

LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Nigeria

Country Report



PARADIGM
INITIATIVE



LONDA 2025

DIGITAL RIGHTS & INCLUSION IN AFRICA REPORT

Report produced and published by Paradigm Initiative
April 2026

This publication may be reproduced for non-commercial use in any form provided due credit is given to the publishers and the work is presented without any distortion.

Copyright ©2026 Paradigm Initiative

374 Borno Way, Yaba, Lagos, Nigeria.
media@paradigmhq.org
www.paradigmhq.org



Creative Commons Attribution-
NonCommercial-NoDerivatives
(CC BY-NC-ND) license

ISBN: 978-978-68-6631-4



Nigeria

By Khadijah El-USman and Muhammed Bello Buhari

Executive Summary

In 2025, Nigeria's digital rights landscape reflected a mix of slow recovery, persistent structural weaknesses, and emerging reforms. Connectivity improved modestly after the disruptions caused by the government-mandated requirement that all SIM cards should be linked to the owner's National Identity Number (NIN), with broadband penetration reaching 49.34%.¹ However, this recovery remains fragile, affordability-constrained, and unevenly distributed, falling significantly

short of the National Broadband Plan target of 70% by 2025. Although there is no concrete proof that the sub-national network shutdown experienced in Nigeria's Zamfara state was ordered by the government, access was also constrained by the first increase in the cost of telecommunications services since 2013 and uneven network quality.

Freedom of expression remained fragile, shaped by overlapping laws, opaque con

tent-removal practices, informal state pressure on platforms, and a pattern of state-level arrests and institutional sanctions that cumulatively undermine legality, necessity, and proportionality standards under the African Commission on Human and Peoples' Rights' Declaration of Principles of Freedom of Expression and Access to Information in Africa, deepening self-censorship. In spite of this, a landmark Supreme Court ruling affirming the full applicability of the Freedom of Information Act, including for sub-national governments, is worth celebrating. Progress in data protection included stronger oversight by the Nigeria Data Protection Commission (NDPC), yet recurrent data leaks and non-compliance by government agencies highlighted critical gaps. Surveillance expanded through new drone and AI-powered monitoring systems without corresponding transparency or safeguards.

Nigeria also advanced emerging technology governance through a National AI strategy, the launch of Nigerian Atlas for Languages & AI at Scale (N-ATLAS), and legislative momentum on AI regulation.

At the same time, digital inclusion efforts progressed through child online safety reforms and assistive technology initiatives, despite persistent accessibility barriers. Universal service interventions continued, but delayed USPF reporting (the latest annual report available is from 2022) significantly constrained transparency and prevented a credible assessment of whether these interventions reduced access gaps for underserved communities. The report utilised Paradigm Initiative's TheScore Index to assess Nigeria's compliance with the Declaration. With an overall score of 35/60, Nigeria is moderately compliant, reflecting meaningful developments but significant risks that require urgent regulatory, institutional, and rights-protective reforms.

1. Nigerian Communications Commission (NCC) Industry Statistics, as reported in "BROADBAND: Nigeria Unlikely to Achieve 2025 Target as Penetration Stands at 49.34%," TechEconomy (November 2025). Available at: <https://techeconomy.ng/broadband-nigeria-unlikely-to-achieve-2025-target-as-penetration-stands-at-49-34>the full applicability of the Freedom of Information Act/

Introduction

Since 2016, Nigeria's digital rights environment has evolved through a mix of state-led reforms and advocacy-driven pressure. Broadband access rose from 20.95% in 2016 to 49.34% in 2025, mainly driven by government initiatives such as the National Broadband Plan and spectrum expansion for 4G and 5G. Key legal reforms also emerged, including the passage of the Nigeria Data Protection Act (2023) and the amendment of the Cybercrimes Act (2024), both state-driven responses influenced by sustained advocacy highlighting gaps in privacy and digital safety. Several advancements, however, were secured through civic action rather than state initiative. An example of this is that after an 11-year legal battle led by journalists and civil society, the Supreme Court affirmed full Freedom of Information Act (FOIA) applicability across the federation in 2024, strengthening access to information. Progress on child online protection also reflected combined legislative action and years of advocacy around online harms. Disability inclusion gained momentum through the Disability Act (2018) and subsequent pressure for assistive technology and accessibility standards.

Despite these gains, persistent challenges illustrate the imbalance of power between the State and users. Restrictions on freedom of expression continued through arrests of online critics, reliance on criminal defamation laws and security-driven regulation. Surveillance capacity expanded significantly through drones, AI-powered monitoring and biometric upgrades without commensurate transparency or oversight. Nigeria's trajectory from 2016 to 2025, therefore, reflects both progress and ongoing systemic risks, with state-driven reforms often competing with patterns of overreach, while advocacy-driven wins fill accountability gaps.

Internet Access

And Disruptions

Reporting Connectivity in the 2024 Londa report was shaped by the final enforcement of the NIN–SIM linkage policy, which resulted in millions of disconnections and a steep decline in the number of active mobile users. The situation was compounded by proposed tariff hikes across the sector, including a 97% increase announced by Starlink, signalling growing pressure on consumers.

By the end of December 2025, the sector had begun a slow recovery. Active mobile subscriptions rose by 10.3 million over the year to reach 179.64 million, pushing teledensity upward to 82.87%,² though still well below the numbers reported before the government forced citizens to connect their National Identity Numbers (NIN) to independently registered SIM cards. Broadband access also saw steady progress, with internet subscriptions pushing official broadband pen-

etration to 51.97%. However, because this metric counts total active SIM cards rather than unique individual subscribers, it inherently overstates actual human connectivity due to the high prevalence of multiple SIM card ownership in Nigeria. Even with this inflation, reaching 51.97% penetration for broadband and non-broadband connections means the country falls critically short of the 70% broadband connectivity target set out in the National Broadband Plan for 2025.

Furthermore, the technological distribution of these connections shifted toward higher-capacity networks by year-end. 4G solidified its dominance at 52.95% of total connections (serving roughly 95 million users), while 5G adoption rose to 3.77%. Conversely, legacy networks lost share, with 2G dropping to 37.37% and 3G falling to 5.91%.³ Because 2G infrastructure provides narrowband connectivity (often capping around 500kbps) rather than true broadband, this data highlights a severe quality-of-service gap. This uneven distribution limits meaningful access for

2. Adeyemi Adepetun, “Nigeria’s active telephone users hit 179.6m as data consumption surges,” *The Guardian Nigeria* (February 4, 2026). Available at: <https://guardian.ng/news/nigerias-active-telephone-users-hit-179-6m-as-data-consumption-surges/>

3. ITPulse, “Nigeria: Subscribers favour 4G as 2G and 3G continue to lose share,” *ITPulse* (January 6, 2026). Available at: <https://itpulse.com.ng/nigeria-subscribers-favour-4g-as-2g-and-3g-continue-to-lose-share/>

underserved communities; reliance on 2G significantly restricts the ability to exercise rights online, including access to information, economic participation, education, and essential digital services, compared to urban 4G-dominant areas. Meanwhile, national data consumption surged past 13.2 million terabytes in 2025, a 35% increase over 2024, underscoring a rapidly growing appetite for digital services that the current infrastructure struggles to equitably match.⁴

On affordability, a 50% tariff hike was announced by telcos in January, and it took effect in February 2025. This is the first time approval has been granted for an increase in prices since 2013. Nigerian Communications Commission (NCC) capped the tariff adjustment at 50%, below the 100% requested by the telcos, yet it still represented a substantial affordability shock for low-income users, with limited evidence of accompanying consumer-protection or subsidy measures.⁵

Notably, the 2024 Londa report's warning of an impending tariff hike materialised in early 2025, reinforcing concerns about affordability. While regulatory intervention moderated the increase, and Nigeria's internet remains relatively cheap compared to many countries on the continent, affordability pressures are still deepening for many users.⁶ Compounding this financial barrier is the uneven network distribution; as previously noted, the continued reliance on legacy 2G networks continues to limit meaningful access and the full enjoyment of rights online. However, in a positive step for consumer protection against financial friction, the NCC collaborated with the Central Bank of Nigeria (CBN) to facilitate refunds exceeding NGN10 billion, approximately US\$739 000 000, to subscribers for failed airtime and data recharge transactions.⁷

In terms of disruptions, no government-ordered shutdowns or throttling were documented; rather, apart from a

4. Adepetun, "Nigeria's active telephone users hit 179.6m," *The Guardian Nigeria*. (See Footnote 2).

5. The Cable, "AT A GLANCE: 50% telecom tariff hike, 15% port charge levies adjusted, introduced under Tinubu's administration", (2025) <https://www.thecable.ng/at-a-glance-50-telecom-tariff-hike-15-port-charges-levies-adjusted-introduced-under-tinubus-administration/> (Accessed December 03, 2025)

6. TechNext "50% data hike: How Nigeria's internet prices compare against 7 African countries" (2025) < <https://technext24.com/2025/02/18/nigerias-internet-costs-and-7-countries/> > (Accessed January 11, 2025)

7. Adeyemi Adepetun, "NCC removes 450 illegal signal boosters, reassigns spectrum," *The Guardian Nigeria* (January 30, 2026). Available at: <https://guardian.ng/business-services/ncc-removes-450-illegal-signal-boosters-reassigns-spectrum/>

disruption that affected Zamfara state in Nigeria but could not be ascertained as government-ordered,⁸ other disruptions stemmed from fibre cuts, power outages and other infrastructure failures, underscoring structural weaknesses in network resilience,⁹ driving sustained advocacy throughout 2025 for the strict enforcement of Critical National Information Infrastructure (CNII) protections to treat telecom assets as protected national security infrastructure.

Online Freedom of Expression and Access to Information

In 2025, Nigeria’s online freedom of expression environment remained fragile despite positive gestures by statutory bodies such as the National Human Rights

Commission issuing an advisory reaffirming the constitutional right to free expression, which served as a soft accountability mechanism rather than an enforceable restraint. In effect, some rights exist in law and policy but are enforced inconsistently. This fragility is further shaped by provisions in the Cybercrime Act, the Nigerian Broadcasting Code, state-level criminal defamation statutes, and ambiguous “false information” provisions that fall short of international human rights standards. The rights impact is systemic; although constitutionally protected, online speech is restricted through overlapping laws, allowing authorities to use whichever tool is most convenient. This is evident from Nigeria’s global ranking of 122 out of 180 on the 2025 Reporters without Borders Press Freedom Index.¹⁰

Censorship and content removal requests continued through opaque mechanisms. Google’s transparency data for the first half of 2025 shows six takedown requests

8. Access Now and the #KeepItOn Coalition. “Authorities in Nigeria must reconnect people in Zamfara, North West Nigeria now.” Access Now Press Release. Available at: <https://www.accessnow.org/press-release/keepiton-authorities-in-nigeria-must-reconnect-people-in-zamfara-north-now/>
9. Intelpoint “Fibre cuts caused 52% of mobile network outages in Nigeria between April and July 2025” (2025), <https://intelpoint.co/insights/fibre-cuts-caused-52-of-mobile-network-outages-in-nigeria-between-april-and-july-2025/> (Accessed October 25 2025)
10. Reporters without Borders. “RSF World Press Freedom Index 2025: economic fragility a leading threat to press freedom” (2025), <https://rsf.org/en/rsf-world-press-freedom-index-2025-economic-fragility-leading-threat-press-freedom> (Accessed December 2nd 2025)

via court orders, two requests from government officials, and one from the police, with compliance ranging from 50% to 100%.¹¹ Furthermore, Meta has now published its government data requests report for the first half of 2025, shedding some light on state interactions with the platform.¹² However, TikTok had not published its updated 2025 transparency report at the time of review. Despite Meta's recent disclosure, the broader transparency gap across certain platforms continues to limit public accountability and makes it harder to assess the true scale of content restriction.

More concerning for rights protection, however, is the shift from formal legal restrictions to informal state pressure, which operates outside judicial oversight and undermines transparency and due process safeguards required under

Principles 22 and 38 of the Declaration, as illustrated by the Department of State Services (DSS) publicly flagging posts by Omoyele Sowore, a digital publisher, activist and politician, themselves¹³ and urging platforms to remove them, and the banning of musician Eedris Abdulkarreem's protest song.¹⁴ The year has also seen a pattern of arrests at the state level, which often escape the national spotlight. In Mohammed Abubakar Isah's case in Niger State, police arrested and arraigned him in October 2025 for a social media post criticising the Governor.¹⁵ Similarly, in Jigawa State, Abba Mu'azu Abiyos was remanded in prison for criticising a local government empowerment programme.¹⁶ 2025 also saw schools and smaller state agencies adopting punitive measures against online criticism, including reprimanding university students who ques-

11. Google Transparency Report. "Government requests to remove content: Nigeria (January – June 2025)." Available at: <https://transparencyreport.google.com/government-removals/by-country/NG>

12. Meta Transparency Center, "Government Data Requests: Nigeria" (H1 2025). Available at: <https://transparency.meta.com/reports/government-data-requests/country/NG/>

13. PRNigeria, "DSS Demands Retraction, Apology from Sowore Over Comments on Tinubu" (2025). <https://prnigeria.com/2025/09/07/dss-demands-retraction-apology/> (Accessed November 30 2025)

14. <https://www.vanguardngr.com/2025/05/nigeria-and-the-eclipse-of-press-freedom/> (Accessed (December 03 2025)

15. Premium Times, "Police arrest student activist days after criticising Niger governor over insecurity, propaganda" (2025) <https://www.premiumtimesng.com/regional/north-central/830487-police-arrest-student-activist-days-after-criticising-niger-governor-over-insecurity-propaganda.html> (Accessed December 4 2025)

16. The Whistler, "Amnesty International Condemns Arrest Of Activist For Criticising LG Chairman" (2025) <https://thewhistler.ng/amnesty-international-condemns-arrest-of-activist-for-criticising-lg-chairman/> (Accessed November 30 2025)

tioned the First Lady,¹⁷ and a National Youth Service Corp (NYSC) member¹⁸ who criticised governance and was subsequently denied her service certificate. The cumulative effect of these developments has contributed to a climate of self-censorship, particularly among journalists, human rights defenders, and students who increasingly moderate their online expression out of fear of reprisal, justifying the country's low compliance score under Principle 20 on protection from arbitrary arrest and harassment.¹⁹

Overall, these developments show not only restrictions on speech but a broader governance model of deterrence: state and quasi-state actors deploy legal threats, administrative sanctions, and platform pressure to regulate dissent. This

undermines constitutional guarantees of expression and narrows civic space, particularly at state and institutional levels where accountability is weakest.

Access to Information

The Freedom of Information Act (FOIA) in Nigeria remains in force, yet journalists continue to report significant challenges in accessing public information despite the law's guarantees.²⁰ In encouraging news, however, the Supreme Court has delivered a landmark judgment after an 11-year legal battle, decisively affirming the validity of the FOIA and its applicability to all arms and levels of government.²¹

17. The Whistler, "Nursing Student Video Queried Over Viral Video On First Lady Remi Tinubu" (2025) <https://thewhisler.ng/nursing-student-queried-over-viral-video-on-first-lady-remi-tinubu/> (Accessed December 1 2025)
18. Premium Times, "Why corps member Rayes discharge certificate was withheld - NYSC" (2025) <https://www.premiumtimesng.com/news/top-news/813307-why-corps-member-rayes-discharge-certificate-was-withheld-nysc.html> (Accessed December 1 2025)
19. Human Angle Media, "Strangled in silence: The Unseen Forces Stifling Nigeria's Press Freedom" (2025) <https://humanglemedia.com/strangled-in-silence-the-unseen-forces-stifling-nigerias-press-freedom/> (Accessed November 30 2025)
20. News Agency Of Nigeria, "FOI Act: How journalists struggle to access public information in Kwara" (2025) <https://nannews.ng/2025/06/03/foi-act-how-journalists-struggle-to-access-public-information-in-kwara/> (Accessed August 05 2025)
21. Premium Times, "Freedom of Information (FOI) Act applicable to 36 states, Supreme Court rules" (2025) <https://www.premiumtimesng.com/news/787268-freedom-of-information-foi-act-applicable-to-36-states-supreme-court-rules.html> (Accessed August 05 2025)

This ruling represents a major victory for transparency, accountability, and press freedom in Nigeria. However, its practical impact will depend on proactive implementation by Ministries, Departments and Agencies (MDAs) and enforcement mechanisms for non-compliance.

Data Protection And

Cybersecurity

Nigeria's data protection landscape continued to evolve in 2025 under the Nigeria Data Protection Act (NDPA) 2023, which remains the country's primary privacy legislation to date and its accompanying Authority. The Commission strengthened compliance mechanisms first through the General Application and Implementation Directive (GAID), which took effect in September 2025,²² and by publishing a public list of 789 non-compliant organisations asking them to comply with the GAID within a short timeframe,²³ signal-

ling a shift toward more active regulatory oversight. These developments indicate that privacy is increasingly being treated as an enforceable right in Nigeria, with the regulator moving toward deterrence-driven accountability. Still, persistent breaches and non-compliance by public institutions undermine regulatory credibility and public trust. Moreover, the legitimacy of this shift will depend on consistent due process, clear enforcement standards, and stronger public awareness of data subject rights.

Despite these developments, persistent and recurring personal data leaks of Nigerian accounts are reported, highlighting the structural weakness of the system.²⁴ Nigerian government institutions were also reported to flaunt directives by the Presidency to comply with the Nigerian Data Protection Act, revealing weak internal accountability and reinforcing concerns that the state itself remains a leading privacy violator. Compounding into a pattern of breaches previously highlighted

22. Law Pavilion, "NDP Act 2023 GAID 2025: A comprehensive Guide to Nigeria's New Data Protection Landscape" (2025) <https://lawpavilion.com/blog/ndp-act-2023-gaid-2025-a-comprehensive-guide-to-nigerias-new-data-protection-landscape/> (Accessed December 01 2025)

23. DNL, "NDPC Publishes List of 789 Non Compliant Banks, Insurance Firms; Gives 21 Days to Comply" (2025)

24. <https://dnlegalandstyle.com/dnl/ndpc-publishes-list-of-789-non-compliant-banks-insurance-firms-gives-21-days-to-comply/> (Accessed December 03 2025)

in the 2024 Londa report, this indicates a system in which laws and policy architecture expand faster than accountability and enforcement capacity, with the State itself possibly among the weakest duty-bearers, undermining the right to privacy and public trust in the NDPA regime.

The 2021 National Cybersecurity Policy and Strategy (NCPS 2021) and the Cybercrimes Act 2015 (amended in 2024) currently form the core of Nigeria's cybersecurity and cybercrime governance framework. The Nigerian Senate, however, has proposed expanding this framework by introducing a dedicated Cybersecurity Act, rather than relying solely on legislation focused on cybercrime. To advance this effort, the Senate has already hosted two consultative engagements with stakeholders.²⁵

Following these developments, Nigeria proceeded to sign the United Nations Convention against Cybercrime: Strengthening International Cooperation for Combating Certain Crimes Committed by Means of Information and Communications Tech-

nology Systems and for the Sharing of Electronic Evidence of Serious Crimes in Hanoi in October 2025.

Nigeria's move toward a dedicated Cybersecurity Act, alongside its signing of the UN Convention against Cybercrime in Hanoi in October 2025, signals a shift from a narrow cybercrime framework to broader cybersecurity governance, with the potential to improve technical resilience, close systemic vulnerabilities, and strengthen international cooperation on electronic evidence. In principle, these developments could enhance protection for Nigerians, particularly given recurrent data breaches and weak institutional safeguards. However, Nigeria's track record of misusing cyber-related laws to restrict civic space means these reforms do not automatically guarantee the protection of rights. Without clear safeguards grounded in legality, necessity and proportionality, independent oversight, and strong privacy and due process guarantees, expanded cybersecurity powers could deepen surveillance, enable political targeting, and further chill online expression.

25. IT edge news, "Data breaches: 152k Nigerian Accounts leaked in 2025 so far, study reports" (2025) <https://www.itedge news.africa/data-breaches-152k-nigerian-accounts-leaked-in-2025-so-far-study-reports/> (Accessed December 03 2025)enate committee on ICT and Cybersecurity,"Senate Legislative-Stakeholders' Summit on ICT and Cybersecurity 2025" (2025) <<https://ict.cybersecurity.senate.gov.ng/civicrm/event/info?id=1&reset=1>> (Accessed December 19 2025)

Privacy and Surveil- lance

In 2025, Nigeria's privacy and surveillance landscape remains largely unchanged, characterised by a patchwork of constitutional guarantees and sector-specific statutes rather than a unified surveillance governance framework. This fragmentation weakens the rule-of-law test for surveillance by reducing clarity on who can intercept communications, under what conditions, and with what oversight. The primary legal protection for privacy is contained in Section 37 of the 1999 Constitution, which guarantees the privacy of citizens, their homes, correspondence, telephone conversations and telegraphic communications. This constitutional safeguard is supported by several statutory instruments, including the Nigeria Data Protection Act (NDPA) 2023, the Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act 2024, the Nigerian Communications Act 2003, the Terrorism (Prevention and Prohibition) Act 2022, and regulatory frameworks such as

the Lawful Interception of Communications Regulations. The combined effect is a surveillance architecture that is security-heavy and light on rights, failing to meet legality, necessity, and proportionality standards under Principle 41.

As with previous years, reports indicate that the Nigerian government and associated security sectors continue to invest heavily in surveillance technologies without corresponding improvements in transparency, oversight, or accountability. On November 25 2025, UrSafe signed a memorandum of understanding with Klass Security, a company providing services to agencies including the Nigerian Ports Authority, Nigerian Maritime Administration and Safety Agency (NIMASA), and APM Terminals at Onne Port in Rivers State. Under this agreement, UrSafe will supply drone surveillance technology to augment Klass Security's existing workforce of 150 security personnel.²⁶ In addition to drone deployment, a new tender was announced for the procurement of an Artificial Intelligence-powered surveillance system for the Corporate Affairs Commission, signalling Nigeria's continued move toward automated monitoring systems capable of large-scale, real-time

26. Techcabal, "Can AI and drones protect Nigeria's school children? UrSafe thinks so" (2025) <https://techcabal.com/2025/11/28/can-ai-and-drones-keep-nigerian-schools-safe-ursafe-thinks-so/#:~:text=When%20agencies%20procure%20entire%20fleets,initial%20assessment%20and%20development%20phase.%E2%80%9D> (Accessed December 04, 2025)

data analysis.²⁷ In line with this, the National Identity Management Commission (NIMC) is also seeking a consulting firm to strengthen the security and resilience of its digital identity infrastructure,²⁸ an acknowledgement of vulnerabilities within a system that already holds sensitive biometric and demographic data of millions of Nigerians.

Despite constitutional and statutory protections for privacy, surveillance practice in 2025 is increasingly diverging from a rights-based approach. Nigeria continues to expand surveillance capacity through drones, AI-powered monitoring systems, and stronger digital identity infrastructure, without corresponding improvements in public transparency, judicial oversight, or accountability, all of which risk normalising intrusive monitoring.

Developments in ICT and

Emerging Technologies

In 2024, Nigeria experienced accelerated momentum in its artificial intelligence ecosystem following the launch of the country's new National AI Strategy.²⁹ This renewed focus on AI set the stage for significant developments in 2025.

A major milestone came with the launch of N-ATLAS, an open-source language model built specifically for Yoruba, Hausa, Igbo, and Nigerian-accented English.³⁰ Developed through a collaboration between the Federal Government and Lagos-based startup Awarri, N-ATLAS represents a significant step for linguistic inclusion and localisation in AI systems.

27. Nigeria Tenders, "Procurement Of Artificial Intelligence-Powered Surveillance System Software" (2025) <https://www.nigeriatenders.com/tender/procurement-of-artificial-intelligence-powered-surveillance-system-software-6e6000b.php#:~:text=Tender%20for%20Procurement%20Of%20Artificial%20Intelligence%20Powered%20Surveillance,Deadline:%2027%20Mar%202025.%20Ref%20No:%20115736587.> (Accessed December 04, 2025)
28. National Identity Management Commission (NIMC), "Request for Expression of Interest (REOI) Engagement of Consultant to Enhance NIMS Security and Resilience," Hometown Development Initiative (HDI). Available at: <https://www.publicprocurement.ng/national-identity-management-commission-nimc-request-for-expression-of-interest-reoi-engagement-of-consultant-to-enhance-nims-security-and-resilience/>
29. Ncair nitda, "National Artificial Intelligence Strategy" (2025) <https://ncair.nitda.gov.ng/wp-content/uploads/2025/09/National-Artificial-Intelligence-Strategy-19092025.pdf> (Accessed December 04, 2025)
30. <https://www.google.com/search?q=https://techpoint.africa/2024/10/29/nigeria-n-atlas-open-source-language-model/> (Accessed December 04, 2025)

Legislative interest also grew. The Senate advanced a Bill to establish an Artificial Intelligence and Innovation Centre in Ekiti State, signalling growing government interest in building institutional capacity for AI development.³¹

In parallel, Nigeria introduced the National Digital Economy and e-Governance Bill 2025, considered Africa's first comprehensive legislative attempt to govern digital transformation across government sectors.³² It seeks to promote the adoption of digital technologies across all sectors by strengthening legal recognition for electronic communications, records, and contracts. Importantly, it also aims to ensure ethical, transparent, and risk-based governance of emerging technologies, including Artificial Intelligence. This Bill has strong value for digital transformation and consumer protection. Still, in its current form, it also concentrates broad power in the regulator, introduces punitive enforcement linked to vague directives, and creates a supremacy regime that could weaken

checks and balances. The Bill is therefore rights-positive in intent but rights-risky in structure, unless strengthened with clear safeguards, oversight mechanisms, and limits on regulatory discretion.

Together, these developments reflect Nigeria's continued efforts in 2025 to shape an AI-ready ecosystem through innovation, policy, and legislation.

Digital Inclusion

In 2025, progress has been recorded with the Child Online Access Protection Bill 2023, which has now passed its third reading in the House of Representatives and been transmitted to the Senate for further consideration.³³ The Bill represents one of Nigeria's most significant legislative efforts to establish a rights-based, structured framework for protecting children online, including obligations on platforms, regulators, and caregivers.

31. National Assembly Library Trustfund, "Senate Advances Bill to Establish Artificial Intelligence and Innovation Centre in Ekiti State" (2025) <https://naltf.gov.ng/senate-advances-bill-to-establish-artificial-intelligence-and-innovation-centre-in-ekiti-state/> (Accessed December 04, 2025)

32. Federal Ministry Of Communications, Innovation and Digital Economy, "Driving Economic Growth Through Digital Technology and Innovation" (2025) <https://fmcide.gov.ng/public-hearing-on-national-digital-economy-and-e-governance-bill-2025-holds-in-abuja/#:~:text=The%20National%20Digital%20Economy%20and%20e%2DGovernance%20Bill%202025%2C%20which,Tinubu's%20Renewed%20Hope%20Agenda.> (Accessed December 04, 2025)

Millions of Nigerians with disabilities continue to face barriers to digital inclusion due to poor design, limited accessibility features, and the high cost of assistive technologies. NITDA has acknowledged that the National Digital Literacy Framework did not adequately include persons with disabilities and has pledged to revise implementation to address these gaps as part of Nigeria’s broader goal of achieving 95% digital literacy by 2030.³⁴ This recognition is a great entry point for reform and a potential for mainstreaming disability inclusion, but measurable outcomes will depend on whether revised frameworks result in accessible design standards, budgetary allocations, and enforcement. In parallel, other MDAs such as the Federal Ministry of Health have intensified efforts to expand access to assistive technologies. Recent initiatives aim to support over 30 million Nigerians living with disabilities, improving the availability of devices, training, and support systems necessary for

meaningful digital participation.³⁵

Nigeria’s Universal Service Provision

Universal Service Fund (USF)

Fund (USPF) remains established under the Nigerian Communications Act 2003 and is administered by the Nigerian Communications Commission (NCC) through a Universal Service Provision Board and Secretariat within the Commission.

The Fund has recently released a 2023–2027 Strategic Management Plan (SMP) that frames the mission as “to facilitate universal service and access to ICT, through partnerships to stimulate development in rural, unserved and underserved communities”.³⁶

The SMP provides a detailed picture of USPF programmes and projects. The three

33. Vanguard, “Reps advance bill to protect children against online violence, abuse” (2025) <https://www.vanguardngr.com/2025/12/rep-advance-bill-to-protect-children-against-online-violence-abuse/> (Accessed December 03, 2025)

34. Premium Times, “NITDA to support digital inclusion for Persons with special needs” (2025) <https://www.premiumtimesng.com/health/health-news/799202-itda-to-support-digital-inclusion-for-persons-with-special-needs.html> (Accessed december 4 2025)

35. Federal Ministry Of Health and Social Welfare, “<https://health.gov.ng/fg-stakeholders-leads-drive-to-expand-assistive-technology-access-for-30-million-nigerians-living-with-disabilities/> (Accessed Decemer 04, 2025)

36. Universal Service Provision Fund, “Strategic Management plan 2023-2027” (2024) https://www.uspf.gov.ng/custom_files/Documents/RevisedSMP20232027.pdf (Accessed Decemer 04, 2025)

core focus areas introduced in the plan are connectivity infrastructure, access and end-user projects, ICT for development (ICT4D) and innovation. The most recent full-fledged report is from 2022, where the 2022 Annual Report financial statements give a recent snapshot of the Fund's scale, notably the total revenue for 2022 totals NGN11.51 billion (approximately US\$25 million), largely from a NGN 10 billion (approx. US\$21.7 million) contribution from NCC, plus interest income and transfers from accumulated funds and total expenditure in 2022 standing at NGN10.17 billion (approximately US\$22.1 million). Total assets were reported at the end of 2022 at NGN20.95 billion (approximately US\$45.4 million), mainly cash and receivables.³⁷³⁸ Reliance on outdated reporting during the 2025 review period constitutes a significant transparency and accountability gap under Principle 37.

An industry-focused Stakeholders' Engagement session was hosted in 2025,

and a report was released by the Fund. The engagement, themed "Fostering Connectivity and Access in Unserved and Underserved Communities: Collaborating for Sustainable Growth", aimed to strengthen collaboration among relevant stakeholders in the telecommunications sector to develop sustainable strategies for expanding connectivity and enhancing digital inclusion in Nigeria's underserved and unserved communities.³⁹

Although the 2025 industry-focused Stakeholders' Engagement report is the most recent publicly available publication, it offers limited value for delivery and impact assessment because it does not clearly outline specific actions taken, outcomes achieved, implementation timelines, or follow-up measures arising from the engagement. Overall, the USPF demonstrates strong policy intent and planning, but insufficient public reporting prevents a credible evaluation of delivery and impact.

37. Universal Service Provision Fund, "Annual Report 2022" (2022) https://www.uspf.gov.ng/custom_files/Documents/AnnualReport2022.pdf (Accessed Decemer 04, 2025)

38. USD equivalents are calculated using the Central Bank of Nigeria (CBN) official exchange rate applicable at the end of the 2022 reporting period (approx. ₦461/US\$1) to accurately reflect the historical value of the fund.

39. Universal Service Provision Fund, "REPORT ON THE INDUSTRY-FOCUSED STAKEHOLDERS' ENGAGEMENT SESSION OF THE UNIVERSAL SERVICE PROVISION FUND (USPF) - 2025" (2025) <https://www.uspf.gov.ng/images/files-temp/Report%20on%20the%20Industry-Focused%20Stakeholders%20Engagement%20Session%20of%20the%20USPF%202025.pdf> (Accessed Decemer 04, 2025)

Conclusion

Nigeria's digital rights landscape in 2025 presents a complex dichotomy between progressive policy development and persistent enforcement deficits. While the country has made measurable strides in broadband penetration, artificial intelligence governance, and legislative frameworks for data privacy and child online protection, these gains are consistently undermined by structural and institutional realities. The continued reliance on legacy 2G networks, compounded by rising tariffs, widened the digital divide and limited meaningful access for underserved populations. Furthermore, the online civic space remains heavily contested, as state and quasi-state actors increasingly bypass

formal judicial processes. The reliance on informal state pressure, arbitrary arrests of online critics at the sub-national level, overlapping cyber laws, and opaque surveillance technologies continues to stifle dissent and foster a pervasive climate of self-censorship. Earning a moderate compliance score of 35/60, down from 36 in the previous year, Nigeria's trajectory indicates that while the foundational frameworks for a robust digital economy are largely in place, realising this potential requires an urgent pivot from mere regulatory expansion to genuine, rights-respecting enforcement, transparent institutional accountability, and the consistent protection of constitutional freedoms.

Recommendations

The Government should:

- Review the implementation of the National Broadband Plan and re-

lease a report on achievements and a plan for reaching new goals,

based on lessons from the implementation of the last plan.

- Strengthen the governance, transparency, and monitoring of the Universal Service Provision Fund (USPF) by publishing annual audited reports, disaggregated project data, and independent impact evaluations aligned with access-gap assessments.
- Publish specific disaggregated data on USPF-funded projects (location, cost, beneficiaries, status) and align future funding with connectivity gaps revealed in access-gap studies.
- Operationalise the Presidency's directive on implementing the Nigerian Data Protection Act by government agencies.
- Issue clear directives to security agencies and state institutions prohibiting the use of criminal law to punish online criticism, particularly against journalists, HRDs, students, and critics on social media.
- Implement the Supreme Court judgment on FOIA by issuing circulars to all ministries, departments and agencies (MDAs) and establishing sanctions for non-compliance with access-to-information obligations.
- Adequately resource and guarantee the independence of the Nigeria Data Protection Commission (NDPC) so it can enforce obligations against both public and private entities.
- In expanding the cybersecurity framework (including any new Cybersecurity Act and implementation of the UN Cybercrime Convention), embed strong safeguards for human rights, judicial oversight, and clear limits on data retention and interception.
- Ensure that deployment of surveillance technologies (including drones and AI-powered systems) is subject to mandatory human rights impact assessments, public procurement transparency and parliamentary and judicial oversight.

The Media should:



- Increase in-depth reporting on digital rights issues, including tariff hikes, connectivity gaps, USPF performance, online censorship, data breaches, and the human impact of surveillance technologies.
- Continue to systematically track and report cases of arrests, intimidation and disciplinary sanctions arising from online speech, especially at state and local levels where incidents are often overlooked.
- Use explainer pieces, talk shows and data visualisations to demystify complex issues such as the NDPA, AI governance, cybersecurity, child online safety and digital inclusion for the general public.

Civil Society Organisations should:



- Continuously document cases of online censorship, arrests, intimidation, data breaches, surveillance deployments and connectivity barriers, producing periodic public briefings and shadow reports.
- Engage the legislature and relevant committees to push for rights-respecting reforms to the various laws, with a focus on digital rights and digital inclusion.
- Monitor USPF implementation, analyse budget and project data, and advocate for community-driven priorities in fund allocation, especially for rural, low-income and marginalised communities.
- Pursue strategic litigation to Challenge abuses on freedom of expression online, enforce FOIA compliance and Data privacy obligations

The Private Sector should:












- Regularly publish comprehensive transparency reports detailing government requests for user data, content takedowns, and network disruptions. Platforms must insist on formal judicial orders and push back against informal or extralegal state pressure for content moderation.
- Strengthen internal cybersecurity measures to prevent recurring data breaches and ensure strict compliance with the Nigeria Data Protection Act (NDPA) and the newly enforced General Application and Implementation Directive (GAID).
- Prioritise the expansion of 4G and 5G infrastructure in underserved and rural areas to phase out reliance on legacy 2G networks, while exploring pro-consumer data packages and models to ease the burden of recent tariff hikes on low-income users.
- Ensure that the design and deployment of new technologies, including AI systems and surveillance tools, are subject to rigorous human rights impact assessments prior to market introduction or government partnership.

The Score Index



Nigeria, 2025

1 = Totally non-compliant; 2 = Mildly compliant; 3 = Moderately compliant; 4 = Considerably compliant; 5 = Fully compliant

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Internet Shutdowns	P38(2)			There were no documented government-ordered internet shutdowns or throttling in 2025. While a localised disruption affected Zamfara state, it could not be verified as a state directive. All other network disruptions throughout the year stemmed from infrastructure failures, such as fibre cuts and power outages, rather than deliberate government interference.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37			Nigeria has a robust broadband plan, and the Universal Access and Universal Service Regulations 2007.
False News Criminalisation	P22(2)			Disinformation is not criminal in Nigeria; however, the Criminal Code Act prohibits “publication of false news with intent to cause fear and alarm to the public” (Section 59)

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Sedition Legislation	P22(2)			The legislation exists
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)			There have been various documented arrests of journalists and dissenting voices
Data Protection Legislation.	P42			There is active legislation (NDPA 2023) and an accompanying regulatory agency. In 2025, the regulator demonstrated a shift toward active enforcement (e.g., issuing the GAID and publishing a list of 789 non-compliant organizations).
States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)			While documented takedown requests to internet intermediaries (such as Google) appear numerically low, the true scale of state-led content removal remains obscured by opaque legal mechanisms and incomplete transparency reporting across all major platforms
Invasion of Privacy of	P41			Demonstrated pattern of surveillance

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Communications				Act (2022), but broad “national security” provisions and limited independent oversight of intelligence agencies remain. Smart-city surveillance expansion lacks a dedicated regulatory framework.
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)			Reports of Government not adhering to the legal requests under the Freedom of Information Act by journalists, but the Judgement in favour of the Act is a significant improvement
AI and Emerging Technologies national strategies	P39(6)			There is a National AI strategy, a National Centre for Artificial Intelligence and Robotics and a bill for AI regulation
Adoption of specific child laws, policies and measures promoting children’s digital safety and privacy online	P39(6)			A non-binding child online protection policy and strategy exists, and specific legislation has made strides in the nation.

Indicator	ACHPR Principle	2024 Score	2024 Score	2025 Justification
Digital Inclusion	P37(3)			There is a law focused on PWDs, and government has indicated interest in improving accessibility.

Total (out of 60):	2024: 36	2025 35
--------------------	--------------------	------------------------------

Moderately compliant.



374 Borno Way, Yaba 101245, Lagos, Nigeria.
www.paradigmhq.org