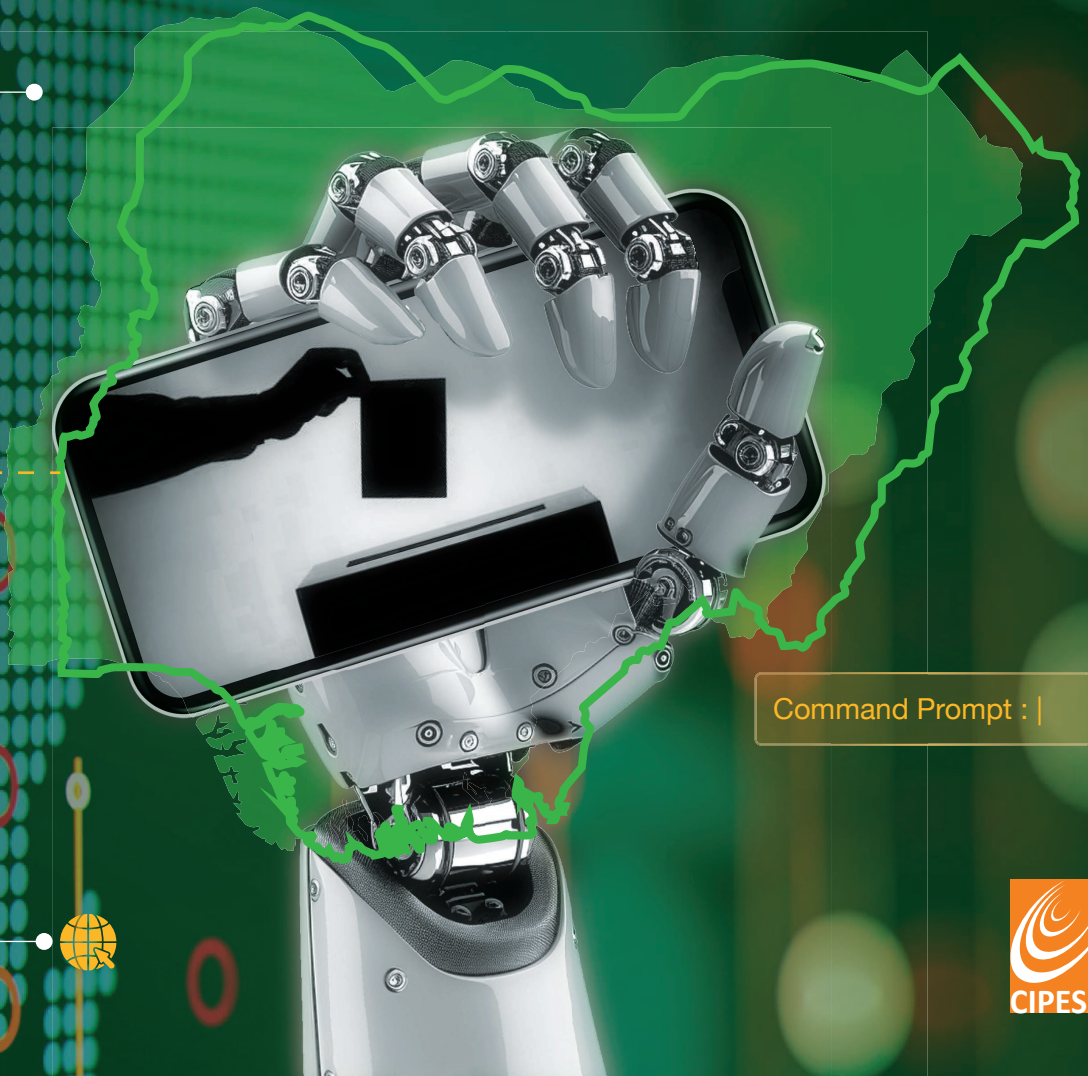


# State of Internet Freedom in Africa 2025

## **Navigating the Implications of AI on Digital Democracy in Nigeria**

September, 2025



Command Prompt : |



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State of Internet Freedom in Africa 2025  
Navigating the Implications of AI on Digital Democracy in Nigeria

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# Executive Summary

Artificial Intelligence (AI) is fast becoming a defining feature of digital governance and socio-economic transformation globally, with profound implications for democracy, human rights, and civic engagement. In Nigeria, the conversation around AI is still emerging but has gained traction in recent years with various policy efforts. The purpose of this research study is to critically examine the implications of AI on Nigeria's democratic and civic space, highlighting both the opportunities and challenges AI presents for digital rights, accountability, and inclusive governance. It aims to identify regulatory gaps, institutional weaknesses, and ethical concerns while offering practical recommendations for building a human-rights-centred AI governance framework in the country.

The research employed a mixed-method approach. A literature and policy review was conducted to analyse existing laws, strategies, and regulatory frameworks intersecting with AI. This was complemented by Key Informant Interviews (KIIs) with stakeholders in civil society, the private sector and the tech community. The analysis drew on these diverse sources to understand both structural challenges and practical experiences shaping Nigeria's AI landscape.

The findings reveal significant regulatory and institutional gaps. There is no dedicated AI law, leaving citizens exposed to risks from facial recognition, predictive policing, and algorithmic content moderation. Civic tech and media actors are experimenting with AI-driven tools to enhance accountability and fact-checking, yet their sustainability is undermined by reliance on donor funding. Government-led initiatives aim to build capacity but face challenges of brain drain, weak retention, and limited spillover effects. Broader challenges include algorithmic bias due to non-local datasets, low digital literacy, infrastructural gaps, and socio-economic inequalities that limit inclusive AI adoption.

To address these challenges, the study recommends the following:

- The government should enact a comprehensive AI law based on a risk-based regulatory model, establish a well-resourced independent AI agency, reform the Cybercrimes Act to prevent abuse and bridge infrastructural divides and ensure transparent AI deployments in sensitive areas.
- Civil Society should strengthen public awareness campaigns on digital rights and AI risks, engage actively in legislative and policy processes, and build partnerships with local innovators to sustain people-centred AI solutions.
- Media actors must develop ethical guidelines for AI use, invest in the training of journalists, and collaborate with fact-checking and civic tech groups to combat threats to information integrity.
- The private sector and the tech community should adopt rights-by-design approaches, diversify datasets, and contribute to open-source, inclusive AI models while collaborating with regulators to shape effective governance.
- Finally, the research underscores the urgent need for Nigeria to embed human rights, inclusivity, and accountability at the heart of its AI governance frameworks. Without deliberate and coordinated action by relevant stakeholders, the promise of AI to strengthen democratic governance risks being overshadowed by its potential to entrench surveillance, exclusion, and repression.

# 1. Introduction

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Artificial intelligence (AI) has gained recognition in the way we do things and navigate our society. However, unlike other technological interventions in our society, AI is not without challenges. With the advent of new technology comes opportunities such as the ease of doing things, cost and time savings, business expansion and efficiencies. At the same time, there are challenges arising from its misuse and risks.



Given Nigeria's complex political history, evolving digital infrastructure, and vibrant yet often challenging civic space, the implications of AI are profound. From biometric voter registration and algorithmic content moderation to automated surveillance and predictive policing, AI technologies are reshaping how citizens engage with the state and each other. Yet, these innovations exist within a fraught socio-political and economic context that raises urgent questions about transparency, accountability, and inclusion. 60% of Nigeria's population is a very expressive youth<sup>1</sup> who have found numerous ways and reasons to use AI. However, the use of AI has been useful for various stakeholders and citizens alike in the country.

Since the introduction of the internet in Nigeria in 1991 through the launch of limited email services<sup>2</sup> and its expansion and growth in 2000<sup>3</sup> with the introduction of mobile networks, there has been an exponential increase in the use of the internet by government, business, and academics, among others. Digital investments and infrastructure have also increased. Yet, despite all these developments, Nigeria still faces issues of poor governance, limited digital literacy, socio-economic inequalities, and a shrinking civic space,<sup>4</sup> all of which shape how AI technologies are deployed and received within its democratic processes.

This research aims to interrogate how AI is influencing Nigeria's digital democracy landscape, and the extent to which it is enabling and constraining it. While AI promises to improve election transparency, service delivery and citizen engagement, there is still a significant risk, particularly on the issue of safeguards, weak institutions, and oversight. The limited legal and ethical frameworks that govern AI use and deployment also complicate the dynamics.

This research aims to critically examine the implications of AI on digital democracy in Nigeria, focusing on its impact on political participation, freedom of expression, civic engagement, and institutional accountability. The study also seeks to explore whether the adoption of AI technologies reinforces or undermines democratic values in a fragile democratic context.

<sup>1</sup> National Population Commission, 2023 Census: NPC, NOA holds Bloggers, Social Media Influencers Workshop in Abuja, <https://nationalpopulation.gov.ng/news/2023-census-npc-noa-holds-bloggers-social-media-influencers-workshop-in-abuja> accessed September 2, 2025.

<sup>2</sup> SiteHub, The History And Growth Of The Internet In Nigeria, <https://sitehub.net.ng/nigeria-internet-history/>, accessed September 2, 2025.

<sup>3</sup> Ibid.

<sup>4</sup> Omweri, F. S.. "A Systematic Literature Review of E-Government Implementation in Developing Countries: Examining Urban-Rural Disparities, Institutional Capacity, and Socio-Cultural Factors in the Context of Local Governance and Progress towards SDG 16.6" *International Journal of Research and Innovation in Social Science (IJRISS)*, vol. 8, no. 08, 1173-1199, 2024, <https://doi.org/https://dx.doi.org/10.47772/IJRISS.2024.808088> accessed September 2, 2025.

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This research is both timely and necessary. As AI adoption accelerates across Africa, Nigeria, given its size, influence, and democratic significance, stands at a crossroads. Understanding how AI is reshaping the digital public sphere is crucial for policymakers, civil society actors, and citizens alike. It is also critical for ensuring that digital transformation does not replicate old patterns of exclusion or usher in new forms of algorithmic authoritarianism.

## 2. Country Context

Nigeria is the most populous country in Africa, with a population of over 230 million people in 2025.<sup>5</sup> The country occupies a salient space, playing a role in the digital pathway for the African continent. The country's information and communications technology sector has experienced tremendous growth over the last three decades, particularly in infrastructural development and users' adoption. This expansion has been driven by demographic factors, private sector innovation, and public policy efforts aimed at improving digital inclusion.<sup>6</sup>

The country's Gross Domestic Product (GDP) per capita was an estimated USD 806.9<sup>7</sup> in the first quarter of 2025, a significant increase from previous years due to the economy's rebasing of the GDP using 2019 as the base year. This represents a real GDP growth of 3.13% in the first quarter of 2025.<sup>8</sup> This growth represents a 0.86 percentage point increase from the 2.27 per cent recorded in the same period in 2024.<sup>9</sup> Nigeria remains the 4th largest economy in Africa, trailing South Africa, Egypt, and Algeria.<sup>10</sup> The rise in the GDP has largely resulted from fiscal strategies such as fuel subsidy removal, foreign exchange market liberalisation, and tighter monetary policy. Amidst Nigeria's growing GDP, inflation is still on the rise<sup>11</sup> and this remains a weighty constraint to many household budgets, as over 100 million Nigerians<sup>12</sup> live below the poverty line.<sup>13</sup>

5 Worldometer, <https://www.worldometers.info/world-population/nigeria-population/> accessed July 20, 2025.

6 FMCIDE, *National Digital Economy Policy and Strategy (2020-2030)*, <https://nitda.gov.ng/wp-content/uploads/2020/06/National-Digital-Economy-Policy-and-Strategy.pdf>, accessed on August 21, 2025.

7 World Bank Group, *GDP per capita (Current US \$) - Nigeria*, <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=NG>; International Monetary Fund, *Nigeria - World Economic Outlook (April 2025)*, <https://www.imf.org/external/datamapper/profile/NGA> accessed September 1, 2025.

8 Channels News, *UPDATED: Nigeria's GDP Up By 3.13% In Q1'2025 After Rebasing*, <https://www.channelstv.com/2025/07/21/just-in-nigerias-gross-domestic-product-rebased-to-%E2%82%A6205tn/>, accessed August 13, 2025.

9 Vanguard Newspaper, *Nigeria's economy grows by 3.13% in Q1'25*, <https://www.vanguardngr.com/2025/07/nigerias-economy-grows-by-3-13-in-q125-2/> accessed August 13, 2025.

10 The Cable, *Rebased GDP: Separating facts from fiction*, <https://www.thecable.ng/rebased-gdp-separating-facts-from-fiction/> accessed August 13, 2025.

11 Channels Television, *Nigeria's Economy Grows Strongly Amid High Inflation* — World Bank, <https://www.channelstv.com/2025/05/12/nigerias-economy-grows-strongly-amid-high-inflation-world-bank/> accessed August 13, 2025.

12 African Development Bank Group, *Nigeria Economic Outlook*, <https://www.afdb.org/en/countries-west-africa-nigeria/nigeria-economic-outlook> accessed August 13, 2025.

13 Punch Newspaper, *Poverty rate among rural Nigerians now 75% - W'Bank*, <https://punchng.com/poverty-rate-among-rural-nigerians-now-75-wbank/> accessed August 13, 2025.

The introduction of mobile phones and connectivity in 2001 has become an essential gateway to the internet.<sup>14</sup> Internet usage has soared in recent years, largely due to increased smartphone adoption, falling data costs, and expanding 4G coverage, although connectivity remains uneven, especially across rural and underserved regions. As of January 2025, mobile data subscribers in the country stood at 219 million.<sup>15</sup> Mobile (GSM) accounted for 141.47 million subscribers, leaving the remaining subscribers under fixed wired and Voice over Internet Protocol (VoIP).<sup>16</sup> The country had an internet penetration rate of 48.15% as of April 2025.<sup>17</sup> Internet subscribers stood at 142.16 million in January 2025, but dropped to 141.98 million in April 2025, largely due to the increase in tariffs by telecom operators.<sup>18</sup> However, the government has set an ambiguous goal in its National Broadband Plan 2020-2025 to reach a target of 70% internet penetration rate by the end of 2025.<sup>19</sup>

Four major mobile network operators account for the vast majority of internet subscribers. MTN is the largest operator with about (37%) market share, followed by Airtel (29%), Glo (28%), and 9mobile (5%).<sup>20</sup> While the presence of these actors has made for a competitive market and product innovation, there are still some infrastructural deficits, particularly in the rural areas, which often have slower and unstable networks. The government, through the Federal Ministry of Communications, Innovations and Digital Economy, has developed the National Broadband Plan 2020-2025 and the Nigeria Digital Economy Policy and Strategy,<sup>21</sup> to bridge the digital divide and strengthen broadband penetration.<sup>22</sup>

Despite the impact of both quality and affordability of ICT services, Nigeria’s ICT sector remains fast-growing and continues to enable socio-economic development. From mobile banking to e-learning and from civic technology to digital entrepreneurship, ICT tools have increasingly enabled how millions of Nigerians operate daily.

Social media users in Nigeria have increased over time. In January 2025, there were an estimated 38.7 million active social media users in the country, equivalent to a total of about 16.4% of the country’s total population. The main platforms used include YouTube (27.0 million), Facebook (38.7 million), Instagram (9.90 million), TikTok (37.4 million), LinkedIn (11.0 million), Messenger (5.65 million), Snapchat (19.6 million), and X (7.57 million).<sup>23</sup>

As of  
**January 2025**  
mobile data  
subscribers in the  
country stood at



**219**  
million



**141.47**  
million  
Mobile subscribers,



internet  
penetration  
rate



**141.98**  
million  
Internet subscribers  
as of April 2025

14 Umar Ahmed and Aliyu Musa, *Assessment of Mobile Phone Use in Nigeria from Inception to Date*, *Sch. Bull.*; Vol-2, Iss-4 (Apr, 2016):192-197.

15 Nigerian Communications Commission (NCC) 2025, *Subscriber Statistics* <https://www.ncc.gov.ng/market-data-reports/subscriber-statistics#collapse-0> accessed July 20, 2025.

16 *The Cable*, *Data consumption falls as Nigeria’s internet subscribers drops to 141.9m*, <https://www.thecable.ng/data-consumption-falls-as-nigerias-internet-subscribers-drops-to-141-9m/>, accessed July 22, 2025.

17 *Punch Newspaper*, *Nigeria’s internet penetration hits 48.15%*, <https://punchng.com/nigerias-internet-penetration-hits-48-15/> accessed July 22, 2025.

18 *The Cable*, *Data consumption falls as Nigeria’s internet subscribers drops to 141.9m*, <https://www.thecable.ng/data-consumption-falls-as-nigerias-internet-subscribers-drops-to-141-9m/>, accessed July 22, 2025.

19 *Punch Newspaper*, *Nigeria’s internet penetration hits 48.15%*, <https://punchng.com/nigerias-internet-penetration-hits-48-15/> accessed July 22, 2025; *National Broadband Plan (2020-2025)*.

20 Ts2, *Internet Access in Nigeria: A Comprehensive Overview*, <https://ts2.tech/en/internet-access-in-nigeria-a-comprehensive-overview> accessed August 21, 2025.

21 *A comprehensive roadmap designed to leverage digital technologies to drive economic growth, create jobs, and enhance government services in Nigeria. It focuses on eight key pillars: Developmental Regulation, Digital Literacy and Skills, Solid Infrastructure, Service Infrastructure, Digital Services Development and Promotion, Soft Infrastructure, Digital Society and Emerging Technologies, and Indigenous Content Development and Adoption.*

22 YAPORH, *A Review of the National Digital Economy Policy and Strategy (NDEPS) 2020-2030 of Nigeria*, <https://youngafricanpolicyresearch.org/a-review-of-the-national-digital-economy-policy-and-strategy-ndeps-2020-2030-of-nigeria/> accessed July 22, 2025.

23 *DataReportal*, *Digital 2025: Nigeria*, <https://datareportal.com/reports/digital-2025-nigeria> accessed July 22, 2025.

Our Life with AI: From Innovation to Application report



**70%**

of the online population have used generative AI



**87%**

believed AI's benefits outweighed its risks



**90%**

anticipated positive impacts in science and medicine,



**81%**

foresaw economic transformation driven by AI.

Additionally, the country has witnessed an increased use of AI. A recent report titled “Our Life with AI: From Innovation to Application”<sup>24</sup> revealed that 70% of the online population have used generative AI, 87% believed AI’s benefits outweighed its risks, 90% anticipated positive impacts in science and medicine, and 81% foresaw economic transformation driven by AI.<sup>25</sup>

While Nigeria’s ICT sector increases potential opportunities for connectivity, communications and innovation, the effect of these opportunities cannot be fully appreciated without positioning them within the broader democratic and civic space of the country. The ability of citizens to leverage technology for participation and accountability is often shaped by political, legal, and rights-related dynamics.

Nigeria’s democratic journey since its transition from military rule in 1999 has been marked by progress and setbacks. The 1999 constitution<sup>26</sup> establishes a federal republic with 36 states and a Federal Capital Territory, ensuring freedoms of religion, expression, movement, and assembly. Elections have become more regular and competitive, with the 2015 polls marking the first peaceful transition of power between two different parties (PDP and APC),<sup>27</sup> facilitated by the Independent National Electoral Commission (INEC) and civil society efforts. However, the 2023 general elections were marred by irregularities, including violence at polling stations, voter intimidation, and vote buying, drawing criticism from domestic and international observers for INEC’s operational failures.<sup>28</sup>

Despite these challenges, Nigeria exhibits mid-range performance in representation, rights, and participation, according to the Global State of Democracy Initiative, but lags in rule of law, with significant declines in judicial independence and access to justice over the past five years.<sup>29</sup> Corruption remains a pervasive issue undermining democratic accountability.<sup>30</sup> The 2023 election of President Tinubu, following a polarising contest, highlighted public discontent with elite-driven politics and a judiciary perceived as compromised.<sup>31</sup>

24 Google / Ipsos Multi-Country AI Survey 2025, <https://www.ipsos.com/en-us/google-ipsos-multi-country-ai-survey-2025> accessed September 3, 2025.

25 Vanguard, Nigeria surpasses global average with 70% AI adoption rate – Report, <https://www.vanguardngr.com/2025/01/nigeria-surpasses-global-average-with-70-ai-adoption-rate-report-2/> accessed September 3, 2025.

26 The Constitution of the Federal Republic of Nigeria 1999 (as amended), <https://nigeriarights.gov.ng/files/constitution.pdf> accessed September 3, 2025.

27 Peoples’ Democratic Party (PDP) and the All Progressives Congress (APC).

28 ACI Africa, Nigeria’s 2023 Election was Marred by Violence, Voter Intimidation: Caritas, <https://www.aciafrica.org/news/8782/nigerias-2023-election-was-marred-by-violence-voter-intimidation-caritas> accessed August 15, 2025.

29 Global State of Democracy Initiative, Nigeria <https://www.idea.int/democracytracker/country/nigeria> accessed August 15, 2025.

30 Ibid.

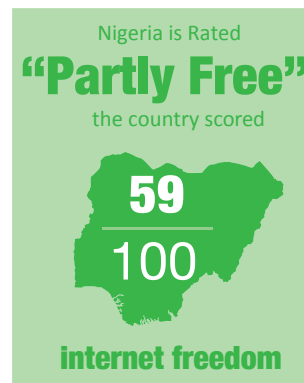
31 Ekeledirichukwu C. Njoku, Okey K. Mbionwu, Shedrack C. Njoku, *The Political Economy of Corruption and Sustainable Development in Nigeria, 2015–2024*, IJRISS, <https://dx.doi.org/10.47772/IJRISS.2025.907000176> accessed August 15, 2025.

Nigeria has made modest democratic gains, which coexist with persistent civic vulnerabilities. Rated as “Partly Free” in both Freedom in the World 2025 and Freedom on the Net 2024, the country scored 44/100 in political and civil liberties, and 59/100 in internet freedom, respectively.<sup>32</sup> Although elections are regularly held, they are frequently tainted by irregularities, fueling public distrust in institutions.<sup>33</sup> The civic space is under pressure as journalists face harassment, detention, and threats, particularly when covering sensitive issues like corruption or insurgency.<sup>34</sup> Arrests under laws such as the Cybercrimes Act are common, often blamed for suppressing dissent and media scrutiny.<sup>35</sup>

These scores reflect a slight decline, as the reports cite continued threats of legal and extralegal retaliation against online journalists and a broader crackdown on online activism. The country’s digital infrastructure also faces challenges from unreliable power and frequent data depletion complaints, impacting the user experience.

Further, Internet freedoms face growing constraints. While the country has not implemented a total internet shutdown, selective measures such as website blocking, license threats, and legal barriers are used to curb online dissent.<sup>36</sup> Freedom House’s report explicitly calls for stronger protections against disproportionate surveillance and content restrictions.<sup>37</sup>

While Nigeria has grown in its digital landscape, the country’s democratic landscape fluctuates in civic openness, electoral integrity, and institutional accountability. The country has, over the years, witnessed the use of social media platforms to enable change. From civic engagement to activism. From political discussions to information sharing and dissemination.



Freedom in the World  
2025 and Freedom on the  
Net 2024

<sup>32</sup> Freedom House, Nigeria, <https://freedomhouse.org/country/nigeria> accessed August 15, 2025.

<sup>33</sup> Ibid.

<sup>34</sup> Freedom House, Nigeria, <https://freedomhouse.org/country/nigeria/freedom-world/2025> accessed August 15, 2025.

<sup>35</sup> Ibid.

<sup>36</sup> Freedom House, Nigeria, <https://freedomhouse.org/country/nigeria/freedom-net/2024> accessed August 15, 2025

<sup>37</sup> Ibid.

# 3. Research Methods

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The research method used was qualitative, combining both primary and secondary data sources to enhance the understanding and implications of AI on digital democracy in Nigeria. The methodology was anchored on three pillars, which include the Key Informant Interview (KII), desk research and the review of relevant laws, policies and reports.

Key informant interviews were conducted with nine individuals drawn from different stakeholder groups, including Media (2), Private Sector (2), Legal Practitioner (1), Civil Society (3) and the Tech Community (1). The KIIs provided perspectives on how AI is being introduced and deployed in Nigeria's digital ecosystem, the opportunities it offers, and the challenges it poses, particularly around surveillance, disinformation, and the protection of civic freedoms. Respondents were purposely selected based on their expertise and involvement in digital rights advocacy, governance, or technology development, ensuring that the insights gathered were both relevant and deeply informed. While this research aimed for broad representation across stakeholder groups, there were challenges in getting participants from government, academia and some civil society, as they were either unavailable or unwilling to participate, despite follow-up.

In addition to KIIs, a comprehensive desk review was undertaken. This involved examining a wide range of academic articles, policy briefs, reports from national and international organisations, and news publications. Furthermore, the research analysed key national legal and policy documents, including the Nigeria Data Protection Act (2023), the National Artificial Intelligence Strategy (2024), and the Cybercrimes (Prohibition, Prevention, etc.) Act (2015). Reports from the Federal Ministry of Communications, Innovations and Digital Economy, the National Information Technology Development Agency (NITDA), the Nigerian Communications Commission (NCC), and civil society submissions on internet freedom and AI were also reviewed. This legal and policy analysis was central to identifying the gaps between existing frameworks and the emerging challenges posed by AI in relation to democratic governance and civic space.

# 4. Research Results

## 4.1 Value of AI to Africa's Civic Space and Digital Rights

In the ever-changing world of technology, Artificial Intelligence (AI) has emerged as a critical technology. The rise of AI offers immense opportunities and breakthroughs in information, our political, social and financial lives, among others. Nigeria, a dynamic country with a large population and a fragile democracy, has not been left behind in the deployment and use of AI among its various groups and sectors.

AI has shaped how people live and experience life both online and offline. It fuels how different state and non-state actors engage with information, exercise power, enhance service delivery and mobilise citizens and communities alike. This includes, through content creation and moderation on social media platforms, the collection of biodata for voter registration, national identity management, bank verification, facial recognition technologies, or AI-powered surveillance. The deployment of AI tools is increasingly influencing the texture of Nigeria's digital democracy.

Interestingly, despite the global interest in AI, it is still an emerging issue in Nigeria. Nonetheless, AI tools are being used to promote access to justice and civic engagement. For instance, in 2024, Citizens' Gavel deployed its legal AI for access to justice, the AI tool which is called 'PODUS'.<sup>38</sup> It works by prioritising cases related to emergencies, police extortion, brutality, fundamental rights issues, illegal arrest, and illegal detention, and it is trained to guide litigants towards the appropriate assistance.<sup>39</sup> Similarly, Yiaga Africa championed the use of AI during elections to protect the integrity of the elections, protect voters' rights and enable election observations during the 2023 elections.<sup>40</sup> BudgIT has also developed an AI tool called "Bimi", an AI-powered chatbot which democratises access to government data. This tool is said to elevate the role of AI in the civic space through advancing transparency, accountability, and civic participation.<sup>41</sup>

The banking sector has also embedded AI in its systems, such as the use of chatbots, which are gaining popularity because of the wide use of banking services by individuals and corporate bodies alike. For instance, AI-powered chatbots for various banks include United Bank for Africa (UBA) with "Leo," Zenith Bank with "Ziva," Fidelity Bank with "Ivy," Access Bank with "Tamada," Heritage Bank with "Octopus chatbot," and Keystone Bank with "Oxygen chatbot. These AI chatbots are set out to produce efficient performance, customer satisfaction and



<sup>38</sup> Podus AI, <https://podus.ai/> accessed July 22, 2025.

<sup>39</sup> Leadership newspaper, Citizens' Gavel Unveils Legal AI for Access to Justice, <https://leadership.ng/citizens-gavel-unveils-legal-ai-for-access-to-justice/> accessed July 23, 2025.

<sup>40</sup> AI and Elections in Africa Conference, <https://yiaga.org/aiandelectionsconference/> accessed July 23, 2025.

<sup>41</sup> Bimi Unveiled: A New Era of AI-Driven Governance and Open Data in Nigeria, <https://budgit.org/bimi-unveiled-a-new-era-of-ai-driven-governance-and-open-data-in-nigeria/> accessed August 12, 2025.

enable seamless banking transactions and customer experience.<sup>42</sup> Additionally, AI in the banking sector extends to functions such as credit scoring, fraud detection, credit risk assessment and IT operations. AI algorithms help to analyse transaction patterns, identify suspicious activities in real-time, and enhance cybersecurity.<sup>43</sup>

In the health sector, AI tools such as Ada Health<sup>44</sup> and Awadoc<sup>45</sup> have been deployed to help provide healthcare. But it is not about creating the tools, but also their popularity, in order to reach more people. AI applications in healthcare typically include patient data analysis, virtual health assistants, clinical decision support systems, and machine learning for diagnostics and telemedicine. Unlike banking services, which are almost universally used for daily financial transactions, AI tools in healthcare are often deployed in more specialised or pilot capacities within hospitals or specific health programs, reducing their direct visibility and “popularity” among the general populace.

The landscape of Artificial Intelligence (AI) in Nigeria is currently undergoing a transformative phase, marked by a dynamic interplay of innovation, strategic initiatives, and persistent challenges. Nigeria is positioning itself to leverage AI to address local challenges and drive economic growth, with a focus on building a robust ecosystem from the ground up. The current state is characterised by a burgeoning startup scene, the emergence of dedicated innovation hubs, and a nascent but growing industry for data services, all supported by an evolving government policy framework.

One of the most significant indicators of Nigeria’s AI development is the proliferation of innovation hubs. Cities like Lagos, Abuja, and Port Harcourt have emerged as key centres, housing a growing number of AI-focused startups and research institutions.<sup>46</sup> AI-focused startups in Nigeria surged to over 80 in 2024, up from 35 in 2022. These companies have collectively attracted more than 120 million USD in funding, which is a testament to growing investor confidence in Nigeria’s AI potential.

Hubs such as Co-creation Hub (CCHUB) and the National Centre for Artificial Intelligence and Robotics (NCAIR) provide essential resources like co-working spaces, mentorship, and access to funding, nurturing the next generation of AI entrepreneurs. Academic institutions are also playing a crucial role, with examples like the EduAI hub at the University of Lagos<sup>47</sup> and this collaborative environment between the private sector, academia, and government is creating a fertile ground for the development of AI solutions tailored to Nigeria’s unique context, particularly in sectors like fintech, healthcare, and agriculture.

Furthermore, a significant hub is the Ilorin Innovation Hub, launched in early 2025 through a public-private partnership involving Kwara State, IHS Nigeria, CcHub, and Future Africa. This large-scale innovation centre supports AI and agritech startups, offering incubation, acceleration, and leadership training programs.<sup>48</sup>



42 Proshare. “Unlocking the Potential: Artificial Intelligence Revolutionising Nigeria’s Banking Sector.” <https://proshare.co/articles/unlocking-the-potential-artificial-intelligence-revolutionising-nigerias-banking-sector> accessed July 23, 2025.

43 Idris Aliyu and Iyere Samuel IHEONKHAN, Impact of Artificial Intelligence on Financial Services in Nigeria, *IIARD Journals*, VOL. 11 NO. 3 2025.

44 The Borgen project, <https://borgenproject.org/ai-in-nigeria/> accessed July 23, 2024.

45 Gavi, In Nigeria, AI tools are changing how people access healthcare, <https://www.gavi.org/vaccineswork/nigeria-ai-tools-are-already-changing-how-people-access-he> accessed July 23, 2025.

46 Enyata, AI and Machine Learning: Powering Nigeria’s Tech Revolution, <https://www.enyata.com/blog/ai-and-machine-learning-powering-nigerias-tech-revolution> accessed September 4, 2025.

47 EduAIHub, <https://eduaihub.org/#:::text=Who%20we%20are,University%20of%20Lagos%20main%20campus> accessed September 4, 2025.

48 Ilorin Innovation Hub, <https://iih.ng/> accessed September 4, 2025.

Also, skills development is further catalysed by national initiatives such as the 3 Million Technical Talent (3MTT) Programme, aimed at building Nigeria’s technical talent backbone to power our digital economy and position Nigeria as a net talent exporter, launched in late 2023 by NITDA under the Ministry of Communications, Innovation and Digital Economy. This training initiative aims to equip three million Nigerians with digital skills, including AI and machine learning, by 2027 through nationwide programs and learning cohorts.<sup>49</sup>

A crucial aspect of the industry is the infrastructure for data. Data labelling and annotation, which are foundational for training machine learning models, are becoming an area of opportunity for Nigerian businesses.<sup>50</sup> The availability of a large, skilled, and cost-effective workforce gives Nigeria a competitive advantage in this space.<sup>51</sup> Notably, localising AI to Nigeria’s sociolinguistic context is a key frontier. For instance, the Centre for Digitisation of Indigenous African Languages (CDIAL) is developing multilingual AI tools such as a smart keyboard and chat interfaces supporting African languages, facilitating more inclusive access to AI.<sup>52</sup>

Although large-scale AI-powered content moderation solutions are still emerging, the media sector is using AI to streamline news generation and audience engagement. Lagos-based startups are pioneering AI-generated content platforms such as MediaX for automated news writing and StoryLabs for AI-assisted storytelling and are experimenting with AI in journalism workflows.<sup>53</sup> Over the past five years, Dataphyte has harnessed the power of data to create innovative AI products. These include Nubia,<sup>54</sup> an open-source AI platform that generates data-driven stories to support journalists, and Goloka,<sup>55</sup> a digital solution that aggregates, labels, and organises diverse datasets—enabling governments, businesses, and civil society actors to make more informed decisions.<sup>56</sup>

The integration of AI into journalism presents a paradox, offering powerful new tools for efficiency and reach while simultaneously introducing significant challenges. Platforms like Dataphyte’s Nubia and Dubawa’s AI-enabled WhatsApp chatbot showcase the technology’s potential to enhance journalistic practices. These tools demonstrate AI’s capacity to streamline data-driven journalism by automating the analysis of large datasets and generating stories, thereby scaling the production of informative content. They also improve fact-checking and verification by providing more accessible and efficient ways to combat misinformation and disinformation.



49 NITDA, 3 Million Technical Talent, <https://3mtt.nitda.gov.ng/> accessed September 4, 2025.

50 6Wresearch, Nigeria Data Annotation and Labeling Market Overview, <https://www.6wresearch.com/industry-report/nigeria-data-annotation-and-labeling-market>, accessed September 4, 2025.

51 Work Force Africa, Understanding Data Annotation and Its Role in AI, <https://workforceafrica.com/outourcing-data-annotation-services-to-africa/> accessed September 4, 2025.

52 GAIF, CDIAL: Indigenous AI for learning African Languages, <https://www.gaif.ai/blogs/indigenius-ai-learning-african-languages> accessed September 4, 2025.

53 Lagos Global, Lagos Innovation: Shaping AI-Generated Content in Nigerian Media, <https://lagosglobal.info/lagos-innovation-shaping-ai-generated-content-in-nigerian-media/> accessed September 4, 2025.

54 Nubia AI, <https://www.nubia.ai/> accessed September 9, 2025.

55 Goloka, <https://www.goloka.io/> accessed September 9, 2025.

56 Dataphyte, Dataphyte to Showcase its AI-Powered Products at DataFestAfrica, <https://archive.dataphyte.com/latest-reports/dataphyte-to-showcase-its-ai-powered-products-at-datafestafrika/> accessed September 9, 2025.

Moreover, a growing number of private organisations, start-ups, and established companies are increasingly integrating AI into diverse aspects of their operations. AI applications are also gaining traction in agriculture through precision farming, crop monitoring, and supply chain optimisation.<sup>57</sup> In education, AI-powered tools are enhancing learning outcomes, streamlining administrative processes, and expanding access to digital learning platforms.<sup>58</sup>

Similarly, the legal sector is experimenting with AI for legal research, case prediction, and contract analysis,<sup>59</sup> while telecommunications companies deploy AI for network optimisation, customer engagement, and predictive maintenance.<sup>60</sup> The transportation industry is also adopting AI-driven technologies to improve logistics, enhance mobility services, and optimise traffic management systems.<sup>61</sup> Collectively, these developments underscore Nigeria's growing AI ecosystem, where innovation is not only sector-specific but also increasingly cross-cutting, reshaping how services are delivered and consumed across the economy.<sup>62</sup>

Government MDAs are also not left out of the use of AI for public service delivery. For instance, in 2025 at the Global Government Summit in Singapore, Didi Esther Walson-Jack, the head of the Nigerian federal civic service launched an AI assistance called Service-Wise GPT, a tool which is said to streamline access to key governance documents such as Public Service Rules, regulations, and statutory instruments and to assist administrative task to be more efficient for civil servants.<sup>63</sup> Service-Wise GPT, once operational, would support the automation of policy drafting and official memos and provide real-time policy research assistance. It would save time and reduce administrative task hours for civil servants, thus improving compliance, ensuring regulatory adherence, enhancing productivity, facilitating faster decision-making across ministries, and ultimately improving service delivery.<sup>64</sup>

Also in 2025, the Corporate Affairs Commission<sup>65</sup> launched a new AI-driven registration portal which aims to simplify registration processes of new businesses and accelerate approvals. According to the Registrar-General and CEO of the Commission, Hussaini Ishaq Magaji, the new system allows for instant name reservation approvals, likening the process to opening an email account. "It is intelligently designed to suggest available alternatives and grant real-time approvals, removing the traditional bottlenecks."<sup>66</sup>

57 Yakubu, M., Yakubu, U., Yakubu, H. and Ahmed F. M. (2024). *Artificial Intelligence*

*Applications in Sustainable Agriculture in Nigeria: A Comprehensive Review. Journal of Basics and Applied Sciences Research*, 2(4), 84-94. <https://doi.org/10.33003/jobasr-2024-v2i4-70> accessed September 4, 2025.

58 Bali, B., Garba, E.J., Ahmadu, A.S. et al. *Analysis of emerging trends in artificial intelligence for education in Nigeria. Discov Artif Intell* 4, 110 (2024). <https://doi.org/10.1007/s44163-024-00163-y>, accessed September 4, 2025.

59 *Legalpedia, Artificial Intelligence in the Nigerian Legal Industry: A Threat or an Opportunity?* <https://legalpediaonline.com/artificial-intelligence-in-the-nigerian-legal-industry/> accessed September 4, 2025.

60 Nigerian Communications Commission, *Final report for Machine Learning and Data Analytics for Mobile Communications Network Planning (SRFP. NO. 001/NCC/RD-6/2022)*, submitted by Hyjosam Integrated Service Limited <https://www.ncc.gov.ng/sites/default/files/2024-11/Documents/research-development/compendium-of-report/Consultancy%20Study%20on%20Machine%20Learning%20%26%20Data%20Analytics.pdf> accessed September 4, 2025.

61 *Paradigm Initiative, Artificial intelligence Project, Nigeria, Stakeholder Mapping of Artificial Intelligence Actors in Nigeria.*

62 *Ibid.*

63 *CIO Africa, Nigeria Unveils AI Tool to Boost Public Services*, <https://cioafrica.co/nigeria-unveils-ai-tool-to-boost-public-services/> accessed July 26, 2025.

64 *The Presidency, Office of the Head of the Civic Service of the Federation*, [https://ohcsf.gov.ng/post-nigeria\\_unveils\\_ai\\_driven\\_public\\_service\\_transformation\\_\\_at\\_global\\_government\\_summit\\_2025](https://ohcsf.gov.ng/post-nigeria_unveils_ai_driven_public_service_transformation__at_global_government_summit_2025) accessed July 26, 2025.

65 *A government agency that deals with the registration of all business names, companies and NGOs.*

66 *Punch Newspaper, CAC unveils AI-powered portal for 30-minute company registrations*, <https://punchng.com/cac-unveils-ai-powered-portal-for-30-minute-company-registrations/> accessed July 26, 2025.

Beyond service delivery, AI in Nigeria has enhanced the anti-corruption efforts. In 2024, the Independent Corrupt Practices and Other Related Offences Commission (ICPC) indicated that it would deploy Artificial Intelligence (AI) to fight corruption. The chairman of the commission, Dr Musa Aliyu, stated that with the help of AI tools, they were able to recover four billion naira (USD 2,621,447.95) of public funds, which had been diverted into private accounts by public officers.<sup>67</sup> In the agency's attempt to leverage innovative technology and AI in tackling corruption in the country, it recently signed an MoU with the National Agency for Science and Engineering Infrastructure (NASENI) to help in the dispensation of information technology, which would be used in its anti-corruption crusade.<sup>68</sup>

AI has generally been a great innovation within Nigeria's civic space, as it has been used for automating large datasets of government budgets, analysing public expenditure documentation, and for research or investigations. For instance, the Edo State government has incorporated the use of a chatbot in this "EdoDiDa Project" to simplify and humanise the interaction with government data.<sup>69</sup> The chatbot is utilised across the state's ministries, departments, and agencies (MDAs). The chatbot explores datasets in real-time, bypassing traditional data bottlenecks, and gains rapid insights critical to program monitoring, policy development, budget planning, and service delivery oversight.<sup>70</sup>

Generative AI is another aspect of AI technology that is rapidly growing within the Nigerian civic space. Enabling and enhancing opportunities for content creation, citizen engagement and automated services. The use of AI in the media landscape is not foreign, as media operations have benefited from the use of AI. AI tools, such as machine learning concepts and algorithms, are used in various aspects of investigative journalism processes. Media organisations like Premium Times have adapted AI into their operations to investigate stories and enhance their operations, which has enabled them to write better, as stated by Mojeed Musikilu, editor-in-chief and chief operating officer.<sup>71</sup>

None of these tools, he emphasised, will take the place of humans. They only supplement the work of humans and allow for greater productivity. Its meeting transcription tool, for example, "doesn't translate accurately, but it will do at least more than 50% of the job for you. So you can then come in and do the proper editing, but it has taken 50% of the labour you would have otherwise done." Premium Times has also introduced the use of AI to analyse procurement documents, uncovering that contracts had been awarded to shell companies linked to government officials.<sup>72</sup>

Edo State government has incorporated the use of a chatbot



**"EdoDiDa Project"**

to simplify and humanise the interaction with government data

<sup>67</sup> Vanguard, ICPC to fight corruption with AI, recovers N4bn in 24hrs, <https://www.vanguardngr.com/2024/09/icpc-to-fight-corruption-with-ai-recovers-n4bn-in-24hrs/> accessed July 26, 2025.

<sup>68</sup> ICPC to Leverage Innovative Technology and AI in Tackling Corruption, Signs MoU with NASENI, <https://icpc.gov.ng/icpc-to-leverage-innovative-technology-and-ai-in-tackling-corruption-signs-mou-with-naseni/#:~:text=Review%20of%20MDAs-,ICPC%20to%20Leverage%20Innovative%20Technology%20and%20AI%20in%20Tackling%20Corruption,issues%20of%20corruption%20in%20Nigeria> accessed July 26, 2025.

<sup>69</sup> EdoDiDa Project: Transforming Governance through AI-Powered Data Access and Digital Public Infrastructure <https://datasciencenigeria.org/edodida-project-transforming-governance-through-ai-powered-data-access-and-digital-public-infrastructure/> accessed August 12, 2025.

<sup>70</sup> Ibid.

<sup>71</sup> International New Media Association, African newsrooms delve into AI for engagement, marketing, journalism, <https://www.inma.org/blogs/conference/post.cfm/african-newsrooms-delve-into-ai-for-engagement-marketing-journalism> accessed July 26, 2025.

<sup>72</sup> The Cable, Holding Nigerian government accountable using AI tools, <https://www.thecable.ng/holding-government-accountable-using-ai-tools-in-nigeria/> accessed July 28, 2025.

In 2025, TVC News made history by becoming the first Nigerian broadcaster to introduce AI news anchors capable of delivering news bulletins in five major local languages, which are English, Yoruba, Hausa, Igbo, and Pidgin.<sup>73</sup> The innovation marks a significant leap in the use of technology to bridge linguistic and cultural gaps in media dissemination, particularly in a country as diverse as Nigeria, where language often determines access to information. The deployment of AI anchors in local languages has the potential to bridge information gaps, expand the reach of broadcast media, and strengthen civic participation by ensuring that news is communicated in languages people best understand. At the same time, this development raises important questions about the balance between technological innovation and the preservation of human-centred journalism, particularly in relation to issues of trust, authenticity, and the future of employment within the media sector.<sup>74</sup>

It is worth noting that the use of AI in content moderation often lacks contextual understanding, which often results in the removal of legitimate content, especially posts in local languages or addressing sensitive issues. This usually affects journalists and activists in sharing information.

Also, AI has proven valuable during elections, a critical moment for assessing the integrity of governance in Nigeria. The 2023 general elections saw an increased use of AI tools both for fact-checking and for voting observation. The Centre for Democracy and Development (CDD), other Nigerian fact-checking organisations such as Dubawa, Fact Check Hub, Cable Check, Round Check, Africa Check, NGOs and media houses came together to form a coalition to tackle misinformation and disinformation during the election cycles.<sup>75</sup> During the last election, CDD was able to deploy an automated fact-checking bot on social media, which was used to track misinformation and disinformation in real time, thereby limiting the impact of fake news on voting decisions.<sup>76</sup>

## “MyElectionBuddy”



reached over

**53**

million Nigerians



with

**100,000**  
users.

In addition, independent monitors used machine learning algorithms to analyse election data and flag discrepancies in real time.<sup>77</sup> This approach revealed inconsistencies in reported voter counts in some states, leading to greater scrutiny and pressure on the Independent National Electoral Commission (INEC) to improve the transparency of its processes.<sup>78</sup> Also, Yiaga Africa partnered with Infoip<sup>79</sup> to implement a WhatsApp conversation chatbot, called “MyElectionBuddy”, to enhance voters’ education and engagement across the country. This solution was developed to bring election-related information, such as the location of their PVCs and polling units, to the citizens of the country.<sup>80</sup> The solution reached over 53 million Nigerians and had 100,000 users.

<sup>73</sup> TVC News, *TVC News Debuts First AI Enabled Anchors in Five Languages*, <https://www.tvcnews.tv/tvc-news-debuts-first-ai-enabled-anchors-in-five-languages/>, August 17, 2025.

<sup>74</sup> Techcabal, *TVC launches Nigeria’s first AI multilingual news anchors*, <https://techcabal.com/2025/05/02/tvc-launches-ai-news-anchor/> August 17, 2025.

<sup>75</sup> Patrick Egwu, “We can’t do this alone”: Nigerian fact-checkers teamed up to debunk politicians’ false claims at this year’s election, <https://reutersinstitute.politics.ox.ac.uk/news/we-cant-da-alone-nigerian-fact-checkers-teamed-debunk-politicians-false-claims-years-election> accessed July 28, 2025.

<sup>76</sup> Isaiah Oden David, Idowu Sulaimon Adeniyi, Aderonke Omotayo Aliu, *Utilization of artificial intelligence in the democratization process of Nigeria*, *International Journal of Multidisciplinary Comprehensive Research* [https://www.multispecialtyjournal.com/uploads/archives/20240321134121\\_B-24-02.1.pdf](https://www.multispecialtyjournal.com/uploads/archives/20240321134121_B-24-02.1.pdf) accessed July 28, 2025.

<sup>77</sup> Yiaga Africa, *Technological Innovations that will impact the 2023 General Election – Samuel Folorunsho*, <https://yiaga.org/technological-innovations-that-will-impact-the-2023-general-election-samuel-folorunsho/> accessed September 4, 2025.

<sup>78</sup> Isaiah Oden David, Idowu Sulaimon Adeniyi, Aderonke Omotayo Aliu, *Utilization of artificial intelligence in the democratization process of Nigeria*, *International Journal of Multidisciplinary Comprehensive Research* [https://www.multispecialtyjournal.com/uploads/archives/20240321134121\\_B-24-02.1.pdf](https://www.multispecialtyjournal.com/uploads/archives/20240321134121_B-24-02.1.pdf) accessed July 28, 2025.

<sup>79</sup> A global cloud communication company

<sup>80</sup> This Day, *Yiaga Africa, Infobip Offer Tech Solution to Enhance Voter Engagement in Nigeria*, <https://www.thisdaylive.com/2023/03/17/yiaga-africa-infobip-offer-tech-solution-to-enhance-voter-engagement-in-nigeria/> accessed July 28, 2025.

Generally, AI tools in businesses have been seen to help them with creating new markets, new business models, improving efficiency, faster products and service delivery timelines to be able to increase market share and also maybe increase profits. Civic society and media would probably view AI's benefit as a tool they can use for analysis, investigation, accuracy and also a form of accountability, as well as enabling faster access to information for citizens.

## 4.2 Challenges and Risks of AI to Digital Rights and Democracy

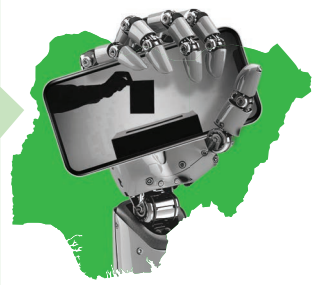
While artificial intelligence offers powerful tools for combating misinformation and disinformation, such as automated fact-checking systems, it also presents new risks by amplifying false information at an unprecedented scale. Generative AI can be used to create misleading content with greater speed, volume, and sophistication, often making it difficult for the average user to discern truth from fabrication. Although online platforms have implemented content detection tools and moderation policies, especially in response to global misinformation concerns, these measures are still falling short in local contexts or vernacular languages.

As a result, public trust in online platforms is steadily declining. Several Nigerians have encountered online content that we know is false, yet it continues to spread widely and without consequence. This erosion of trust is not just about AI-generated content; it includes human-generated misinformation that algorithms inadvertently reward through engagement metrics.<sup>81</sup> For many, especially those outside media-literate circles, there is growing scepticism towards any content seen online, regardless of the source. The information ecosystem is increasingly viewed as unreliable, which poses serious risks for democratic discourse, civic participation, and public accountability.

The immersion of AI tools and technology into our daily lives and operations does not just bring value and opportunities. It also comes with a number of risks. One key concern is the capacity of AI tools to be used to generate and disseminate misinformation and disinformation on an unprecedented scale.<sup>82</sup> Another risk factor is the very limited representation of Nigerian local languages in these AI applications as well as cultures, and societal nuances in training datasets, leading to misinterpretation or exclusion of marginalised groups.<sup>83</sup>

Another challenge is that these AI companies do not have enough datasets that can be used to train these models in the Nigerian local languages, as these models are trained with the English language on a large scale. This hurdle expands the digital divide as these AI tools leave languages such as Yoruba, Hausa, Igbo, and others significantly underrepresented, thereby creating inequalities by excluding the non-English-speaking population from the use and benefit of AI.

AI tools can enable the generation and dissemination of misinformation and disinformation at an unprecedented scale and speed. AI-powered content generation, including deepfakes and sophisticated text that mimics human writing styles, makes it increasingly difficult for citizens to distinguish between fact and fiction. This can be used to manipulate public opinion, influence elections, and create social instability.



81 Onigbinde, C. O., & Oloyede, I. B. (2024). *Misinformation and disinformation in the Nigerian media landscape*. *IMSU Journal of Communication Studies*, 8(1), 93-100. <https://doi.org/10.5281/zenodo.11551723> accessed July 29, 2025.

82 *Disinformation Social Media Alliance, AI-Generated Misinformation in, over-reliance over-reliance Africa Remains Unchecked by Meta, According to Fact-Checkers and Human Rights Organizations*, <https://disa.org/ai-generated-misinformation-in-africa-remains-unchecked-by-meta-according-to-fact-checkers-and-human-rights-organizations/> accessed September 5, 2025.

83 *This Day, Nigeria's AI future at risk without indigenous data, expert warns*, <https://www.thisdaylive.com/2025/07/15/nigerias-ai-future-at-risk-without-indigenous-data-expert-warns/> accessed September 5, 2025.

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Hannah Ajakaiye, a seasoned journalist, spearheaded local efforts in the fight against misinformation and disinformation through FactsMatterNG<sup>84</sup> in the month leading up to the election, which revealed the use of deepfakes. She indicated that some of the deepfakes were seen to enhance public perception of Pete Obi, a presidential candidate in the election. There was also a deepfake video of various Hollywood actors and personalities like Tesla CEO Elon Musk and US President Donald Trump supporting Peter Obi. Another deepfake that went around a few hours before the vote was a manipulated audio of Nigeria’s former vice president, Atiku Abubakar, discussing plans to rig the election. Hannah added that there was also a shallow fake video later debunked by Reuters, which showed Bola Tinubu, the current president, facing criticism for an incoherent response during a Chatham House event during the campaigns.<sup>85</sup>

A major challenge to civil society is its over-reliance on short-term grants to develop AI-driven civic tech tools, often for the pilot phases, thus affecting sustainability, unlike the innovations in the private sector on platforms such as WhatsApp, Facebook, etc. Many of the civic techs in Nigeria are heavily relying on foreign grants to function, and when such grants are finished, or withdrawn, as in the current case of the US government withdrawing its USAID funding,<sup>86</sup> some of these AI tools might not be sustained.<sup>87</sup> There is a need for the Nigerian civic tech actors to re-strategise on funding and invest in the sustainability of tools used for civic engagement.<sup>88</sup>

Further, government initiatives such as the 3 Million Technical Talents (3MTT) program and Nigeria Artificial Intelligence Research Scheme (NAIRS) aim to build domestic AI capacity, but retention and spillover benefits remain low amid brain drain and inconsistent support structures.<sup>89</sup> The mismatch between funded pilots and sustained civic infrastructure<sup>90</sup> threatens the long-term viability of AI-enhanced services.<sup>91</sup>

The Nigerian government, in its frail attempt to identify harmful posts in a bid to tackle and strengthen cybersecurity, have decided to use AI to monitor social media platforms and mitigate their influence. The Director-General of the National Information Technology Development Agency (NITDA), Kashifu Inuwa CCIE, stated that the Agency is dedicated to fostering a resilient digital environment where businesses and citizens can operate with confidence. And the DG further noted “that this comes amid growing concerns over misinformation, hate speech, and other harmful digital activities. The agency is particularly interested in tools that offer real-time monitoring, advanced data analysis, and streamlined takedown requests to social media platforms.”<sup>92</sup> However, such approaches raise concerns about a “chilling effect” on free speech

<sup>84</sup> A fact-checking initiative founded to restore information integrity on digital platforms.

<sup>85</sup> Institute for Security and Technology, Applied Trust & Safety Initiative Q&A: Hannah Ajakaiye on manipulated media in the 2023 Nigerian presidential elections, generative AI, and possible interventions, <https://securityandtechnology.org/blog/qa-hannah-ajakaiye/> accessed July 27, 2025.

<sup>86</sup> The White House, Reevaluating and Realigning United States Foreign Aid, <https://www.whitehouse.gov/presidential-actions/2025/01/reevaluating-and-realigning-united-states-foreign-aid/> accessed September 4, 2025.

<sup>87</sup> Tech cabal, Nigeria’s Civic Tech Funding Crisis: What Happens When Grants Stop? <https://insights.techcabal.com/nigeria-civic-tech-funding-crisis/> accessed July 26, 2025.

<sup>88</sup> Ibid.

<sup>89</sup> Venture Valley, How 3MTT Is Training 3 Million Nigerians for the Future of Tech, <https://www.youtube.com/watch?v=IXCZZxPZMSY> accessed September 9, 2025.

<sup>90</sup> Ahmed Muazu, 3MTT Nigeria Cohort 2 Fellow (ID: FE/23/47749586), Challenges Faced by 3MTT Nigeria Fellows in ALC Training, [https://www.linkedin.com/posts/muazu-s-ahmed-50560391\\_challenges-faced-by-3mtt-nigeria-fellows-activity-7253756777995915264-jcHh/](https://www.linkedin.com/posts/muazu-s-ahmed-50560391_challenges-faced-by-3mtt-nigeria-fellows-activity-7253756777995915264-jcHh/) accessed September 9, 2025.

<sup>91</sup> Silicon Africa, Latest Update on Bosun Tijani’s Plan to Train 3 Million Tech Talents in Four Years, <https://siliconafrica.org/latest-update-on-bosun-tijani-plan-to-train-3-million-tech-talents-in-four-years/>; IT Edge news.africa, 3MTT ministerial initiative grapples with financial difficulties and quality concerns, <https://www.itedge news.africa/3mtt-ministerial-initiative-grapples-with-financial-difficulties-and-quality-concerns/> accessed September 9, 2025.

<sup>92</sup> NITDA To Strengthen Cybersecurity With Ai-Powered Social Media Monitoring, <https://nitda.gov.ng/nitda-to-strengthens-cybersecurity-with-ai-powered-social-media-monitoring/8992/#> accessed July 28, 2025.

and the potential for these tools to be used to suppress legitimate dissent under the guise of combating cybersecurity. The Nigerian civic space has been somewhat fragile over the last few years, with the arrest and detention of media practitioners, activists and dissenting voices.

Another significant challenge of the implementation of AI is the algorithmic bias, which stems from a lack of locally relevant training data in these AI development datasets. Many AI models are developed using datasets from the global north, which do not adequately represent the languages, cultural, and social nuances of the people.<sup>93</sup> This can lead to biased outcomes in applications ranging from financial services to public safety. For instance, the deployment of AI-driven systems for predictive policing or facial recognition in Nigerian cities may perpetuate existing biases if the underlying algorithms are not trained on diverse, local data.<sup>94</sup> The resulting lack of understanding of local languages, accents, and cultural norms can lead to inaccuracies and unfair outcomes, eroding public trust in these technologies.

Although there are various AI initiatives, they focus on major urban cities and are developed mostly in English. Very few people are doing work around local languages, or it's not actually promoted as much as it should be. Also, smartphones, good Internet, and electricity are not available in rural communities. In addition, the data used to train some of these models often underrepresents these particular groups and leads to biased outcomes and hallucinations at the end of the day.

Beyond this is the ability for state and non-state actors to use AI tools and technology for surveillance.<sup>95</sup> There have been instances where the government invested in the purchase of surveillance equipment and used surveillance equipment to monitor citizens, media practitioners, activists and dissenting voices. A 2023 study by the Institute of Development Studies and the African Digital Rights Network revealed that Nigeria was Africa's largest customer of every major surveillance technology<sup>96</sup> such as for internet and mobile and internet interception, social media monitoring, biometric ID data and the so-called 'safe city' monitoring of citizens in public spaces.<sup>97</sup> These technologies have been reportedly used to spy on peaceful activists, opposition politicians, and journalists. Nigeria also spends heavily on surveillance, with the total of known contracts during 2013–2022 exceeding USD 2.7 billion.<sup>98</sup>

Moreover, the use of AI-powered surveillance and cybercrime legislation to target journalists and media practitioners remains a significant challenge under the current Nigerian government administration. Since President Bola Tinubu took office in May 2023, several cases have emerged that illustrate how these tools are used to stifle press freedom and critical reporting. Where journalists were arrested and charged, often under the Cybercrimes Act.<sup>99</sup> The law, despite some recent amendments, continues to be used as a tool for digital repression.

Nigeria spends heavily on surveillance



with the total of known contracts during 2013–2022 exceeding



**USD 2.7 billion**

93 Vanguard, Without indigenous data, Nigeria's AI future is at risk — Expert, <https://www.vanguardngr.com/2025/07/without-indigenous-data-nigerias-ai-future-is-at-risk-expert/> accessed September 5, 2025.

94 The Guardian, Mitigating bias in identity verification, <https://guardian.ng/apo-press-releases/mitigating-bias-in-identity-verification/> accessed September 5, 2025.

95 The Cable, How digital surveillance threatens press freedom in Nigeria, West African countries, <https://www.thecable.ng/how-digital-surveillance-threatens-press-freeorganisationdom-in-west-africa/> accessed July 29, 2025.

96 Paradigm Initiative, Safeguarding Privacy: Regulating AI Surveillance In Nigeria, <https://paradigmhq.org/safeguarding-privacy-regulating-ai-surveillance-in-nigeria/>

97 Institute of Development Studies, Nigeria spending billions of dollars on harmful surveillance of citizens, <https://www.ids.ac.uk/press-releases/nigeria-spending-billions-of-dollars-on-harmful-surveillance-of-citizens/> accessed July 29, 2025.

98 Mapping the supply of surveillance technologies to Africa: case studies from Nigeria, Ghana, Morocco, Malawi, and Zambia.

99 The Guardian, HURiWA condemns crackdown on journalists under Tinubu, <https://guardian.ng/news/huriwa-condemns-crackdown-on-journalists-under-tinubu/> accessed September 5, 2025.



141

documented incidents between May 29, 2023 and May 29, 2025, of attacks on journalists, media workers, and ordinary citizens for the peaceful expression

Media Rights Agenda (MRA) documented 141 incidents between May 29, 2023 and May 29, 2025, of attacks on journalists, media workers, and ordinary citizens for the peaceful expression of their views on a variety of issues, including governance, economic hardship, and the security situation in the country.<sup>100</sup> Some of the cases included the arrest and detention of journalists and media practitioners. These include Segun Olatunji, the editor of a private news site, who was abducted on March 15, 2024 from his home in Lagos by more than a dozen armed men and was later released on March 28, 2024 by the Defence Intelligence Agency (DIA) and handed over to the General Secretary of the Nigeria Guild of Editors, Iyobosa Uwugiaren in Abuja.<sup>101</sup> His detention by the military was widely condemned and highlighted a concerning trend of unlawful detentions against journalists in Nigeria.<sup>102</sup>

Precious Eze Chukwunonso, the publisher of the privately owned News Platform website, was arrested on September 20, 2024 and detained following a complaint about his reporting. He, along with three other journalists, Olurotimi Olawale, Roland Olonishuwa, and Seun Odunlami, were later charged with cybercrimes in October 2024 for reporting on alleged financial misconduct by the Guaranty Trust Bank CEO.<sup>103</sup> These four journalists were denied bail on October 4, 2024<sup>104</sup> but the case was eventually struck out by the court after counsel to the prosecution informed the court that GTCO and the defendants had reached an amicable settlement.<sup>105</sup>

In October 2023, Saint Mienpamo Onitsha was arrested and charged under the Cybercrimes Act for reporting on tensions in the Niger Delta region. Though he was released on bail on January 25, 2024.<sup>106</sup> There is no news of the conclusion of this case yet. His case is an example of how the law is used to prosecute journalists and create a chilling effect on reporting.<sup>107</sup>

Chioma Okolie, a private citizen, was granted N5 million (USD 3,260.81) bail in May, 2024 by the Federal High Court Abuja following her arrest in September 2023 by police operatives in Lagos based on Erisco's complaint, accusing her of cyberbullying, cyberstalking and demarketing its product. This arrest came after Ms Okolie posted online a negative review of a tomato paste produced by Erisco Foods Limited, stating that the product contained a lot of sugar.<sup>108</sup>

<sup>100</sup> Media Rights Agenda, *Attacks against Journalists Intensifying under Tinubu Administration, Says MRA in New Report*, <https://mediarightsagenda.org/attacks-against-journalists-intensifying-uder-tinubu-administration-says-mra-in-new-report/> accessed July 29, 2025.

<sup>101</sup> International Federation of Journalists(IFJ), *Nigeria: FirstNews Editor released after two weeks in military custody*, <https://www.ifj.org/media-centre/news/detail/article/nigeria-firstnews-editor-released-after-two-weeks-in-military-custody> accessed September 5, 2025.

<sup>102</sup> Committee to Protect Journalists, *Chained and blindfolded: Nigerian journalist Segun Olatunji recounts his detention*, <https://cpj.org/2024/07/chained-and-blindfolded-nigerian-journalist-segun-olatumji-recounts-his-detention/> accessed July 29, 2025.

<sup>103</sup> Committee to Protect Journalists, *Nigeria police charge 4 journalists with cybercrimes for corruption reporting*, <https://cpj.org/2024/10/nigeria-police-charge-4-journalists-with-cybercrimes-for-corruption-reporting/#:~:text=On%20September%2027%2C%20the%20four,%20according%20to%20Aliagan%2C%20Akogun%2C> accessed July 29, 2025.

<sup>104</sup> MFWA, *Four journalists detained after corruption reporting, denied bail*, <https://mfwa.org/country-highlights/four-journalists-detained-after-corruption-reporting-denied-bail/> accessed Setember 5, 2025.

<sup>105</sup> The Cable, *GTCO withdraws 'defamation' suit against four journalists after out-of-court settlement*, <https://www.thecable.ng/gtco-withdraws-defamation-suit-against-four-journalists-after-out-of-court-settlement/#:~:text=Guaranty%20Trust%20Holding%20Company%20Plc,the%20cyberstalking%20and%20defamation%20case.> accessed September 5, 2025.

<sup>106</sup> CPI, *After nearly 4 months in jail, Nigerian journalist Saint Mienpamo Onitsha freed on bail*, <https://cpj.org/2024/02/after-nearly-4-months-in-jail-nigerian-journalist-saint-mienpamo-onitsha-freed-on-bail/> accessed September 6, 2025.

<sup>107</sup> Al Jazeera, *Nigeria's cybercrime reforms leave journalists at risk*, <https://www.aljazeera.com/opinions/2024/4/20/nigerias-cybercrime-reforms-leave-journalists-at-risk> accessed July 29, 2025.

<sup>108</sup> Premium Times, *Court grants Erisco tomato paste reviewer, Chioma Okoli, N5 million bail*, <https://www.premiumtimesng.com/news/top-news/699435-court-gran,ts-erisco-tomato-paste-reviewer-chioma-okoli-n5-million-bail.html> accessed July 29, 2025. ,,,

The case of investigative journalist Daniel Ojukwu, who was detained for over a week<sup>109</sup> without charge under the Cybercrime Act, is also an example of how the law works in reality. Despite its intended purpose of tackling cyber-offences, it is being used to target journalists for their work, particularly when they report on corruption and government officials.<sup>110</sup>

AI remains an emerging technology in Nigeria despite its use and deployment by various stakeholders. Its use remains significant to the advancement of the citizens of the country to be on par with the global community at large. However, even with opportunities, risks and challenges, the Nigerian legal landscape is not presently equipped to combat the hurdles that will be faced as we continually use and deploy AI tools and models.

### 4.3 State of AI Regulation in Nigeria

Currently, there is no specific or standalone legislative framework for AI in Nigeria. Nonetheless, the government is taking steps towards the regulation of AI through existing legal frameworks that indirectly apply to AI systems, particularly in areas such as data protection, cybersecurity, and intellectual property.

Nigeria is steadily advancing multistakeholder initiatives to shape its AI governance landscape in a participatory, accountable, and rights-conscious manner. One notable development is the National Human Rights Commission (NHRC) launching deliberative engagements with technology firms to embed human rights due diligence in AI deployment. During a March 2025 webinar organised with the International Network for Corporate Social Responsibility and NITDA, the NHRC emphasised the need for establishing clear accountability lines, promoting independent audits, and enforcing transparency in AI systems to protect the public from algorithmic harm.<sup>111</sup> In tandem, NITDA has committed to developing ethical guidelines through collaborations with researchers and industry partners spearheading Nigeria's first government-backed large language model (LLM) designed in five low-resource local languages and accented English to mitigate bias and improve inclusivity.<sup>112</sup>

In August 2024, the government through the Federal Ministry of Communications, Innovation, and Digital Economy, in collaboration with NITDA and the National Centre for Artificial Intelligence and Robotics (NCAIR), launched the National Artificial Intelligence Strategy (NAIS)<sup>113</sup> in an effort to mitigate the risk and set a concrete pathway for the country's involvement with AI technologies. The Strategy is designed to position the country for responsible, inclusive, and innovative adoption of AI by building on existing digital, data protection, and cybersecurity policies.<sup>114</sup> The strategy leverages institutions like the National Centre for Artificial Intelligence and Robotics (NCAIR) to strengthen research and development, while aligning with intellectual property, competition, and science and technology policies to promote innovation, protect rights, and ensure fair competition. At its core, the strategy seeks to create a secure, enabling



<sup>109</sup> New Central Tv, Nigerian Journalist Daniel Ojukwu Released After 10-Day Detention: Sowore Discusses Press Freedom, <https://www.youtube.com/watch?v=uZdgwzoEqL4> accessed September 9, 2025.

<sup>110</sup> FII, Police Abduct FII Reporter Daniel Ojukwu 'On IGP's Orders', <https://fij.ng/article/police-abduct-fii-reporter-daniel-ajukwu-on-igps-orders/> accessed September 9, 2025.

<sup>111</sup> Nairametrics, NHRC to engage tech companies over AI harm prevention in Nigeria, <https://nairametrics.com/2025/03/21/nhrc-to-engage-tech-companies-over-ai-harm-prevention-in-nigeria/> accessed September 6, 2025.

<sup>112</sup> *Ibid.*

<sup>113</sup> National Artificial Intelligence Strategy, [https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy\\_01082024-copy.pdf](https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy_01082024-copy.pdf) accessed July 30, 2025.

<sup>114</sup> National Artificial Intelligence Strategy (NAIS) 2024, [https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy\\_01082024-copy.pdf](https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy_01082024-copy.pdf) accessed July 30, 2025.

ecosystem that balances innovation with accountability, thereby enhancing Nigeria’s global readiness in the AI era.<sup>115</sup> While the National AI Strategy (NAIS) (2024) introduces a framework for ethical, inclusive innovation, it lacks binding mechanisms, timelines, and implementation resources, which significantly undermine its efficacy.<sup>116</sup>

The government has also launched initiatives to support innovation and capacity-building, such as the Nigeria Artificial Intelligence Research Scheme (NAIRS) and the National Centre for Artificial Intelligence and Robotics (NCAIR). Both of these initiatives provide funding, infrastructure, and technical support for AI-driven projects.<sup>117</sup> The Federal government has also launched the Nigeria AI Collective, a platform which aims to harness artificial intelligence to drive economic growth and social progress, positioning the country as a leader in Africa’s AI market.<sup>118</sup>



While there is no standalone AI law, there are some laws that indirectly regulate aspects around the development, use and regulation of AI in Nigeria

While there is no standalone AI law, there are some laws that indirectly regulate aspects around the development, use and regulation of AI in Nigeria. The Nigeria Data Protection Regulation (NDPR) of 2019,<sup>119</sup> similar to the European Union’s General Data Protection Regulation (GDPR), provides a strong legal framework for managing and exchanging electronic data in line with international standards. Its key objectives are to protect individual privacy, ensure the integrity of personal data transactions, prevent misuse or manipulation of personal data, and strengthen Nigerian businesses in global trade through fair data protection practices. It also establishes Nigeria’s data protection authority in line with global best practices.<sup>120</sup>

The Nigeria Data Protection Act (NDPA) of 2023<sup>121</sup> establishes the framework for safeguarding personal data and ensuring privacy in digital systems. Since AI systems are heavily dependent on large datasets, the NDPA plays a central role in ensuring that data collection, processing, and storage respect individual rights. It enshrines principles such as lawfulness, fairness, transparency, purpose limitation, and data minimisation, which align with international human rights standards on the right to privacy and data protection.<sup>122</sup> The NDPA grants data subjects the right to object to decisions based solely on automated processing, including profiling, if such decisions significantly affect them. This provision is crucial for AI applications in sectors like finance and telecommunications, where automated decision-making is prevalent. Additionally, it mandates that organisations conduct Data Privacy Impact Assessments (DPIAs) when deploying AI for personal data processing, ensuring compliance with privacy standards.<sup>123</sup>

The Cybercrimes (Prohibition and Prevention) Act of 2015 (amended in 2024) addresses cyber threats, online fraud, and identity theft. Although it seeks to enhance cybersecurity, the Act has been criticised for vague provisions that have sometimes been misapplied to target journalists

<sup>115</sup> *Ibid.*

<sup>116</sup> Wigwe and Partners, *Strengthening The National Ai Strategy: Addressing The Challenges And Gaps Ai Poses*, <https://wigweandpartners.com/strengthening-the-national-ai-strategy-addressing-the-challenges-and-gaps-ai-poses/>

<sup>117</sup> PWC, *AI in Nigeria*, <https://www.pwc.com/ng/en/publications/ai-in-nigeria.html> September 6, 2025.

<sup>118</sup> – The Punch Newspaper, *FG unveils AI Collective to boost economic growth*, <https://punchng.com/fg-unveils-ai-collective-to-boost-economic-growth/> -accessed July 30, 2025.

<sup>119</sup> *Nigeria Data Protection Regulation 2019*, <https://nitda.gov.ng/wp-content/uploads/2020/11/NigeriaDataProtectionRegulation11.pdf> September 7, 2025.

<sup>120</sup> OAL, *Artificial Intelligence (AI) Application in Cybersecurity: A Synergistic Approach to Safeguarding the Digital Realm*, <https://oal.law/artificial-intelligence-ai-application-in-cybersecurity-a-synergistic-approach-to-safeguarding-the-digital-realm/> September 7, 2025.

<sup>121</sup> *Nigeria Data Protection Act, 2023* <https://placng.org/i/wp-content/uploads/2023/06/Nigeria-Data-Protection-Act-2023.pdf> September 7, 2025

<sup>122</sup> Article 17 of the International Covenant on Civil and Political Rights (ICCPR).

<sup>123</sup> Lexworth Legal Partners, *The Adoption of Artificial Intelligence (Ai) In Nigeria’s Legal Landscape: Examining Intellectual Property, Data Privacy, And Ethical Considerations*, Mondaq, <https://www.mondaq.com/nigeria/privacy-protection/1567242/the-adoption-of-artificial-intelligence-ai-in-nigerias-legal-landscape-examining-intellectual-property-data-privacy-and-ethical-considerations>, accessed August 19, 2025.

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and activists, raising concerns about freedom of expression.<sup>124</sup> While its integration with human rights standards is limited, the law has the potential to protect individuals against harms like cyber harassment or AI-enabled fraud if implemented transparently and with accountability safeguards.

Further, the Federal Competition and Consumer Protection Act (FCCPA) 2018 offers a crucial framework for ensuring fairness, transparency, and consumer protection in Nigeria's market and is increasingly relevant as AI applications increasingly affect markets and consumer choices. As AI becomes more embedded in sectors like finance, e-commerce, and telecommunications, risks such as algorithmic bias, data monopolies, and unfair automated decision-making could undermine consumer rights and fair competition. The FCCPA incorporates consumer rights principles that intersect with human rights such as equality, fairness, and protection from harm.<sup>125</sup> Integrating consumer protection principles into AI governance alongside the National AI Strategy and data protection framework can help safeguard consumer welfare, prevent monopolistic dominance, and foster a balanced environment where innovation thrives without compromising rights.

Sector-specific regulations also play a role. For instance, the Nigerian Communications Commission (NCC) oversees AI applications in telecommunications, while the Copyright Act governs AI-generated content, though it does not explicitly address ownership of works created autonomously by AI systems. These fragmented regulations, while relevant, highlight the absence of a cohesive AI-specific framework, leading to potential overlaps and gaps in enforcement. Also, the Securities and Exchange Commission's (SEC) Rules on Robo-Advisory Services (2021) regulate AI-powered investment platforms, ensuring compliance with licensing requirements and safeguarding investors.<sup>126</sup>

Notably, the Independent National Electoral Commission (INEC) established an AI division which will help harness AI's potential to improve logistical planning, material distribution, and polling unit allocation through geo-spatial intelligence as well as combat the challenges it poses, such as the spread of misinformation and content manipulation.<sup>127</sup> Additionally, Nigeria in 2023, along with 28 other countries, including the UK and France, signed the Bletchley Declaration on AI, which obligates Nigeria to develop AI that mitigates risk.<sup>128</sup>

Because of these gaps, citizens in Nigeria remain exposed to the unregulated use of AI tools in sensitive areas such as facial recognition, electoral technologies, and automated decision-making. In the absence of clear safeguards, these tools can perpetuate bias, compromise data privacy, and expand state surveillance without adequate oversight, transparency, or avenues for redress.

<sup>124</sup> Punch, *Cybercrime Act failed to protect Nigerian journalists – Report*, <https://punchng.com/cybercrime-act-failed-to-protect-nigerian-journalists-report/> accessed September 2025.

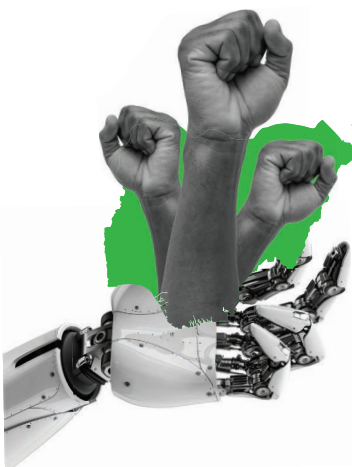
<sup>125</sup> Afriwise, *Regulating artificial intelligence in Nigeria*, <https://www.afriwise.com/blog/regulating-artificial-intelligence-in-nigeria> accessed September 7, 2025.

<sup>126</sup> Securities and Exchange Commission's (SEC), *Rule on Robo-Advisory Services*.

<sup>127</sup> Punch, *INEC establishes AI unit to enhance electoral process*, <https://punchng.com/inec-establishes-ai-unit-to-enhance-electoral-process/> accessed September 7, 2025.

<sup>128</sup> White and Case, *AI Watch: Global regulatory tracker – Nigeria*, <https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-nigeria> accessed August 19, 2025.

Key informants across civil society, the private sector and the legal sector stress that weak infrastructure, limited funding, limited oversight, and a shortage of skilled AI professionals constitute foundational barriers. Stakeholders lament that NAIS lacks clarity on roles and accountability between NITDA, NDPC, NCAIR, and relevant ministries.<sup>129</sup> Without an AI regulatory body, enforcement remains scattered. Similarly, the lack of funding mechanisms, no dedicated AI fund, continues to stall project rollout and sustainability.<sup>130</sup> Other factors that may influence the implementation of AI in Nigeria include ethical concerns, data security, slow adoption by the private sector, and rapid changes in technology.



#### 4.4 Towards Human Rights-Centred AI Governance in Nigeria

Nigeria has made notable strides in establishing multistakeholder mechanisms to advance inclusive dialogue, oversight, and coordination around AI governance. Central to this progress is the National Artificial Intelligence Strategy (NAIS), developed under the leadership of the Federal Ministry of Communications, Innovation, and Digital Economy. The NAIS was shaped through a collaborative national workshop in 2024 that brought together government officials, academics (including diaspora experts), civil society groups, and representatives of global technology companies, ensuring that the strategy reflects Nigeria's unique challenges and opportunities while adopting a human-centred and ethical approach to AI.<sup>131</sup>

Out of this process emerged the Nigeria AI Collective, a consortium managed by the Centre for Journalism, Innovation and Development (CJID), Lagos Business School (LBS), and Data Science Nigeria (DSN).<sup>132</sup> The Collective, supported by international partners such as the Luminate Foundation, underscores Nigeria's commitment to inclusive AI governance by combining civil society engagement, academic research, and private sector innovation.<sup>133</sup>

On the institutional front, the National Centre for Artificial Intelligence and Robotics (NCAIR), established by the National Information Technology Development Agency (NITDA), provides a government-led hub for AI research and policy. Through its focus on ethics, regulatory frameworks, and public-private collaboration, NCAIR exemplifies Nigeria's attempt to institutionalise participatory AI governance.<sup>134</sup>

<sup>129</sup> Yohanna Wandanje, *Unlocking Nigeria's AI Potential: Bridging Gaps in the National AI Strategy*, <https://www.linkedin.com/pulse/unlocking-nigerias-ai-potential-bridging-gaps-yohanna-wandanje-ewkgf> accessed August 20, 2025.

<sup>130</sup> *Ibid.*

<sup>131</sup> FMCIDE, *Ministry's Artificial Intelligence Strategy Workshop to Attract 120 Experts from Across the World*, <https://fmcide.gov.ng/ministrys-artificial-intelligence-strategy-workshop-to-attract-120-experts-from-across-the-world/> accessed August 21, 2025.

<sup>132</sup> CJID Communications. (2025). *CJID, Nigeria AI Collective Expands AI Integration Training for Educators to Southern Institutions, Deepens Push for Media Curriculum Reform*, <https://thecjid.org/cjid-nigeria-ai-collective-expands-ai-integration-training-for-educators-to-southern-institutions-deepens-push-for-media-curriculum-reform/> accessed August 20, 2025.

<sup>133</sup> Luminate, *Partnerships will ensure inclusivity for Nigeria's AI strategy*, <https://www.luminategroup.com/posts/news/partnerships-nigeria-ai-strategy>, accessed August 20, 2025.

<sup>134</sup> NITDA, *STRATEGIC ROADMAP AND ACTION PLAN (SRAP 2.0) 2021-2024*, <https://nitda.gov.ng/wp-content/uploads/2024/02/SRAP-2.0.pdf> accessed August 21, 2025.

Local and international stakeholders are highly engaged in shaping Nigeria’s AI norms, with a notable ability to influence policy. Local actors, including government agencies like NITDA, academic institutions, and a vibrant civil society, are the primary drivers of this process. The collaborative development of the National Artificial Intelligence Strategy (NAIS) is a testament to this, as it involved extensive workshops and consultations with a wide range of Nigerian experts. This bottom-up approach ensures that the policies are relevant to the country’s unique socio-economic landscape and address local concerns. International stakeholders, such as global tech companies like Google and foundations like the Gates Foundation, also exert influence by providing crucial financial and technical support, bringing global standards, and fostering partnerships. This blend of local ownership and international collaboration defines Nigeria’s policy-making process, allowing the country to leverage global resources while maintaining control over its own AI agenda.<sup>135</sup>

While stakeholder engagement is strong, the overall level of awareness, technical expertise, and institutional capacity to address the risks and opportunities of AI varies. Awareness of AI’s potential benefits is growing among various stakeholder groups. However, there’s a significant gap in widespread public understanding, which can hinder informed public discourse on critical issues. The country also faces a considerable skills gap, with a limited number of professionals in AI-related fields, which can impede the development of homegrown solutions.<sup>136</sup>

From an institutional standpoint, while government agencies are making strides, there’s a need to strengthen regulatory bodies and ensure they have the necessary capacity to enforce new policies, particularly concerning human rights and civic space. Civil society groups are actively working to fill this gap, raising awareness about issues like data privacy, algorithmic bias, and the potential for AI to be used to suppress dissent. They advocate for human-centric AI policies and for accountability mechanisms to protect fundamental rights.

To ensure AI in Nigeria is human-rights centred, guiding principles such as human dignity and rights, inclusivity, transparency, accountability, and participatory governance must be prioritised. This means embedding fairness and ethics into AI design, using diverse local datasets, ensuring explainability in AI-driven decisions, and engaging all stakeholders in policy processes.

Key stakeholders must act collectively and individually: the government should enact a comprehensive AI law and establish an independent regulator. CSOs and media should monitor, raise awareness, and hold actors accountable. The private sector should adopt responsible innovation and contribute representative datasets. Academia should drive local research and capacity building, and international partners should fund sustainable AI governance initiatives. Together, these measures will create a transparent, inclusive, and rights-respecting AI ecosystem in Nigeria.



To ensure AI in Nigeria is human-rights centred, guiding principles such as human dignity and rights, inclusivity, transparency, accountability, and participatory governance must be prioritised

<sup>135</sup> BudgIT, AI, Society, and the Nigerian Reality: A Match Made in Data Heaven?, <https://budgiti.org/ai-society-and-the-nigerian-reality-a-match-made-in-data-heaven/> accessed August 21, 2025.

<sup>136</sup> Paradigm Initiative, Towards-A-Rights-Respecting-Artificial-Intelligence-Policy-for-Nigeria, <https://paradigmhq.org/wp-content/uploads/2021/11/Towards-A-Rights-Respecting-Artificial-Intelligence-Policy-for-Nigeria.pdf> accessed August 21, 2025.

# 5. Discussion:

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## 5.1 AI Governance and Regulatory Gaps

While AI technologies offer powerful tools for enhancing civic engagement, public service, and anti-corruption efforts, they simultaneously raise serious risks for digital rights, inclusion, and democratic accountability. Nigeria’s emerging AI governance framework and civic innovations have shown some level of growth despite institutional and regulatory gaps.

Although there is no standalone laws on AI in the country, the National Artificial Intelligence Strategy (NAIS) represents a step in the right direction as it builds on the National Digital Economy policy and strategy (2020-2030) adopted in 2019, the establishment of the National Centre for Artificial Intelligence and Robotics in 2020, the release of the NITDA strategic Roadmap (2021-2024) in 2021 and the second Roadmap 2.0 for 2024-2027. Nigeria’s signing the Bletchley Declaration in 2023 and the Release of the National AI strategy in 2024 have placed the country on the right path towards enabling AI engagement across various levels and stakeholders.

At the heart of AI in Nigeria’s digital democracy is the nature of AI tools, which could be used to bolster transparency, efficiency, and inclusion. However, when wielded by the shroud of secrecy, unregulated environments can establish surveillance, censorship, and exclusion.

Although it can be argued that without a specific AI law, systems like biometric voter verification, predictive analytics in public service, or AI in security will remain ungoverned, thereby increasing concerns around accountability and misuse. However, there are sector-specific laws that can be used to regulate the use and deployment of Artificial Intelligence in Nigeria, such as the Data Protection Act, 2023 and the Nigeria Data Protection Regulation, 2019 (NDPR). The two legislations regulate the collection, storage, and processing of data in Nigeria.

Other relevant statutes include the Copyright Act, Patent and Designs Act and Trademarks Act, which guide the registration and protection of intellectual property (IP) in Nigeria. These can be used to regulate the use of IP in the AI space. In Nigeria, tech projects such as code, algorithms, and software are subject to IP protection. The Nigeria Startup Act, 2022, provides guidelines for registration and funding of startups in Nigeria, which includes AI startup projects, while the Consumer Protection Act regulates consumer protection.<sup>137</sup>

137 Legal Framework for Regulating Smart Contracts and Artificial Intelligence (AI) in Nigeria, <https://www.bimakassociates.com/legal-framework-for-regulating-smart-contracts-and-artificial-intelligence-ai-in-nigeria/> accessed July 30, 2025.

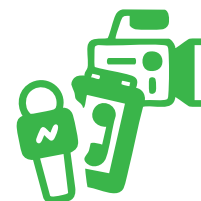
## 5.2 Institutional Capacity and Sustainability Challenges

Institutional capacity and sustainability in the civic and media sectors remain weak, limiting the positive impact of AI tools. Despite vibrant innovation among civic tech actors such as BudgIT, Dataphyte, and Citizens' Gavel, many initiatives collapse after pilot phases due to funding scarcity and limited scalability. Government-led initiatives like the 3 Million Technical Talents (3MTT) program and the Nigeria Artificial Intelligence Research Scheme (NAIRS) represent important steps toward building domestic AI capacity and equipping young Nigerians with the skills needed to participate in the global digital economy. These programs are designed to nurture talent pipelines, stimulate research, and encourage innovation across sectors such as health, education, and governance. However, their long-term impact is undermined by systemic challenges. One key issue is brain drain, as many of the trained professionals migrate abroad in search of better opportunities, thereby reducing the retention of critical expertise within Nigeria.

Furthermore, while these initiatives provide funding for research and pilot projects, there is a noticeable mismatch between short-term pilots and the sustained civic infrastructure required to scale AI-enhanced services. For instance, AI projects developed for transparency in governance, educational technology, or healthcare delivery often stall once initial grants or government funding expire, reflecting a lack of consistent support structures. Unlike the private sector, where platforms such as WhatsApp or Facebook thrive on robust business models, civic-tech AI tools in Nigeria rely heavily on donor support and are rarely designed for long-term sustainability. Without deliberate efforts to address talent retention, create sustainable financing models, and embed civic AI tools into institutional frameworks, the broader promise of these government initiatives risks being reduced to isolated successes rather than systemic transformation.

## 5.3 Media Innovations, Misinformation, and Trust Deficit

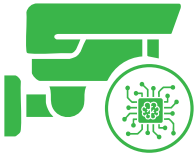
The media landscape offers instructive examples of both AI's potential and its perils. Initiatives like Dubawa's AI-enabled WhatsApp fact-checking chatbot<sup>138</sup> and Dataphyte's Nubia story-generation<sup>139</sup> platform demonstrate how AI enhances fact verification, improves data-driven journalism, and scales information access. However, AI-amplified misinformation, particularly generative disinformation, and algorithm bias pose new challenges.<sup>140</sup> When combined with declining trust in platforms due to rampant misinformation and opaque algorithmic content flows, the potential of AI to support democratic discourse remains compromised. Public scepticism toward online information, driven by repeated exposure to false content, whether AI-generated or human-driven, could undermine the civic impact of media-led AI interventions.



<sup>138</sup> Premium Times, *Dubawa launches AI tools to check misinformation*, <https://www.premiumtimesng.com/news/headlines/698270-dubawa-launches-ai-tools-to-check-misinformation.html?tztc=1> accessed September 9, 2025.

<sup>139</sup> Dataphyte, *Dataphyte, Archivi.ng Forge Partnership to Uncover Untold Stories of Nigeria with Nubia AI*, <https://archive.dataphyte.com/latest-reports/dataphyte-and-archivi-ng-forge-partnership-to-uncover-untold-stories-of-nigeria-with-nubia-ai/> accessed September 9, 2025.

<sup>140</sup> Chinasa T. Okolo, Ph.D, *African Democracy in the Era of Generative Disinformation: Challenges and Countermeasures against AI-Generated Propaganda*, Center for Technology Innovation, The Brookings Institution.



## 5.4 AI-Enabled Surveillance and Civic Space

Equally concerning are cases where government deployment of AI-enabled surveillance tools has directly eroded press freedom and civic space.<sup>141</sup> It's not just about what is happening, but how it's happening. The subtle and overt ways technology is being used to silence critical voices and control public discourse remain problematic. This issue is multifaceted, intersecting with legal frameworks, digital rights, and the overall state of democracy.

A recent and emblematic case is that of investigative journalist Daniel Ojukwu, who was detained for over a week under the pretext of violating the Cybercrimes Act but was not formally charged. His arrest, widely reported as arbitrary, underscores how laws ostensibly designed to combat cybercrime can be weaponised to suppress dissenting voices and critical reporting,<sup>142</sup> particularly when applied in tandem with AI-driven surveillance tools.<sup>143</sup>

Beyond Ojukwu's case, there have been credible reports of other journalists and civil society actors being tracked via mobile interception tools and subsequently detained based on their digital footprints.<sup>144</sup> This trend illustrates how the integration of surveillance technologies with weak governance safeguards enables disproportionate state power over citizens, raising red flags for both freedom of expression and the right to privacy. Such practices reflect how weak legal safeguards and broad cybercrime statutes are used to target media practitioners, weakening democratic accountability and chilling civic expression.<sup>145</sup>

The Nigerian example highlights the absence of a robust legal and institutional framework to regulate AI-driven surveillance. While the EU has begun to introduce explicit safeguards in its AI Act, Nigeria still lacks clear boundaries governing the ethical deployment of AI for law enforcement and national security. The risks are further compounded by the opacity of surveillance operations, limited judicial oversight, and the lack of effective redress mechanisms for victims of rights violations.<sup>146</sup> This creates a vacuum where unregulated AI use not only amplifies existing structural problems but also directly threatens core democratic freedoms.

Addressing these concerns requires a deliberate shift towards human-rights-centred AI governance. Mechanisms such as independent oversight bodies, parliamentary scrutiny of surveillance procurement, and mandatory human rights impact assessments for AI deployments in security contexts are crucial. Without these safeguards, Nigeria risks institutionalising a surveillance ecosystem where AI exacerbates repression rather than serving as a tool for inclusive development.

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145 Tamila Shvryda, *Public Surveillance in Nigeria: Violations of the Human Right to Privacy*, GORSTRA RESEARCH GROUP, <https://www.gorstra.com/africa-desk/public-surveillance-in-nigeria> accessed July 30, 2025.

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## **5.5 Inclusion, Digital Literacy, and Infrastructure Gaps**

Importantly, digital literacy, infrastructural gaps, and language exclusion further complicate AI adoption. The language bias built into generative AI models is due to limited training data in Nigerian languages, which risks excluding non-English speakers and reinforcing existing inequalities. Unless deliberate investments are made in localised datasets and inclusive AI systems, the technology may widen the digital divide. Similarly, low broadband penetration, high connectivity costs, and unreliable power supply restrict both civic access to AI tools and oversight capacity among civil society and regulatory agencies.

Nigeria's National AI Strategy (NAIS) focus on capacity-building through initiatives like the 3MTT program, the establishment of High-Performance Computing (HPC) centres, and the proposed AI Ethics Expert Group, are commendable steps towards fostering an AI-driven ecosystem. However, such approaches must be critically evaluated and could potentially be undermined by a lack of sustained funding and clear accountability mechanisms.

The most significant concern raised is the absence of a legally binding, risk-based regulatory framework, similar to the European Union's (EU) AI Act, which leaves Nigeria vulnerable to the misuse of high-risk AI applications. Specific AI regulatory vacuums could have profound implications for civil rights, particularly concerning technologies like biometric voting, surveillance, and predictive policing, and highlight the urgent need for a more comprehensive and rights-respecting governance structure.

# 6. Conclusion and Recommendations

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## 6.1 Conclusions

This research postulates that Nigeria is at a pivotal moment, where the trajectory of its democratic journey will be profoundly shaped by its approach to artificial intelligence. The dual nature of AI, its capacity to foster an era of unprecedented civic empowerment and its potential to serve as a mechanism for digital authoritarianism present a fundamental choice for the nation.

The findings underscore that a passive or uncoordinated approach to AI governance risks reinforcing existing societal inequalities, chilling dissent, and eroding the very foundations of democratic participation. However, this outcome is not inevitable. The path forward demands a concerted, multi-stakeholder effort focused on building a rights-based and inclusive AI ecosystem. This requires intentional investment in a diverse data infrastructure, the establishment of independent and accountable regulatory institutions, and the sustained engagement of civil society in the policymaking process.

Ultimately, the future of Nigeria's digital democracy will be a testament to its collective will: whether it chooses to harness AI as a catalyst for transparency, equity, and resilience, or allows it to become a tool that undermines the civic aspirations of its people.

## 6.2 Recommendations

### Government

- Adopt a comprehensive AI law. The proposed legislation can adopt a risk-based approach similar to the EU's AI Act, with strict regulations for high-risk applications, such as law enforcement, biometrics, and electoral processes, that could infringe on fundamental rights.
- Establish a fully autonomous National AI agency, within existing MDAs, with a mandate to enforce the new regulations, conduct risk assessments, and ensure transparency and accountability with AI tools and systems. The agency should be set up to include multi-stakeholder representatives.
- Amend the Cybercrimes Act to prevent its misuse as a tool for surveillance and the targeting of journalists and activists. The law should be human rights-centred and align with international standards on freedom of expression and digital rights.
- Prioritise public-private partnerships (PPPs) to expand broadband and high-speed internet access, especially in underserved rural areas. This will help bridge the digital divide, making civic technology and AI's benefits more accessible to all citizens.

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## Civil Society Organisations (CSOs)

- Launch sustained public campaigns to create citizens' awareness on their digital rights, the risks of AI, and the importance of data privacy.
- Simplify complex legal and technical concepts to empower communities, particularly underrepresented or grassroots communities, to demand accountability from both state and private actors.
- Proactively participate in legislative hearings, public consultations, and policy discussions on AI regulation.
- Partner with local tech innovators to create open-source, people-centric civic tech solutions. These projects should focus on addressing community-specific needs, promoting transparency, and enhancing public participation in governance.
- Continue monitoring and reporting to document and expose instances of state-sponsored digital surveillance targeting journalists, activists, and ordinary citizens.

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## Media

- Develop clear, in-house newsroom policies for the ethical use of AI tools in reporting, fact-checking, and content generation. These policies must prioritise transparency and accuracy and be disclosed to the public where AI is used.
- Invest in continuous professional development for journalists to enhance their understanding of AI technologies, data journalism, and digital security. This training is crucial for both leveraging AI's benefits and reporting accurately on its risks.
- Continue collaboration with civil society, academia, and fact-checking organisations to combat misinformation and disinformation.

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## Tech Community & Private Sector

- Implement a "rights-by-design" approach, ensuring that AI systems are developed with fairness, privacy, and accountability as core principles from the outset. This includes using diverse and representative datasets to prevent algorithmic bias.
- Establish clear communication channels to inform users about how their data is being used and the potential limitations or biases of AI systems. For high-risk applications, provide comprehensive and easily understandable documentation.
- Actively engage with policymakers and regulators to share expertise and help shape practical, innovation-friendly, and rights-respecting frameworks.
- Contribute to the development of open-source AI models and public datasets that are inclusive and representative of Nigeria's diverse population.





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