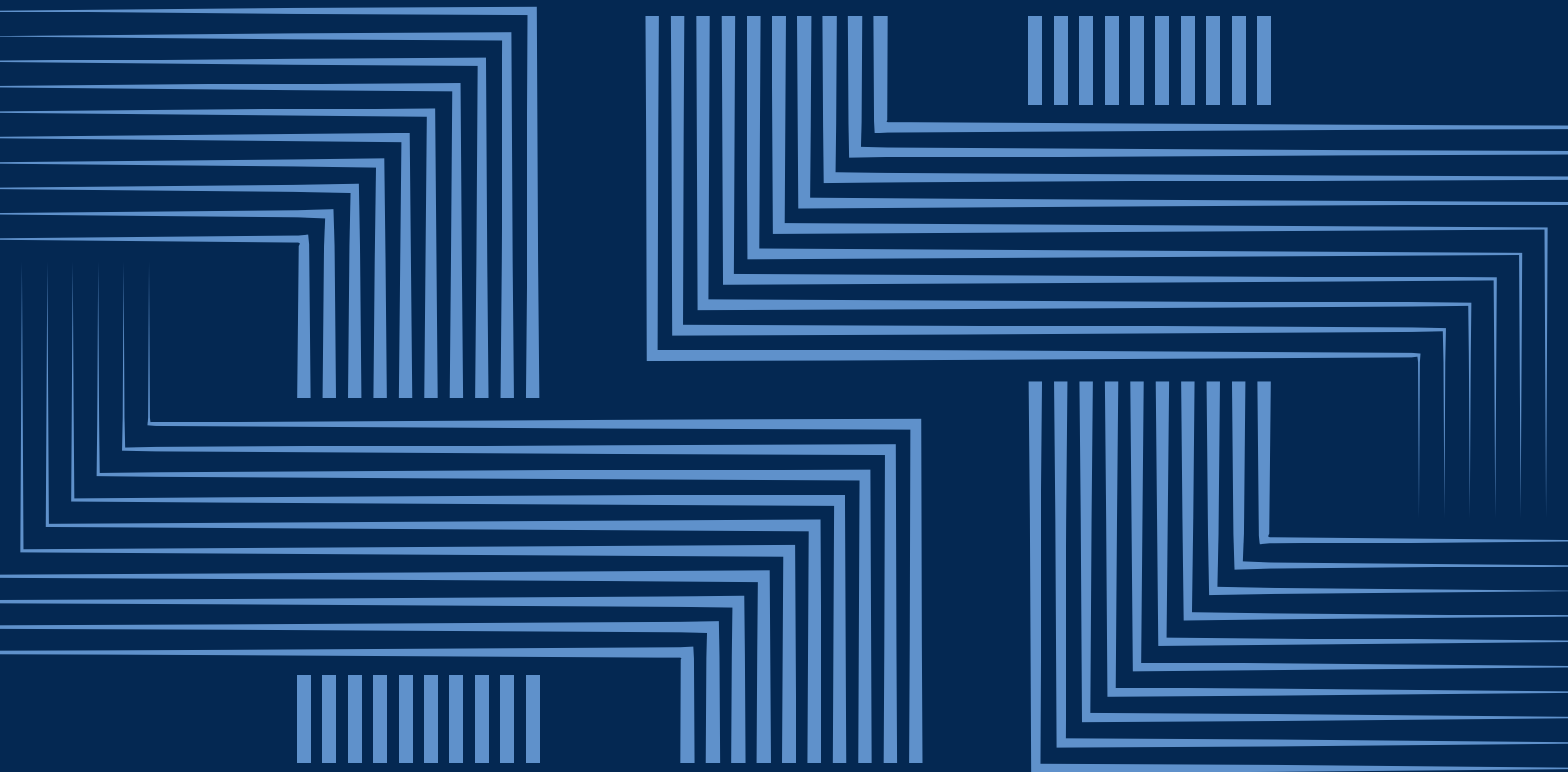


# Nigeria's National AI Strategy

Ambition, Execution Gap, and the Path to Credible Implementation

Alhassan Pereira Ibrahim



## Abbreviations

3MTT	Three Million Technical Talent
AIEEG	AI Ethics Expert Group
AIGN	Artificial Intelligence Governance Network
AfDB	African Development Bank
C4IR	Centre for the Fourth Industrial Revolution
CIPIT	Centre for Intellectual Property and Information Technology Law
FMCIDE	Federal Ministry of Communication, Innovation and Digital Economy
HPC	High-Performance Computing
IFC	International Finance Corporation
ICLR	International Conference on Learning Representations
IMF	International Monetary Fund
LLM	Large Language Model
MDA	Ministry, Department and Agency
N-ATLAS	Nigerian Atlas for Languages and AI at Scale
NAIS	National Artificial Intelligence Strategy
NAIRS	National Artificial Intelligence Research Scheme
NAPCE	Nigerian AI Partnership for Commercialisation Excellence
NDPA	National Data Protection Act
NDPS	National Digital Economy Policy and Strategy
NCAIR	National Centre for Artificial Intelligence and Robotics
NDPC	Nigeria Data Protection Commission
NERDC	Nigerian Educational Research and Development Council
NITDA	National Information Technology Development Agency
NCC	Nigerian Communications Commission
OECD	Organisation for Economic Co-operation and Development
TRAIN	Top Ranked AI Nations Index
UNDP	United Nations Development Programme
WEF	World Economic Forum

**EXECUTIVE SUMMARY**

- Nigeria's NAIS (2025) is a competent strategic document with a clear five-pillar architecture and an ambitious global-leadership vision.
- A significant implementation gap exists: the strategy contains few binding commitments, measurable KPIs, or dedicated budget lines.
- Despite plans to boost workforce (3MTT, N-ATLAS LLM), Nigeria loses talent internationally, and lags peers on infrastructure, governance, and R&D spending (0.2% GDP vs. 2.2% global average).
- Rwanda and Kenya offer concrete peer lessons — Rwanda's WEF-backed execution framework and Kenya's phased roadmap with implementation milestones outperform Nigeria's approach in operational specificity.
- Five priority actions are recommended: establish an independent AI Governance Body; secure ring-fenced R&D funding; publish a binding KPI dashboard; fast-track compute infrastructure; and ratify an AI-specific legislative framework.

**1. Introduction and Context**

Nigeria's September 2025 National Artificial Intelligence Strategy (NAIS) represents the country's most comprehensive attempt to position itself in the global AI race. Developed by the Federal Ministry of Communication, Innovation and Digital Economy (FMCIDE), and supported by National Information Technology Development Agency (NITDA) the National Centre for Artificial Intelligence and Robotics (NCAIR), the strategy articulates a vision **"to be a global leader in AI, leveraging ethical and inclusive innovation, local talent, and strategic collaboration to drive sustainable development."** This brief evaluates that strategy through empirical and comparative lenses.

Nigeria arrives at this moment from a relatively weak baseline. The country ranked 94th in the 2024 Oxford Insights Government AI Readiness Index (up from 103rd in 2023, a nine-position gain driven almost entirely by the strategy's publication). It sits 73<sup>rd</sup> of 83 in the Global AI Index 2024, and is ranked last out of 25 countries in the Top Ranked AI Nations (TRAIN) Index published by Tufts University's Fletcher School. It is against this backdrop that the NAIS is assessed not just as a vision document, but as an operational instrument capable of translating ambition into measurable outcomes.

**2. Analytical Framework**

This brief applies three complementary analytical lenses:

Framework	Core Question	Applied Here
Policy Evaluation	Is the policy grounded in evidence? Does it align intent with institutional capacity?	NAIS pillar coherence, risk analysis, evidence base quality
Strategy Assessment	Does the governance architecture match the risk profile of the technology?	Pillar 5 (Governance) adequacy; ethics body independence; regulatory gaps

Framework	Core Question	Applied Here
Comparative Peer Analysis	How does the strategy compare in specificity, implementation, and outcomes to peer nations?	Nigeria vs. Kenya (2025) and Rwanda (2023) on structure, execution, and readiness indices

### 3. What the NAIS Gets Right

#### 3.1 Process Legitimacy and Stakeholder Breadth

The NAIS was developed through a remarkably inclusive process — a four-day co-creation workshop in April 2024 involving over 150 stakeholders from academia, diaspora, government, civil society, and international technology companies (including Google, Microsoft, Meta, Amazon and Huawei). Subsequent public consultations ran through January 2025. This process compares favourably to many OECD strategies developed primarily by government ministries with limited civil society input. The breadth of the contributor list (151 experts) signals clear collaborative and multi-stakeholder ownership.

#### 3.2 Five-Pillar Architecture: Logical Coherence

The strategy's five pillars exhibit sound internal logic:

Pillar	Focus	Assessment
1	Foundational AI Infrastructure (HPC, clean energy, data centres)	Addresses root constraint; targets realistic 3-year investment window
2	World-Class AI Ecosystem (partnerships, talent, startups, CoEs)	Strong on ambition; weak on talent-retention mechanism beyond export
3	Sector Adoption & Transformation (agriculture, health, finance)	Sector-specific roadmaps mandated but not yet produced — critical gap
4	Responsible & Ethical AI (ethics body, principles, legal reform)	Ethics architecture is thoughtful; AIEEG (AI Ethics Expert Group) independence unspecified
5	Robust AI Governance Framework (regulatory body, risk management)	Weakest pillar: regulatory body proposed but timeline and powers unclear

#### 3.3 Early Empirical Progress

Despite weak baseline indicators, Nigeria has made some measurable progress on a number of fronts since the NAIS process began:

- 3MTT Programme: Up to 300,000 Nigerians have been trained in Phases 1&2 (target: 3 million by 2027); 67% of the cohorts secured employment or promotions within six months of completion, though 34% moved to international organisations — highlighting a structural brain-drain risk.
- N-ATLAS / M-ATLAS LLM: In September 2025, NCAIR — in collaboration with Awarri Technologies — launched Nigeria Atlas for Languages and AI at Scale ([N-ATLAS](#)), a multilingual large language model

fine-tuned on Yoruba, Hausa, Igbo, and Nigerian-accented English, built on Meta's Llama-3 8B architecture with over 400 million multilingual [tokens](#).

- NITDA AI Transformation Roadmap (March 2025): A complementary internal roadmap for NITDA to become a 'smart organisation' using AI for document processing and workflow, signalling government-internal adoption.
- Nigeria AI Scaling Hub: Oxford Insights' 2025 Government AI Readiness Index (in which Nigeria ranked 72nd) noted the launch of this hub (in collaboration with the Gates Foundation) as a significant milestone, contributing to the country's improved standing.
- International commitments: Nigeria signed the Bletchley Declaration (2023) and joined the US-led AI Security by Design initiative alongside 18 other nations.

### 3.4 Recognition of Structural Constraints

The NAIS is commendably honest about Nigeria's weaknesses: 35 Mbps average download speed (well below the 93 Mbps global average); only 43% internet penetration; 0.2% of GDP spent on R&D vs. the 2.2% global average; only 3% of IT professionals focused on AI; and 80% of tech hub funding derived from offshore sources. Acknowledging these constraints is a prerequisite for designing realistic interventions.

## 4. Critical Gaps and Implementation Risks

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### 4.1 The Measurement Deficit

The most significant structural weakness of the NAIS is the near-total absence of binding, measurable key performance indicators (KPIs). The strategy articulates outcomes ('affordable HPC resources,' 'thriving network of startups') without attaching quantitative targets, baseline measurements, or timelines to individual initiatives. The risk register identifies six high-level risk categories but does not specify ownership, budget, or monitoring mechanisms for any mitigation strategy. This renders accountability almost impossible and makes the document more aspirational than operational.

#### Strategy Credibility Test

A credible AI strategy must answer four questions for each initiative: Who is responsible? By when? With what funding? How will success be measured? The NAIS answers the first question partially and the remaining three rarely.

### 4.2 Governance Architecture: Insufficient Specificity

Pillar 5 calls for an 'AI Governance Regulatory Body' and a National AI Policy Framework but provides no timeline for establishment, no definition of its legal independence, no funding mechanism, and no description of its mandate relative to existing bodies (NITDA, NCC, NDPC). As of March 2026, **the NITDA Code of Practice for AI (2025)** has not been finalised, and the independent governance body — the strategy's own capstone institution — has not been constituted. NITDA's own AI Transformation Roadmap (March 2025) assigns governance functions to NITDA itself, creating a structural conflict-of-interest between the promoter and regulator of AI.

### 4.3 Infrastructure Investment Gap

Nigeria has 25<sup>1</sup> data centres operated by a variety of entities, mostly telecommunications companies and data service providers. By contrast, Rwanda operates the Kigali Innovation City as a hyperscale data centre hub and has received hyperscale investment commitments from international partners. Kenya's 2025 strategy explicitly targets 5G expansion, local high-performance computing centres, and renewable-powered data centres with quantified investment targets. Nigeria's strategy mandates deployment of HPC resources but provides no investment figure, funding source, or construction timeline.

### 4.4 Retention Architecture

The NAIS acknowledges the mass emigration of skilled Nigerian professionals. The Tech Nation Visa report of 2021 shows that Nigeria is the African country with the most applicants for the UK Global Tech Talent Visa, ranking third in the world with 11.3% of applicants globally. However the proposed solution (the 'Nigerian AI Talent Transfer Program' to attract global experts) only addresses the supply side, and not the retention side.

### 4.5 Data Ecosystem Deficits

AI depends on high-quality, accessible training data. Nigeria's Open Data Initiative is proposed in the NAIS but not yet operational. A 2020 World Bank assessment described Nigeria's data collection rates as critically low. Many available datasets lack standardisation and interoperability. Meanwhile, Rwanda's National AI Policy centres data sovereignty as a first-order priority, with a specific Data Act AI Governance Framework (AIGN) already operational. Kenya's 2025 AI strategy elevates Data to a standalone pillar with defined governance and quality benchmarks. Nigeria's treatment of data remains embedded within Pillar 3 with insufficient regulatory teeth.

## 5. Comparative Analysis: Nigeria, Kenya, and Rwanda

### 5.1 Strategic Architecture Comparison

Dimension	Nigeria (NAIS 2025)	Kenya (AI Strategy 2025–30)	Rwanda (AI Policy 2023)
Publication	Sept 2025 (final)	March 2025 (final)	Dec 2023 (final)
Structure	5 pillars, 3 objectives, 34 strategies	3 pillars + 4 enablers (phased)	6 priority areas (enablers/accelerators/safeguards)
Implementation Roadmap	High-level only; no binding KPIs	Phased roadmap published Dec 2025 with milestones	Annual implementation plan with fiscal year targets
Dedicated Budget	Not specified	Not specified	USD 76.5 million (5-year commitment)

<sup>1</sup> Data on the precise number of data centres in Nigeria is inconsistent. Varying sources point to between 13-25 data centres.

Dimension	Nigeria (NAIS 2025)	Kenya (AI Strategy 2025–30)	Rwanda (AI Policy 2023)
AI Governance Body	Proposed; not yet constituted	Proposed; draft Robotics & AI Bill tabled	C4IR Rwanda operational since 2020; MINICT leads
Data Pillar	Embedded in Pillar 3	Standalone second pillar	Core enabler with specific data acts
Ethics Framework	AIEEG proposed; principles listed	Ethics, Equity & Inclusion cross-cutter	Practical AI Ethical Guidelines adopted
Oxford AI Readiness (2024)	94th (up from 103rd)	101st	84th
Distinguishing Edge	N-ATLAS LLM; 3MTT scale	Silicon Savannah ecosystem; private sector depth	Hyperscale data hub; WEF C4IR partnership; ICLR 2024 host

## 5.2 Rwanda: The Execution Template

Rwanda — with a GDP roughly one-tenth of Nigeria's and a population of 14 million — provides an instructive case study in converting strategic intent into operational reality. The National AI Policy (2023) was co-developed with the WEF's Centre for the Fourth Industrial Revolution (C4IR), GIZ FAIR Forward, and The Future Society, bringing international implementation expertise directly into the design process. Key differentiators include:

- A USD 76.5 million five-year investment commitment attached to the policy at launch — an accountability anchor Nigeria's NAIS lacks entirely.
- The C4IR Rwanda node (established 2020, three years before the full AI policy) provided an institutional home for AI governance experimentation before the strategy was written — reversing the typical sequence of strategy-first, institution-second.
- Rwanda hosted the International Conference on Learning Representations (ICLR) in 2024 — the first time this premier AI research conference convened in Africa — signalling credibility to the global research community.
- Rwanda's 2025 Global AI Summit on Africa further cemented its positioning as the continent's responsible AI governance hub.
- A teacher corps investment to embed AI into primary school curricula from the ground up, rather than retrofitting tertiary education alone.

### Key Lesson from Rwanda

Rwanda did not wait for a comprehensive national strategy before building institutional capacity. C4IR Rwanda existed and was producing governance outputs — data protection law, AI ethics guidelines — years before the full AI Policy was published. Nigeria should prioritise constituting the AI Governance Regulatory Body immediately, independent of completing the broader legislative programme.

### 5.3 Kenya: The Implementation Roadmap Model

Kenya's National AI Strategy 2025–2030, launched in March 2025, is the most structurally comparable peer document to Nigeria's NAIS. It is similarly comprehensive and similarly ambitious. However, Kenya improved on Nigeria's approach in several operationally significant ways:

- A formal Implementation Roadmap — published separately in December 2025 — converts the strategy's pillars into time-bound deliverables with responsible agencies, budget estimates, and monitoring indicators.
- The DigiKen initiative – Short for Digital Platforms Kenya, it's a 36-month initiative launched in 2024 that has already seen 15 Digital Innovation [Hubs](#) become operational.
- Kenya's Robotics and AI Bill — currently before the National Assembly — creates a legal architecture for AI governance rather than leaving regulatory powers to executive discretion through NITDA circulars.
- Kenya explicitly addresses data colonialism and sovereignty concerns within its governance pillar, an issue the NAIS references only obliquely.

### 5.4 What Kenya and Rwanda Do That Nigeria Should Emulate

Practice	Kenya / Rwanda	Nigeria NAIS Gap
Phased Implementation Roadmap	Kenya published a separate implementation roadmap with milestones (Dec 2025)	NAIS contains no standalone implementation roadmap document
Ring-Fenced Budget	Rwanda: USD 76.5M commitment at strategy launch	No specific budget allocated to NAIS objectives
Pre-Existing Governance Institution	Rwanda: C4IR operational since 2020 before strategy launch	AI Governance Regulatory Body: proposed, not yet constituted
Legislative Framework	Kenya: Robotics & AI Bill before Parliament	AI-specific legislation not yet drafted; NITDA Code of Practice in draft
Data Pillar as Standalone Priority	Kenya elevates Data to co-equal pillar; Rwanda has AIGN framework	Data embedded in Pillar 3 without dedicated governance mechanism
Community-Level Implementation	Kenya: 15 Digital Innovation Hubs selected between 2024-25	Innovation hubs referenced but no deployment timeline or targets given

## 6. Five Priority Recommendations

The following recommendations are sequenced by urgency and grounded in the comparative evidence above. They apply the principle that governance infrastructure should precede, not follow, large-scale AI deployment.

### RECOMMENDATION 1 — Constitute the AI Governance Regulatory Body Immediately

*Timeframe: Q2 2026 | Lead: FMCIDE / NITDA*

The AI Governance Regulatory Body must be constituted before the NITDA Code of Practice is finalised, not after. Without an independent oversight body, the Code of Practice will be a self-regulatory instrument of the very agency that promotes AI development. The body should be constituted by executive order with a statutory mandate, draw its board from academia, civil society, and industry (not government ministries), and publish a work programme within 90 days of establishment.

### RECOMMENDATION 2 — Publish a Binding NAIS Implementation Roadmap with KPIs

*Timeframe: Q3 2026 | Lead: NCAIR / AI Governance Body*

The NAIS should be accompanied by a separate, publicly accountable Implementation Roadmap modelled on Kenya's December 2025 document. It should specify: (a) a responsible agency for each of the 34 strategies; (b) a quantified 12-month, 36-month, and 60-month target for each; (c) a budget envelope; and (d) a public-facing dashboard updated quarterly. The 3MTT programme's 30,000-trained-vs-3-million-target gap illustrates the risk of programmes without milestone accountability. Minimum KPIs should include: number of operational HPC centres, volume of publicly available training datasets, number of AI startups receiving government support, and the Oxford AI Readiness ranking trajectory.

### RECOMMENDATION 3 — Secure a Ring-Fenced AI R&D Budget Commitment

*Timeframe: 2026/27 Budget Cycle | Lead: FMCIDE / Ministry of Finance | Target: 0.5% of GDP toward R&D by 2030*

Nigeria's 0.2% of GDP R&D expenditure — one-eleventh of the OECD average — is the single greatest barrier to achieving any of the NAIS's innovation objectives. The 2026/27 budget should include a dedicated AI R&D Fund line with a five-year escalation schedule toward 0.5% of GDP. Rwanda's USD 76.5 million five-year commitment (approximately 1.5% of GDP at the time of its policy launch) demonstrates that smaller economies can and must make credible fiscal commitments to AI policy. Nigeria should additionally require that all Ministries, Departments and Agencies (MDAs) allocate a minimum percentage of their digital transformation budgets to AI-specific procurement and research.

### RECOMMENDATION 4 — Fast-Track Compute Infrastructure via Public-Private Partnerships

*Timeframe: 2026–2028 | Lead: NCAIR / Galaxy Backbone*

With 13–25 data centres (mostly private) and no national GPU cluster, Nigerian researchers and startups must depend on foreign cloud services at dollar-denominated costs — a competitive handicap that worsens with each Naira devaluation. NCAIR should immediately operationalise the 'Pioneer Status for AI' tax incentive (already proposed in Pillar 1) and publish a clear PPP framework inviting hyperscale data centre investment. The government should negotiate sovereign computing access agreements with at least two major cloud providers, modelled on the EU's digital infrastructure agreements. Galaxy Backbone's existing national backbone infrastructure should serve as the foundation for a federated

national AI compute network. Clean energy powering must be mandated from the outset — NCAIR's own target of 50% renewable energy for HPC clusters by 2027 should be codified as a procurement requirement.

### RECOMMENDATION 5 — Enact AI-Specific Legislation with Talent Retention Mechanisms

*Timeframe: 2026–2027 | Lead: National Assembly / Ministry of Justice*

The current regulatory patchwork — NDPA 2023, Cybercrime Act, NITDA Act, and a draft Code of Practice — is insufficient for AI governance at scale. Nigeria needs a National AI Act that: (a) establishes the legal basis and independence of the AI Governance Regulatory Body; (b) defines risk classifications for AI systems deployed in high-stakes domains (healthcare, criminal justice, finance); (c) mandates algorithmic transparency for public sector AI; and (d) creates a structured pathway for regulatory sandboxes. The AI Act should also include an AI Talent Retention Framework: incentives for AI graduates who work in Nigeria for five or more years; a public-sector AI pay scale competitive with private sector offers; and equity participation in government-incubated AI startups for researchers who commercialise from NCAIR.

## 7. Broader Structural Challenges the NAIS Cannot Resolve Alone

The NAIS is a technology and governance strategy, not a macroeconomic reform programme. But several structural conditions it presupposes are outside its scope of intervention and require government-wide action:

Structural Challenge	NAIS Treatment	What Is Actually Required
Currency instability (Naira depreciated >70% in one year)	Acknowledged as SWOT threat	Fiscal stabilisation; AI investment must be insulated from FX volatility via dollar-denominated innovation funds
Energy unreliability (most data centres self-generate)	Pillar 1 targets clean-energy AI clusters at <50% grid dependence	A separate energy transition programme; AI infrastructure cannot precede grid stabilisation
Internet access (43% penetration; 35 Mbps avg speed; ranked 111th mobile, 140th fixed)	Linked to NAIS via National Broadband Plan targets (25 Mbps urban, 10 Mbps rural)	Accelerated Universal Service Fund deployment; AI adoption roadmaps must reflect access reality
Governance quality (ranked 114th in regulatory quality; 123rd in governance)	Risk factor acknowledged in SWOT	Institutional reform beyond digital economy ministry's mandate; AI governance is impossible without baseline rule of law
Brain drain (474 tech visas to UK 2014–21; 34% of 3MTT graduates employed internationally)	Talent Transfer Programme proposed (inward, not retention)	Structural economic reform; AI-specific retention legislation (Rec 5 above)

## 8. Conclusion

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Nigeria's NAIS represents genuine strategic progress, it is among the most comprehensive AI policy documents on the continent. Its process legitimacy, stakeholder breadth, ethical grounding, and honest self-assessment are commendable. The launch of N-ATLAS demonstrates that Nigeria can produce credible AI research outputs, and the highly ambitious 3MTT programme if scaled sustainably, and seen through to the end, could be the continent's most significant AI workforce development initiative.

However, measured against standards for operational credibility and concrete implementation evidence from similar economies, the NAIS remains incomplete. It is **a strategy without a roadmap or a budget, and a governance framework without a regulatory body**. Nigeria's fundamental challenge is not imagining an AI-enabled future — it is the sustained, mundane, politically contested work of constituting the bodies, appropriating the funds, and passing the laws that convert vision into reality.

The window is not permanently open. As AI capabilities accelerate globally, the asymmetry between nations that move from strategy to implementation and those that produce successive strategy documents will compound rapidly. Nigeria's median age of 18, its 220 million citizens, its 3,360-plus tech startups, and its demonstrated capacity to produce AI research all represent genuine assets. The question before policymakers in Abuja is whether those assets will be mobilised by credible institutional action, or whether the NAIS will become another entry in a long library of ambitious plans unrealised.

### **Immediate Plan of Action: Establish a Presidential AI Initiative with Ring-Fenced Capital Funding**

Many Nigerian Ministries, Departments and Agencies (MDAs) have not received capital grants for at least two consecutive years as of 2025. FMCIDE and NCAIR, regardless of their strategic intentions, cannot credibly commit to deploying HPC centres or constituting an AI Governance Body when the capital appropriations to fund those activities are either absent or subject to executive discretion on release. This is an implementation failure that is systemic across Nigeria's capital budget cycle. But it is especially damaging for a strategy that depends on time-sensitive infrastructure investment and institutional formation. The NAIS's own risk register rates 'Funding Shortfall' as High likelihood / High impact — yet proposes no structural solution beyond generic public-private partnership language.

The solution requires presidential-level intervention, not ministerial-level planning. Specifically: (a) the President should designate AI as a key priority, creating a dedicated AI Development Fund outside normal MDA capital allocation channels; (b) the Fund should be capitalised at a minimum of ₦500 billion over five years, drawn from oil windfall revenues, diaspora bond issuance, and matched contributions from multilateral partners (World Bank, AfDB, IFC); (c) disbursement should be governed by the independent AI Governance Regulatory Body — ensuring the same institution that sets KPIs controls the budget that funds them.

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Alhassan's work focuses on information integrity, and governance of digital technologies. He's led regional USAID programmes in West Africa assessing the impact of digital platforms on mis- and disinformation, and worked on infodemic management during public health emergencies.

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## About Tunani Initiative

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Tunani Initiative is a non-profit organisation committed to fostering a society in which citizens' voices significantly impact governance. Our mission is to cultivate an informed and active citizenry by equipping and propelling citizens towards purposeful civic engagement.

# TUNANI POLICY INSIGHTS

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