Institutional Trust, Data Governance, and the Sustainability of AI-Enabled Civic Technology Systems in Nigeria

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Abstract
The success of AI-enabled civic technology in Nigeria's transition to a digital-first model of governance is heavily reliant on strong institutional trust and robust data governance frameworks. Using an analytical framework that combines Institutional Theory and the Extended Technology Acceptance Model (TAM), this qualitative analysis examines the macro-institutional and micro-behavioral challenges that constrain the implementation of AI-driven accountability mechanisms in Nigeria. Data from the Nigerian Economic Summit Group (NESG) 2025 public perception index indicate that more than 40% of Nigerians express deep distrust toward key public institutions, creating an atmosphere of "automated distrust" that leads to heightened risk perceptions and low adoption of emerging technologies. This problem is associated with institutional information fragmentation of public databases that exist as silos and generate "fiscal dialects" in AI. Furthermore, evaluations using the World Bank's Land Governance Assessment Framework (LGAF) reveal that 95% of Nigerian landholdings worth over $300 billion remain invisible as untapped "dead capital" due to the absence of digital identification and data traceability. Nevertheless, the study reveals that homegrown civic tech platforms are overcoming these obstacles by optimizing the behavioral parameters of the Extended TAM. Technologies used by BudgIT, such as the AI-based assistant "BIMI" and FactCheckAfrica's KedereAI, can quickly convert complex information from financial and legal records into easy-to-understand insights, empowering citizens to circumvent bureaucratic secrecy in government agencies. Unfortunately, this promising trend may prove unsustainable due to its reliance on declining foreign aid. This study concludes that artificial intelligence alone is not the solution to governance shortcomings. It sets out three key imperatives for the future: closing the policy implementation gap, architecting data interoperability to reverse the deliberate fragmentation, and moving from building siloed "apps" to a collaborative, shared "civic stack" to ensure long-term domestic sustainability.

Keywords: Institutional Trust, Data Governance, Civic Tech, Public Accountability, Fiscal Dialects.

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1. INTRODUCTION

The intersection of artificial intelligence and civic engagement in Nigeria is a profound attempt to use technology to recalibrate the social contract (Nigerian Economic Summit Group [NESG], 2025). However, as the nation shifts toward a digital-first governance model, the success of AI-driven tools depends heavily on the robustness of institutional trust and data governance frameworks (NESG, 2025). Currently, there is a significant tension between Nigeria's rapid technological ambitions and its historical legacy of institutional fragility, characterized by opaque processes, fragmented administrative structures, and a persistent execution gap (NESG, 2025). Years of institutional incapacity, which have led to judicial inadequacies and a politicized, poorly funded civil service sector, have eroded public faith and created the potential for "reform fatigue." The origins of such problems can be traced back to repeated cases of corruption, bureaucratic inefficiencies, and insincere political reforms. One notable instance that illustrates the problem of such fractures between institutions is the government's handling of the coronavirus outbreak and the revelations about the secret allocation of relief payments to citizens. Such past instances of "managed disappointment" have only contributed to the Creation of a vicious cycle of mistrust. In turn, citizens may end up rejecting new policies not because of their inherent inadequacies but simply because of mistrust of those who implement them. Overall, such a socio-political setting becomes the foundation on which any AI-powered civic technology system would need to operate. According to the Foundational Institutional Theory, organizational structures, routines, and policies are determined not only by technical rationality or efficiency but also by the search for social legitimacy in their environment (Meyer & Rowan, 1977). DiMaggio and Powell (1983) extended this notion by showing that there are strong institutional pressures (coercive, mimetic, and normative) on organizations within a field to behave similarly to conform to societal expectations. To map the way these forces produce systemic stability or friction, Scott (2008) operationalized institutions into three interdependent dimensions: the regulative (formal laws and sanctions), the normative (social values and obligations), and the cultural-cognitive (deeply ingrained, taken-for-granted shared understandings). Applying such a theory to study the public administration environment in Nigeria makes One see why digital transformation runs into serious organizational resistance. Despite strong external pressure on the federal government to use technological means of governance to demonstrate its legitimacy and relevance in the modern world, such innovations often fail because they are inconsistent with deeply ingrained institutional values (Hummingbird Publications, 2024). Due to long-term practices of bureaucratic corruption and a lack of transparency, data fragmentation and the Creation of information silos are considered the norm (Neumann et al., 2026; Oliva et al., 2025). Thus, artificial intelligence does not enter the environment from scratch, without any existing structures. In Scott's (2008) words, the cultural-cognitive element here consists of widely shared beliefs about institutional weakness. Given the absence of procedural Justice and historical accountability at the macro level, technological updates made at the governmental level will be viewed with suspicion (Nigerian Economic Summit Group [NESG], 2025). Until such issues are resolved, no matter how innovative technological tools may be, they will not be accepted by people, who see their adoption as merely an upgrade of the same corruption ("automation of distrust," Udoh, 2026).

2. Extended Technology Acceptance Theory (TAM) and User Behavior

As Institutional Theory accounts for the macro-level governance environment, the Technology Acceptance Model (TAM) is used to examine individual behavioral intention to use or resist an information technology at the micro level. The standard TAM framework stipulates that technology adoption is driven by two main factors: Perceived Usefulness (PU) and Perceived Ease of Use (PEOU). However, in the high-risk public sector, where data vulnerability is a concern, it is necessary to take into account an extended TAM framework with additional factors such as Perceived Trust and Perceived Risk, which mediate behavioral intention (Moqbel & Bartelt, 2015; Wijaya et al., 2024; Zhao et al., 2024). Studies of structural models of e-government implementation have shown that trust increases acceptance levels. In contrast, higher risk perceptions reduce the perceived usefulness of government IT systems and users' behavioral control (Zhao et al., 2024).

In the case of Nigeria, micro-level behavioral factors are presented within the conflict of state-oriented technology vs citizen-driven civic technology:

- Perceived Risk and Individual Friction: When citizens are expected to interact with digital identity ecosystems mandated by states, the lack of historically clear regulatory buffers raises the level of Perceived Risk associated with data surveillance, political targeting, and disenfranchisement by bureaucratic authorities (Salami & Nwankwo, 2023). According to the Extended TAM model, this high-risk level works as a powerful barrier to behavior, leading to non-compliance and resistance among users (Wijaya et al., 2024).
- Perceived Usefulness and Perceived Ease of Use as Alternative Strategies: In contrast, non-state civic technologies intentionally employ user-centered designs aimed at maximizing PU and PEOU. By applying natural language processing methods to make difficult-to-search public budgets easier to understand, the "BIMI" platform used by BudgIT can significantly increase perceived usefulness. At the same time, developing apps such as "KedereAI," which can operate on low-bandwidth mobile devices without needing to be downloaded to smartphones, is key to optimizing PEOU for socioeconomically marginalized groups.

2.1 Trust as the Mediating Variable

By integrating these two theories, this study will formulate a mechanism that enables the sustainability of civic technology use, with institutional trust as the mediating variable linking sustainability and technological use. At the macro level, the institutional framework (as explained in Institutional Theory) determines the extent of trust among citizens. Public trust influences the micro-level variables discussed within the Extended Technology Acceptance Model, reducing perceived risk and increasing perceived usefulness. In cases where institutional trust is low, the use of civic technology leads to privacy concerns, institutional sabotage, and citizen boycotts, rendering the application unsustainable (Hamm et al., 2021). Thus, for AI accountability to be sustainable, designers need to ensure sufficient citizen trust while optimizing the technology.

3. LITERATURE REVIEW

3.1 Conceptual Foundations of Digital and AI Governance

Digital and AI governance refer to the frameworks, policies, and safeguards used to ensure the safe, ethical use of technologies, guide decision-making within digital environments, and regulate the development, deployment, and oversight of artificial intelligence systems (Erhirhie, 2026; Floridi et al., 2018). Recent research by Mäntymäki et al. (2022) and Kim & Hogenhout (2025) argues that AI governance is an evolution of digital governance. Unlike standard IT protocols, where traditional digital governance could rely on inspecting source code to ensure fairness, AI governance cannot; it must address "black box" risks in which decision-making logic is opaque. Researchers like Floridi et al. (2018) and Rahwan et al. (2019) have established that governance structures must now move beyond simple compliance to active risk monitoring. Promoting responsible and effective governance in the dynamic landscape of artificial intelligence, to assess, to develop, to incentivize, and to support good AI. Research by Strauss et al. (2025) indicates that corporate AI governance is heavily skewed toward the "pre-deployment" phases (model alignment and testing) while significantly neglecting the "post-deployment" risks, such as bias drift, hallucinations, and societal impact. In systematic reviews using the PRISMA framework, Göhsl (2026) argues that regulatory fragmentation is the single largest barrier to implementation, as organizations struggle to harmonize conflicting requirements across the EU AI Act, NIST frameworks, and local digital sovereignty laws.

3.2. Institutional Trust: Dynamics and Determinants

In the Nigerian context, "institutional trust" is not a static baseline but a volatile, dynamic construct shaped heavily by historical performance and perceived corruption. Integrating AI technologies in developing countries such as Nigeria involves confronting the "Corruption-Technology" paradox (Ingrams et al., 2021). Garba et al. (2026) argues that trust in Nigeria is transactional, while citizens resent mandatory data collection for the digital identity (NIN) integration, compliance (a proxy for functional trust) increases when the system demonstrably reduces bureaucracy, but decreases when the system fails, turns the public service into a form of "automated distrust," where people perceive the algorithmic integration as the digitization of state graft rather than an efficiency mechanism. Civic Technology in Nigeria, often acting as a "Counter-Institutional Power," creates a complex trust dynamic, with tools used by organizations like BudgIT exposing state inefficiency. Treré (2018) argues that adversarial digital activism often relies on "communicative capitalism" to expose state violence or corruption, thereby decreasing trust

in incumbents (politicians) but increasing trust in the democratic process (accountability). In addition, tools that help the government (e.g., vaccine-tracking apps) often struggle to gain adoption because they are "tainted" by their association with the state.

3.3. Data Governance and Privacy Anxiety

With the implementation of the Nigeria Data Protection Act (NDPA) in 2023, Nigeria has entered an era of good governance in data security, theoretically aligning it with GDPR requirements. However, recent studies have shown that such legislation does not necessarily provide "psychological safety" for citizens. Salami and Nwankwo (2023) argue that compliance among organizations in the private sector is gradually increasing; there is a "governance asymmetry" in which public-sector institutions (the largest data collectors) seem to enjoy absolute immunity. Citizens now assume that *all* data submission leads to state surveillance. In contrast, data breaches or opacity in electoral data management have convinced a segment of the population that digital governance tools are weapons of disenfranchisement rather than enablers of democracy (Udoh, 2026).

3.4. Structural Barriers to Digital Transformation

The ongoing friction between ambitious policy visions such as the Federal Ministry of Communications, Innovation and Digital Economy's blueprint and deep-seated systemic constraints is categorized into five critical dimensions: infrastructural deficits, human capital capacity gaps, funding misallocations, organizational resistance, and weak legal/regulatory frameworks (Abasilim & Esisio, 2025; Wuni et al., 2024; Amole, 2026). Structural barriers to digital transformation are the direct catalysts for systemic institutional distrust and acute citizen privacy anxiety. Rather than existing as isolated administrative hurdles, the infrastructure deficits, human capital gaps, and institutional resistance earlier discussed form a continuous loop that actively erodes the citizen-state social contract.

3.5. Civic Technology, AI, and Public Accountability

Civic technology acts as the critical bridge between state digital infrastructure and citizen oversight, with Nigerian initiatives primarily focusing on citizen engagement, accountability, transparency, and service delivery (Zisengwe, 2024). To counteract institutional opacity, the civic technology sector is increasingly leveraging Artificial Intelligence to demand public transparency. Tools such as BudgIT's AI assistant "BIMI" and FactCheckAfrica's "KedereAI" instantly translate bulky, unstructured public finance documents and legal texts into accessible knowledge, empowering citizens to hold the government accountable. However, on a comparative analysis, Zisengwe (2024) posit that while collaboration may bring government and civic stakeholders together in neighboring countries like South Africa, Nigerian civic tech initiatives face greater hurdles in directly integrating their oversight projects into the daily operations of government departments (Zisengwe, 2024). Furthermore, the sector faces an existential funding crisis; Nigerian civic tech organizations have long depended on foreign aid to survive, and as grants recede, the long-term sustainability of these platforms is severely threatened (Wuni et al., 2024).

4. METHODOLOGY

This research explores the intersection of artificial intelligence, civic engagement, and public governance in Nigeria, specifically examining how the success of AI-driven civic technology depends heavily on the robustness of institutional trust and data governance frameworks. The study adopts a secondary research method, involving a review of existing literature and data related to the topic. A qualitative analysis was employed to investigate the intersection of artificial intelligence, civic engagement, and public governance in Nigeria. The case selection criteria were purposefully restricted to systems with national macroeconomic and social impact (e.g., NIMC, TSA, GIFMIS). established homegrown civic technology platform from organizations actively deploying AI-enabled accountability tools s such as BudgIT, FactCheckAfrica, WAPAN. While it focuses on developments between 2019 and 2026, a timeframe deliberately selected to capture the critical period surrounding the enactment of the Nigeria Data Protection Act (NDPA) 2023 and the drafting of the National Artificial Intelligence Strategy (NAIS) 2024.

The study reviewed academic articles and journals published between 2019 and 2026, secondary data from official government and policy documents and verified civic tech and institutional reports. The study employed document analysis and thematic synthesis to systematically evaluate the evidence, guided by an integrated framework combining Institutional Theory and the Extended Technology Acceptance Model (TAM). This study employed data

triangulation to mitigate the inherent limitations and potential biases of relying on secondary data. All claims and aspirations outlined in government policy documents were cross-referenced against independent academic analyses and the operational reports of civil society organizations.

5. THE SOCIO-POLITICAL LANDSCAPE OF INSTITUTIONAL TRUST IN NIGERIA

The sustainability of any technology-mediated governance system is rooted in the perceived legitimacy of the institutions that deploy or regulate it. In Nigeria, institutional trust is not merely a psychological state but a functional requirement for system adoption. Data suggest that over 40 percent of the population expresses deep-seated distrust in key public institutions (Nigerian Economic Summit Group [NESG], 2025). This skepticism is particularly acute regarding the Nigeria Police Force and the Independent National Electoral Commission (INEC), with distrust levels at 52.5% and 47.6%, respectively (NESG, 2025). The roots of this deficit are found in recurring corruption scandals, bureaucratic opacity, and the perceived insincerity of political reforms. For instance, the management of the COVID-19 pandemic served as a critical case study in how trust or the lack thereof dictates the success of public policy. The shrouded disbursement patterns of cash transfers and the discovery of hidden palliatives intended for citizen relief during the peak of the pandemic significantly deepened the fracture between the government and the governed (Abayomi, 2022). This created a vicious cycle in which citizens resisted policy measures not on their technical merits but due to an entrenched lack of confidence in the agencies implementing them (Abayomi, 2022).

5.1. Historical Precedents and the Vicious Cycle of Distrust

Decades of institutional weakness have led to a situation in which the population is skeptical of any proposed change, thereby risking reform fatigue on both fronts (NESG, 2025). Trust is a complex issue because it is based on contacts, interactions, and relationships among people, which imply reliability, truthfulness, and good faith (Abayomi, 2022). However, in Nigeria, the pattern of managed disappointment has prevailed. For example, institutional weaknesses have included a lack of transparency, judicial inefficiency, and politicization, as well as under-resourcing of the civil service (NESG, 2025). Such structural weaknesses hinder policy reforms because effective institutions are needed to signal to citizens that government interventions are reliable and legitimate; otherwise, even the most advanced digital technologies will fail to deliver meaningful results in people's lives (NESG, 2025). Trust derived from performance implies that trust can be raised through effectiveness and procedural Justice (Udoh, 2026). However, the Nigerian experience suggests that digital governance introduces new forms of Power asymmetries. Citizens express fears that personal information collected through digital identity systems could be mismanaged or exploited for political gain, provoking anxiety rather than generating trust (Udoh, 2026).

Table 1: Institutional Trust Metrics in Nigeria (2024-2025)

Institutional Trust Metrics in Nigeria (2024-2025)	Percentage of High Distrust ("Not at all")	Key Drivers of Distrust
Nigeria Police Force	52.5%	Human rights concerns, extrajudicial issues, lack of transparency (NESG, 2025)
Independent National Electoral Commission (INEC)	47.6%	Perceived electoral irregularities, management of the 2023 cycle (NESG, 2025)
Public Service/Civil Service	>40.0%	Bureaucratic delays, politicized appointments, weak capacity (NESG, 2025)
Judicial System	Significant	Judicial inefficiencies, opaque processes, reform reversals (NESG, 2025)

The perception that digitalization is driven more by political optics than by genuine institutional reform reinforces public skepticism (Udoh, 2026). When governance reforms exclude significant segments of the population due to poor connectivity or low digital literacy, trust inevitably erodes as citizens perceive the state as indifferent to their realities (Udoh, 2026).

6. FACTORS INFLUENCING INSTITUTIONAL PARTICIPATION IN DIGITAL SYSTEMS

Government institutions must be willing to engage with a shared data ecosystem for AI-driven civic technology to be successful. Such participation depends on a complex interplay of political will, technical capacity, and organizational culture. Nigeria's legal framework for the digital economy is robust, but the actual implementation of these policies by government agencies is low, which shows critical weaknesses in policy implementation (Anzor et al., 2025).

6.1. Political Will vs. Technical Capacity

Institutions responsible for digital governance, such as the Nigerian Communications Commission (NCC) and the National Information Technology Development Agency (NITDA), play a vital role in regulating the digital landscape (Anzor et al., 2025). However, their effectiveness is often hampered by weak governance structures and fragmented coordination among different tiers of government (NESG, 2025; Anzor et al., 2025). Overlapping regulatory mandates among the NCC, NITDA, and the Central Bank of Nigeria (CBN) create uncertainty and discourage private-sector participation (Anzor et al., 2025). Technical expertise remains a recurring barrier. Most government employees lack the skills to operate new digital systems, slowing the speed and efficiency of technology adoption. (Abasilim, U. D., & Esisio, O. J., 2025). Furthermore, approximately 65% of Nigerian public agencies struggle with inadequate digital infrastructure, which negatively affects their operational efficiency and responsiveness (Onwuegbuna et al., 2022). The 3MTT program is a multi-pronged effort to address this by training Nigerians in areas like software development, machine learning, and data visualization, aiming to bridge the talent gap. (World Economic Forum, 2024).

6.2. Organizational Culture and Resistance to Change

Resistance within the civil service is a major hurdle. Many employees fear that automation and AI will lead to job losses, creating a culture of non-compliance or foot-dragging (Abasilim & Esisio, 2025). In addition, the implementation of e-government is hindered by some officials' reluctance to share information and by low IT skills among the general population (Nwaimo et al., 2024). Institutional weaknesses are deeply rooted in a history of patronage politics, in which institutions often face issues such as poor management structures and a lack of long-term endowment systems capable of sustaining their missions (Oliva et al., 2025). Many institutions rely heavily on government subsidies or unstable donor funding, leaving them vulnerable to political changes and corruption (Oliva et al., 2025). The absence of durable endowment structures—systems that should secure permanent, predictable financing deepens this vulnerability and undermines the sustainability of reforms (Oliva et al., 2025).

7. THE CRISIS OF DATA GOVERNANCE AND INTEROPERABILITY

One of the most significant obstacles to the reliability of AI-enabled civic tech in Nigeria is the fragmented nature of government data infrastructure. AI systems are only as effective as the data they process, and in the Nigerian public sector, data is often siloed, fragmented, and contradictory (NESG, 2025; World Bank, 2026).

7.1. The Fragmentation of Financial Systems

Nigeria operates multiple digital financial governance systems with about 5,000 accounts yet to be fully integrated into the country's consolidated revenue framework. (World Bank 2026). While each system performs useful functions in isolation, they do not communicate to provide a unified trail of public funds. Fragmentation is not simply a failure of investigative will; the lack of integration among these systems continues to slow down reporting processes and weaken the reliability of fiscal data, allowing public funds to move across disconnected systems with no verifiable trail. The Government Integrated Financial Management Information System (GIFMIS) monitors budget execution. The Integrated Payroll and Personnel Information System (IPPIS) is responsible for the federal payroll. The Treasury Single Account (TSA) consolidates all funds in accounts held at the Central Bank of Nigeria. The Nigeria Open Contracting Portal (NOCOPO) stores data on procurement processes. The Beneficial Ownership Register is managed by the Corporate Affairs Commission (CAC). The Nigeria Extractive Industries Transparency Initiative (NEITI) traces the revenue from extractive activities. The Nigerian Financial Intelligence Unit (NFIU) follows suspicious financial flows. Each mechanism performs its own useful function, and this fragmentation benefits those who benefit from opacity.

7.2. The Problem of "Fiscal Dialects" and Data Inconsistency

At the subnational level, nearly all 36 states publish Budget Implementation Reports. Still, they apply the Administrative, Economic, Functional, Programme, Project, and Geographical classifications of the National Chart of Accounts inconsistently (BudgIT, 2025). This lack of structure means states speak different fiscal dialects, making cross-state comparisons and regional accountability impossible for AI systems. Furthermore, data integrity issues are pervasive. The federal government has not published audited financial statements since 2021 (Office of the Auditor-General for the Federation, 2023), and the audit framework remains anchored in a 1956 law. Discrepancies abound; for example, a N3.42 trillion gap was flagged in the 2024 budget due to undisclosed agency budgets. (Budget Office of the Federation, 2024). When AI systems are trained on such biased, incomplete, or historically skewed datasets, they produce discriminatory or inaccurate outcomes, challenging the very trust they were designed to build (Alliance Law Firm, 2026; SHQ Legal, 2026)

7.3. The Impact of Invisibility: Dead Capital

The "data problem" extends to the very visibility of national assets. It is estimated that 95% of land in Nigeria exists outside formal, digitized, and verifiable systems, representing over $300 billion in dead capital (PricewaterhouseCoopers [PwC] Nigeria, 2019). Because these properties lack identity, traceability, and standardized records, they are invisible to financial systems and cannot function as economic assets for loans, insurance, or investment (PwC Nigeria, 2019). This reflects a broader technological failure, in which the challenge is not whether the country has assets but whether it has the systems to make them count (PwC Nigeria, 2019).

8. AI-ENABLED CIVIC TECHNOLOGY: INNOVATION AMID FRAGILITY

8.1. The Evolution of Accountability Platforms

Organizations like BudgIT and FactCheckAfrica have moved beyond simple data visualization to complex AI-driven assistants. The BIMI assistant, developed by BudgIT, transforms technical and bulky fiscal data into accessible formats. Previously, analyzing a federal budget required weeks of manual data cleaning from non-searchable PDF documents. With AI, citizens can ask direct questions in plain language about local government allocations or project statuses and receive instant, verifiable answers.

Table 2: AI-Driven Civic Tech Platforms and Their Impact in Nigeria

AI-Driven Civic Tech Platform	Primary Function	Key Impact/Metric
KedereAI	Tracking local allocations/contracts	Currently tracks N2.8 trillion across 774 LGAs (FactCheckAfrica, 2026b)
BIMI (BudgIT)	Public finance assistant	Trained 1,500 community champions in AI prompting (BudgIT Foundation, 2025).
GovQuest	Gamified Civic Education	Targeted at young Nigerians for scenario-based learning (FactCheckAfrica, 2026c)
Podus AI (Citizen Gavel)	Legal assistance	Addresses Justice system gaps via AI legal aid (Citizen Gavel, 2024)
CLHEEAN	Citizen-Government Bridge	Multilingual support for policy inquiries and feedback (Tukur, 2025)

These tools represent a shift toward transformative accountability, moving it from an elite-driven process into a citizen-led culture. For example, KedereAI is designed to function on low-data mobile networks without requiring downloads, ensuring that digital participation is not limited by internet access or smartphone ownership. FactCheckAfrica (2026a).

8.2. Case Study: WAPAN and the Waste Picker Registry

A relevant example of civic tech being used to address a crucial data problem is the Waste Pickers Association of Nigeria (WAPAN). Informal workers in the sector were previously neither socially visible nor captured in data, which prevented them from receiving incentives under the EPR model (Thian, 2026). A digital register, coupled with a live dashboard, was developed by WAPAN to help the government make better policies for these workers (Thian, 2026).

This project has utilized a mobile app with QR codes for identification, thereby addressing the existing mistrust between waste pickers and the formal sector (Thian, 2026). It shows that while technology is an important component in problem-solving, co-creation with stakeholders is equally important (Thian, 2026). However, the challenge lies in implementing these solutions within a bureaucratic government system (Thian, 2026).

9. GOVERNANCE AND ACCOUNTABILITY MECHANISMS FOR IMPROVEMENT

To address trust and data deficits, Nigeria is developing a multi-layered governance framework that combines legislation, strategic oversight, and international standards.

9.1. The Nigeria Data Protection Act (NDPA) 2023

The NDPA 2023 and the General Application and Implementation Directive (GAID) 2025 form the backbone of data governance. (Nigeria Data Protection Commission [NDPC], 2025; Lex Luminar, 2025) The Nigeria Data Protection Commission (NDPC) has moved toward a compliance-in-practice model, conducting over 1,000 investigations across financial, educational, and insurance sectors. (Lex Luminar, 2025).

The NDPC is no longer just a policy body but an active data watchdog, emphasizing that organizations must identify a valid lawful basis for AI data processing (SHQ Legal, 2026; Lex Luminar, 2025). This includes recognizing the right of individuals not to be subject to decisions made solely by automated processing that have legal or similarly significant effects (SHQ Legal, 2026).

9.2. The National AI Strategy (NAIS) 2024 and AI Trust

The 2024 National Artificial Intelligence Strategy (NAIS) aims to position Nigeria as a global leader in ethical and inclusive AI (Digital Watch Observatory, 2024; National Centre for Artificial Intelligence and Robotics [NCAIR], 2025). A central feature is the National Artificial Intelligence Trust, a first-of-its-kind body comprising 10 AI experts and government ministers, tasked with mobilizing resources and providing oversight (OECD.AI, 2025).
Five strategic pillars underpin the NAIS:

1. Building Foundational AI Infrastructure (HPC centres and energy).
2. Sustaining a World-class AI Ecosystem (Centres of Excellence, startups).
3. Accelerating AI Adoption (Sector-specific roadmaps for health/agriculture).
4. Ensuring Responsible/Ethical Development (Ethics Commission, principles).
5. Developing a Robust Governance Framework (Regulatory body, risk management) (Digital Watch Observatory, 2024; OECD, 2026).

Despite this vision, significant structural gaps persist. Critics note an absence of comprehensive, AI-specific legislation and a deficit of technical skills among regulators and the judiciary (Fawei, 2025; Adeyemi, 2025). Furthermore, the lack of dedicated domestic funding threatens to stall progress, as the strategy relies heavily on external partners (Fawei, 2025).

9.3. International Alignment and the OGP Framework

Nigeria's participation in the Open Government Partnership (OGP) provides a formal mechanism for co-creation. The third national action plan includes 13 commitments focused on open contracting and beneficial ownership transparency (OGP, 2026). The OGP process remains robust, bringing together government, civil society, and private sector reformers to reduce costs and fight corruption (OGP, 2026).
The OGP Action Framework, updated for 2026, shifts the focus to action commitments with more flexible submission timelines, thereby strengthening accountability for members (OGP, 2026). This is critical for Nigeria, as it allows alignment with domestic political and budgetary cycles (OGP, 2026).

10. SUSTAINABILITY CHALLENGES: THE FUNDING AND INFRASTRUCTURE GAP

A fragile funding model and a fragmented civic ecosystem threaten the long-term viability of AI-driven civic tech.

10.1. Receding Foreign Aid and the Dependency Crisis

Traditionally, the Nigerian civic tech space depended heavily on foreign grant funding for projects. Nevertheless, according to current studies regarding civil society sustainability, there is evidence that this structure is very vulnerable. With bilateral aid funding becoming increasingly short-lived, organizations are suffering greatly from a lack of the funds needed to operate (Paradigm Initiative, 2023). Additionally, according to Zisengwe (2024), civic technology projects that depend too heavily on foreign funding tend not to integrate effectively into the governmental structure. Therefore, organizations need to change their funding approach to prevent a disaster.

Table 3: Current Funding Sources and Sustainability Implications for Civic Tech in Nigeria

Funding Source	Current Status	Implication for Civic Tech
Foreign Aid (USAID/EU)	Significant contractions in bilateral aid cycles are impacting digital governance initiatives.	Severe budget deficits force domestic civic tech platforms to scale back their digital accountability deployments, highlighting the risks of operating outside integrated government systems (Zisengwe, 2024; Paradigm Initiative, 2023).
Local Philanthropy	Focused on "old issues" (health/Education)	Limited support for digital governance and anti-disinformation (African Philanthropy Forum, 2023)
Corporate Foundations	Male-led, direct giving focus	Need for strategic alignment with governance outcomes (African Philanthropy Forum, 2023)
Tech Incubators (CivicHive)	Growing	Facilitates localized funding but lacks the macroeconomic scale to replace bilateral foreign aid (Zisengwe, 2024).

The solution lies in diversifying funding toward local philanthropy and revenue-generating models. The National AI Trust is One attempt to mobilize resources domestically, but its non-binding status may limit its impact (OECD.AI, 2025).

10.2. From "Apps" to "Civic Infrastructure"

Nigeria's civic tech sector is rich in ideas but poor in coordination. Multiple organizations chase the same donor funds to build parallel tools, creating a scattered noise that is easy for politicians to ignore (Zisengwe, 2024). There is a profound need for a "civic stack"—interconnected layers of civic technology that work from a shared source of civic truth (Zisengwe, 2024).

A shared civic data layer would reduce redundancy, lower costs, and allow organizations to present a united front when demanding reforms (Olajide & Sheidu, 2026). This requires a shift from treating each tool as a complete solution to designing them as interconnected components of a national civic infrastructure (Olajide & Sheidu, 2026). Sustainability also depends on embedding these systems within communities, ensuring that civic participation is built with rural and urban realities in mind (Olajide & Sheidu, 2026).

11. CONCLUSION AND RECOMMENDATION

An analysis of institutional trust deficit issues in Nigeria suggests that, even if AI is a highly effective instrument for accountability, it cannot overcome serious issues of bad governance in the country. The effectiveness of AI-powered tools is inherently dependent on the quality of the data used as input, but data fragmentation is currently undermining its integrity (Udoh, 2026).

In the course of the qualitative analysis, the following three important priorities have been identified:

1. Closing the Implementation Gap: Institutions need to progress from being seen as policy institutions to becoming accountable via rules. Technology alone is unlikely to overcome trust deficits in contexts characterized by patronage and institutional opacity (NESG, 2025; Udoh, 2026).

2. Creating Interoperable Governance: It is a governance design choice to maintain fragmentation, which must be changed. The only thing capable of preventing public money from slipping away across fragmented digital platforms is a single data trail system. (National Information Technology Development Agency [NITDA], 2019).
3. Achieving Self-sustainability: The civic tech sector must evolve from depending on dwindling foreign aid support into an infrastructure-driven, self-owned model. (Paradigm Initiative, 2023; Zisengwe, 2024).
4. As such, Nigeria needs to ensure that in pursuing digital transformation, the use of AI is aimed at promoting inclusion rather than the use of this technology to facilitate surveillance or oppression of Nigerians. While the use of tools such as BIMI and KedereAI is commendable, as they have helped demonstrate AI's potential as a facilitator of inclusion, these tools would need significant institutional restructuring and a shift in mindset to survive. There is a need to develop a 'stack of trust' that includes all the parties concerned to establish standards aligned with the needs of all stakeholders (NITDA, 2019; Zisengwe, 2024).

Failure to implement institutional reforms will result in a stagnant policy cycle in which Nigerian digital innovations will attract media attention without yielding concrete achievements in Nigerians' lives (Nigerian Economic Summit Group [NESG], 2025). In this respect, the efforts undertaken by the NDPC and other institutions to promote the adoption of the National AI strategy are laudable. However, their effectiveness will depend on their impact on citizens' lives (Adeyemi, 2025).

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