Consent without a click

Consent, privacy and accountability in voice AI

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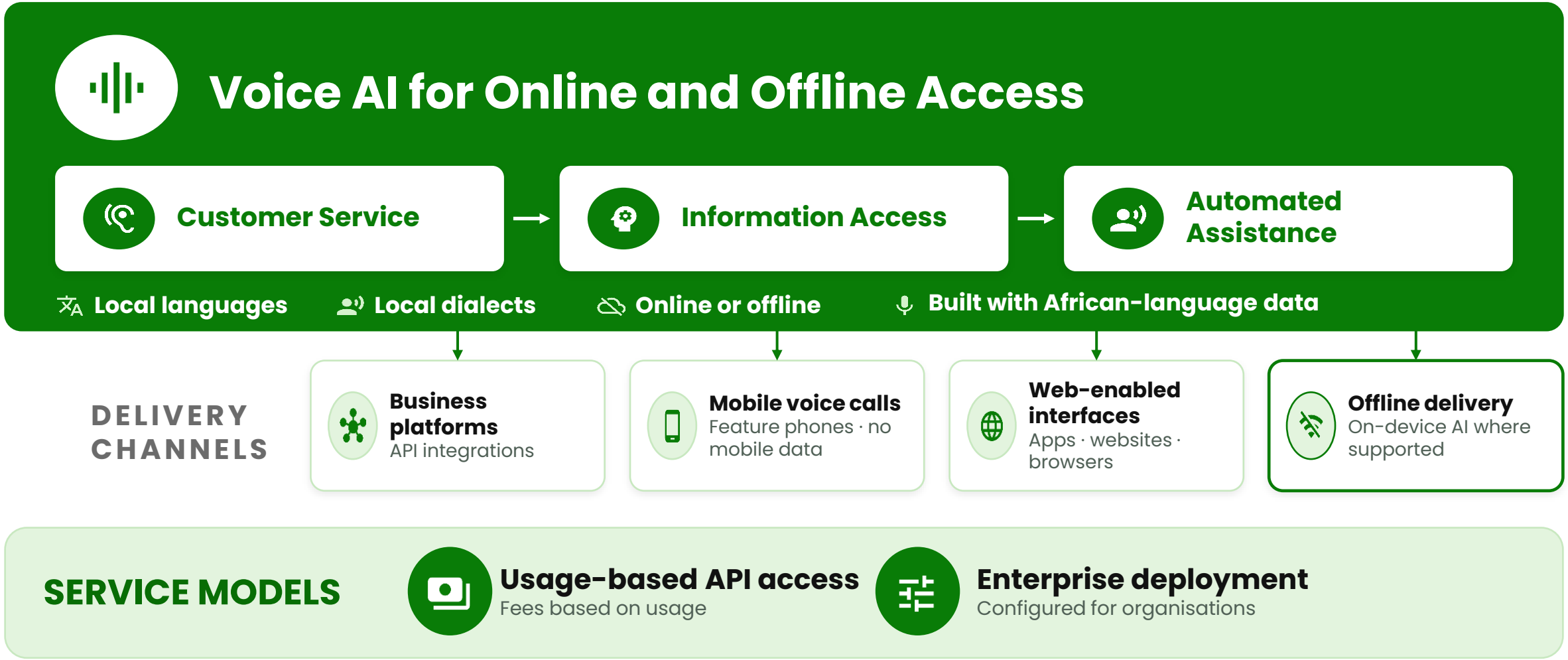
About EqualyzAI :

We develop African-language voice AI infrastructure for internet and non-internet channels





Today's agenda

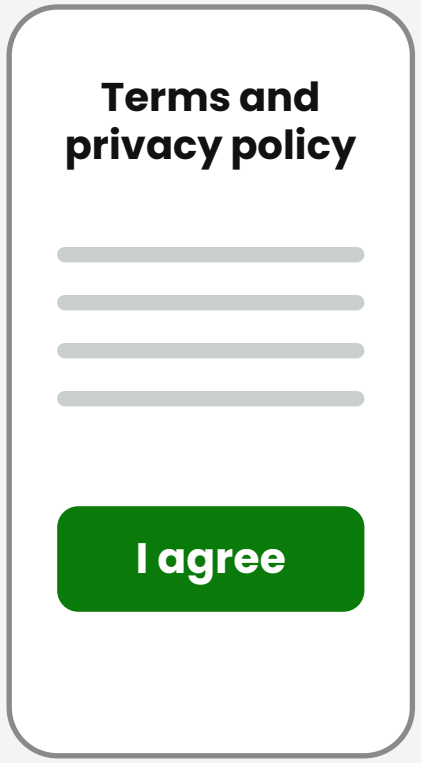
01 Why the click breaks

02 Five ways consent fails

03 The RIGHTS framework

04 From law to redress

4 assumptions about digital consent



A user who can read

Reads the terms

A personal device

Their own smartphone

An explicit agreement

Taps 'I agree'

One person, one account

Nobody else on the line

Many digital consent processes rely on these assumptions.

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These assumptions often fail in practice

Common assumption	What may happen
A literate user	Low literacy or another language
A personal screen	A voice call, no screen
A clear click	Spoken consent or a keypad response
One person, one account	A shared phone and a helper

The caller may use a shared phone or need help.

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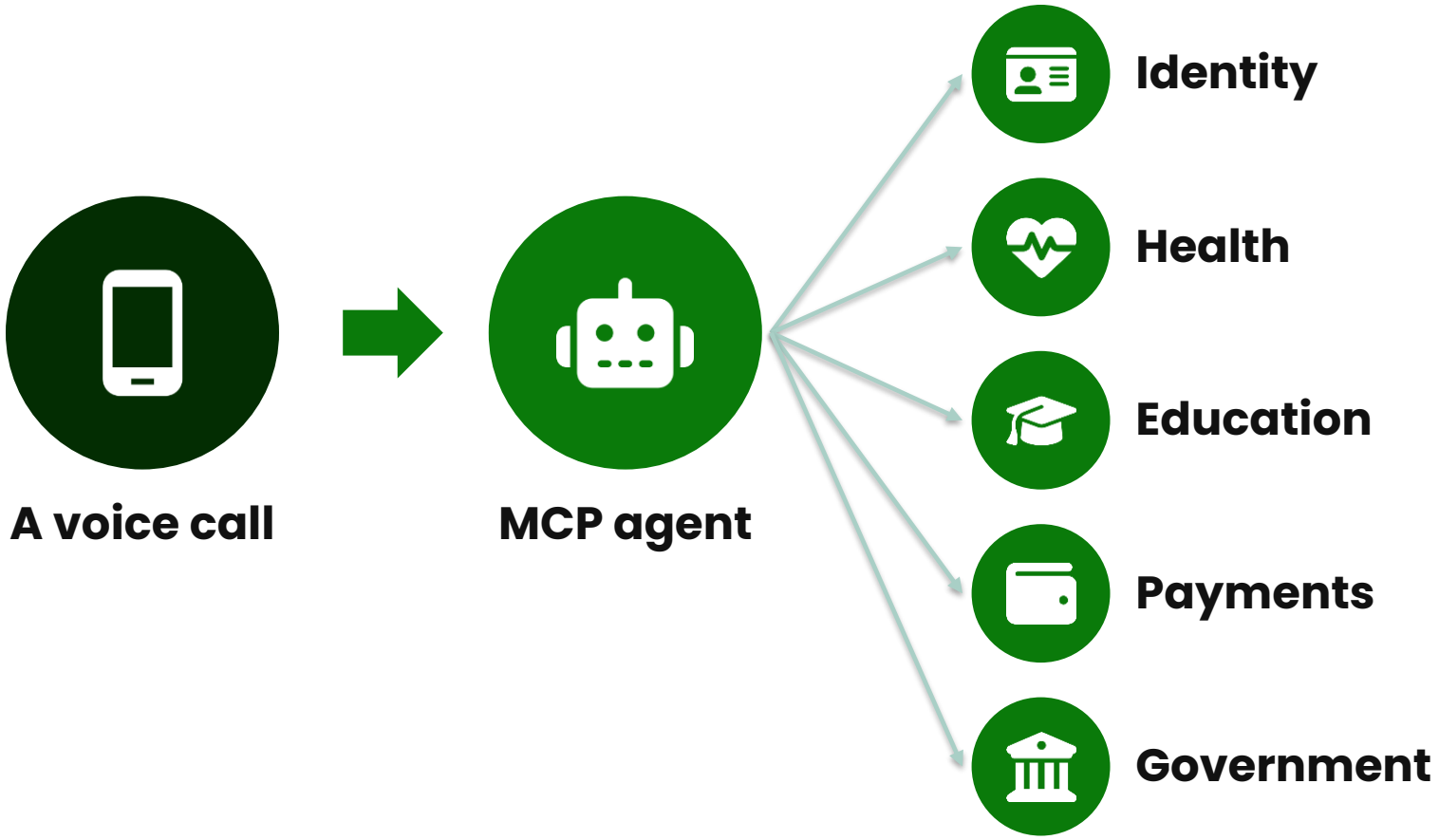
AI agents can take action during a call



It can

Verify

Enrol

Pay

Update

Cancel

A voice command could authorise a payment.

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Agenda

01 Why the click breaks

02 **5 Ways Consent Can Fail**

03 The RIGHTS framework

04 From law to redress

5 voice consent risks

1



Identity on a shared phone

Musa uses his mother's phone. The system assumes he is the owner.

2



Coerced or mistranslated consent

Someone else agrees, or a translation changes the meaning.

3



Undisclosed data linkage

A health service accesses payment data without her knowledge.

4



Excessive permissions

An agent checking a balance could also transfer funds.

5



Unclear responsibility

Who is responsible when the service makes a mistake?

We will assess RIGHTS against these 5 risks.

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Agenda

01 Why the click breaks

02 Five ways consent fails

03 **The RIGHTS framework**

04 From law to redress

EqualyzAI +Law RIGHTS framework for voice AI

R — Recorded consent

Clear agreement in the caller's language

I — Identity and authorisation

Verify the caller and representative

G — Defined purpose

Use data only for the stated purpose

H — Human review

Human review for high-risk actions

T — Tight permissions

Minimum access and necessary data

S — Complaints and redress

Responsibility and complaint resolution

6 safeguards for MCP-enabled services

EqualyzAI AI+Law supports organisations in applying RIGHTS.

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R: Recorded consent

R



Simple comparison

Proof of the person's agreement

In practice

- Explain clearly in the caller's language
- Explain the action and ask for clear agreement
- Retain appropriate evidence of consent securely

In the MCP system

Require valid consent evidence when consent is the legal basis

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I: Identity and delegated authority



Simple comparison

Permission to act for another person

In practice

- Do not assume the caller owns the phone
- Verify identity using a PIN or one-time code
- Define who may act, what they may do and for how long

In the MCP system

Record the caller and any delegated authority

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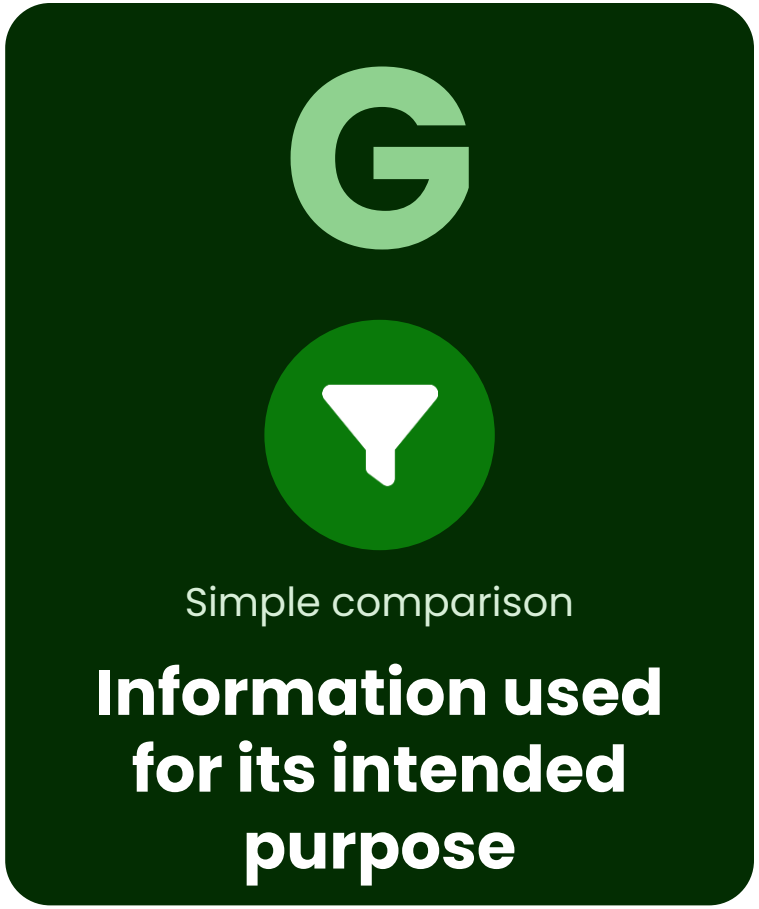
G: Defined purpose



In practice

- Explain why the information is needed
- No linkage without a lawful basis
- Check the lawful basis for a new purpose

In the MCP system

Define approved purposes and block other requests

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H: Human review

H



Simple comparison

A second signature on a large cheque

In practice

- Classify actions by risk: view, change, pay
- Require human review for defined high-risk decisions
- Provide a clear option to reach a person

In the MCP system

High-risk actions require approval before proceeding

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T: Tight permissions

T



Simple comparison

A hotel key card: your room, your stay only

In practice

- Give each tool only the access it needs
- Return only the information needed
- Limit access by user, purpose and duration

In the MCP system

Use limited credentials and restricted tool responses

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S: Standing to complain

S



Simple comparison

A receipt and a complaints desk

In practice

- Give important transactions a reference number
- Identify the organisation handling complaints
- Allow review and correction where appropriate



In the MCP system

Link relevant authorisation and transaction audit records

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How RIGHTS addresses the 5 consent risks

Failure	R	I	G	H	T	S	Recommended safeguard
Shared-device identity	●	●					Verify the caller's identity
Coerced or mistranslated consent	●			●		●	Explain clearly and confirm understanding
Invisible data linkage			●		●		Restrict access to the approved purpose
Over-broad agent authority		●		●	●		Limit tool permissions and access duration
Unclear accountability	●					●	Name the responsible organisation

Several safeguards may be needed for each risk.

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How legal requirements become system controls



Law	Policy	Permission	Tool	Action	Audit	Redress
Rights and duties in statute	What this service may do	Who may do it, for whom, until when	One narrow MCP action	Done with consent recorded	Every step logged, one reference	Review, reverse, repair

If a duty does not reach the permission and the tool, it is not enforced.

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Aisha enrols in health insurance



The case

Aisha uses a health worker's phone to enrol in health insurance in Hausa

Law	Health data needs a lawful basis and safeguards
Policy	Health workers may enrol members, not view diagnoses
Permission	Enrolment mandate for one ward, valid for 30 days
Tool	enrol_member: returns a transaction reference
Action	Aisha confirms the enrolment in Hausa
Audit	Caller, authorisation, tool and result
Redress	SMS reference and a correction process

Illustrative case. Legal requirements vary by country.

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Where RIGHTS safeguards are implemented

Duty	Implementation point	How to test
Purpose limitation	Tool purpose tags + policy check	Unapproved requests are rejected
Data minimisation	Tool outputs	Returns yes/no, not the record
Delegated authority	Token claims: who, for whom, until	Expired authorisation is rejected
Least privilege	One action per tool, narrow scopes	Balance tool cannot make transfers
Auditable consent	Consent record required as input	Consent-dependent actions require valid evidence
Human review	Approval queue for high-impact tools	Payment waits for approval
Redress	Reference number + reversal route	Reference and correction process work

Enforce these controls in the system and test them.

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5 steps for safer voice consent

1. Classify tools by risk: view, change or pay
2. Check legal basis and access before sensitive actions
3. Limit access by person, purpose and duration
4. Keep transaction records and provide a reference
5. Specify who handles complaints in service agreements

Start with existing legal requirements and test each control.

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3 key lessons

1



Voice services need clear agreement and appropriate consent evidence

2



Translate legal requirements into permissions and controls

3



Important actions need audit records and redress

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EqualyzAI +Law: Responsible agentic AI, end to end

Our AI+Law practice

- Legal and governance expertise built into delivery, not added after launch
- Designed for shared phones, local languages, low literacy and voice or offline channels
- Consent, accountability and redress that work without a screen or a click
- Advisory, research and product support for governments, funders and companies

How we support delivery, end to end

1 Assess
Legal basis, risk and local context review

2 Design
Consent flows in local languages, RIGHTS controls

3 Build
Tight permissions, audit logs, data and IP terms

4 Test
Failure, misuse and comprehension tests

5 Operate
Monitoring, human review, complaints and redress

Practice areas

1. **AI regulation and governance**
2. **Responsible AI frameworks**
3. **Data protection and privacy**
4. **Intellectual property**
5. **Technology contracting**
6. **Algorithmic accountability**
7. **Legal process automation**
8. **AI-enabled contract review**

Cross-cutting: the legal implications of deploying AI across every sector we serve

We help partners deploy voice agents that people can trust, question and correct.

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Demo, Questions and discussion

Contact us for the RIGHTS checklist and support in applying it.

Demo

EqualyzAI AI+Law Practice

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