tough on the media's information gathering and dissemination roles. For instance, The Tanzania Communications Regulatory Authority (TCRA) banned Clouds TV and suspended several other radio stations and Newspapers, accusing them of violating the electoral code. Also, the authority imposed an Internet chokehold on Mainland Tanzania and in Zanzibar, and Twitter, WhatsApp and other social media platforms were shut down, and mobile phone service providers limited the use of short text messages and voice calls. Therefore, based on the findings of this study, it can be concluded that the media in South Africa and Ghana had more freedom to gather and impart election-related information than the media in Tanzania.

(vii) The ability of the government-owned media to provide political contestants fairly and equitable freedom to communicate their message to the electorate

Based on the findings of this study, it is clear that the government-owned media in South Africa and Ghana provided fair coverage to the political parties throughout the electoral process. Nevertheless, Ghana Television favoured the New Patriotic Party (NPP) by allocating 26.2 per cent of airtime to its election-related news and programmes, compared to 15.8 per cent allocated to the National Democratic Congress (NDC). In Tanzania, the government-owned news media provided political contestants with space to cover their political issues; however, it was reported to be biased in covering the major opposition political parties. Even if opposition parties were covered, stories from the ruling party CCM were first to be run, notwithstanding the government-owned media was observed to elevate some minority parties while ignoring the positions of major opposition parties and, especially, CHADEMA and ACT-WazaleWazalendo. These situations raised complaints from many social media users who often commented that the government-owned news media favoured the ruling party CCM over other parties. Therefore, based

on the present study's findings, it can be argued that the government-owned media in Tanzania provided less equitable coverage to the opposition political parties than to the government-owned media of Ghana and South Africa.

Factors differentiating the performance of Tanzania's democratic election from that of Ghana and South Africa

The textual analysis of the seven (7) themes (i – vii) in the present study shows that the democratic performance of Tanzania in its 2020 elections is less than the democratic performance of 2020 Ghana's elections and 2019 South African elections, especially in items (ii), (iv), (v), (vi), and (vii) in the present study. Therefore, the present study concurs with the assessment of the Economist Intelligence Unit (EIU), where in its 2021 Sub-Saharan Democracy index, Tanzania scored 5.1 performance, below Ghana (6.5) and South Africa (7.05). The criteria EIU (2021) used in the democratic assessment were electoral process and pluralism, functioning of government, political participation, political culture, and civil liberties. These criteria resemble criteria (i) – (vii) applied in the current study to compare the performance of democracy during the elections of South Africa (2019), Tanzania (2020), and Ghana (2020); however, they appear to be more general than those employed in the present study.

Based on the analysis of the seven (7) themes (i – vii) in the current study, it is revealed that Tanzania has earned less democratic performance in its 2020 elections as compared to the democratic performance of South Africa and Ghana in their 2019 and 2020 elections. This finding can be shown simply in Table 1.

Table 1. The comparative performance of democratic elections between Ghana (2020), South Africa (2019), and Tanzania (2020)

Criteria for comparison	Country		
	Ghana	South Africa	Tanzania
i. The freedom of the electorate to make political choices in a peaceful environment.	YL	Y	YL
ii. Awareness of the electorate about elections, electoral contestants, and voting rights	Y	Y	YL
iii. Voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination.	YL	YL	YL
iv. A sound legal framework and an impartial and effective election administration	Y	Y	YL
v. Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations.	Y	Y	YL
vi. Freedom of news media to gather and impart information about political contestants and issues of political importance.	Y	Y	YL
vii. The ability of the government-owned media to provide political contestants fair and equitable freedom to communicate their message to the electorate.	Y	Y	YL

Source: Researcher's work based on the analysis of the present study findings.

Key: Y=Yes; YL=Yes, but Low

The differences in the performance of democratic elections indicated in Table 1 are due to the fact that, unlike in Ghana and South Africa, in Tanzania, several CSOs that could participate in increasing awareness of the election process and the voting rights of the citizens were not accredited the permission to perform such a role without formal reasons. Characteristically, the legal framework of Tanzania is tough as it contains several legislations that were more restrictive on information gathering and dissemination roles/freedom of the media during the elections. For instance, the Tanzania Communications Regulatory Authority (TCRA) was reported to ban Clouds TV and suspended several other radio stations and newspapers, accusing them of violating the electoral code. Also, the authority blocked the operation of social media platforms, and mobile phone service providers limited the use of short text messages and voice calls. Moreover, some opposition election campaigns, activist groups, and opposition party agents who wanted to access the polling stations to observe and monitor the elections were all repressed by the state authorities, allegedly accused of violating the election rules. Notwithstanding, incidences of violence involving state apparatuses were more widely reported in Tanzania than in Ghana and South Africa, together with the tendency of the Tanzanian government-owned media to be biased in providing coverage to the political parties by favouring the ruling party CCM.

The challenges faced in the 2020 Tanzania elections range from designing the electoral legal framework to conducting and administrating elections. The electoral legal framework comprises the constitutional provisions, legislation, rules, regulations and procedures that govern the electoral system design, forming electoral institutions and bodies, and implementing electoral activities.¹¹ If the electoral legal framework is not well designed, it lacks effective provisions and political will and commitment to implement all instruments designed; it is unlikely to address challenges and problems of democracy during elections effectively; consequently, tensions may rise due to violence and conflicts.

Election-related violence and conflicts diminish trust in democratic processes and institutions, undermine civil and political rights, cause human suffering, and create a huge economic impact. The electoral legal systems will inevitably need to adapt over time to respond adequately to such challenges and problems and new political, demographic and legislative trends and needs.¹² First, citizens and political parties must understand their rights to vote, form and join associations and organisations, express their messages to the public, and organise peaceful assemblies and other demonstrations in an environment free of undue restrictions. To recognise such fundamental rights, citizens and political parties must be aware of legal framework issues and the environments in which they are formulated and executed. Since democracy depends on the voice of an informed majority, democratic institutions and regulatory processes must provide opportunities for citizens, political parties, and CSOs – including election monitoring organisations, human rights groups, lawyers’ associations, technology expert organisations, “think tanks,” civic education groups and others – to review, and challenge the existing legal frameworks (Melrose, 2008) and comment on proposed changes, as well as to suggest modifications for improving democracy in the future elections and to monitor the election processes.

Conclusion and Recommendations

This study was designed to compare the state of democratic elections in South Africa (2019), Tanzania (2020), and Ghana (2020) based on the following dimensions: (i) The freedom of the electorate to make political choices in a peaceful environment; (ii) Awareness of the electorate about the election, electoral contestants, and voting right (iii) voting by secret ballot and a genuine right to exercise this right without restrictions and discrimination; (iv) A sound legal framework and an impartial and effective election administration; (v) Freedom of political parties to express their messages and to organise peaceful assemblies and demonstrations; (vi) Freedom of news media to gather and impart information about political contestants and issues of political importance; and (vii)

the ability of the government-owned media to provide political contestants a fairly and equitable media coverage.

Based on the study's findings, it was found that in all three countries, the electorate had the freedom to make political choices in a peaceful environment. However, some electoral malpractice and violence dented the election process in Ghana and Tanzania. Given that observation, it can be established that there was a higher rate of violence during the elections of Ghana and Tanzania than in South Africa. In Tanzania, the electorate's level of awareness about elections, electoral contestants, and voting rights was not higher than in Ghana and South Africa because the voter education process in Tanzania experienced several challenges compared to the two mentioned countries. Challenges ranged from designing the electoral legal framework to administering elections. In Tanzania, the arrangements of polling stations ensured voting by secret ballot in many polling stations; hence little, challenges affected voting by secret ballot were reported, unlike in Ghana and South Africa, where the layout of the polling stations and issues of devices and sealing of ballot boxes did not guarantee a secret vote.

The electoral legal framework of Tanzania, Ghana and South Africa reflects principles of good governance and democracy. However, Tanzania's election administration faced several negative characteristics compared to Ghana and South Africa. Those characteristics ranged from violence, restrictions of opposition party agents and candidates, restriction of many CSOs to participate in voter education, vandalism of campaign materials, to restrictions on freedoms of the media and internet restrictions. Also, it was revealed that political parties in Ghana and South Africa had more freedom of expression and organising assemblies and demonstrations as compared to the political parties in Tanzania, where there were widespread concerns about the restrictions and weakening of opposition campaigns by state authorities; restrictions of media and internet which could strengthen the spread of party messages to the public; and few acts of violence during campaigns. Moreover, the media of South Africa and Ghana had more

freedom to gather and impart information on elections than the media of Tanzania. This is a relevant finding because the legal framework of Tanzania was reported to contain more restrictive legislation on information gathering and dissemination roles/freedom of the media during the elections. Besides, Clouds TV and several radio stations, newspapers and social media platforms were blocked from operation by the state, allegedly accused of violating the electoral code. Notwithstanding, the government-owned media in Tanzania provided less equitable coverage to the opposition political parties than to the government-owned media of Ghana and South Africa.

Generally, based on the present study's findings, Tanzania has earned less democratic performance in its 2020 elections as compared to the democratic performance of South Africa and Ghana in their 2019 and 2020 elections due to several challenges ranging from the design of a legal framework to election administration.

Therefore, reflecting on the current study findings, the following recommendations should be considered for Tanzania to operate more democratically in the forthcoming elections.

- (i) Laws and requirements in place for accrediting the CSOs to provide civic education should be reviewed and amended to create an inclusive environment where multiple but credible stakeholders can participate in providing civic education to Tanzanians. With this strategy in place, the electorate's level of civic education and awareness about election and electoral contestants is expected to increase.
- (ii) The legal framework and the legislation accrediting and governing news media operation should be revised, and amendments should be made to create a favourable, pluralistic and diverse broadcasting system where media (both online and offline) can operate freely during the elections. The successful implementation of this suggestion will positively impact the citizens' level of civic education and election awareness. This is a valid perception because the

- multiplicity of operating media platforms offers citizens opportunities to acquire more civic education and election awareness, thereby becoming more civilised and patriotic. Not only that but also the adequate press freedom and freedom of speech will minimise claims regarding the functioning of the state as authoritative.
- (iii) The legal framework that guarantees political parties the freedom to express their messages and to organise assemblies and demonstrations should be executed effectively without biases. Indeed, legislation should be enacted to ensure that political parties exercise their right to freedom of expression and organise assemblies and demonstrations. That legislation should have a provision that penalises any person or entity interfering with the political party's freedom of expression and organising assemblies. However, the guaranteed freedom of expression, speech, and assembly and the enactment of the above proposed legislation should not make political parties feel immune from sanctions against misconduct.
 - (iv) The electoral legal framework should be amended to give opposition party agents and activist groups more chances to access the polling stations for observing and monitoring the election process peacefully, as it is in Ghana and South Africa. Implementing this suggestion will silence the widespread claims about the obstruction and harassment of opposition parties' agents and activist groups at the polling stations. Not only that but also the presence of party agents and observers at the polling stations will make candidates feel more confident about the results of the elections and may credit the general election as democratic, fair and valid.
 - (v) The government should increase its commitment to democratic principles by allowing independent candidates to contest in future elections.

- (vi) The execution of the Electoral Code of Conduct, which provides for government-owned media to provide fair coverage for all competing political parties to disseminate information to their respective constituents fairly, should be supplemented by additional legislation that may stipulate mechanisms for ensuring fair media coverage for all competing political parties.
- (vii) Strong channels of negotiations should be at all national government levels to reduce electoral violence. Negotiations should involve mechanisms for identifying early warnings into election processes, early monitoring and observations of violence and conflict resolution mechanisms before violence turns out of control. Moreover, the security forces should be well-trained and competent, and they should respect the public's civil and political rights and should not engage in any form of discrimination to prevent tensions that may arise due to violence.

Conflict of interest

There is no conflict of interest between the author and any other part regarding the contents of this article.

Notes

¹ Universal Declaration of Human Rights, General Assembly Resolution 217A (III) of 10 December 1948, Article 21, Paragraph 3 (hereinafter UDHR).

² For instance, as of 2022 Tanzania had 61 million population (Tanzania Bureau of Statistics); South Africa 58 million population in 2020 (Macrotrend: <https://www.macrotrends.net/>); and Ghana 32 million population as of 2020. (Macrotrend: <https://www.macrotrends.net/>)

³ Mauritius, Cabo Verde, Botswana, Namibia, and Lesotho are models of a high-quality democracy in Africa (see EIU, 2021, p. 57) and have very small population sizes compared

to Tanzania, Ghana, and South Africa. Since there has been a significant relationship between the small population size and high-quality democracy (Gerring & Zarecki, 2011, p.1), it may sound unfair to compare the quality of democracy between two states with population sizes varying to the greatest degree. In this regard, Mauritius, Cabo Verde, Botswana, Namibia, and Lesotho are excluded from the present study. Notwithstanding, states with low democratic performance (authoritarians) indicated by the EIU (2021, p. 58) are omitted from this study because they may offer little lessons to the democratic outperformers. It is always a good goal to learn from the more successful democracies.

⁴ Ghana's Constitution of 1992 with Amendments through 1996. See "General fundamental freedoms" in section 21 (3), page. 21

⁵ Political parties Law Act 574, 2000. See "Founding and Registration of Political Parties" in sections 1 (1), (2), and (3); and "Participation in politics" in section 2 (1)

⁶ Ghana's Constitution of 1992 with Amendments through 1996. See "General fundamental freedoms" in section 21 (1) (a) and (d), page. 2

⁷ SADC Observer Mission 'Preliminary statement' 10 May 2019 www.sadc.int/news-events/news/sadc-election-observationmission-releases-its-preliminary-statement-2019-national-and-provincial-elections-republic-south-afric/

⁸ Promotion of Access to Information Act 2 (2000), see page 2

⁹ J Maaten 'Despite Challenges, Democracy in South Africa is Alive and Well: Preliminary Statement from the Friedrich Naumann Foundation for Freedom Sub-Saharan Africa on South Africa's Elections' 10 May 2019 <https://africa.fnst.org/content/despitchallenges-democracy-south-Africa-alive-and-well>.

¹⁰ National Association of Broadcasters 'About' <https://www.nab.org.za/content/aboutpage>

¹¹ <https://aceproject.org/ace-en/topics/ev/Electoral%20violence/definitions>

¹² <https://aceproject.org/ace-en/topics/es/onePage>

References

- Abdulai, M., Ibrahim, H., & Mashoud, M. (2020). The Role of Radio in Setting the Agenda for the Electorate and Creating an Atmosphere of Aggression during Elections in the Northern Region of Ghana. *Athens Journal of Mass Media and Communications*, 6 (4), 255-270. <https://doi.org/10.30958/ajmmc.6-4-3>
- Adams, C. (2020). Ghana: Voter Registration Takes Off Smoothly ... but With Social Distancing, Mask Wearing Concerns. *AllAfrica.Com*. <https://allafrica.com/stories/202007020552.html>
- Adejumobi, S. (2000, June 26-28). Between Democracy and Development in Africa: What are The Missing Links? [paper presentation]. World Bank Conference on “Development Thinking in the Next Millennium”, Paris. https://documents1.worldbank.org/curated/en/143061468741593788/820140748_2004041400400401/additional/28762.pdf
- African Union Election Observation Mission (AUEOM). (2019). African Union Election Observation Mission to the 8 May 2019 National and Provincial Elections in the Republic of South Africa. https://au.int/sites/default/files/documents/38696-doc-report_of_the_african_union_election_observation_mission_to_the_08_may_2019_national_and_provincial_elections_in_the_republic_of_south_africa.pdf
- African Union Election Observation Mission (AUEOM). (2020). African Union Expert Mission to the 28 October 2020 General Elections to the United Republic of Tanzania. https://au.int/sites/default/files/documents/40252-doc-report_of_the_african_union_expert_mission_to_the_28_october_2020_general_elections_to_the_united_republic_of_tanzania.pdf
- Anckar, C. (2008). On the Applicability of the Most Similar Systems Design and the Most Different Systems Design in Comparative Research, *International Journal of Social Research Methodology*, 11(5), 389-401, DOI: 10.1080/13645570701401552

- Asekere, G. (2021). The 2020 General Elections in Ghana: An Analysis of the Issues, Voting Pattern and Impact. *Social Sciences*, 10 (1), 15-27. doi 10.11648/j.ss.20211001.13
- Bekoe, D., & Burchard, S. (2021). Robust electoral violence prevention: An example from Ghana, *African Affairs*, 120 (481), 543–567. <https://doi.org/10.1093/afraf/adab028>
- Bratton, M. (1998). Second elections in Africa. *Journal of Democracy*, 9(3), 51-66. 10.1353/jod.1998.0041
- Braun, V. & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, 3, 77-101. doi: 10.1191/1478088706qp063oa
- Centre for Human Rights. (2020). Proactive Disclosure of Information and Elections in South Africa: An assessment of South Africa's compliance with the Guidelines on Access to Information and Elections in Africa. <http://hdl.handle.net/20.500.11910/15457>
- Collord, M. (2021). Tanzania's 2020 Election: Return of the One-Party State", *Études de l'Ifri, Ifri*. Sub-Saharan Africa centre. https://www.ifri.org/sites/default/files/atoms/files/collord_tanzania_2020_election_2021.pdf
- Diamond, L. (2002). Elections Without Democracy: Thinking about hybrid regimes. *Journal of Democracy*, 13(2), 21-35. 10.1353/jod.2002.0025
- Dixon, R., Ginsburg, T., & Abebe, A. (Eds.). (2022). *Comparative Constitutional Law in Africa*. UK: Edward Elgar Publishing. <https://doi.org/10.4337/9781839106897>
- Giorgip, B. (2015). Peaceful Transfer of Political Power and its Characteristics in Georgia. The Georgian Parliamentary Elections Of 2012. *Revista Moldovenească de Drept Internațional și Relații Internaționale*. 38 (4), 48-55. https://www.researchgate.net/publication/305481276_Peaceful_Transfer_of_Political_Power_and_its_Characteristics_in_Georgia_The_Georgian_Parliamentary_Elections_of_2012

- Economist Intelligence Unit (EIU). (2021). Democracy Index: The China Challenge. <https://www.eiu.com/n/campaigns/democracy-index-2021/>
- EISA. (2020). Election Observation Mission to the 2020 General Elections in Tanzania: <https://s3-eu-west-1.amazonaws.com/s3.sourceafrica.net/documents/120793/EISA-Preliminary-Statement-Tanzania-2020-General.pdf>
- European Union Election Observation Mission (EUEOM) Ghana. (2020). Presidential and Parliamentary Elections, 7 December 2020. Final Report. <https://www.eods.eu/library/EU%20EOM%20GHA%202020%20FR.pdf>
- GhanaWeb. (2020a, December 7). Election 2020: Awutu Senya East: 'Ballot tampering' EC officials arrested. <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Election-2020-Awutu-Senya-East-Ballot-tampering-EC-officials-arrested-1128431>
- GhanaWeb. (2020b, December 7). Election 2020: Guns blaze at Kasoa polling station, 2 shot. <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Election-2020-Guns-blaze-at-Kasoa-polling-station-2-shot-1128404>
- GhanaWeb. (2020c). Man, reportedly shot for snatching ballot box at Awutu Senya West. <https://www.ghanaweb.com/GhanaHomePage/Man-reportedly-shot-for-snatching-ballot-box-at-Awutu-Senya-West-1128644>
- Gerring, J., & Zarecki, D. (2011). Size and Democracy. Revisited. <https://www.bu.edu/polisci/files/2011/04/SizeandDemocracyRevisited.pdf>
- Gyampo, R., & Graham, E. (2022). Ghana's 2020 General Elections: An Assessment of the Journey and Processes. *The African Review*, 49(3), 310-333. <https://doi.org/10.1163/1821889x-20224913>
- Hadenius, A. (1992). *Democracy and Development*. England: Cambridge University Press.

- Huang, C., Kuo, M.-F., & Stockton, H. (2016). The Consequences of MMM on Party Systems. In C. Huang, N. F. Batto, A. C. Tan, & G. W. Cox (Eds.), *Mixed-Member Electoral Systems in Constitutional Context: Taiwan, Japan, and Beyond* (pp. 25–51). University of Michigan Press. <http://www.jstor.org/stable/j.ctt1gk08h7.6>
- IDEA (International Institute for Democracy and Electoral Assistance). (2016). *Emerging Trends and Challenges of Electoral Democracy in Africa*. International IDEA Policy Dialogue. Sweden.
<https://www.idea.int/sites/default/files/publications/emerging-trends-and-challenges-of-electoral-democracy-in-africa.pdf>
- Idowu, H., & Mimiko, N. (2020), *Enabling Factors for Peaceful Political Power Alternation and Democratic Consolidation in Ghana and Nigeria*. *Taiwan Journal of Democracy*, 16 (1), 161-195.
https://www.researchgate.net/publication/342788613_Enabling_Factors_for_Peaceful_Political_Power_Alternation_and_Democratic_Consolidation_in_Ghana_and_Nigeria
- Kersting, N. (2007). Electoral Reform in Southern Africa: Voter Turnout, Electoral Rules and Infrastructure. *Journal of African Elections*, 6 (1): 134–151
- Khemani, S. (2004). Political cycles in a developing economy: Effect of elections in the Indian States. *Journal of Development Economics*, 73(1), 125-154.
- Konrad Adenauer Stiftung “Framing Democracy, Media Coverage of Tanzania’s 2020 Presidential Elections: A Focus on Opposition Candidate Tundu Lissu”
Johannesburg: KAS Media Programme Sub Sahara Africa.
<https://www.kas.de/documents/285576/285625/Framing+Democracy+Tanzania.pdf/36dbfd35-4d4c-7896-ccb8-7106eace5f65?version=1.0&t=1603363559594>
- Mahadew, A., & Mendy, P., (2022). Political Representation of Ethnic Groups in the Gambia: Lesson from the Mauritius. In Nabaneh, S., Abebe, A., & Sowe, G.

- (Eds.). (2022). *The Gambia in transition: Towards a new constitutional order*. South Africa: Pretoria University Law Press. p. 221 -253.
- Melrose, P. (2008). *Promoting Legal Frameworks for Democratic Elections. An NDI guide for developing Elections Laws and Law Commentaries*. Washington, DC: National Democratic Institute for International Affairs.
- Mude, T. (2022). Digital Technologies and Election Management in Zimbabwe: Pseudo-democratic Transition and Contorted Delirium? *Africa Development / Afrique et Développement*. 47(2), 179–198. <https://www.jstor.org/stable/48682671>
- National Democratic Institute (NDI). *Applying International Election Standards. A Field Guide for Election Monitoring Group*. <https://www.ndi.org/sites/default/files/Applying-International-Standards-ENG.pdf>.
- Nyenhuis, R., & Krönke, M. (2019). The 2019 South African Elections. Incumbency and Uncertainty. *Journal of African Elections*. 18 (2), 112-133
<https://hdl.handle.net/10520/EJC-1f6efb3e44>
- Olson, M. (1993). Dictatorship, Democracy, and Development. *The American Political Science Review*, 87 (3), 567-576. URL: <http://www.jstor.org/stable/2938736>
- Owusu Kyei, J., & Berckmoes, L. (2021). Political Vigilante Groups in Ghana: Violence or Democracy? *Africa Spectrum*. 55(3), 321–338.
<https://doi.org/10.1177/0002039720970957>
- Research and Education for Democracy in Tanzania (REDET). (2021). *The 2020 General Elections in Tanzania: Report of The Research and Education for Democracy in Tanzania*. <https://www.udsm.ac.tz/web/index.php/centres/redet/report-of-the-2020-general-election-in-tanzania>
- Schedler, A. (2002). Elections without democracy: The menu of manipulation. *Journal of Democracy*, 13(2), 36- 50. 10.1353/jod.2002.0031

Tanzania Elections Watch. (2021). Final Observation Report on The General Elections Held in Tanzania On 28 October 2020.

<https://tanzaniaelectionswatch.org/download/tanzania-elections-watch-final-report/>

The Citizen (2022, July). NEC Picks 245 Organisations for Voter Education. The Citizen.

<https://www.thecitizen.co.tz/tanzania/news/national/-nec-picks-245-organisations-for-voter-education-2711854>

Tlakula, P. (2007, October 26). Democratic Elections in a Global Context [Paper presentation]. Colloquium on The Effect of Globalisation on the Development of Constitutionalism in Southern Africa, under the auspices of the Faculty of Law, North-West University, Potchefstroom and the Konrad Adenauer Foundation.

DOI:10.17159/1727-3781/2007/v10i2a2797

Zamfir, L. (2021). State of Democracy in Sub-Saharan Africa. Democratic progress at risk.

European Parliament: European Parliamentary Research Service.
[https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690647/EPRS_BRI\(2021\)690647_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690647/EPRS_BRI(2021)690647_EN.pdf)

Walker, N., & Robinson, T. (2020). Tanzania 2020 Presidential Election (CBP 9046, 17 November 2020). House of Commons Library.

<https://researchbriefings.files.parliament.uk/documents/CBP-9046/CBP-9046.pdf>