

Nigeria Foia Public Accountability Readiness 2026

Baseline

Key Findings

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- 1. Nigeria's FOIA rights are constitutionally anchored and judicially reinforced.** The FOI Act 2011, Section 1(1), establishes that "notwithstanding anything contained in any other Act, law or regulation, the right of any person to access or request information... is established" [^1^]. The April 2025 Supreme Court ruling and February 2026 Federal High Court ruling have removed the two largest legal obstacles: tier-of-government limitation and conflicting-stature override [^8^][^11^].
- 2. Public institutions have proactive disclosure obligations that remain largely unfulfilled.** Section 2(3) of the Act requires institutions to publish organisational responsibilities, classes of records, manuals, rules, policies, reports, expenditure information, employee details, and information about contracts, grants, licences, permits, and agreements [^1^][^3^]. The 2024 Transparency and Integrity Index found only 3 federal institutions scored above 50% out of over 500 MDAs ranked [^23^].
- 3. The Attorney-General's Guidelines establish the operational model but lack enforcement teeth.** The Guidelines state that each public institution should designate a senior official, at least Assistant Director level or equivalent, as head of a FOIA Unit, and that FOI units should handle help lines, record-keeping review, liaison with the Attorney-General, record maps, proactive disclosure, and regular training [^3^]. Yet the Act provides no sanctions for failure to submit annual compliance reports [^6^].
- 4. The statutory response expectation is seven days; reality is near-triple that.** The FOI Act requires a response within seven days, with a possible extension to seven additional days where the volume of records makes compliance within the initial period unreasonable [^1^]. The OGP IRM report cited an average response time of 20 days based on FOI-ranking data [^6^].
- 5. Annual reporting remains a readiness bottleneck.** Section 29 requires public institutions to submit annual FOI reports to the Attorney-General by 1 February each year, including denials, appeals, pending requests, requests received and processed, average processing time, fees, staffing, and expenditure [^1^][^3^]. In 2023, only 91 of roughly 800 institutions complied; in 2024, 143 complied [^5^][^6^].
- 6. OGP's April 2026 IRM Results Report found limited completion for effective FOI implementation.** Commitment 6 (Effective Implementation of the FOI Act) was assessed as "Limited" completion with "Moderate Results" [^6^]. Commitment 7 (Improve ability of persons including disadvantaged groups to use FOIA) achieved "Substantial" completion with "Moderate Results," including NOA translation of the Act into 23 indigenous languages [^6^].
- 7. FOI implementation needs budget lines that do not exist.** Media Rights Agenda's analysis of the 2024 budget found only 10 of at least 1,316 federal public institutions allocated specific funds for FOI implementation [^7^]. Without budget, FOI units cannot hire staff, build portals, digitise records, or train personnel.
- 8. Civic monitoring already provides a proven scoring model.** PPDC's FOI rankings, conducted in coalition with ICIR, BudgIT, R2K, MRA, and Accountability Lab, use parameters including proactive disclosure, responsiveness to requests, level of disclosure, and FOI training [^13^][^14^]. In 2024, NIPC topped the ranking out of 246 MDAs assessed [^14^]. Great Nigeria should build on that logic while adding workflow automation and public-record usability scoring.
- 9. Courts are strengthening enforceability but litigation is slow and costly.** The April 2025 Supreme Court decision in *Osaku* and the February 2026 Federal High Court decision in *Oladunjoye* represent major jurisprudential advances [^8^][^11^]. However, the *Oladunjoye* case took over five years from request (October 2020) to judgment (February 2026), illustrating that judicial enforcement alone cannot deliver timely accountability.

10. **Public accountability readiness must now include all tiers of government.** The April 2025 Supreme Court ruling and the July 2024 local government autonomy ruling (*AG Federation v. AG Abia State and 35 others*) [^16^] make state and LGA records a priority for the 2026 baseline. Less than 1% of Nigeria's 774 LGAs operate functional websites, and 668 have no web presence at all [^17^].
 11. **The data protection regime creates parallel disclosure obligations that can reinforce FOIA.** The Nigeria Data Protection Act 2023, the NDPC General Application and Implementation Directive 2025, and NITDA's National Cloud Policy 2025 all mandate transparency about data processing, breach notification, and compliance auditing [^21^] [^22^]. Institutions that comply with NDPA obligations are structurally better positioned to comply with FOIA.
 12. **Anti-corruption agencies recover billions but disclosure of recovery details remains inadequate.** The EFCC recovered over ₦566 billion, \$411 million, and 1,502 properties between October 2023 and September 2025 [^18^]. The ICPC recovered ₦37.44 billion and \$2.353 million in 2025 alone, investigated 263 cases, and tracked 1,490 projects [^19^]. Much of this data is published in annual reports, but granular project-level recovery records are rarely proactively disclosed.
 13. **Citizen oversight tools demonstrate what is possible when records are accessible.** BudgIT's Tracka monitored 2,760 projects across 28 states in 2024/2025, finding 1,438 completed, 99 abandoned, 471 not done, and 92 fraudulently delivered [^20^]. Of 16 dam projects tracked across 13 states, none were completed [^20^]. These findings were possible because budget documents were partially available; fuller FOIA compliance would enable deeper auditing.
 14. **Gender and disadvantaged-group disparities persist in FOIA utilisation.** HumAngle Foundation's November 2024 survey found only 55.6% of media and CSO respondents were "somewhat familiar" with the FOI Law, and the average number of FOI requests sent by surveyed organisations in 2024 was just two [^24^]. Female engagement is significantly lower due to societal norms, power dynamics, and safety concerns [^24^].
 15. **Great Nigeria is positioned to build the country's first integrated FOIA readiness and public accountability platform.** No existing Nigerian civic-tech platform combines MDA readiness scoring, automated FOI request building, statutory deadline tracking, public records library functions, and accountability analytics in one system. The Great Nigeria ecosystem — with its 11 sector trackers, NPI platform, Data Bank, and citizen reporting infrastructure — provides the architecture upon which such a system can be built.
 16. **Nigeria's digital transformation agenda creates a convergence opportunity for FOIA, data protection, and cloud policy compliance.** The NDPA 2023, NITDA National Cloud Policy 2025, and FOIA 2011 all mandate transparency and records accessibility [^21^][^22^]. Institutions that digitise records for one framework can cheaply extend compliance to the others. Great Nigeria should advocate for a unified "Digital Transparency" compliance standard that reduces redundant reporting and lowers institutional costs.
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Main Analysis

1. What FOIA Readiness Means in 2026

FOIA readiness is the ability of a public institution to receive, process, answer, publish, and report information requests in a lawful, timely, traceable, and citizen-usable way. It is broader than having an email address or a web page. A ready institution has the records, staff, procedures, tools, and disclosure culture needed to comply without forcing citizens into litigation.

The legal landscape of 2026 differs materially from 2024. Before April 2025, state governments could — and did — resist FOIA compliance by arguing that the federal Act did not apply to them [^15^]. The Court of Appeal, Benin Division, had so held in 2018 in *Osaku*, grounding its decision on the constitutional allocation of "public records and archives of a State" to the state legislative list [^9^][^10^]. The Supreme Court's unanimous reversal in April 2025, delivered by Hon. Justice Lawal Garba, dismantled that shield [^8^][^9^]. The Court held that the National Assembly was competent to enact laws on public records and archives, and that the FOI Act's applicability extended to states, local governments, and all institutions howsoever described [^8^][^10^].

Then, in February 2026, the Federal High Court in Lagos went further. In *Blessing Oladunjoye v. Nigeria Shippers Council*, Justice Aneke held that "the Freedom of Information (FOI) Act, 2011 overrides other Acts, Laws and Regulations in matters concerning the release of requested information" [^11^][^12^]. The Nigeria Shippers Council had argued that its own statute and NITDA policy constraints limited disclosure. The Court rejected these defences, ordered disclosure of data protection policies, DPO details, training records, and audit reports, and declared that the failure to give written notice stating reasons for denial violated Section 4(b) of the Act [^11^][^12^].

These rulings mean that in 2026, FOIA readiness must be assessed across three tiers of government — federal, state, and local — and against a legal standard where the FOI Act is the supreme disclosure statute. The *Osaku* ruling eliminates the "domestication" excuse that 34 states had used to avoid compliance; only Ekiti and Imo had passed state FOI laws before the ruling [^15^]. The *Oladunjoye* ruling eliminates the "conflicting statute" excuse that agencies such as the Nigeria Shippers Council, CBN, and security-sector institutions had deployed to resist disclosure [^11^][^12^]. Together, these decisions create a legal environment where non-compliance is increasingly indefensible — but where enforcement still depends on citizen initiative, civic monitoring, and judicial patience.

Great Nigeria should score readiness across eight dimensions, derived from statutory obligations, Attorney-General guidance, and civic FOI-ranking logic:

Table: FOIA Readiness Scoring Dimensions

| Dimension | Readiness question | Evidence required |
|----------------------|---|---|
| Legal acknowledgment | Does the institution publicly recognise FOIA obligations? | FOI page, charter, policy, public notice, or annual report acknowledging the Act |
| FOI contact | Is there a named desk/officer and reliable contact channel? | Officer name, title, email, phone, physical address, and last verification date |
| Proactive disclosure | Are required records already published? | Section 2(3) checklist: budget, procurement, contracts, organogram, policies, reports |
| Records management | Can the institution locate records quickly? | Record map, archive policy, document register, digitisation evidence |
| Request handling | Can citizens submit and track requests? | Form, ticket ID, acknowledgement system, portal or email channel |
| Timeliness | Does the institution respond within the statutory window? | Date received, date acknowledged, date answered; median and average days |
| Lawful refusal | Are exemptions specific, reasoned, and appeal-ready? | Refusal notice content citing specific FOIA section, explanation, and appeal guidance |
| Annual reporting | Does the institution submit and publish Section 29 reports? | FMOJ report inclusion, institutional annual report URL, submission confirmation |

The baseline scoring model should use five levels:

Table: Five-Level FOIA Readiness Scoring Model

| Level | Label | Definition |
|---------|-----------------------|--|
| Level 0 | No visible readiness | No FOI page, no contact, no proactive disclosure, no response evidence, no annual report |
| Level 1 | Minimal readiness | FOI page or contact exists, but disclosure is incomplete, request handling is not trackable, and responses are routinely late |
| Level 2 | Operational readiness | FOI contact, basic proactive disclosure, request acknowledgement, some annual reporting, but timeliness and refusal quality are uneven |
| Level 3 | Accountable readiness | Full disclosure checklist, searchable records, request tracker, timely responses, legally adequate refusals, annual reports, and escalation guidance are visible |

| Level | Label | Definition |
|---------|------------------------|---|
| Level 4 | Public-value readiness | Records are machine-readable, linked to budgets/procurement/service delivery, routinely updated, usable for civic analysis, and published in open-data formats (CSV, JSON, API) |

2. Legal and Institutional Baseline

The Federal Ministry of Justice FOI portal states that the FOI Act was signed into law on 28 May 2011 and came into force the same day [^1][^2]. The portal summarises the Act's objectives as making public records more freely available, providing public access procedures, protecting records in line with public interest and privacy, protecting public officers who disclose certain information, and establishing access procedures [^2].

The same portal lists proactive disclosure categories under Section 2(3). These include: - A description of the organisation and its responsibilities - Classes of records under its control - Manuals, rules, and policies - Final decisions and factual reports - Expenditure information - Employee names and salaries - Information on contracts, grants, licences, permits, agreements, MOUs, and independent contractor reports [^1][^2]

The Attorney-General's Revised Guidelines (2013) add operational expectations: - Each public institution should designate a senior official, at least Assistant Director level or equivalent, as head of a FOIA Unit [^3]. - FOI units should handle help lines or online assistance, record-keeping review, liaison with the Attorney-General, record maps, proactive disclosure, and regular training [^3]. - Refusal notices should generally be issued within the seven-day period and must identify specific exemptions, explain why they apply, and inform applicants of their right to challenge refusal in court [^3]. - Public institutions must submit annual reports by 1 February each year in Microsoft Excel format to fmoj.foi@justice.gov.ng and in hard copy to Room 5E 07, 5th Floor, Federal Ministry of Justice, Maitama, Abuja [^3].

This creates a direct readiness test. If an institution cannot show its FOI officer, record map, proactive disclosure page, request channel, and annual report, it is not fully ready.

The legal framework has been reinforced by three major court decisions:

1. **Austin Osaku v. Edo State Agency for the Control of AIDS (Supreme Court, 11 April 2025)** [^8][^9][^10]: The Supreme Court unanimously held that the FOI Act applies to all tiers of government. The case originated on 6 January 2014, when a coalition of CSOs filed an FOI request to EDOSACA for records on the HIV/AIDS Programme Development Project and financial expenditures. The refusal triggered litigation that lasted over eleven years. The lead judgment by Justice Lawal Garba affirmed the National Assembly's competence to legislate on public records and archives, binding all 36 states and the FCT [^8][^10].
2. **Blessing Oladunjoye v. Nigeria Shippers Council (Federal High Court, Lagos, 24 February 2026)** [^11][^12]: Journalist Blessing Oladunjoye requested data protection compliance records from the Nigeria Shippers Council in October 2020. The Council failed to respond within seven days. In February 2026, Justice Aneke ruled that the FOI Act overrides conflicting laws, ordered full disclosure, and declared that the failure to provide a written refusal notice violated Section 4(b) [^11][^12]. The Court rejected the Council's defence that no approved IT policy existed at the time, holding that Section 1(1) establishes a right to access information regardless of whether it exists in a particular format [^12].
3. **July 2024 Supreme Court ruling on local government autonomy (AG Federation v. AG Abia State and 35 others)** [^16]: While not an FOI case, this ruling directed federal allocations to local government accounts directly, bypassing state joint accounts. Combined with the April 2025 FOI ruling, it means LGA financial records are now directly accessible under FOIA.

3. The MDA Responsiveness Workflow

Great Nigeria should model the FOI request workflow as a structured case pipeline with ten stages. Each stage generates data that feeds the MDA Readiness Index and the Accountability Analytics dashboard.

Stage 1: Identify the record.

The user selects a record type: budget, procurement, audit, staffing, grant, licence, inspection report, policy memo, court

compliance record, service delivery report, or project implementation evidence.

Stage 2: Identify the likely holder.

The system maps the record to an MDA, state ministry, LGA, parastatal, public corporation, or private body performing public functions or receiving public funds. The mapping draws from the master institutional registry.

Stage 3: Check proactive disclosure first.

If the record is legally expected to be proactively published under Section 2(3), the system checks whether it already exists online and logs the disclosure gap if missing. This shifts the burden from citizens to institutions.

Stage 4: Generate request.

The request builder produces a plain-language FOI request including applicant details where needed, record description, preferred format, delivery channel, and a clear statutory basis. The Act does not require applicants to show a special interest; the right belongs to "any person" [^1^].

Stage 5: Start statutory clock.

The tracker records date submitted, method, recipient, acknowledgement date, and the seven-day due date. Where the institution transfers the request or asks for clarification, those events are logged. The system sends automated reminders at Day 5, Day 7, and Day 14.

Stage 6: Classify response.

Responses are classified as: full disclosure, partial disclosure, no record held, transfer/referral, fee request, extension/clarification, refusal with exemption, non-response, or defective response.

Stage 7: Validate refusal.

A refusal must cite a specific FOIA exemption (Sections 11-21), explain why it applies, and advise on challenge rights. Broad claims such as "confidential" or "official secret" are flagged for legal review. The *Oladunjoye* ruling confirms that institutions cannot rely on generalised assertions [^11^][^12^].

Stage 8: Escalate.

Escalation options include: reminder, administrative escalation to FOI desk/head of institution, complaint to the Attorney-General's FOI Unit, public-interest publication, civil society referral, or litigation support. The system should generate pre-filled court templates for Federal High Court mandamus applications under Section 20.

Stage 9: Extract accountability value.

Disclosed records are tagged to public issues: budget tracking, procurement red flags, abandoned projects, payroll fraud, grants mismanagement, subsidies, environmental harm, school/health service delivery, security spending, LGA allocations, or electoral administration.

Stage 10: Publish anonymised learning.

The platform publishes institution response times, refusal patterns, proactive disclosure gaps, and successful request examples. This creates reputational pressure and guides future requesters.

4. Data Needed for a 2026 Baseline

The baseline requires three integrated datasets.

Dataset 1: Master Institutional Registry.

Each institution record should include: - Institution name and acronym - Tier: federal, state, LGA, public corporation, regulator, judiciary, legislature, security, education, health, extractives, infrastructure, social protection - Parent ministry or supervising authority - FOI officer name and title - FOI email, phone, physical address, portal URL - FOI page last updated date - Proactive disclosure score (0-100) - Annual FOIA report submitted: yes/no/unknown - Annual FOIA report publication URL - Average response time (median and mean) - Requests received, processed, denied, pending - Exemptions used (by section) - Court cases or appeal outcomes - FOI budget line or implementation expenditure - Records management evidence - Machine-readable records availability - Last verification date

Dataset 2: Public Records Inventory.

The inventory should track availability, freshness, completeness, machine readability, and usability for: - Current budget

and prior-year budget - Quarterly budget implementation reports - Procurement plan - Tender notices and bid results - Contract award lists - Contractor names and beneficial ownership links - Capital project list with location and amount - Audit reports and management responses - Auditor-General queries and responses - Board/committee membership - Grants and subsidies - Licences and permits - Payroll and staff lists where lawful - Inspection reports - Environmental and social impact documents - Service-level performance data - LGA allocation and expenditure records

Dataset 3: Request Log.

Each request record should include: - Request ID - Applicant type (citizen, journalist, CSO, researcher, diaspora, platform-generated) - Institution - Record sought - Submission date and method - Due date - Response date - Response classification - Exemption claimed (specific section) - Fees requested - Appeal/escalation status - Litigation status - Disclosure URL or file reference - Public-interest tags - Civic Credit award (for verified platform requests)

5. Public Records and Proactive Disclosure

The most important readiness shift is from reactive FOI to proactive disclosure. Many requests should not need to be filed because the records should already be published. Section 2(3) creates a legal duty of proactive publication; Section 29(2) requires institutions to make annual reports available by computer and telecommunications [^1^][^3^].

Great Nigeria should treat the following as high-priority proactive disclosure records, scored for availability, freshness, completeness, machine readability, and usability:

Table: High-Priority Proactive Disclosure Records

| Record category | Why it matters | Machine-readable ideal format |
|---|--|---|
| Current and prior-year budget | Enables budget tracking and variance analysis | CSV/JSON with programme codes and line items |
| Quarterly budget implementation reports | Shows whether appropriated funds were spent | XLSX with treasury codes and expenditure actuals |
| Procurement plan | Allows pre-award monitoring and competition assessment | OCDS JSON |
| Tender notices and bid results | Enables vendor diversity and conflict-of-interest checks | OCDS JSON |
| Contract award lists | Links budgets to specific deliverables and contractors | OCDS JSON with beneficiary ownership |
| Capital project list with location and amount | Powers project tracking and citizen verification | GeoJSON with LGA/ward coordinates |
| Audit reports and management responses | Reveals financial irregularities and accountability gaps | Searchable HTML/PDF with structured findings tables |
| Grants, subsidies, and intervention funds | Tracks distributive justice and inclusion | CSV with recipient name, amount, purpose, location |
| FOI annual report | Demonstrates institutional compliance and transparency | XLSX matching FMOJ template |
| Organisational structure and functions | Helps citizens navigate institutional responsibility | HTML organogram with role descriptions |
| Service charter and complaint channels | Enables service-delivery accountability | HTML with SLA commitments |
| Board and senior management profiles | Supports conflict-of-interest and asset-declaration checks | Structured HTML with appointment dates |
| Policy documents and regulations | Allows legal and rights-based advocacy | Searchable HTML/PDF |

A PDF scan counts as "published" but should score lower than structured CSV, XLSX, JSON, or searchable HTML. The

NITDA National Cloud Policy 2025 mandates that Federal Public Institutions achieve 75% cloud adoption by 2030, share operational and compliance data upon request, and structure cloud contracts on a "pay as you go" basis [^22^]. These digital-transformation commitments create an opportunity to align FOIA proactive disclosure with NDPA data-subject-access infrastructure.

6. MDA Responsiveness Indicators

The 2026 readiness dashboard should publish institution-level indicators derived from the request log and institutional registry:

Table: MDA Responsiveness Indicator Suite

| Indicator | Definition | Benchmark |
|---------------------------------|--|--------------------|
| Response rate | Percentage of requests receiving any response | 100% |
| Timely response rate | Percentage answered within 7-day statutory timeline | 100% |
| Full disclosure rate | Percentage resulting in complete records | Sector-dependent |
| Partial disclosure rate | Percentage resulting in redacted/incomplete records | Track trend |
| Refusal rate | Percentage denied | Track by exemption |
| Legally adequate refusal rate | Refusals citing specific section with reasoned explanation | 100% of refusals |
| Non-response rate | Percentage receiving no response within 30 days | 0% |
| Average response days | Mean calendar days from submission to response | ≤7 days |
| Median response days | Median calendar days from submission to response | ≤7 days |
| Proactive disclosure score | Percentage of Section 2(3) categories published | 100% |
| Annual report submission status | Submitted to FMOJ by 1 February | 100% |
| FOI officer availability | Named, contactable officer verified within 90 days | 100% |
| Records usability score | Machine readability × freshness × completeness | 80%+ |
| Litigation/escalation frequency | Number of court cases or AG complaints per institution | Declining trend |

The OGP IRM report cited an average response time of 20 days for FOI-ranking data, which is 186% beyond the seven-day statutory expectation [^6^]. Great Nigeria should make this gap visible by institution and sector, updating it as new request data flows into the platform.

7. Public Accountability Use Cases

FOIA readiness is not only a legal compliance issue. It is the infrastructure that makes public accountability practical across every sector Great Nigeria tracks.

Budget monitoring: Citizens can request release warrants, project implementation records, procurement documents, and completion certificates. The Auditor-General's 2021 report (published November 2024) revealed that the CBN failed to remit over ₦1 trillion of the Federal Government's portion of operating surplus into the Consolidated Revenue Fund, with fears the money may have been diverted [^25^]. SERAP has sued the CBN at the Federal High Court in Abuja (FHC/ABJ/CS/250/2026) seeking an order of mandamus to compel disclosure [^25^].

Local government autonomy: Citizens can request LGA allocation receipts, council budgets, procurement plans, and project status reports. The July 2024 Supreme Court autonomy ruling potentially frees ₦2 trillion annually for local development [^16^]. The April 2025 FOI ruling removes the legal barrier to accessing LGA records. Yet less than 1% of LGAs have functional websites [^17^], meaning citizens will need to file requests directly or rely on Great Nigeria's proxy request service.

Health and education: Communities can request facility upgrade contracts, school rehabilitation records, staffing allocations, drug supply records, and inspection reports. Budget Tracker's 2024/2025 monitoring of 47 revitalised primary healthcare centres across 25 states found 8 with no interventions despite being listed as revitalised, and 1 completely abandoned [^20^]. FOIA requests for implementation reports and contractor details would expose these gaps before Tracker field teams arrive.

Anti-corruption: Journalists and CSOs can request audit responses, recovered asset management records, abandoned project files, and disciplinary outcomes. The EFCC's recovery of ₦566 billion and \$411 million (October 2023–September 2025) [^18^] and the ICPC's recovery of ₦37.44 billion in 2025 [^19^] are reported at aggregate level. FOIA requests could compel publication of case-level recovery data, asset disposal records, and beneficiary lists.

Elections: Citizens can request voter education spending, polling unit logistics procurement, election technology contracts, and post-election evaluation records. The OGP IRM noted that Nigeria's OGP process remains robust and collaborative, but rights-based commitments such as civic space remain important areas for further progress [^6^].

Environment and extractives: Communities can request remediation plans, spill reports, environmental impact documents, licence conditions, and host community fund records. The NUPRC published 62 Petroleum Prospecting Licenses, 27 Conversion Contracts, and 56 Concession Contracts by 2025, and launched the Nigerian Oil and Gas Asset Beneficial Ownership Register (NOGABOR) with about 119 entities registered [^6^]. However, community access to the full text of production-sharing contracts remains limited [^6^].

Security and human rights: Citizens can request detention records, use-of-force reports, prison inspection records, and compensation disbursement data. The Nigeria Security Tracker (Council on Foreign Relations) and ACLED document thousands of incidents annually, but official military and police records on civilian harm investigations are rarely proactively disclosed. FOIA requests for these records — combined with the Triad verification model (citizen, peer, institutional) described in the Civic Intelligence Strategy [^26^] — can convert anecdotal reports into verified datasets that influence Security Tracker health scores and trigger MDA responses. The security-sector exemption (Section 14) is frequently overbroad; institutions often classify entire categories of information as security-sensitive without applying the proportionality test required by the Act. The February 2026 *Oladunjoye* ruling establishes that sector-specific statutes do not override FOIA [^11^], suggesting that security agencies must now provide reasoned, record-specific justifications for each refusal rather than blanket classifications.

Procurement and open contracting: The Bureau of Public Procurement (BPP) operates the Nigerian Open Contracting Portal (NOCOPO), which contributed to government savings and strengthened price intelligence under OGP Commitment 3 [^6^]. However, NOCOPO data completeness varies by MDA. FOIA requests for procurement plans, bid evaluation reports, and contract amendments can fill gaps that open contracting automation misses, particularly for state and LGA contracts that are not yet on NOCOPO.

Social protection and humanitarian funds: The alleged diversion of ₦585.2 million by former Minister of Humanitarian Affairs Betta Edu — funds meant for vulnerable people in Akwa Ibom, Cross River, Lagos, and Ogun states — illustrates why FOIA requests for beneficiary lists, disbursement schedules, and vendor contracts in social protection programmes are critical [^25^]. SERAP has demanded full details of spending within the National Social Investment Programme (NSIPA) [^25^]. Great Nigeria's FOI workflow should include a dedicated "Social Protection" record type with pre-populated request templates for NSIPA, ecological funds, and disaster relief allocations.

8. What Great Nigeria Should Build

Great Nigeria should build a FOIA/Public Accountability module with six integrated components, drawing on the platform's existing tracker architecture, Data Bank, NPI platform, and citizen reporting infrastructure.

Component 1: MDA Readiness Index

A searchable scorecard ranking institutions by legal acknowledgment, FOI contact, proactive disclosure, responsiveness, annual reporting, budget provision, and records usability. The index should be filterable by tier (federal/state/LGA), sector, and geopolitical zone. Each institution page should display: - Current readiness level (0-4) - Historical trend line - Comparison to sector average - Specific disclosure gaps - Contact details for FOI officer - Direct "Request Record" button - Downloadable institutional profile (PDF) for researchers and journalists

The index should update dynamically. When a citizen submits a request through the platform and receives a response, the response time automatically feeds into the institution's timeliness score. When an institution publishes a new proactive disclosure, the platform's scraper or manual verifier updates the disclosure score. This creates a living baseline rather than a static snapshot. The index should also surface "fast improvers" and "chronic defaulters" quarterly, generating reputational incentives that complement legal enforcement.

Component 2: FOI Request Builder

A guided tool that helps users select a record type, identify the likely institution, generate plain-language FOI requests in English, Pidgin, Hausa, Yoruba, or Igbo, and submit by email or portal. The builder should: - Pre-populate statutory citations - Suggest alternative records if the primary is likely exempt - Generate a request ID and statutory-deadline calendar entry - Offer anonymous submission for sensitive requests - Integrate with the platform's Civic Credit system to reward verified requests - Include a "Request on My Behalf" option for community champions who proxy requests for offline citizens

The request builder must be designed for Nigeria's device and connectivity constraints. The initial payload should be under 800KB, forms must work on 3G networks with intermittent connectivity, and offline draft-saving should allow users to complete requests without continuous connection [^26^]. Voice-note input should be supported for users with limited literacy, translating spoken Pidgin or Hausa into structured text through Ask Nigeria AI. This accessibility layer is not optional; it is survival engineering for the 55% of Nigerians outside consistent internet access [^26^].

Component 3: Deadline and Escalation Tracker

A case-management layer that tracks due dates, sends reminders, flags non-response, validates refusal notices for legal adequacy, and guides users through escalation steps. The tracker should: - Display a public dashboard of overdue requests by institution - Generate pre-filled complaint letters to the Attorney-General - Generate Federal High Court mandamus application templates - Log escalation outcomes for institutional scoring - Integrate with the platform's WhatsApp bot for reminder delivery (critical given WhatsApp's 98% message open rate and 51 million Nigerian users) [^26^] - Support batch tracking for CSOs and journalists managing multiple simultaneous requests

The escalation workflow must reflect Nigerian legal reality. Most citizens cannot afford litigation. The tracker should therefore prioritise low-cost escalations: social media amplification, journalist referral, CSO coalition letters, and parliamentary petition. Litigation support should be reserved for high-impact cases with strong precedential value, funded through a "Public Interest Litigation Fund" seeded from GN Insider subscriptions and diaspora donations.

Component 4: Public Records Library

A repository for disclosed records, official reports, budgets, procurement files, audit reports, and court documents, tagged by institution, state, sector, and topic. Each record should be scored for usability and linked to related tracker data, news clusters, and explainer content. The library should support: - Full-text search - Filter by record type, date, institution, and format - API access for researchers and journalists - Citation generator (APA, MLA, Chicago) - Machine-readability scoring: PDF scan = 1 star, searchable PDF = 2 stars, structured table = 3 stars, CSV/JSON/API = 4 stars - Version control for records that are updated annually (budgets, audit reports) - Community annotation: verified users can highlight sections, add context, and flag discrepancies

The library should follow open-data principles. All records should be licensed under a Creative Commons Attribution license, requiring only that users cite Great Nigeria and the original institution. This encourages academic and journalistic reuse while building the platform's reputation as Nigeria's definitive governance archive.

Component 5: Accountability Analytics

Dashboards showing response times, non-response rates, disclosure gaps, most-requested records, institutions with repeated refusals, and sectors with high public-interest demand. The analytics layer should: - Surface anomalies (e.g., institution that never responds, sector with sudden spike in refusals) - Generate monthly "FOIA Accountability Briefs" - Feed data into the Governance Tracker and Power Map - Support academic and journalistic research with exportable datasets - Predictive modelling: using historical request data, predict which institutions are likely to miss deadlines and auto-prepare escalation materials - Geographic heat maps showing FOI compliance by state and LGA, revealing regional patterns of opacity - Comparative benchmarking: Nigeria's federal compliance rate (11.38%) against Ghana's (~60%), South Africa's (~70%), and Kenya's (~45%), contextualising reform urgency

The analytics layer should be accessible to three audiences: citizens (simplified infographic summaries), researchers

(full datasets with methodology notes), and MDAs (institutional performance reports with improvement recommendations). This three-way transparency ensures that the platform is perceived as an accountability tool rather than an opposition weapon.

Component 6: Evidence-to-Story Workflow

A backend workflow that converts disclosed records into report leads, project verification tasks, budget-monitoring cards, and citizen action briefs. This closes the loop between data acquisition and civic action: - A disclosed LGA budget becomes a tracker data point - A procurement contract becomes a Power Map relationship node - An audit finding becomes a forum discussion thread and explainer topic - A refused request becomes a campaign brief for CSO partners - A batch of disclosed health facility records becomes an Education Tracker or Health Tracker verification campaign - A disclosed environmental impact assessment becomes a Protest Tracker alert if community concerns were ignored

The workflow should be semi-automated. AI Studio should scan newly disclosed records for anomalies (e.g., budget line item that exceeds sector average by 300%, contractor name that matches a politically exposed person, project location that differs from budget description). Flagged records enter a human-editor queue. Verified anomalies generate automated content: a forum thread, an explainer draft, a tracker update, and a social media card. This converts raw disclosure into narrative and action at scale.

Integration with Existing Great Nigeria Infrastructure. The FOIA/Public Accountability module should not be built in isolation. It must plug into the existing Civic Intelligence architecture: - **Trackers:** Each of the 11 sector trackers (Security, Economy, Governance, Education, Health, Justice, Infrastructure, Election, Protest, Poverty, Power Map) should display an "FOIA Gap" widget showing records that should be proactively published but are missing [^26^]. - **NPI:** The Nigeria Progress Index (NPI) project tracking should ingest disclosed contract and completion-certificate records to validate citizen photo submissions [^26^]. - **Data Bank:** Downloaded datasets from the Data Center should include a "Source: FOIA" provenance field, with request ID and disclosure date, so researchers can verify and cite [^26^]. - **Forum:** The Nigeria Forum should auto-create discussion threads when an institution's readiness score drops or when a major refusal is validated, enabling community analysis and peer verification [^26^]. - **AI Studio:** Ask Nigeria AI should be trained on the Public Records Library corpus so users can ask "What did the Auditor-General say about LGA X in 2023?" and receive sourced answers rather than hallucinated responses [^26^]. - **Trust Score:** Users who submit verified FOI requests, review disclosed records for accuracy, or contribute to institutional scoring should earn Civic Credits that elevate their Trust Score and unlock economic privileges [^26^].

Technical Architecture. The module should follow the gn_reports model pattern already implemented on the platform: a canonical gn.foi_request record with report-specific metadata (institution, record type, statutory dates, response classification, exemption cited), linked to gn.report records for published accountability briefs, and stored with ir.attachment for disclosed files [^29^]. Public routes should follow the same slug-based pattern as existing reports: /foi/readiness/<institution-slug>, /foi/request/<request-id>, /foi/library/<record-slug>. Access tiers should mirror the Data Center model: public summaries free, premium dashboard and API access for GN Insider subscribers, and enterprise API for verified organisations [^26^].

What This Means For Nigerians

For the citizen in a rural LGA: The April 2025 Supreme Court ruling means you can now request records from your local government chairman — allocation receipts, council budgets, project lists — and the law is on your side. Great Nigeria's request builder and LGA readiness index will show you whether your council has ever responded to an FOI request and what to do if they refuse.

For the journalist investigating corruption: The *Oladunjoye* ruling means institutions can no longer hide behind sector-specific statutes or claim "official secrets." Great Nigeria's deadline tracker and escalation templates reduce the cost and delay of enforcement. The Public Records Library gives you a searchable archive of disclosed documents you can cite with confidence.

For the student or researcher: The MDA Readiness Index shows which institutions are actually transparent. The Data Center tiered access model — public (90 days), Civic (2 years), Premium (full historical), Academic (full historical with citation) — gives you structured datasets with embedded methodology and provenance [^26^].

For the diaspora investor or remittance sender: The local government autonomy ruling plus FOIA applicability means you can now verify how funds sent to hometown associations or LGA projects are being used. Great Nigeria's "Adopt an LGA" programme can integrate FOI-verified project tracking into diaspora engagement.

For the anti-corruption activist: The EFCC and ICPC recovery data is a start, but FOIA requests for case-level asset disposal records, project tracking for 1,490 ICPC-monitored projects [^19^], and budget implementation reports provide the granular evidence needed for effective advocacy.

For the woman or marginalised-group member: HumAngle Foundation's research shows that female engagement with FOIA is significantly lower due to safety concerns and power dynamics [^24^]. Great Nigeria's anonymous request option, gender-disaggregated readiness data, and female-centred FOI advocacy campaigns can close this gap. The November 2024 HumAngle roundtable on female-centred FOI engagement identified specific barriers: apprehension about physical safety when visiting MDAs, lack of female FOI desk officers in many institutions, and domestic responsibilities that limit time for follow-up [^24^]. Addressing these requires not just technology but community-based support: female community champions who proxy requests, WhatsApp voice-note guidance in local languages, and safe-spaces for documentation.

For the person with disabilities: The NDPA 2023 and GAID 2025 require data controllers to design systems that enable seamless data subject access [^21^]. Great Nigeria's FOIA module should comply with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA: screen-reader compatibility for request forms, high-contrast modes for visually impaired users, and voice-navigation support. The National Orientation Agency's translation of the FOI Act into 23 indigenous languages [^6^] should be linked directly from the request builder so that users can reference their rights in their first language.

For the religious leader and community elder: Traditional authorities are often the first point of contact for governance complaints in rural Nigeria. Great Nigeria's community champion programme — 774 LGA ambassadors trained to translate online tracker data into offline community action [^26^] — should include FOI literacy. An imam or pastor who understands that the law guarantees access to LGA allocation records can mobilise congregation members to file coordinated requests, multiplying accountability pressure.

For the civil servant: Many public servants want to comply with FOIA but lack training, budget, or managerial support. The MDA Readiness Index should include an internal-facing dashboard showing exactly what the institution needs to do to improve, with downloadable templates for record maps, proactive disclosure checklists, and refusal notice formats. Civil servants who drive compliance should be named in "Most Improved MDA" reports and eligible for Civic Credits if they engage transparently on the platform.

For the entrepreneur and SME owner: Procurement transparency directly affects market access. When contract awards, pre-qualification criteria, and bid evaluation reports are proactively published, small businesses can compete for government contracts on merit rather than connection. The BPP reported that open contracting reforms under NOCOPO generated significant government savings [^6^], but SME participation data is rarely disclosed. FOIA requests for contractor diversity metrics, subcontractor names, and payment timelines can expose whether public procurement actually serves the "Buy Nigerian" policy objective.

For the elected official or legislator: FOIA compliance is a constituency service. Legislators who assist constituents with FOI requests, publish their own office expenditure proactively, and demand MDA accountability in oversight hearings build reputational capital. Great Nigeria's Power Map should integrate FOI readiness scores with legislator profiles, showing which representatives actively champion transparency.

Data Notes

This report was prepared from sources verified on 2026-05-04. The Federal Ministry of Justice FOI portal and annual report pages were accessible. The 2024 Annual FOIA Report to the National Assembly (Annexure A) was published on 16 June 2025 [^4^]. The 2023 Annual Report was submitted on 27 March 2024 [^27^].

The exact 2025/2026 list of institutions that submitted or failed to submit FOIA annual reports needs extraction from FMOJ appendices before publication as a definitive dataset. The OGP IRM Results Report provides a strong national

summary, but institution-level scoring will require fresh requests, portal checks, and manual verification across MDAs.

The Supreme Court FOIA applicability details were confirmed through multiple civic and media sources citing the *Osaku* judgment of 11 April 2025 [^8^][^9^][^10^]. The Federal High Court *Oladunjoye* judgment of 24 February 2026 was reported by Media Rights Agenda and BONews Service [^11^][^12^].

State and LGA FOIA readiness remains under-documented. Because the Act's practical implementation varies by institution and tier, Great Nigeria should avoid overclaiming readiness without direct verification. The finding that less than 1% of LGAs operate functional websites is drawn from Veriv Africa's 2024 analysis citing The Nation's report that 668 local governments have no websites [^17^]. This digital silence at the grassroots level means that even though the Supreme Court has now made LGA records legally accessible, citizens face a practical barrier: there is no online portal to browse, and the FOI officer — if one exists — may be a council secretary with no training in records management.

Asset recovery figures are drawn from official statements: the Attorney-General of the Federation's asset recovery summit remarks (May 2025) [^28^], CISLAC/Transparency International Nigeria's CPI 2025 release (February 2026) [^18^], and ICPC's end-of-year statement (December 2025) [^19^]. These figures represent self-reported agency data and should be cross-referenced with Auditor-General reports where available. The Auditor-General's 2021 report, published in November 2024, revealed that the NNPC failed to account for ₦22.3 billion, \$49.7 million, £14.3 million, and €5.2 million in oil-related revenues [^18^]. This gap between recovered assets and unaudited shortfalls illustrates why FOIA requests for granular recovery records are essential.

BudgIT Tracka data is drawn from the 2024/2025 Tracka Report released in early 2026 [^20^]. Tracka monitored 2,760 projects across 28 states, representing approximately 11.2% of the 24,553 projects captured in national budgets. The report found that only about 52% of Nigeria's 2024 capital projects showed evidence of on-ground delivery [^20^]. Of 16 dam projects tracked across 13 states (₦432 million), none were completed; four were abandoned, six were progressing slowly, and six had not commenced despite prior funding [^20^]. These findings were possible because budget documents were partially available through open data releases; fuller FOIA compliance would enable Tracka to monitor the remaining 88.8% of projects.

Digital Governance Context. Nigeria's digital governance landscape is evolving in parallel with FOIA implementation. The Nigeria Data Protection Act 2023 established the Nigeria Data Protection Commission (NDPC) and mandates breach notification within 72 hours, data subject access rights, and periodic compliance audits [^21^][^34^]. The NDPC's General Application and Implementation Directive (GAID) 2025 requires Data Controllers and Processors of Major Importance to file annual Compliance Audit Returns and imposes penalties of up to ₦10 million or 2% of annual gross revenue for non-compliance [^21^][^34^]. NITDA's National Cloud Policy 2025 mandates 75% cloud adoption across Federal Public Institutions by 2030, with data sovereignty and security requirements [^22^]. These frameworks create a dual opportunity: institutions that invest in digitisation for NDPA/NITDA compliance are simultaneously building infrastructure for FOIA proactive disclosure. Great Nigeria should advocate for alignment — a single digitisation investment that serves data protection, cloud policy, and access-to-information obligations.

Risk Factors. Several risks could degrade the 2026 baseline before the next refresh: - *Judicial reversal or delay:* While the Supreme Court ruling is binding, implementation depends on lower courts and state executives. States may resist through administrative obstruction rather than legal challenge. - *Funding collapse:* The FMOJ FOI Unit depends on budgetary allocation. If the 2026 appropriation reduces FOI sensitisation and training funds, compliance rates could stall or reverse. - *Political transition:* Nigeria's 2027 electoral cycle begins in 2026. Transitions often disrupt institutional memory; FOI desk officers may be rotated, and annual reporting may lapse. - *Security pretext:* The security-sector exemption (Section 14) is already overused. A major security incident could trigger blanket invocations of this exemption, choking off accountability requests. - *Platform capture:* If Great Nigeria's FOIA module becomes the dominant channel, institutions may channel all responses through the platform while ignoring direct citizen requests, creating a single point of failure.

These risks are not arguments against building the module; they are design requirements. The system must be resilient to political cycles, decentralised across multiple civic partners, and legally redundant so that platform failure does not extinguish statutory rights.

Ethical Safeguards. Great Nigeria's FOIA module must adhere to the same ethical framework that governs the broader platform. Individual FOI requests and disclosed records should never be sold to political parties, campaign organisations,

or commercial data brokers. The revenue model for the module should mirror the Data Partnership model described in the Civic Intelligence Strategy: 60% platform operations, 20% Civic Credit fund for contributors, 20% data acquisition and FOI litigation support [^26^]. All data partnerships must be disclosed publicly in an annual transparency report. Users must be able to opt out of aggregation via privacy settings. The module must comply with the Nigeria Data Protection Act 2023, including breach notification within 72 hours and data minimisation principles [^21^].

Accessibility and Inclusion. The module must be designed for Nigeria's dual-speed digital landscape. For online users (107 million internet users), the web interface should follow the Great Nigeria PWA specification: sub-800KB initial payload, service worker offline caching, WebP lazy loading, and dark mode default [^26^]. For offline users (130 million), content must be accessible via WhatsApp audio broadcasts, SMS summaries, radio scripts in English, Pidgin, Hausa, Yoruba, and Igbo, and community champion proxy services [^26^]. The request builder should support voice-note input, and the Public Records Library should offer text-to-speech for key documents. These are not add-on features; they are inclusion requirements for a platform that claims to serve "Great Nigeria" in its entirety.

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Report History and Versioning.

| Version | Date | Changes |
|---------|------------------------|--|
| 1.0 | 2026-05-04 | Initial baseline publication. Legal analysis current through February 2026 Federal High Court ruling. Institutional data based on FMOJ 2023-2024 annual reports. |
| 1.1 | (Scheduled 2026-08-04) | Q2 refresh: incorporation of primary request sampling data, updated institutional registry, state-level mapping results, and LGA pilot findings. |

Peer Review. This report was prepared by the Great Nigeria Research team with external source verification. Legal analysis was cross-referenced against published court reporting and constitutional commentary. Statistical claims were traced to original source documents where possible. Users are encouraged to submit corrections or additions via the platform's feedback channel or by emailing research@greatnigeria.net.

Corrections Policy. Great Nigeria Reports maintains a transparent corrections log. If a factual error is identified in this report after publication, the correction will be noted in the report footer with the date of correction and a description of the change. Methodological updates, source retractions, or significant new court decisions will trigger a version update (1.1, 1.2, etc.) rather than a silent edit.

About Great Nigeria Reports. Great Nigeria Reports is the investigative and analytical publishing arm of Great Nigeria Network. Reports combine verified data from the GN Data Bank (54,126+ economic indicators, 118,386+ news entries,

14,346+ incidents), news clustering engine, NPI platform, and external authoritative sources to produce publication-grade baseline documents on Nigerian governance, economy, security, and society. All reports follow a structured methodology, include minimum 25 cited sources in [^n^] format, and are published with defined access tiers: public executive summaries for all Nigerians; premium datasets, dashboards, and downloadable PDFs for registered users, GN Insider subscribers, and enterprise clients.

Prepared by Great Nigeria Research. © 2026 Great Nigeria Network. This report is published under the Great Nigeria Reports Library. Access tier: Public executive summary; premium institutional readiness dashboard and FOI request tracker available to registered users. For data licensing, citation, or partnership enquiries, contact intelligence@greatnigeria.net.

Methodology

This baseline used a source-first review of Nigerian FOIA law, official Ministry of Justice materials, Attorney-General implementation guidelines, OGP IRM implementation assessment, civic accountability reporting, relevant court reporting, anti-corruption agency disclosures, and budget transparency research. Sources were browsed and verified on 2026-05-04 because governance and FOI compliance facts are time-sensitive.

The readiness model was derived from statutory obligations (FOI Act 2011, Sections 1-29), Attorney-General implementation guidance (Revised Guidelines 2013), and civic FOI ranking logic (PPDC/BudgIT/MRA methodology). The five-level scoring system was designed to align with Great Nigeria's existing Health Score architecture (0-100 composite) while providing institution-level granularity [^26^].

The report separates legal obligations from observed implementation. Where evidence indicates non-compliance, the report identifies it as a readiness gap and recommends data collection before institutional scoring. Legal analysis reflects the April 2025 Supreme Court ruling and February 2026 Federal High Court ruling as binding precedents, but users should seek independent legal counsel before initiating litigation.

External research was conducted using verified government portals, CSO publications, academic journals, and reputable news outlets. No primary survey data was collected for this baseline; all statistics are drawn from published reports, official statements, court records, and verified civic monitoring datasets.

Limitations. This baseline does not claim to have verified every institution's FOI readiness through direct request. The institutional compliance figures (91 of 800; 143 of 800) are drawn from FMOJ annual reports and OGP IRM citations [^5^][^6^]. Great Nigeria recommends a systematic verification sweep — submitting test FOI requests to a stratified sample of institutions across all three tiers — before publishing definitive institution-level scores. The legal analysis reflects binding precedents as of May 2026, but constitutional and administrative law evolves; users should verify that no subsequent ruling has modified the principles stated herein.

The BudgIT Tracka data reflects field monitoring of 2,760 projects and cannot be generalised to all 24,553 budgeted projects without statistical weighting [^20^]. The EFCC and ICPC recovery figures are self-reported and have not been independently audited by this report [^18^][^19^]. The Transparency and Integrity Index scores are produced by the Center for Fiscal Transparency and Public Integrity and reflect methodology specific to that index [^23^].

Updating Protocol. This baseline should be refreshed quarterly. Key refresh triggers: (1) release of FMOJ annual FOIA report (typically March-April); (2) publication of new FOI Ranking by PPDC and coalition (typically October); (3) major court decisions on FOIA applicability or exemptions; (4) budget-cycle transitions (January appropriation, quarterly implementation reports); (5) OGP action plan milestones. The Great Nigeria Reports module supports versioning and periodic updates through its `gn.report` model and section-based architecture [^29^].

Recommended Next Steps.

1. *Legal verification:* Engage a Nigerian constitutional lawyer to review the legal analysis in this report, particularly the scope and limits of the April 2025 Supreme Court ruling and February 2026 Federal High Court ruling, before publishing litigation guidance.
2. *Institutional sampling:* Submit test FOI requests to a stratified random sample of 100 institutions (50 federal, 30 state, 20 LGA) to generate primary response-time and disclosure data for the 2026 Q3 refresh.

3. *FMOJ data extraction*: Obtain and parse the full FMOJ annual report appendices listing compliant and non-compliant institutions, converting them into the master institutional registry.
4. *State-level mapping*: Identify which of the 36 states have functional FOI pages, designated officers, and proactive disclosure portals. Only Ekiti and Imo have state FOIA laws, but all 36 are now bound by the Supreme Court ruling [^15^].
5. *LGA pilot*: Select 10 LGAs across 5 geopolitical zones for an intensive readiness pilot: verify website presence, identify council secretaries or clerks as de facto FOI contacts, and test proxy request workflows through community champions.
6. *CSO partnership*: Formalise data-sharing agreements with PPDC, BudgIT, Media Rights Agenda, SERAP, HEDA, and HumAngle Foundation. Each partner brings specialised expertise: PPDC (procurement rankings), BudgIT (budget tracking), MRA (litigation support), SERAP (constitutional enforcement), HEDA (anti-corruption advocacy), HumAngle (security-sector transparency and gender inclusion) [^13^][^20^][^24^][^25^].
7. *Technology build*: Begin gn_foi_accountability module development using the gn_reports codebase as the structural template. Reuse slug generation, access-tier logic, attachment handling, and portal authentication patterns [^29^].
8. *Content seeding*: Populate the Public Records Library with existing disclosed documents: FMOJ annual reports, PPDC FOI ranking datasets, BudgIT Tracka reports, Auditor-General reports, ICPC and EFCC annual reports, and NUPRC contract disclosures.
9. *User testing*: Conduct usability testing with five audience segments — youth, professional, diaspora, activist/researcher, and offline user — to validate request builder design, language localisation, and offline accessibility [^26^].
10. *Launch sequencing*: Release the MDA Readiness Index first (public, free) to establish credibility and attract institutional engagement. Follow with the FOI Request Builder and Deadline Tracker (free with registration). Launch the full Public Records Library and Accountability Analytics as premium features for GN Insider subscribers and enterprise clients.
11. *Radio and offline integration*: Produce a 5-minute weekly "FOI Right Radio" segment for the five-station network (Wazobia FM, Beat FM, Cool FM, Nigeria Info FM, and one community radio partner) already planned in the Growth Phase content marketing strategy [^26^]. Each segment should explain one FOIA right in Pidgin, profile one institution's readiness score, and invite listeners to submit requests via SMS or community champion proxy.
12. *Diaspora engagement*: Create a "Diaspora FOIA Corps" of verified Nigerian professionals abroad who submit requests to institutions in their home states, fund litigation for high-impact cases, and mentor local requesters through the platform's forum and WhatsApp groups. Diaspora Nigerians sent \$20.93 billion in remittances in 2024 and already fund schools, hospitals, and roads through hometown associations [^26^]. Channeling this civic investment through structured FOIA workflows can accelerate LGA accountability.