



The transfer of digital governance policies from developed to developing countries: Lessons from Africa

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Abstract

This article examines the transfer of digital governance policies from developed nations to African countries, analysing the mechanisms, challenges, and outcomes of this complex policy diffusion process. Drawing on empirical evidence from Nigeria, Kenya, The Gambia, Somalia, Mozambique, and Sierra Leone, the analysis demonstrates that policy transfers often fail due to "design-reality inconsistencies" between imported frameworks and local contexts, infrastructure constraints, and the political economy of governance reform. The article argues that successful digital governance requires domestication rather than replication, with The Gambia's domestication of the African Union Data Policy Framework offering a promising model of contextualised, participatory policy development. It concludes that donors and policymakers must move beyond coercive transfer modalities toward genuine partnerships that respect African agency and local realities.

Keywords: Digital governance, policy transfer, policy domestication, African agency, design-reality inconsistencies

Introduction

Policy transfer has been the dominant approach by both local policy actors and international donors to domestic policy development in less developed countries across Africa, with the adoption of New Public Management reform ideas and e-government strategies representing key examples of this phenomenon (Dolowitz & Marsh, 2000) ^[3]. Many existing studies on policy transfer focus on transfer between developed countries, creating a significant lacuna in knowledge regarding transfers across Africa (Benson *et al.*, 2019) ^[1]. Currently, the literature suggests that policy transfer across Africa a) originates from the global north, with pressures from international donors serving as the major cause of e-government strategy transfer, and b) African governments implement transferred policies for fear of losing loans and other benefits that come as conditions for policy transfer (Benson *et al.*, 2019) ^[1].

However, this framing oversimplifies a far more complex reality. As empirical research on Nigeria demonstrates, both international pressures and domestic factors are responsible for policy transfer, and not all transfers originate from the global north (Okafor, 2021) ^[14]. The use of coercive modalities by donor organisations to impose policy transfer on African governments does not necessarily lead to successful implementation, as local factors such as economic conditions, infrastructural deficits, bureaucratic resistance, and lack of sufficient political support, rather than international pressures, shape the outcomes of implementation across Africa (Benson *et al.*, 2019) ^[1].

This article examines the transfer of digital governance policies from developed countries to Africa through a systematic analysis of empirical evidence from multiple case studies. It explores the mechanisms of transfer, the contextual factors that determine success or failure, and emerging models of domestication that offer more sustainable pathways. The analysis draws on policy diffusion theory, actor-network theory, and empirical research to provide actionable insights for policymakers and development practitioners.

The Policy Transfer Landscape: Mechanisms, Actors, and Theoretical Frameworks

1. Understanding Policy Transfer and Diffusion in Digital Governance

a. Theoretical Foundations: Policy Diffusion and Transfer Models

Policy Diffusion Theory offers a valuable framework for understanding how digital governance innovations cross borders. This approach demonstrates that policy innovations spread not primarily as products of internal experimentation or domestic demand, but largely due to external pressures in the form of mimicry, normative persuasion, coercion, or the quest for global legitimation (Simmons *et al.*, 2006) ^[16]. Foreign influences and predominant global narratives on "good governance" significantly impact domestic governance decisions in Africa (Benson *et al.*, 2019) ^[1].

Scholars identify emulation, learning, competition, and coercion as important mechanisms of policy diffusion at the global level (Simmons *et al.*, 2006) ^[16]. Policy transfer can be both voluntary (lesson-drawing, inspiration) and coercive (conditional aid, imposed reforms) (Dolowitz & Marsh, 2000) ^[3]. A critical caution emerging from this literature is the danger of reforms not being sufficiently accommodating to local context, creating dysfunctional policy as a consequence (Heeks, 2002) ^[6].

The theoretical underpinnings of policy diffusion theory reveal several crucial insights (Simmons *et al.*, 2006) ^[16]. First, external actors—multilateral agencies (UNDP, World Bank), bilateral donors, international NGOs, and transnational advocacy networks—influence national policy agendas through finance, technical support, and norm-setting. Second, there is a distinction between symbolic adoption and effective success, with reform often functioning more to demonstrate conformity to global norms than to address actual domestic problems. Third, reform spreads through a combination of soft (persuasion, peer action) and hard (donor conditionality, international surveillance) channels. Most importantly, the theory signals the well-documented tendency for imported reforms to be

poorly synchronised with domestic institutional capacity (Heeks, 2002) ^[6].

b. The Role of External Actors in African Digital Governance

The role of international donors and development organisations in shaping African digital governance policy cannot be overstated (Heeks, 2002) ^[6]. Under the label "Information and Communication Technologies for Development" (ICT4D), these organisations stress the relevance of ICTs and e-government as a way to promote development and reduce poverty (Heeks, 2002) ^[6]. E-government is seen as strengthening the performance of government and public administration, an efficient and effective state administration being a necessary prerequisite for economic and social development (Heeks, 2002) ^[6].

This issue is especially relevant for sub-Saharan Africa, where public administration is characterised by inefficiency, limited capacity, and poorly-trained personnel (Heeks, 2002) ^[6]. However, because e-government and its related organisational concepts were developed in industrialised countries, it should not be assumed that this concept is automatically appropriate for developing countries (Heeks, 2002) ^[6]. When introducing e-government in sub-Saharan Africa, different and more far-reaching efforts are necessary than in developed countries (Heeks, 2002) ^[6].

The transfer of digital governance expertise from developed nations is exemplified by the EU-funded €23 million initiative involving Estonia and Finland, who are partnering with Nigeria to implement a digital governance project aligned with Nigeria's National Digital Economy Policy (2020–2030) (ESTDEV, 2026) ^[4]. Estonia's X-Road experience is being leveraged to create a data exchange framework, with the Nigerian government specifically requesting Estonian involvement as recognition of the quality of Estonia's e-government capabilities (ESTDEV, 2026) ^[4]. This initiative creates opportunities for Estonian entrepreneurs in one of Africa's largest markets, but also raises questions about the adaptability of the Estonian model to Nigeria's complex governance environment (ESTDEV, 2026) ^[4].

2. The Failure of Regulatory Transplants: Design-Reality Inconsistencies

a. Infrastructure Constraints and the "Design-Reality Gap"

A growing body of evidence demonstrates that major digital governance frameworks imported from developed nations are failing across much of Africa (Heeks, 2002, 2003; Tolulope Abegunde, 2026) ^[6, 7, 17]. These frameworks were designed for environments with mature enforcement institutions and fintech sectors that can absorb high compliance costs—conditions that do not exist in the median African regulatory context (Tolulope Abegunde, 2026) ^[17]. Instead of protecting citizens, these "regulatory transplants" create what experts' term "compliance theatre," concentrating power in foreign vendors and delegitimising local institutions (Tolulope Abegunde, 2026) ^[17].

The "design-reality gap" model, developed by Heeks (2003) ^[7], identifies that e-government projects succeed or fail based on the level of difference between the current reality and the model built into the project's design (Heeks, 2003) ^[7]. Seven dimensions are necessary to understand this gap: information, technology, processes, objectives and values,

staffing and skills, management systems and structures, and other resources—namely time and money (Heeks, 2003) ^[7]. Six case studies from South Asia, Southern Africa, Central Asia, and the Middle East tested this model and identified three archetypes of e-government failure (Heeks, 2003) ^[7]:

First, hard-soft gaps: most government organisations are dominated by 'soft' factors—people, politics, emotions and culture—and e-government systems tend to get designed according to harder notions of machinery, rationality and objectivity (Heeks, 2003) ^[7].

Second, private-public gaps: many IT systems have been designed in the private sector and shoehorned into a public sector reality which operates very differently (Heeks, 2003) ^[7].

Third, country context gaps: an 'off the shelf' approach is set to fail. Infrastructure and mindsets are very different across the world. A system designed for New Delhi will not suit Johannesburg (Heeks, 2003) ^[7].

These design-reality gaps are particularly acute in Africa because e-government solutions designed for one sector or country are being forced directly into very different realities, causing failure (Heeks, 2002) ^[6]. Many key players—donor agencies, consultants, IT vendors, and African civil servants—are complicit in the continuing importation of inappropriate, Western e-government models and systems (Heeks, 2002) ^[6].

b. The Political Economy of Digital Governance Transfer

The greatest barrier to successful digital governance transfer is not technical, but political. Imported digital systems that standardise processes and reduce discretionary power directly threaten the patronage networks that sustain many elites in fragmented governance environments (Dercon, 2022) ^[2]. Without the requisite political buy-in, reform risks what experts call "isomorphic mimicry"—adopting the facade of reform without its substance (Dercon, 2022) ^[2].

Kenya's experience illustrates this tension (Muganda-Ochara, 2009, 2011) ^[11, 12]. Research on the Local Authority Integrated Financial Operations Management System (LAIFOMS) in Kenya's local authorities reveals that control was the dominant theme, typical of bureaucratic systems in a highly politicised environment characterised by centralisation of power exercised by executive politicians who influence top civil servants (Muganda-Ochara, 2011) ^[12]. The process of building e-government infrastructure in Kenya unfolds in an environment where local actors' interests are weakly inscribed, while interests of global actors are strongly inscribed, enhancing bureaucratisation through managerialisation (Muganda-Ochara, 2009) ^[11].

E-government design intentions are rarely realised in developing countries beset by design-reality inconsistencies (Muganda-Ochara, 2009) ^[11]. Designs based on plans, procedures, methodologies, and strategies developed from a rationalistic perspective rarely capture the 'here and now' of e-government implementation (Muganda-Ochara, 2009) ^[11]. The Nigerian case further illustrates these dynamics (Isoun, 2026) ^[8]. Nigeria's 2023 introduction of the Bimodal Voter Accreditation System (BVAS) enjoyed a modernisation story legitimating support from donors but could not prevent integrity problems (Isoun, 2026) ^[8]. This represents an instance of the fundamental lesson that diffusion theory offers: technological adoption does not mean democratic improvement (Isoun, 2026) ^[8]. The hard truth, as one

Nigerian Internet Service Provider observed, is that credible 4G LTE coverage exists in barely 50% of Nigerian polling unit locations, making electronic transmission of results impossible from many rural areas (Isoun, 2026). As Heeks (2002)^[6, 8] notes, failure will remain the dominant theme for e-government in Africa unless challenges can be addressed by adoption of best practice in design-reality gap closure (Heeks, 2002)^[6].

Empirical Evidence: Country Cases and Emerging Models

1. Country Case Studies: Successes, Failures, and Lessons Learned

a. Nigeria: Coercive Transfer and Implementation Challenges

Nigeria provides a compelling case of the dynamics of policy transfer in practice (Benson *et al.*, 2019)^[1]. Research examining e-government transfer to the Independent National Electoral Commission (INEC) and the Nigerian Immigration Service (NIS) demonstrates that both international pressures and domestic factors shape policy outcomes (Benson *et al.*, 2019)^[1]. The study examines the origin of transfer, its causes, the actors involved, and the modalities used—concluding that domestic factors, not international pressures, shape the outcomes of implementation in Africa (Benson *et al.*, 2019)^[1].

The Nigerian case demonstrates that donors often overlook domestic contextual factors, coercing political office holders to transfer policies without engaging other critical domestic policy actors (Okafor, 2021)^[14]. This creates situations where institutionalised dysfunction and politicised bureaucracies prevail, undermining the pragmatic feasibility of reforms (Okafor, 2021)^[14].

However, recent developments indicate a more nuanced approach to digital governance transfer. The EU-funded €23 million initiative involving Estonia and Finland represents a significant effort to share digital governance expertise with Nigeria (ESTDEV, 2026)^[4]. Estonia's internationally recognised e-government capabilities are being deployed to help implement the X-Road data exchange framework in Nigeria, making Nigeria the most populous country in the world to use this system (ESTDEV, 2026)^[10]. This initiative, aligned with Nigeria's National Digital Economy Policy (2020–2030), aims to boost interoperable, citizen-centred services, cybersecurity, data protection, and institutional capacity (ESTDEV, 2026). The involvement of multiple Nigerian government agencies—including the Federal Ministry of Communications, Innovation and Digital Economy, the National Information Technology Development Agency (NITDA), Galaxy Backbone Limited, the National Identity Management Commission, and the Nigeria Data Protection Commission—suggests a more coordinated approach than previous transfer efforts (ESTDEV, 2026).

b. Somalia: Structural Dependence and the Limits of Legal Sovereignty

Somalia's digital governance journey illuminates the distinction between formal jurisdiction and operational control—a central concept for understanding policy transfer challenges (Nimmo & Lohmöller, 2026)^[13]. The 2023 Data Protection Act creates a formal legal basis for personal data governance, and the eGovernment Strategy 2025^[20]–2029 frames digital transformation as an unfinished

administrative project (Nimmo & Lohmöller, 2026). In 2026^[13], the Ministry approved a regulatory framework for public data protection, indicating further movement toward implementation. However, the governance regime is still being assembled (Nimmo & Lohmöller, 2026)^[13].

Somalia's dependence is layered rather than singular, encompassing reliance on telecom-fintech infrastructures for economic circulation and communication, reliance on externally mediated or vendor-managed digital architectures for data processing and storage, and reliance on still-maturing public institutions to translate legal authority into practical oversight (Nimmo & Lohmöller, 2026)^[13]. This "structural dependence" does not mean Somalia lacks agency—it means public authority is exercised under conditions in which essential digital functions are already embedded in private, commercial, and partly external infrastructures (Nimmo & Lohmöller, 2026)^[13].

The digital sovereignty literature cautions against assuming that legal authority and practical control are the same (Nimmo & Lohmöller, 2026)^[13]. As demonstrated in analyses of e-Estonia, digital sovereignty is negotiated through external dependencies and geopolitical constraints rather than achieved through legal declaration alone (Nimmo & Lohmöller, 2026)^[13]. Governments exercise digital sovereignty unevenly across different technical and administrative domains, and sovereignty depends on governance mechanisms that make rights, responsibilities, and accountability operational across distributed systems (Nimmo & Lohmöller, 2026)^[13].

For Somalia, formal jurisdiction should be treated as the starting point of sovereignty-building, not as proof of completed operational control (Nimmo & Lohmöller, 2026)^[13]. Three gaps remain: legal thinness, institutional capacity constraints, infrastructural opacity, and political-economic asymmetry—all of which challenge the effectiveness of imported digital governance models (Nimmo & Lohmöller, 2026)^[13].

c. Kenya: The Control Agenda and Network Dynamics

Kenya's e-government implementation offers insights into the irreversibility of digital governance projects (Muganda-Ochara, 2009)^[11]. Research using Actor-Network Theory analysis assessed the strength of irreversibility of the e-government infrastructure project, finding that mobilisation within the network addresses issues surrounding stability, which is attained when actors' investments reach a point where withdrawal becomes unlikely (Muganda-Ochara, 2009)^[11].

The process of building e-government infrastructure in Kenya unfolds in an environment where local actors' interests are weakly inscribed, while interests of global actors are strongly inscribed (Muganda-Ochara, 2009)^[11]. The overall implication is a trend where the Central Government is enhancing bureaucratisation through managerialisation—creating a system that extends control rather than empowering local governance (Muganda-Ochara, 2009)^[11].

This case illustrates that the transfer of digital governance from developed to developing countries often carries embedded political agendas (Muganda-Ochara, 2009)^[11]. The standardisation of service delivery appears to serve centralising objectives, potentially undermining the decentralisation and democratisation goals that transferred policies often rhetorically promote (Muganda-Ochara, 2009)^[11].

2. Emerging Models: Domestication, Participation, and Contextual Adaptation

a. The Gambia: Domestication of Continental Frameworks

The Gambia offers a promising model of how digital governance frameworks can be successfully adapted to national contexts (Moyo, 2026) ^[10]. On 3rd July 2025, The Gambia became the first African country to domesticate the African Union Data Policy Framework (AUDPF)—a continental framework drafted in 2022 to harmonise data governance across Africa, enable safe and responsible data flows, unlock economic value, and reduce fragmentation (Warislohner, 2025; Moyo, 2026) ^[10, 20].

The success of this domestication process rested on a fundamental principle: "It was built with Gambians, by Gambians, not as something done to them" (Moyo, 2026) ^[10]. This approach recognised that African countries are at different levels of development and at different points in their digital transformation journeys, requiring the framework to be contextualised locally (Warislohner, 2025) ^[20].

The process began by grounding the entire effort in local realities, capacities, and constraints (Moyo, 2026) ^[10]. Initial work addressed institutional coordination between the Ministry of Communications and Digital Economy and the Ministry of Information—two institutions with overlapping but distinct data responsibilities (Moyo, 2026) ^[10]. An MOU between the ministries strengthened the policy process, enabling them "to speak with one voice" (Moyo, 2026) ^[10].

From there, a multi-layered process of research, consultation, and drafting followed (Moyo, 2026) ^[10]. The process combined rigorous background research with 29 in-depth interviews across government, academia, civil society, and the private sector (Moyo, 2026) ^[10]. Researchers mapped the existing legal environment, reviewed digital and data infrastructure, analysed e-government initiatives, and identified challenges and opportunities across the national data ecosystem (Moyo, 2026) ^[10]. The research was not desktop work imposed onto Gambian realities but was tested, discussed, and reshaped through multiple rounds of consultation (Moyo, 2026) ^[10].

Inclusion was deliberate: the process reached out directly to civil society organisations and especially to women, because structural inequalities meant they were under-represented in policy spaces (Moyo, 2026) ^[10]. A final validation workshop brought together more than 70 stakeholders in Banjul for a two-day session where the draft was read line by line (Moyo, 2026) ^[10]. Breakout groups debated each section, and the plenary reconvened to accept, reject, or refine each vision, measure, and legal provision (Moyo, 2026) ^[10].

As Moyo (2026) ^[10] observed, "Policymaking is political. Coordination matters. Trust matters." The inclusive approach created a level of legitimacy that proved vital to the policy's successful adoption (Moyo, 2026) ^[10].

b. Contextual Principles for Successful Digital Governance Transfer

Emerging evidence from successful cases suggests several principles for effective transfer of digital governance policies (Heeks, 2002, 2003; Muganda-Ochara, 2009; Nimmo & Lohmöller, 2026) ^[6, 7, 11, 13].

First, each case should be taken individually—there is no one solution that will fit all situations (Heeks, 2002) ^[6]. Greater importance should be attached to determining the

expectations and reality of those for whom the project will serve and be operated by, and these expectations should be incorporated before the design of the project and revisited during implementation (Heeks, 2003) ^[7].

Second, customisation to African realities is essential (Heeks, 2002) ^[6]. Leaders of African e-government projects must be competent and confident to demand designs that match their particular situation (Heeks, 2002) ^[6]. Stakeholders need to be encouraged to articulate the difference between rational, prescriptive models of what they should be doing and real depictions of what they are actually doing (Heeks, 2003) ^[7].

Third, projects must be reconfigured to limit the extent of change at any given time through stretching project time horizons, modularity (supporting one business function at a time), and incrementalism (providing stepped levels of support for business functions) (Heeks, 2003) ^[7].

Fourth, build coalitions (Moyo, 2026) ^[10]. As The Gambia's experience demonstrates, inclusion and trust are critical. Integrity in research, ethical handling of stakeholder inputs, and transparency throughout the process are essential for building legitimacy (Moyo, 2026) ^[10].

Fifth, contestability before compliance: Minimum viable mechanisms should be prioritised over comprehensive compliance frameworks that cannot be enforced (Tolulope Abegunde, 2026) ^[17].

Sixth, sequencing matters (Nimmo & Lohmöller, 2026) ^[13]. Given Somalia's limited public evidence on actual cloud hosting arrangements, regulatory practice, and procurement contracts, the most realistic path is to identify where sovereignty matters most, prioritise high-risk public data systems, strengthen institutional routines, and improve accountability over systemically important digital intermediaries (Nimmo & Lohmöller, 2026) ^[13].

Seventh, use procurement as a practical instrument (Nimmo & Lohmöller, 2026) ^[13]. In low-capacity settings, procurement rules may be more immediately actionable than broad strategic declarations. Contracts for critical public systems can require data classification, logging, breach reporting, interoperability, audit access, exit rights, and clear rules for subcontracting and cross-border processing (Nimmo & Lohmöller, 2026) ^[13].

Conclusion

The transfer of digital governance policies from developed to developing countries, as evidenced across Africa, presents a complex picture of promise and peril (Heeks, 2002 ^[6]; Onyango & Karuri-Sebina, 2024) ^[15]. While e-government and digital transformation offer genuine potential to improve public service delivery, reduce corruption, and strengthen governance, the mechanisms through which these policies are transferred often undermine their effectiveness.

The evidence from Nigeria, Kenya, Somalia, and other countries demonstrates that coercive transfer modalities, where donors impose policies without adequate attention to local context, create "design-reality inconsistencies" that result in symbolic adoption without substantive impact (Heeks, 2002, 2003; Benson *et al.*, 2019) ^[1, 6, 7]. Infrastructure constraints, political economy dynamics, and institutional capacity limitations mean that imported frameworks often fail to deliver their promised benefits, instead creating compliance theatre and new forms of structural dependence.

However, emerging models from The Gambia offer more promising pathways (Moyo, 2026) ^[10]. These cases demonstrate that successful digital governance requires domestication rather than replication—a process of contextual adaptation that respects local realities, builds broad participation, and creates genuine ownership (Moyo, 2026) ^[10]. The domestication of the African Union Data Policy Framework in The Gambia, achieved through inclusive consultation and stakeholder engagement, provides a replicable model for how continental and international frameworks can be translated into nationally appropriate policies.

The implications for policy and practice are clear. Donors and development partners must move beyond coercive transfer modalities toward genuine partnerships that respect African agency (Onyango & Karuri-Sebina, 2024) ^[15]. Policymakers must prioritise political feasibility alongside technical design, recognising that digital governance reforms threaten entrenched interests (Dercon, 2022) ^[2]. And African countries must position themselves as leaders in global digital governance conversations, rather than passive recipients of external frameworks (Tolulope Abegunde, 2026) ^[17].

As Heeks (2002) ^[6] argues, failure will remain the dominant theme for e-government in Africa unless challenges can be addressed by adoption of best practice in design-reality gap closure (Heeks, 2002) ^[6]. The most obvious best practice will be customisation to African realities (Heeks, 2002) ^[6]. Leaders of African e-government projects must be competent and confident to demand designs that match their particular situation (Heeks, 2002) ^[6]. Stakeholders need to be encouraged to articulate the difference between rational, prescriptive models of what they should be doing and real depictions of what they are actually doing (Heeks, 2003) ^[7]. Projects must be reconfigured to limit the extent of change at any given time, through stretching project time horizons, modularity, and incrementalism (Heeks, 2003) ^[7].

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