

AI Governance and Institutional Readiness in Public Sector Systems: A Comparative Study Between India and Nigeria

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ABSTRACT

Artificial Intelligence (AI) is proving to be a crucial technology to enhance public service and governance. This paper examines how governance frameworks and institutional capacities shape AI adoption and management within government systems. By adopting a qualitative comparative case study analysis, using India and Nigeria as primary cases and South Korea as a benchmark for successful AI governance implementation, this paper examines the governance and institutional preparedness of AI in the public sector and identifies practical lessons on building governance structures and institutional foundations for responsible AI adoption.

The analysis suggests that India possesses a more evolved framework for AI governance, enforced by the National Strategy for Artificial Intelligence (2018), and the India AI Mission (2024), a well-developed digital public infrastructure, and a strong focus on the development of skills and training. The National Artificial Intelligence Strategy (2024) indicates Nigeria's growing institutional commitment to AI, as well as notable strides towards preparedness. South Korea is introduced as a benchmark, representing a more advanced AI governance model that offers concrete lessons for developing economies. Despite these disparities, the common concerns include the disconnect between policy aspirations and policy implementation, difficulty in developing specific AI laws, and concerns about accountability, transparency, bias, privacy and digital inclusion. The study calls for specific AI legislation, autonomous regulatory bodies, and more effective data governance between developing countries. It contends that institutional building and the institutionalization process are key to having responsible, sustainable and adaptive AI governance in the Global South, and that governance progress must be measured against concrete indicators like enforcement action, institutional capacity, digital literacy rates, public accountability and operationalization of independent bodies rather than policy adoption alone.

Keywords: Artificial Intelligence Governance, Institutional Readiness, Public Sector AI, Digital Governance, AI Regulation.

INTRODUCTION

Artificial Intelligence (AI) is being used by governments globally to enhance public services, boost administrative effectiveness, and improve decision-making. Today, AI applications are common in fields like healthcare, tax, education, welfare delivery, law enforcement, and so much more. Although AI presents numerous possibilities to enhance the governance and operations of public services, it also poses several critical regulatory, accountability, transparency, privacy, and ethical issues.

This study explored the governance and institutional preparedness of AI in two developing countries, India and Nigeria, where AI has become a key development driver for national development agendas. Both nations have adopted national AI policies and are looking into the potential of AI applications in government management and public services. But there are significant differences in the digital infrastructure, institutional capacity, regulatory environment, and technological readiness. These differences are useful and relevant to a comparative analysis.

This paper pays attention to term "institutional preparedness" meaning the capacity of government institutions, regulators, and public institutions to manage and oversee AI technologies effectively. Besides the policy commitment, institutional preparedness includes the availability of relevant policies, administrative capability, technical expertise, and accountability mechanisms that determine whether governance frameworks translate into practice. The paper also addresses ethical governance concerns of AI such as algorithmic bias, transparency, privacy protection, and digital inclusion.

This study further introduces South Korea as a reference case, a non-Western, developed economy that has successfully translated AI strategy into institutional reality to benchmark India and Nigeria's governance trajectories and draw actionable lessons for developing countries pursuing responsible AI adoption. Together, these three cases produce a cross-country evaluation that addresses a gap in current AI governance literature, redirecting analytical focus from short-term programme metrics toward long-term ecosystem governance.

BACKGROUND OF THE STUDY

The Global Artificial Intelligence Landscape

The issue of governing Artificial Intelligence has moved from being just a technical concern to a significant policy matter that touches on regulation, ethics, accountability, and international collaboration. These changes are because AI is now so intertwined with our daily lives, leading to growing worries about privacy, algorithmic biases, and the competition between countries on the global stage.

Key organizations, like the OECD with its AI Principles established in 2019, UNESCO's Recommendation on the Ethics of AI from 2021, and the European Union's AI Act, have laid down important guidelines promoting transparency, ensuring accountability, protecting human rights, and advocating for risk-based regulation. There is a notable division between countries that are actively developing AI standards and those that mainly rely on these standards.

Setting Governance Principles for Artificial Intelligence in Developing Countries

Challenges in developing countries, such as limited regulatory capacity, lack of infrastructure, financial limitations, and a lack of technical expertise, all influence AI governance. These factors pose significant obstacles to achieving effective governance and raise concerns about data protection, surveillance, and accountability. Meanwhile, AI holds great promise in solving developmental problems in the areas of health, agriculture, financial inclusion, public administration, and more. Governments are thus increasingly striving to strike the balance between innovation, responsible and inclusive use of AI.

AI Governance in India

India has developed its AI governance framework through the Digital India Programme. Digital Public Infrastructure like Aadhaar, UPI, and DigiLocker has established a solid platform for AI growth. The vision of #AIforAll was laid out in the National Strategy for Artificial Intelligence (2018) and key sectors were identified for the deployment of AI. Later, the Digital Personal Data Protection Act, 2023 and the IndiaAI Mission have added to the governance, innovation and capacity-building initiatives. The initiatives put India in a prominent place amongst the developing nations as one of the major actors of AI governance.

AI Governance in Nigeria

Nigeria's journey of AI governance has been shaped by broader digital economy reforms, such as the Nigeria E-Government Master Plan and the National Digital Economy Policy and Strategy. With the launch of the National AI Strategy, a new era of AI governance, focusing on research, infrastructure, building human capabilities, data governance, ethical regulation and international cooperation. While Nigeria's AI ecosystem is still less developed than India's, recent policy efforts signal increasing institutionalization of AI-driven development.

AI Governance in South Korea

South Korea's AI governance journey provides a compelling developmental roadmap for countries like India and Nigeria. Beginning with the National Strategy for Artificial Intelligence (2019), South Korea has progressed through successive phases of policy development to arrive at the world's second comprehensive AI law, the AI Basic Act (formally, the Framework Act on Artificial Intelligence Development and Establishment of a Foundation

for Trustworthiness), which was passed in December 2024 and is effective January 2026. This trajectory from an ideal strategy to enforceable legislation represents precisely the pathway that India and Nigeria are still navigating (IAPP, 2025; digital.nemko.com, 2025).

OBJECTIVES

- To make a comparative study of policies, regulations and institutions of AI governance in India and Nigeria.
- To assess the readiness of public sector institutions for AI governance and implementation in both countries.
- To detect the key areas of strengths, weaknesses and gaps in their AI governance systems.
- To explore ethical, legal, and administrative issues in the use of AI in the public sector.
- To introduce South Korea as a governance reference case and extract lessons applicable to developing economies, particularly India and Nigeria.

Research Questions

- How do the AI governance models of India and Nigeria differ in terms of policies and regulations?
- What is the level of preparedness of the public sectors of both countries to govern AI?
- What are the ethical and governance challenges in public administration that come up in the use of AI?
- What are the policy instruments to support governance and institutional readiness of AI in India and Nigeria?
- What governance lessons does South Korea's more advanced AI framework offer to India and Nigeria as developing economies?

SCOPE AND LIMITATIONS

The study examines the governance framework and institutional preparedness of India and Nigeria with regard to the adoption of AI in the public sector. The scope is deliberately narrow; a detailed comparison between the two countries will be more useful than a broad survey that will tell little. The analysis is based on public documents from governments, national AI strategies, academic research and reports from international organizations operating in the field of digital governance.

The study examines not only the governance framework and institutional preparedness of India and Nigeria's AI adoption in the public sector, but also uses South Korea as a deliberate

governance benchmark. The scope is deliberately focused to provide a detailed comparison between two developing countries, informed by a more advanced governance model, which will be more useful for precise and actionable insights.

The focus remains at the sectoral level, dealing with public administration, which encompasses welfare provision, regulation and administrative decisions. The main focus is on the governance mechanisms of these governments, not on the AI technologies themselves.

The present research is limited to the following:

- Subnational variation: Two countries, India and Nigeria, are large federally organized countries with variation in governance capacity between states and regions. This study is conducted at the national level and does not fully reflect those internal differences.
- AI governance is rapidly evolving: The policy landscape is changing rapidly. This may not completely reflect developments that took place near or since the research period.
- Public documents reliance: The research is based on public sources of information. It is hard to represent informal institutional practices and the realities that happen on the ground that are not recorded.
- Limited generalizability: The study is based on two countries, and does not represent the broader Global South, although some findings might be applicable beyond these two cases.
- South Korea's governance context: South Korea offers valuable lesson and operates at a significantly higher level of institutional and economic development than India and Nigeria. Lessons drawn from its AI governance experience should therefore be understood as directional guidance rather than a replicable blueprint.

REVIEW OF LITERATURE

In her book *Responsible Artificial Intelligence: How to Develop and Use AI Responsibly*, Dignum (2019) proposes that transparency, accountability, fairness and human control should form the basis of AI governance. She emphasizes the need for the innovation of technology to go hand-in-hand, and that governments need to establish institutional frameworks which will enable them to ensure that AI is used responsibly and ethically. The study offers a conceptual basis for recognizing the broader issue of AI governance which goes beyond technical aspects.

The Organization for Economic Co-operation and Development (OECD, 2019) has developed internationally agreed-upon standards for trustworthy AI by means of the OECD Principles on Artificial Intelligence. It focuses on values related to human transparency, robustness, safety and accountability. The principles have influenced national AI strategies all over the world and

have been adopted as a guideline by governments that want to promote innovation while regulating it.

In the article *Artificial Intelligence and the Public Sector: Applications and Challenges*, Wirtz, Weyerer and Geyer (2019) explored the potential of using AI within the public sector and the challenges encountered. Chief among their research findings were institutional capacity, transparency, privacy protection, and accountability as primary issues that governments face with the use of AI. The authors conclude that good governance provisions and administrative preparedness are imperative to the effective implementation of AI.

The first all-encompassing policy framework for AI in India was presented by NITI Aayog in the report, *National Strategy for Artificial Intelligence: #AIforAll* (2018). According to the report, the healthcare, agriculture, education, mobility, and smart cities sectors are key to the use of AI. It identified the problems that faced research capacity, the lack of data ecosystems, and also regulatory gaps. It also suggested the creation of various institutional reforms such as Centers of Research Excellence (COREs) and International Centers for Transformational AI (ICTAIs) to strengthen the Indian AI system.

In their research on AI governance in India, Basu and Hickok (2021) report that the country has been rapidly undergoing digital transformation, faster than regulatory protection has been developed. The authors highlight issues with privacy, surveillance, algorithmic bias, and accountability. They say that although India has good digital infrastructure, there is a need for improved institutional coordination for governance processes.

The Digital Personal Data Protection Act (Government of India, 2023) is a major step in India's digital governance. The legislation reinforces privacy safeguards and provides principles for the lawful processing of data. Previous research indicates that the law introduces additional measures for privacy protection and principles for the lawful processing of data. However, the scholars indicate that the Act is mainly about data governance and does not fully regulate the problems of AI such as automated decision-making, algorithmic accountability, and AI risk management.

Oxford Insights (2025) published the *Government AI Readiness Index 2025*, which evaluated the capability of 193 countries in three categories: government capability, development of the technology sector, and the data infrastructure. According to the report, India was one of the top ten countries in the Global South and faced ongoing issues around the regulatory environment and institutional capacity. The study shows that technological progress is not enough without improvement in governance capacity and public sector preparedness.

The National Information Technology Development Agency (NITDA, 2024) has developed the *National Artificial Intelligence Strategy (NAIS)* as the national strategy for governing the use of AI in Nigeria.

Nigeria has recently started giving greater attention to Artificial Intelligence as a tool for national development. The country's AI Strategy focuses on improving digital infrastructure, developing skilled professionals, promoting ethical use of AI, encouraging research and innovation, and creating systems for regulation and oversight. This shows the government's growing interest in using AI responsibly to support economic and social progress.

According to Aluko and Oyeboade (2024), the Nigeria Data Protection Act is an important step towards protecting personal data and strengthening digital governance. However, they argue that existing laws are not yet fully equipped to address AI-specific concerns such as transparency, explainability, and accountability of automated systems.

Birhane (2020) highlights another important issue facing many African countries: dependence on foreign technologies, datasets, and digital platforms. The study argues that African countries need governance systems that reflect their own social and economic realities rather than relying entirely on technologies developed elsewhere.

The World Bank (2024) also emphasizes that strong digital infrastructure, skilled human resources, and effective institutions are essential for AI readiness. Many developing countries still struggle with poor internet connectivity, shortages of technical expertise, and weak regulatory systems, which can limit the successful adoption and governance of AI.

The OECD Digital Government Review of South Korea (OECD, 2025) documents how Korea has successfully embedded AI into public service delivery through integrated digital infrastructure, presidential-level governance coordination, and a comprehensive legal framework. The NBR (2026) notes that South Korea's AI governance approach is distinguished by its human-centered ethics standards, AI Safety Institute, and risk-based regulation that has remained a shared political priority across successive governments, a governance stability that both India and Nigeria are yet to achieve.

Research Gap

Existing research has provided useful insights into AI governance, ethics, and digital transformation. However, most studies focus on either India or Nigeria separately and often examine governance and institutional readiness as independent issues. There is limited research that examines both AI governance and institutional preparedness together comparatively, and almost none that introduces a more advanced non-Western governance model as a reference benchmark. Research on India mainly discusses digital public infrastructure, national AI strategies, and data governance, while studies on Nigeria focus on emerging policies and institutional development. This study addresses that gap by analyzing and comparing legal frameworks, governance institutions, digital infrastructure, and human capital development

across India and Nigeria, with South Korea providing a calibration point for what effective AI governance implementation looks like in practice.

RESEARCH METHODOLOGY

The study adopts a qualitative comparative research approach with Indian and Nigerian AI governance frameworks as the two primary cases and South Korea as a reference case. The comparative case study approach allows for an in-depth understanding of governance structures, institutional capacities and policy processes in their socio-political context. India and Nigeria have been chosen as representative Global South democracies, allowing for a systematic examination of how they regulate AI and implement its use in the public sector.

The data are mainly gathered from national AI strategies and policies, government reports, legislation, national AI and regulatory documents, as well as institutional publications from official government portals and policy repositories. Secondary data are collected from academic literature, international reports, and digital governance indicators.

To ensure analytical consistency, this study employs a four-dimension analytical framework adapted from the OECD's AI Readiness Assessment Model and Wirtz et al.'s (2019) public sector AI governance taxonomy:

- 1) Policy and Legal Architecture; the existence, scope, and enforceability of national AI strategies and data protection legislation.
- 2) Institutional Architecture; the structure, mandate, and independence of AI governance bodies.
- 3) Digital Infrastructure; broadband penetration, data center capacity, and digital public infrastructure availability.
- 4) Human Capital Development; AI skilling programs, digital literacy rates, and brain drain risk.

Each dimension is assessed independently for both countries before comparative inferences are drawn, enabling a structured rather than narrative comparison.

AI GOVERNANCE: THE INDIAN FRAMEWORK

The National Strategy for Artificial Intelligence (2018), published by NITI Aayog, formally pioneered India's first step to the development of a regulatory framework to India's development. It was known as the "*AI for All*" strategy and outlined major sectors such as healthcare, agriculture, education, mobility and growth of Smart cities where AI can boost rapid transformations. The strategy emphasized inclusivity, affordability and social welfare, paving

the way for valuable innovation, scientific research and development across major sectors of the country.

Pivotal Developments in India's AI Framework

India has reached its pinnacle of progress today through the meticulous governance frameworks of its think tanks, planning commissions and statutory bodies that have played specific roles and responsibilities in its journey to technological independence. The Planning Commission of India, Niti Aayog, operates as the principal advisory body in the development of recommendations and sector-specific guidelines in India's socio-political landscape. Along with the Niti Aayog, the Ministry of Electronics and Information Technology (MeitY) governs and safeguards initiatives of digital innovation and technological governance with respect to strengthening AI projects. The Digital Personal Data Protection Act (DPDA), 2023 outlines conditions for digital privacy and individual consent by mandating the prior consent of users before the usage of personal data as training models for AI algorithms.

On 25th November, 2025, the much-awaited India AI Governance Guidelines was released by the Ministry of Electronics and Information Technology (MeitY). India's approach to AI governance is perfectly summed up and widely cited by IT Secretary S. Krishnan's words. He said, "India has consciously chosen not to lead with regulation but to encourage innovation while studying global approaches. Wherever possible, we will rely on existing laws rather than rush into new legislation". Essentially, the Indian government would modify existing legal frameworks to foster the growth of AI rather than completely transform its legal structures for citizen welfare.

Driving Principles and Underlying Limitations

Although Indian regulatory frameworks foster AI development with stringent principles such as inclusivity, transparency, accountability, fairness, etc, its effects have been historically underwhelming. Limitations surrounding the misuse of personal data by inappropriate use of algorithmic frameworks highlight a pressing need for AI-specific legislations. Contrary to the state's mandate of reworking existing laws to accommodate public welfare, it is crucial to understand that digital rights and the use and misuse of AI frameworks require its own legal framework in the era of digitalization. Other concerning aspects of AI frameworks lie in unequal accessibility to data across urban, rural and semi-urban regions where ignorance, illiteracy and ethical implications of data usage for decision-making creates greater cybersecurity risks across the country. When vulnerable groups become easy victims to cyber-threats, it becomes important to realize that clear lines of privacy and responsible use of information must be imparted through digital sensitization programmes for the youth and rural population of India.

INSTITUTIONAL READINESS IN INDIA

India has an unusual position in the global AI governance landscape. It is one of the world's most dynamic AI innovation ecosystems and a country where public sector institutions are still building the regulation to oversee the use of AI. This high innovation output and uneven governance depth define India's institutional AI readiness in 2026 more than any single policy document or ranking score. Understanding how India arrived at this position requires tracing the institutional architecture it has built since the National Strategy for Artificial Intelligence was published in 2018, examining what has been established, what remains proposed, and where the structural weaknesses lie.

Normative and Strategic Foundations

The report mandates that AI's benefits lie not just in the drive for economic growth and development, but also in its catalytic impact on inclusive growth. The “*#AIforAll*” strategy focused on five high-impact sectors (health, agriculture, education, smart cities infrastructure and smart mobility), and five critical barriers blocking its progress were also identified:

1. A lack of wider exposure and expertise in research and development.
2. A diminishing number of data ecosystems.
3. Expensive resources with little knowledge of its efficient utilization.
4. An absence of legislation concerning privacy and safety of both individuals and data.
5. The lack of collaborative opportunities and innovative spaces for AI growth.

To counter these, the strategy formulated a two-tiered institutional structure. The first tier, which is Centers of Research Excellence (COREs), functions for primary research. The second tier, International Centers for Transformational AI (ICTAIs) operate as instruments for deployment based on needs to fulfil specific sectoral objectives.

Implementation Architecture and Progress, 2020–2026

The Government of India issued valuable guidelines that standardized principles for the ethical use of AI, which is conducive for all persons from all social, economic and cultural backgrounds to bring secular, inclusive growth in the digital sphere in 2020 and 2021. Most importantly, the year 2023 signified a turning point in India's journey of digital governance with the passing of the Digital Personal Data Protection Act (DPDP), safeguarding individual consent, privacy and security in the modelling of algorithmic tools. In 2024, the IndiaAI Mission was launched with an outlay of 10,300 crores, seeking to fund indigenous research, build diverse AI platforms and to employ sovereign digital infrastructure. The 2025–2026 phase emphasizes strategic international cooperation, widening digital sovereignty and the expansion of digital infrastructure, with collaborative projects such as the India- UNESCO

partnership which brought about the *AI Readiness Assessment Report*. Initiatives like Yuvai have successfully built a diverse pool for AI talent, boosting employment opportunities targeting over one lakh students in India. This bears testament to AI's growing presence as an active model for education, employment and international security dialogue in the 21st century.

Institutional Readiness: Gaps, Governance and Data Ecosystems

In spite of legal and economic transitions in AI development and recognition, India's transitions with respect to AI institutional preparedness are far from transformative. According to the Oxford Insights Government AI Readiness Index released in 2025, India stands at the 27th position globally with a score of 66.55. This performance has been argued to be "middling...on governance, regulatory quality, and public-sector capability". A principal reason for these shortcomings lies in inefficiencies in data governance. The 2018 NITI Aayog Report identified the lack of encouraging data ecosystems as a persistent barrier to questions of data ownership, privacy, and quality. In 2026, this challenge persists, and it has been renamed as a problem of "semantic interoperability", referring to the fragmentation of sectoral unity due to the absence of a unified regulatory digital framework. The absence of a standardized AI Act is a dangerous legislative drawback that places India on a risky plane in an era where digital sovereignty is regarded as heavily as national sovereignty. A critical finding about India's AI governance position lies in the divergence between its Stanford Global AI ranking (3rd globally, driven by research output, talent, and startup activity) and its Oxford Insights Government AI Readiness ranking (27th globally). This gap of 24 positions captures a structural imbalance that pervades India's AI landscape: a dynamic and rapidly growing private-sector AI ecosystem operating within a public-sector governance architecture that is still developing the institutional depth and accountability mechanisms needed to oversee it effectively. This divergence- high innovation, middling governance, is the defining characteristic of India's AI readiness position and carries direct policy implications for the prioritization of regulatory investment over further innovation promotion.

Conclusion: From Strategic Competencies to State Capacities

The way forward for India's steady progress lies in the adoption and maintenance of a three-fold policy action plan by the planning bodies to balance sustainability, safety and secure digital sovereignty.

1. Legislations must operate beyond the boundaries of infrastructure and broaden its frameworks to incorporate useful investments in regulatory clarity and data governance.
2. An integrated policy for AI must be drafted and implemented, aligning digital and technological development with related areas of urban planning and the fruitful harnessing of semiconductor energy.

3. Institutional capacities to use and optimize AI usage responsibly must never be overlooked in the drive to technological advancement. No matter how flexible data flows may be, data ethics and lines of personal privacy must be clearly defined.

As Lloyd Mathias states, “India has a great opportunity to lead the AI revolution at scale, but opportunity without preparedness is a fragile advantage”.

AI GOVERNANCE FRAMEWORK IN NIGERIA

Artificial Intelligence has become a key strategic asset for Nigeria, the biggest economy and most populous nation in Africa, in the quest for economic growth and public sector transformation. As AI becomes increasingly present in industries like finance, healthcare, agriculture, and e-governance, the need for governance frameworks to ensure responsible AI use is becoming more apparent. While there is no specific AI bill in Nigeria, the country has made significant strides with policy efforts, data protection measures, and institutional changes.

The Federal Ministry of Communications, Innovation and Digital Economy (FMCIDE), in partnership with the National Information Technology Development Agency (NITDA), leads AI governance efforts. They have been actively working on the National Artificial Intelligence Strategy (NAIS) 2024, a national guiding document for the development and governance of AI. The plan seeks to make Nigeria the top country in the world in terms of the development of AI in its economy through innovation, infrastructure development, human talent building, and responsible AI practices.

National Artificial Intelligence Strategy (NAIS): The three main goals of the NAIS are: supporting economic growth and competitiveness, social development and inclusion, and technological innovation. It takes a human-centered, risk-based approach to AI governance, requiring transparency, accountability, fairness, and respect for human rights. The strategy has been structured into five main pillars that support the AI governance framework in Nigeria.

Pillar	Objective	Governance Relevance	Status / Notes
1. Foundational AI Infrastructure	Establish high-performance computing centers and clean energy AI clusters	Enables auditable AI systems	Under implementation (NAIS 2025–2029)

An Independent Youth-Led Think Tank

2. AI Ecosystem Development	Create AI centers of excellence and partnership platforms	Supports capacity building for governance	NCAIR active; accelerators being established
3. AI Adoption & Sector Transformation	Industry-specific AI roadmaps in healthcare, agriculture, and finance	Requires sectoral oversight mechanisms	CBN sandbox operational; NAFDAC guidelines pending
4. Responsible & Ethical AI Development	Establish a National AI Ethics Commission	Direct ethical governance mechanism	Ethics Expert Group (AIEEG) proposed; NEAIF published 2026
5. Robust AI Governance Framework	Create clear governance structures, national AI principles, a regulatory body, and a risk management framework	Core governance pillar	Independent regulatory body not yet constituted (as at 2026)

Source: Compiled by the author from Regulations.AI (2024); OECD.AI (2025); NCAIR/NITDA (2024). Core Pillars of the NAIS Governance Framework

In a significant development announced in London in June 2026, the Honourable Minister Dr. Bosun Tijani confirmed that Nigeria's Federal Executive Council (FEC) has approved the creation of the National AI Trust, an institution mandated to mobilize resources for AI development, guide responsible AI adoption across sectors, and provide strategic stewardship of Nigeria's AI ecosystem. This approval represents a concrete and landmark step toward operationalizing the governance framework envisaged under NAIS Pillars 2 and 5, and signals a meaningful transition from policy articulation to institutional creation. The National AI Trust's mandate to guide responsible AI adoption and resource mobilization directly addresses the governance gap identified in the absence of a unified AI oversight mechanism (FMCIDE, 2026).

Supporting Legal and Regulatory Instruments

Nigeria Data Protection Act (NDPA) 2023

Nigeria's AI governance framework is supported by the Nigeria Data Protection Act (NDPA) 2023, which is the main law governing the collection, processing, and use of personal data. The Act establishes key principles such as lawful data processing, transparency, accountability, data protection rights, security safeguards, and rules for cross-border data transfers.

These provisions are important for AI governance because they help protect personal information and ensure that AI systems operate in line with privacy and accountability standards. The Act also established the Nigeria Data Protection Commission (NDPC), which is responsible for enforcing data protection regulations and protecting citizens' privacy rights. As AI systems depend heavily on large volumes of data, the NDPA provides a crucial legal foundation for the responsible development and deployment of AI in Nigeria.

Overview of Key Legal and Regulatory Instruments

While the NAIS is a strategy document, several existing laws and proposed instruments provide foundational governance, as summarized

Key Legal and Regulatory Instruments Relevant to AI Governance in Nigeria

Instrument	Governance Relevance	Status
Nigeria Data Protection Act (NDPA) 2023	Protects personal data used in AI; covers data security, cross-border transfer, and individual rights	Enacted; operational rules effective September 2025 (Aluko & Oyeboode, 2024)
Nigerian Ethical AI Framework (NEAIF)	Independent ethical governance layer addressing data sovereignty, bias mitigation, transparency, and accountability	Open-access preprint (2026); complements NAIS (This Day Live, 2026)
Cybercrimes Act 2015 (amended 2024)	Addresses AI-specific cybersecurity vulnerabilities	Enacted (NCAIR/NITDA, 2024)
National Digital Economy and E-Governance Bill (proposed)	Would grant NITDA formal authority over algorithms, data governance; introduces risk-based AI regulation with mandatory audits	Expected approval by March 2026 (NITDA, 2026)

Source: by the author from Aluko & Oyeboode (2024); This Day Live (2026); NCAIR/NITDA (2024); NITDA (2026).

Key Regulatory Institutions

- ***Nigeria Data Protection Commission (NDPC):*** The NDPC's role is to ensure compliance with data protection laws, to enforce them and to safeguard citizens' personal data. It is an important institution in the digital and AI governance ecosystem in Nigeria.
- **The National Centre for Artificial Intelligence and Robotics (NCAIR):** NCAIR is an initiative of NITDA that supports AI research and innovation, capacity development and responsible development of emerging technologies. It facilitates the realisation of the Nigeria AI strategy through research and stakeholders' engagement.
- **Sectoral Regulators:** AI governance is a multi-sectoral effort, with several sector-specific agencies playing a part. The Nigerian Communications Commission (NCC) is responsible for regulating telecommunications and digital infrastructure, and the Central Bank of Nigeria (CBN) is responsible for regulating AI applications in the financial sector. NAFDAC and the Ministry of Health regulate the healthcare sector.
- **International Alignment** The regulatory and policy landscape of AI in Nigeria is generally consistent with international norms and standards, including the OECD AI Principles, which emphasize principles of transparency, accountability, human-centered values, and responsible innovation.

While Nigeria has achieved substantial efforts in the governance of AI, there are still considerable challenges. This involves a lack of AI-specific legislation, poor coordination between different regulatory bodies and lack of guidance on algorithmic transparency, fairness and accountability. These gaps will play a crucial role in ensuring the effective and responsible governance of AI in Nigeria.

INSTITUTIONAL READINESS IN NIGERIA

Nigeria's readiness for AI governance can be assessed across three dimensions: capacity building and human capital development, institutional progress, and persistent structural challenges.

Capacity building and human resource development.

Building AI capacity has been a priority in Nigeria with initiatives such as the 3 Million Technical Talent (3MTT) Program to support the development of digital and AI skills among young people. The Nigeria Artificial Intelligence Research Scheme (NAIRS) is designed to encourage AI research and innovation by way of funding and institutional partnerships. Also, NCAIR fosters AI literacy, startup development, and professional training to bolster thnational AI ecosystem.

Institutional Progress

AI governance initiatives in Nigeria have come a long way with the implementation of the NAIS, strengthening of institutions, and increased use of AI in critical sectors like finance, health, education, and public administration. International collaborative partnerships and investments have also been used to build institutional capacity and to develop policy.

Institutional Readiness

Recently, the Federal Executive Council's June 2026 approval of the National AI Trust reassures a bright future and marks a big shift in Nigeria's institutional AI readiness journey. The Trust is designed to function as a stewardship body for AI development, providing the kind of centralized resource mobilization and responsible adoption guidance that has been identified as a structural gap in Nigeria's governance architecture, this development represents the highest-level institutional commitment to AI governance Nigeria has made to date. Its establishment, if effectively operationalized, could begin to address the regulatory fragmentation challenge that has characterized Nigeria's multi-agency AI oversight landscape (FMCIDE, 2026).

Persistent Challenges

Although these developments have been achieved there are still some issues that need to be addressed. The availability of limited infrastructure is a barrier, including poor broadband internet connectivity (48.15% penetration as of April 2025, below the 70% government target), computing power, research facilities, etc. There are governance gaps and coordination challenges due to the lack of regulatory coordination and a comprehensive law on AI itself. The issue of human resources shortage, brain drain and absence of technical skills in public institutions affects the effectiveness of the regulation as well. Also, data quality, access, interoperability, and privacy are still major hurdles in the creation and management of AI.

Future Prospects

With Nigeria's large youth population and growing economy while technology is in its infancy, it is no surprise that there is tremendous potential for AI development in the country. Investments in digital infrastructure, education, research and regulatory development can further build institutional readiness. When governance, infrastructure and capacity gaps have been appropriately addressed, Nigeria has the potential to become one of the leading centers for responsible and inclusive AI governance in Africa.

AI GOVERNANCE FRAMEWORK IN SOUTH KOREA

South Korea is introduced in this study not as a third subject of comparative analysis equal to India and Nigeria, but as a reference case. A country that has successfully navigated the transition from AI policy ambition to institutional and legislative reality, and whose governance trajectory offers concrete, actionable lessons for developing economies. South Korea's journey from its first National AI Strategy in 2019 to the enactment of the world's second comprehensive AI law in December 2024 represents a governance maturation arc that both India and Nigeria are currently midway through.

National AI Strategy and Legislative Framework

South Korea's AI governance formally started with the National Strategy for Artificial Intelligence (2019), published by the Ministry of Science and ICT (MSIT). The strategy outlined a progressive vision to become the top three global AI leaders by 2030, anticipated to generate economic benefits of up to 455 trillion won and create 7.3 million new jobs (Digital Watch Observatory, 2024). This vision was implemented through successive phases of policy development, including the Framework Act on Intelligent Informatization and, most significantly, the Framework Act on Artificial Intelligence Development and Establishment of a Foundation for Trustworthiness, commonly known as the AI Basic Act.

Passed by the National Assembly on 26 December 2024 and taking effect on 22 January 2026, the AI Basic Act became the world's second comprehensive national AI law after the EU AI Act, and the first in the Asia-Pacific region (FPF, 2025; Stimson Center, 2026). The Act establishes a risk-based governance framework with particular obligations for high-impact AI systems deployed in critical sectors including healthcare, education, finance, employment, and essential public services. Operators of high-impact AI systems must ensure continuous human oversight, notify users when interacting with AI-generated content or decisions, conduct risk assessments, maintain documentation, and implement effective control measures (Regulations.AI, 2025). Foreign AI providers are required to appoint a local representative for regulatory communications, giving the Act meaningful extraterritorial reach.

Critically, the AI Basic Act was designed with what South Korean lawmakers described as an 80-90% emphasis on industry promotion rather than restriction, a deliberate innovation-first posture that parallels India's approach but is embedded in a more mature legal framework (Stimson Centre, 2026). The Act also provides substantial public support for private sector AI development through AI data centres, training data access programmes, and technological standardization support for SMEs and start-ups.

Institutional Architecture

South Korea's AI governance architecture is supported by two institutions established in 2024, which collectively drive the country's AI governance ecosystem. The National AI Strategy Committee, operating under the President's Office, functions as the primary coordinating body for national AI policy. This body manages policy implementation of the national AI strategy, promotes public-private collaboration, aligns regulatory approaches across ministries, and represents South Korea in international AI governance initiatives. During its first plenary session in September 2025, the Committee adopted the Korea AI Action Plan as the government's overarching master plan, alongside eight subcommittees covering Technology Innovation, Data, Global Cooperation, Society, Science and Talent, Defence and Security, Industrial Applications, and Public-Sector Applications (ITIF, 2025).

Also a dedicated research centre responsible for evaluating advanced AI models, developing safety benchmarks, and addressing deepfake and cybersecurity risks was established in November 2024, making South Korea the sixth country in the world to create a national AI Safety Institute, following the London AI Safety Summit. Korea AISI actively participates in the AISI International Network across ten countries (NBR, 2026). In February 2026, the National AI Strategy Committee finalized the Korea AI Action Plan 2026-2028, a comprehensive statutory roadmap under Article 6 of the AI Basic Act containing 99 execution tasks and more than 300 policy recommendations developed through extensive public consultation and interagency collaboration (Regulations.AI, 2026).

A third institutional innovation directly relevant to India and Nigeria is the Board of Audit and Inspection (BAI), which runs annual audit plans including focused assessments on AI ecosystem development to ensure government AI initiatives meet public-interest standards and risk-management protocols (OECD, 2025). This independent audit function is precisely the kind of accountability mechanism that both India and Nigeria's governance frameworks currently lack.

Digital Infrastructure and E-Government

South Korea's digital infrastructure provides the most instructive contrast with India and Nigeria. In the UN's 2024 E-Government Development Index (EGDI), South Korea ranked 4th of 193 countries with an EGDI score of 0.9679, and its Online Service Index reached the ceiling score of 1.000, reflecting a government service delivery model built on integrated portals and inter-agency operability (Digital Watch Observatory, 2024). The Government24 platform covers approximately 12,000 public services, with around 1,300 available for cross-agency application, representing the kind of unified, citizen-centric AI-ready infrastructure that India is building toward with its DPI stack and Nigeria is yet to establish.

On AI-specific infrastructure, South Korea's 2026 national AI infrastructure strategy aims to secure 18,000 high-performance GPUs by mid-2026, with 10,000 deployed through a public-private National AI Computing Centre and 8,000 as part of a sixth national supercomputer (Digital Watch Observatory, 2026). South Korea's R&D investment for national strategic technologies stands at approximately 8.6 trillion won (US\$5.66 billion) for the 2024-2028 period (Stimson Center, 2026). These figures represent a qualitatively different scale of state infrastructure investment compared to India's IndiaAI Mission (INR 10,300 crore) and Nigeria's growing computing capacity.

Human Capital Development

South Korea's approach to AI human capital development offers both a model and a cautionary note for India and Nigeria. In November 2025, the South Korean government announced an investment of approximately 1.4 trillion won (approximately US\$1 billion) for AI talent development in 2026 alone, including training 11,000 high-level AI specialists and expanding AI education from elementary through postgraduate levels under the national "AI Talent Development Plan for All" (British Council, 2025; Korea Herald, 2025). A fast-track programme allows outstanding students to complete bachelor's, master's, and doctoral degrees in 5.5 years rather than the typical eight-plus years, directly targeting the supply of elite AI researchers.

However, South Korea's experience on human capital retention carries a direct and cautionary lesson for both India and Nigeria. Despite ranking 6th globally in overall AI competitiveness on the 2024 Global AI Index (Tortoise Media), South Korea ranked only 13th in the talent category and suffers the OECD's fourth-largest AI brain drain (Korea Herald, 2025). This finding is analytically significant, even a country with South Korea's infrastructure, investment levels, and governance maturity has not fully resolved the human capital retention challenge. For India and Nigeria, it underscores that talent development programmes alone are insufficient without complementary ecosystem conditions, competitive salaries, research funding, and institutional environments, that make it worthwhile for skilled professionals to remain.

AI Ethics and Safety Governance

South Korea's approach to AI ethics is distinguished by its layered, institutionalized structure. The National AI Ethics Standards, developed by MSIT and finalized in 2020, established a voluntary national ethics framework guided by "human-centered AI" as a supreme value, operationalized through three foundational principles and ten core requirements including human rights, fairness, safety, accountability, and transparency (NBR, 2026). This non-binding framework preceded the AI Basic Act and provided the guiding foundation for its later legislative development, a model that both India (through its AI Governance Guidelines) and Nigeria (through the NEAIF) are implicitly following.

The AI Basic Act further mandates transparency and accountability through Article 30, which supports testing and certification of AI safety and trustworthiness. South Korea has also carried out AI ethics impact assessments based on UNESCO's methodology since 2020, and has established domain-specific guidelines for AI developers across sectors (NBR, 2026). This multi-layered approach, combining voluntary ethics standards, sector-specific guidelines, and binding legislative obligations, offers a governance architecture that is both more comprehensive and more operationally realistic than the single-instrument approaches currently pursued by India and Nigeria.

AI Readiness Benchmark

South Korea's position on international AI readiness benchmarks provides a concrete performance calibration point for this comparative study. On the 2024 Government AI readiness Index compiled by Oxford Insights, South Korea scored 79.98, ranking 2nd in East Asia after Singapore and placing within the global top tier. An alternative 2026 AI Readiness Index places South Korea 3rd globally with a score of 79.98, behind only the United States (87.03) and Singapore (84.25) (index.dev, 2026). Compared to India's score of 66.55 (27th) and Nigeria's improvement from 94th to 72nd on the same Oxford Insights index, South Korea's governance position represents not merely a quantitative advancement but a qualitatively different institutional ecosystem.

COMPARATIVE ANALYSIS

The comparative analysis applies the four-dimension analytical framework across all three countries, India, Nigeria, and South Korea. The inclusion of South Korea transforms the analytical architecture from a comparative study of two developing-country into a triangular framework where South Korea functions as a governance benchmark, enabling both India and Nigeria to be assessed not only against each other but against a demonstrably successful implementation model.

Institutional Architecture

Architecture of institutions is an important measure of AI governance readiness. NITI Aayog and Ministry of Electronics and Information Technology, MeitY are responsible for AI governance in India, with the IndiaAI Mission responsible for research, infrastructure, skilling, and AI applications. India has been placed on the 27th position in the Oxford Insights Government AI Readiness Index 2025, showcasing good progress in AI development but the need to address governance issues.

The Federal Ministry of Communications, Innovation and Digital Economy (FMCIDE) and NITDA are the key stakeholders in AI governance in Nigeria. The National Centre for Artificial Intelligence and Robotics (NCAIR), is the central research institute of the country, dedicated

to AI. But the powers of regulation are diffused across several agencies, including the Central Bank of Nigeria, the Nigerian Communications Commission and NAFDAC. Although Nigeria is still facing governance issues, the country has improved from 94th to 72nd position in the 2024-2025 iteration of the Oxford Insights AI Readiness Index, reflecting improved institutional capacity.

Comparative Institutional Architecture

The following table provides a structured comparison,

Indicator	India	Nigeria	South Korea (Reference)
Digital Infrastructure	Unified DPI stack (Aadhaar, UPI, DigiLocker); 45th on Network Readiness Index	No equivalent unified DPI stack; 48.15% broadband penetration; 132nd in internet speed	Government24: 12,000+ public services; UN EGDI score 0.9679 (4th globally); Online Service Index at (1.000)
AI Computing Infrastructure	IndiaAI Mission; 38,000+ GPUs onboarded	NCAIR active; no national AI computing center	18,000 high-performance GPUs targeted by mid-2026; National AI Computing Centre (public-private)
Primary Skilling Programme	IndiaAI FutureSkills; AI in 1,000+ institutions	3MTT; 135,000 trained by 2026	AI Talent Development Plan for All; ₩1.4 trillion won (\$1B) invested in 2026; 11,000 high-level specialists targeted
Brain Drain Risk	Moderate	Explicitly acknowledged as structural challenge in NAIS	4th highest AI brain drain in OECD despite advanced ecosystem; cautionary lesson for India and Nigeria
Digital Literacy Rate	High in urban areas; uneven across states	43-50% below 60% government target	Among world's highest; consistent digital education investment since 1990s

Source: Oxford Insights (2025); NITDA (2024); British Council (2025); Korea Herald (2025); Digital Watch Observatory (2024); index.dev (2026). South Korea column additions highlighted in blue.

Infrastructure and Capacity Building

Infrastructure and human capital are essential for effective AI governance. India has a significant advantage through its Digital Public Infrastructure ecosystem, including Aadhaar, UPI, and Digi Locker, which supports large-scale digital service delivery and AI adoption. While Nigeria on the other hand faces greater infrastructure challenges, with broadband penetration and internet connectivity remaining below national targets. However, the country

is making progress through investments in digital infrastructure and technology development. In terms of human capital, India has expanded AI education through the India AI Future Skills progra across numerous engineering institutions. Nigeria has also strengthened capacity-building through its 3 million Technical Talent program, which has trained thousands of technology professionals. Despite these efforts, challenges such as low digital literacy levels and the migration of skilled AI professionals continue to affect Nigeria's AI readiness.

Comparative Infrastructure and Capacity Building Indicators

Indicator	India	Nigeria	South Korea (Reference)
Digital Infrastructure	Unified DPI stack (Aadhaar, UPI, DigiLocker); 45th on Network Readiness Index	No equivalent unified DPI stack; 48.15% broadband penetration; 132nd in internet speed	Government24: 12,000+ public services; UN EGDI score 0.9679 (4th globally); Online Service Index at (1.000)
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Key Lessons South Korea Offers India and Nigeria

The comparative analysis yields five concrete governance lessons that India and Nigeria can derive from South Korea's experience:

Lesson 1. Legislation first, then enforcement architecture: South Korea's progression from voluntary ethics guidelines (2020) to sector-specific guidance to binding AI law (2024) demonstrates that a sequenced approach building guiding consensus before legislating

produces more durable and operationally realistic regulatory frameworks than attempting to legislate prematurely. Both India and Nigeria should accelerate their AI-specific legislation with this sequenced model in mind.

Lesson 2. Separate promotion from regulation structurally: South Korea's AI Safety Institute is institutionally distinct from MSIT's promotional functions, resolving the conflict of interest that afflicts both NITDA in Nigeria and MeitY in India. Establishing genuinely independent oversight bodies, and not divisions within promotional agencies, is the single most critical institutional reform both countries need.

Lesson 3. Presidential-level coordination is the governance multiplier: The National AI Strategy Committee, chaired at presidential level with cross-ministry participation, resolves the inter-agency coordination problem by placing AI governance above any single ministry's jurisdiction. Nigeria's National AI Trust and India's AI governance guidelines should similarly be elevated to cross-ministerial accountability structures.

Lesson 4. Infrastructure investment must precede AI deployment at scale: South Korea's 18,000 GPU target, National AI Computing Centre, and Government24 integrated services platform reflect an understanding that AI governance is only as effective as the infrastructure it governs. Nigeria's 90,000km fibre gap and India's semantic interoperability problem must be resolved before AI-driven public service delivery can achieve overall effect.

Lesson 5. Brain drain is a structural problem that investment alone cannot solve: South Korea's 4th-highest OECD AI brain drain despite its US\$1 billion talent investment demonstrates that human capital retention requires ecosystem conditions, competitive research environments, institutional culture, and career pathways, not just training numbers. India and Nigeria must design retention strategies alongside skilling programmes.

FINDINGS AND DISCUSSION

Both India and Nigeria have national AI strategies that priorities inclusive, human-centered, and development-oriented AI governance. India's governance framework has progressed from the NSAI (2018) to the IndiaAI Mission (2024), reflecting a more operationalized institutional trajectory. Nigeria's National AI Strategy (2024) adopts a comparable risk-based, human-centered approach and is currently in early implementation, though the Federal Executive Council's June 2026 approval of the National AI Trust marks a significant step toward translating that strategy into institutional reality (FMCIDE, 2026).

Currently, there are no specific AI laws in either country. However, data protection mechanisms form the backbone of AI governance in both countries, with the Digital Personal Data

Protection Act (2023) in India and Nigeria's Data Protection Act (2023). These laws offer protection for personal data, but are less effective in tackling AI-related issues like algorithmic accountability, transparency, and risk classification. The influence of global norms of AI governance is also growing, with both countries adopting international governance principles such as those of the OECD, UNESCO and the European Union.

South Korea's AI Basic Act (2026) directly addresses these gaps: it mandates human oversight of high-impact AI systems, requires transparency notifications to users, and establishes risk assessment obligations absent from both India's and Nigeria's current legal frameworks. The existence of the AI Basic Act demonstrates that developing an AI-specific legal framework is achievable, and its risk-based, innovation-friendly design offers a template that fits both countries' governance goals.

Institutional Architecture

The institutional landscape is comparatively more cohesive in India, with NITI Aayog, MeitY, and IndiaAI Mission playing a pivotal role in guiding the policy implementation and capacity building efforts. While there has been substantial growth, there is still a disparity between the robust AI innovation ecosystem and public-sector capacity for governance in India.

FMCIDE, NITDA and NCAIR are the lead agencies for AI governance in Nigeria. The country has seen significant progress in the readiness for AI, but both the roles and authorities of the coordinating institutions are divided. The institutional issue is a common one in both countries, as the promotional and regulatory roles of the lead AI agencies are intertwined, and there are concerns about regulatory independence and accountability.

South Korea's structural resolution of this tension is through an institutionally independent Korea AISI and a presidential-level National AI Strategy Committee, which demonstrates that the promotional-regulatory conflict is a design choice, not an inherent feature of AI governance. Neither India nor Nigeria has yet made this structural separation, and both are paying the governance credibility cost.

CHALLENGES AND ETHICAL CONCERNS

The use of artificial intelligence in public administration is growing, leading to several governance and ethical concerns for India and Nigeria. These challenges are all linked to limited regulatory capacity, digital inequality and reliance on foreign technologies. These challenges include:

- **Accountability and Transparency:** AI systems are now being used for many different purposes, such as welfare and healthcare, and for public services. However, there are

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no clear policies in both countries to allow for transparency, explanation and accountability of AI decision making.

- **Bias and Discrimination:** If trained with biased data, AI systems can result in unfair outcomes. Discrimination is a concern for gender, income, place, social status and others, where there are not many means to identify and rectify bias.
- **Privacy and Surveillance:** There are concerns about privacy rights and government surveillance with the use of AI. There are some data protection laws in both countries, however, they are still in their infancy when it comes to data protection for AI-driven monitoring and use of data.
- **Digital Exclusion:** In rural and marginalized areas, there is a risk of some groups being unable to access AI-driven public services due to unequal access to digital infrastructure.
- **Regulatory Capacity:** AI technologies are constantly changing, and regulatory institutions may not have the necessary expertise and resources to effectively regulate them.
- **Technological Dependence:** Both countries are dependent on external technologies and cloud services, raising fears of data sovereignty and technological self-sufficiency.

Lessons to Note from South Korea: South Korea's experience demonstrates that ethical challenges do not disappear with governance maturity; even with the AI Basic Act and the Korea AISI, challenges around one-size-fits-all regulation, implementation timeline pressures, and persistent brain drain remain (Stimson Center, 2026). For India and Nigeria, this indicates that governance development is a continuous process rather than a destination.

POLICY RECOMMENDATIONS

Recommendation	India Specific Action	Nigeria Specific Action	Measurable Target
1. Establish Independent AI Regulatory Bodies	Constitute a standalone AI Regulatory Authority separate from MeitY by 2026, with mandate over algorithmic audits and accountability.	Constitute the proposed National AI Ethics Commission and independent regulatory body by end of 2026 as mandated under NAIS Pillar 5	Both countries: regulatory body operational by December 2026; first AI audit completed by June 2027

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2. Establish AI-Specific Legislation	Introduce standalone AI Act addressing algorithmic accountability by 2027	Pass the National Digital Economy and E-Governance Bill and supplement with dedicated AI liability provisions by 2027	Draft AI Bills tabled in respective legislatures by Q2 2027; enacted by Q4 2027
3. Resolve Institutional Conflicts of Interest	Structurally separate MeitY's promotional and regulatory functions; establish regulatory division with independent reporting line	Structurally separate NITDA's promotional and regulatory roles; assign regulatory authority to NDPC or new independent body	Separation of functions completed within 18 months of legislative reform
4. Invest in Digital Infrastructure	Standardize 288 priority datasets for AI-readability via MoSPI's semantic interoperability protocol by 2027	Close 90,000km fibre gap; achieve 70% broadband penetration by 2027	Nigeria: 60% broadband penetration by 2027; India: 288 datasets standardized by Q3 2027
5. Strengthen Data Governance	Mandate DPIAs for all public AI systems; enforce DPDPA audits annually	Operationalize NDPA enforcement fully; require AI-specific DPIAs for all government AI procurement from 2026	100% of public-sector AI systems subject to DPIA by end of 2027; annual compliance reports published
6. Adopt South Korea-Inspired Presidential-Level AI Coordination	Elevate AI governance coordination above MeitY to a cross-ministerial committee reporting to the Prime Minister	Elevate the National AI Trust to a cross-ministerial committee with presidential mandate, modelled on Korea's National AI Strategy Committee	Cross-ministerial AI coordination body established and operational within 12 months

Source: Compiled by the author based on comparative analysis findings.

CONCLUSION

The comparison of India and Nigeria demonstrates the challenges faced by many developing countries in realizing their high-level AI policies in practice. Both countries have seen the potential of Artificial Intelligence in transforming the world and have positioned AI as a priority

in their development plans, yet the capacity of governance mechanisms, regulations and implementation, determines the effectiveness of such programs.

India has made significant efforts with the IndiaAI Mission (2024) and NSAI (2018), facilitated by strong digital public infrastructure and growing AI investment in research, innovation and skill development programs. Nonetheless, governance gaps remain in transparency, accountability, algorithmic fairness, and independent oversight.

Nigeria has also made institutional progress, by improving from 103rd to 94th to 72nd on the Oxford Insights AI Readiness Index across 2023-2025, the fastest growth of improvement among African nations. The NAIS (2024) and the NDPA (2023) provide a credible policy foundation. However, foundational constraints in broadband infrastructure, regulatory fragmentation, data governance, and the absence of an independent AI regulatory body remain the primary barriers to translating policy ambition into implementation reality.

Most significantly, the Federal Executive Council's June 2026 approval of the National AI Trust to mobilise resources and guide responsible AI adoption represents the most concrete evidence that Nigeria's governance ambitions are beginning to translate into institutional reality. Announced by the Honourable Minister Dr. Bosun Tijani in London, this development directly addresses the governance gap that this study identified as the defining characteristic of Nigeria's institutional AI readiness position: the gap between strategic commitment and institutional creation (FMCIDE, 2026).

South Korea's governance trajectory provides the most instructive reference point for both countries. Its progression from the 2019 National AI Strategy to the 2026 AI Basic Act, over seven years of sequenced policy development, institutional construction, and legislative maturation, is the arc that both India and Nigeria are navigating. The critical lesson is not that India and Nigeria should replicate Korea's model, but that the gap between ambition and institutional reality can be closed with deliberate, sustained, and politically prioritized governance investment. South Korea's National AI Strategy Committee (presidential coordination), Korea AISI (independent oversight), and the AI Basic Act (enforceable obligations) together represent the three institutional pillars that both India and Nigeria are still building toward.

One of the key outcomes of the study is that neither India nor Nigeria currently has a comprehensive and dedicated legal framework specifically designed to regulate artificial intelligence (AI). While the existing governance approaches are somewhat useful, they primarily rely on data protection and digital governance frameworks, which are inadequate for addressing the new challenges and risks posed by algorithms, automated decision-making, explainability, accountability, and digital governance. Also, the merging of promotional, regulatory, and institutional functions can create conflicts of interest, which may undermine the effectiveness of governance in this area.

In conclusion, the study highlights the fact that successful AI governance is more than just vision and technology. It emphasizes the need to strengthen institutions, frameworks, oversight and investment in human capital and digital platforms. AI governance readiness will be determined not by the strategies written, but by the capacity of the institutions tasked with implementing those strategies every day. Investing in institutional independence, regulatory resourcing, and human capital development within the public sector is not a secondary concern to be addressed after AI ecosystems mature, it is the foundational work that makes responsible AI governance possible. Both India and Nigeria have demonstrated the vision. South Korea has demonstrated what implementation looks like. The task now is closing the gap between them. India and Nigeria must also invest in their long-term sustainability ensuring that AI governance institutions are financially independent, free from politically influence, and technically adaptive enough to remain effective as AI capabilities evolve and international development partnerships change.

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