

Nigeria

Country Focus Report

June 2025

Credit: Nupo Deyon Daniel



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A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

SIX ENABLING PRINCIPLES

- 1. Respect and Protection of Fundamental Freedoms**
- 2. Supportive Legal and Regulatory Framework**
- 3. Accessible and Sustainable Resources**
- 4. Open and Responsive State**
- 5. Supportive Public Culture and Discourses on Civil Society**
- 6. Access to a Secure Digital Environment**

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the 6 principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

Brief Overview of the Country Context

The enabling environment for civil society in Nigeria is shaped by a complex blend of laws, policies, administrative practices, and prevailing social attitudes. Civil society organisations (CSOs) play an essential role in democratic governance, service delivery and policy advocacy, but their operational environment is constrained by bureaucratic bottlenecks, financial and legal hurdles, political interference, and inconsistent implementation of rights and protections.

The period of assessment (June 2024 to June 2025) was marked by economic stabilisation achieved alongside severe social suffering and a shrinking of civic space. Bold reforms by government such as the removal of fuel subsidies and the foreign exchange [liberalisation regime accelerated real GDP growth of 4.23% by Q2 of 2025](#) but resulted in a massive inflationary shock, bringing inflation above 34% and pushing many Nigerians further into poverty. This hardship fuelled intense public dissent including a general strike and nationwide protests. Compounding the crisis is persistent insecurity including banditry and communal conflicts along with worsened food inflation. While macro-fiscal goals were achieved, the foundation of democratic tolerance was severely dented by the state.

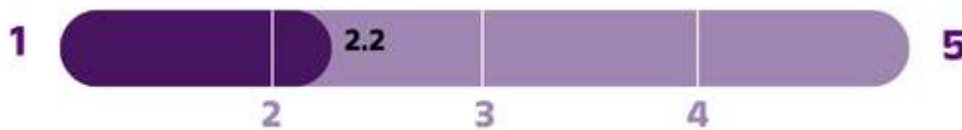
The findings reveal a largely “partially enabling” environment with systemic barriers that disproportionately affect grassroots organisations, marginalised groups, and CSOs working on sensitive issues such as human rights and governance.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: ¹



Freedom of association, peaceful assembly, and expression are formally guaranteed in Nigeria's [Constitution](#). However, civil society actors face limitations as authorities at federal and state levels sometimes use excessive force during protests, place restrictions on politically sensitive gatherings, and engage in intimidation of activists and journalists. Security forces used excessive force during the #EndBadGovernance demonstrations in August 2024, with reports from rights groups confirming that [24 protesters](#) died from the use of live ammunition, while over 1,200, including minors, faced mass arrests. The [National Human Rights Commission](#) and [Amnesty International](#) denounced the police's use of excessive force to violently quash #EndBadGovernance protests. In response, the Nigeria Police Force asked Amnesty for an [apology for what it called false publication](#). Incidents of [journalist harassment](#) and clashes between the police and [Shi'ite protesters](#) also occurred.

Authorities also repeatedly [used](#) vague "cyberbullying" and "fake news" charges under the [Cybercrimes Act 2024](#) to arrest and intimidate individuals and online activists who post content critical of public figures. The use of mixed [threats](#) and [cajoling](#) (government officials offering to dialogue and showing conciliatory actions) is a common trend, including [court orders](#) and security deployments to limit protest activity in prominent public places. During the #EndBadGovernance protest a court order was used to confine protesters in Lagos to specific, limited venues while police and military personnel occupied planned assembly points in Abuja along with heavy deployments in Kano. The Ogun State Government also secured a [court order](#) limiting protests to a certain time of the day. Isolated cases of [killings, harassment, and arrests linked to peaceful activism](#), measured progress on freedom of association as a result

¹This is a rebased score derived from the [CIVICUS Monitor rating](#) published in December 2024.

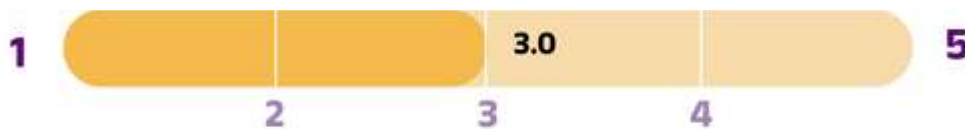
of pushback and evidence-based advocacy by civil society underscores inconsistencies in protecting fundamental freedoms, leading to a score of disabling.

The findings suggest a complex and deeply contradictory, partially enabling and disabling environment for civil society in Nigeria, badly undermined by ongoing crackdowns on fundamental freedoms associated with expression and assembly. The conflicting narrative (police denial vs. rights group reports) reflects the need to strengthen independent accountability mechanisms that exist within the police and National Human Right Commission. For an improved enabling environment, civil society must continue to push for independent investigations into the actions of security forces and cessation of the use of suppressive laws to silence critics, offline and online.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:



The legal framework for CSO registration exists but is riddled with barriers. CSOs can register with the [Corporate Affairs Commission \(CAC\)](#) or at state levels, but the process is bureaucratic, costly, and often arbitrary. Restrictions on names, unclear feedback from the Attorney General's office for companies limited by guarantee, and the requirement of newspaper adverts delay registration for months or years. Grassroots organisations without financial resources are often particularly disadvantaged in these cases. While CSOs can generally determine their objectives, authorities often impose restrictions. For instance, the CAC and Attorney General's office sometimes ask organisations seeking registration to amend objectives in registration documents in ways that aligns with charitable or ecclesiastical preferences. Opening bank accounts remains a barrier for smaller CSOs, as a certificate from the Special Control Unit Against Money Laundering is required and may sometimes prove cumbersome to acquire, thereby limiting access to funds. [Though legal provisions guard against arbitrary dissolution](#), broad clauses such as Section 839 (1) and (7) of the [CAMA Act](#) present risks. These sections prescribe that the Corporate Affairs Commission (CAC), as an executive agency, retains the power to adjudicate misconduct, determine "public interest" criteria and execute the suspension without mandatory prior judicial order. Despite the procedural steps introduced in the 2021 [Company Regulations](#) to guarantee administrative fairness, the lack of a mandatory judicial order as a safeguard violates freedom of association and fair hearing, guaranteed under the Nigerian [Constitution](#), Article 22 of the [International Covenant on Civil and Political Rights](#) (ICCPR), and the [African Charter on Human and People's Rights](#) (ACHPR, Article 10). Enforcement of protections is inconsistent. For example, in June 2025, [federal authorities suspended INSO's activities arbitrarily](#) and ordered the international humanitarian organisation's [immediate exit](#).

Many grassroots CSOs in Nigeria face significant regulatory barriers that prevent them from achieving legal standing necessary for asset security and long-term sustainability. These challenges include the non-recognition of state-level registration by donors and significant difficulties with the Corporate Affairs Commission (CAC) registration process. Issues with CAC registration stem from high costs, accessibility challenges in remote areas due to internet

connectivity and lack of digital literacy, and mandatory use of technology for filings, which collectively exclude smaller CSOs from legal compliance and formal recognition benefits.

Engagements between CSOs and regulators have improved, signalling progress for the enjoyment of freedom of association. At the same time, deepened engagements between civil society and the National Assembly on contentious sections of Part F of the Companies and Allied Matters Act 2002 are ongoing amidst an appeal by CAC against an earlier High Court judgment in 2023. This [judgment](#) had nullified some sections of CAMA, 2020, which were considered to infringe on the fundamental human rights of persons in Nigeria.

A recent regulation on [terrorism financing](#), in place since 12 May, 2023, supports the implementation of the Financial Action Task Forces Recommendation 8 (R8) aimed at avoiding undue disruption of legitimate charitable activities of Nigerian nonprofits through a risk-differentiated approach to compliance amidst greater organisational transparency. As of late 2024 and early 2025, Nigeria fully achieved [full compliance with R8](#) which deals with how anti-terrorism financing measures for the nonprofit sector are implemented.

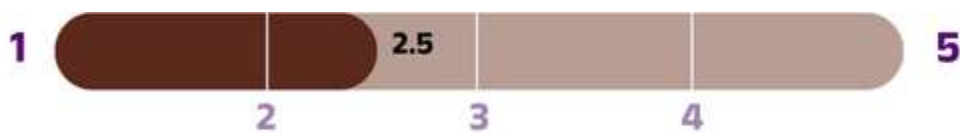
The renewed efforts throughout 2024 by Honourable Sada Soli, the lawmaker representing Jibia/Kaita Federal Constituency of Katsina State in the House of Representatives through a [NGO Regulation Bill](#) was repeatedly criticised by civil society organisations as an attempt to militarise civic space and control organisations that are critical of government policies and actions. For example, the Bill makes registration mandatory for all nonprofit organisations and explicitly criminalises the operation of an NPO without registration and a certificate. The allegations by US Congressman Scott Perry, a Republican representing Pennsylvania [regarding USAID funding potentially supporting Boko Haram](#) led to the House of Representatives initiating an investigation into the activities of NGOs in the Northeast which was greeted with pushback from NGOs and was [eventually stood down by the House Speaker](#). This event highlighted the need for robust protection frameworks that clearly define parameters for state inspection and oversight.

Overall, the framework allows CSOs to exist but creates significant uncertainty, costs, and vulnerability to state interference, reflecting an obstructive and unstable enabling environment characterised by significant red tape and possibilities of state interference. If allowed to persist, the reported legal and administrative barriers will continue to limit the independence, scope and sustainability of the civil society sector in Nigeria.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:



CSOs in Nigeria face difficulties in accessing and [sustaining resources](#): Funding opportunities exist but remain highly competitive and inaccessible to grassroots organisations. Donor requirements (e.g., CAC registration, organisational policies) exclude many, while lack of information on funding, limited capacity in proposal writing and financial management further hinder access. Small nonprofits often derive funding for their work from founders' resources, friends, family, corporate organisations and the public. Tax incentives for philanthropy are available in theory, but it remains costly to register for exemptions. Funding is largely project-based, with restrictive donor conditions that undermine CSFO autonomy, some of which includes short term funding, sudden changes in funding policies as seen in the USAID funding freeze, a common but often not reported action, high competition for limited funds, and disproportionate focus on service delivery over policy advocacy. Excessive reporting requirements and pressure to align with donor agendas reduce flexibility. Larger CSOs can sometimes negotiate terms, but smaller ones cannot.

Most CSOs operate from hand to mouth. Opportunities for self-reliance through donations and volunteers are limited by economic hardship. Regulatory barriers such as non-recognition of state government registration and inability to register with the Corporate Affairs Commission as a result of weak capacity, affordability and accessibility issues, prevent many grassroots CSOs from owning assets in their name, undermining long-term sustainability. Regional disparities further exacerbate inequality, with CSOs in the South-West showing stronger grassroots fundraising capacity than those in the North. The implication of this is that organisations are not sustainable and will typically have challenges meeting regulatory requirements, and in some instances closing down within a life cycle of five to ten years.

The above shows a funding environment that is largely disabling and inequitable, threatening the sector's long-term viability. The primary implication is the chronic unsustainability of organisations whose true costs or overheads are not sufficiently funded by donors. Bureaucratic requirements by donors will continue to exclude smaller entities while favouring larger ones. The donor driven agenda forces a focus on external rather than local needs. Over the long run, the ability of civil society organisations to drive systemic change remains limited, with many organisations not seeing their "10th birthday".

PRINCIPLE SCORE

4. Open and Responsive State

Score:



Nigeria's [Freedom of Information \(FOI\) Act](#) provides a framework for access to information. At the federal level, progress has been made through initiatives like the Open Government Partnership (OGP), where civil society and government have worked together on reforms relating to open budget, procurement and beneficial ownership. Through the OGP, the government committed to collaborate with civil society to develop a policing protest toolkit in its 3rd [National Action Plan](#) under commitment 12. This commitment has received commendation from the global OGP community as an initiative to [watch](#).

Despite this progress, many states fail to publish laws and budgets proactively, and grassroots CSOs struggle to access documents as a result of internet challenges, accessibility and affordability of technology. FOI requests are inconsistently processed, and the digital divide hampers access.

Federal ministries and the National Assembly occasionally consult CSOs, but consultations at state level are often superficial. Inputs are sometimes disregarded, and discrimination based on CSO type or political stance persists. For example, organisations working in thematic areas that are not related to democratic principles or rights are often seen as less confrontational and are more likely to be invited than those that are perceived as combative. Consultations often occur late in the policymaking process, reducing impact as they usually happen during the validation or public hearing states, whereas opportunities should exist for participation right from the conception stage.

Feedback from government on CSO contributions is minimal. Documentation of consultations is incomplete and opportunities to challenge government decisions are limited. Accountability is weakest at the subnational level, where CSOs' influence is minimal. One exception is humanitarian contexts in the Northeast, where CSO inputs are more actively sought owing to

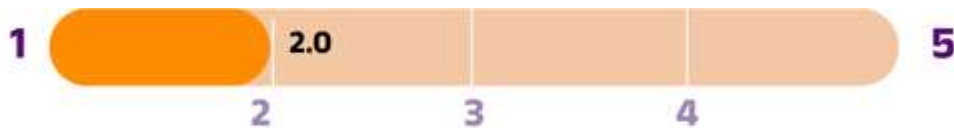
opportunities provided by the need for aid coordination as led by the United Nations mechanisms.

Superficial and biased consultations often lead to bad law or policy development having implications for civic space, as can be seen from the subsidy removal and exchange rate liberalisation. Opportunities exist to use the OGP platform and aid coordination mechanisms in enhancing openness while improving the enabling environment for civil society. Civil society organisations will need to strategise on how these platforms can serve to improve respect for fundamental freedoms.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:



Civil society is often portrayed by government officials and sections of the media as foreign-driven or a threat to sovereignty. A pattern of strained relationships exists between the Nigerian military and humanitarian NGOs. The operations of humanitarian NGOs have often been viewed with suspicion and portrayed as undermining counterterrorism efforts or engaging in activities that inadvertently benefit terrorist groups. Instances of foreign funding and allegations of terrorism links to portray civil society as a threat to national sovereignty have intensified in the media. In January 2025, a Vanguard Newspaper article titled [“Why boko haram, bandits thrive: How NGOs, others aid terrorists — Former generals, commanders”](#) added to existing narratives on foreign interference from previous years. The report quoted unnamed security sources or other officials to reinforce the perception that NGOs are tied to terrorism. A Guardian Newspaper front page article of September 2024, titled [“Amid low impacts, over 174,100 new NGOs established in 4yrs”](#) additionally reinforced the perception that NGOs are used as conduits for money laundering, contributing to a hostile environment for NGOs and eroding public trust.

In response to the accusations and subsequent investigation surrounding USAID funding and Boko Haram, Secretary of the Borno Elders Forum, Bulama Gubio, [claimed](#) to have previously raised concerns about the activities of NGOs as far back as 2014. Owing to this allegation, an amplification of the unsubstantiated claims and distrust of CSOs, particularly those receiving foreign funding, has been seen on social media through [posts and videos](#).

Disinformation campaigns targeting CSOs remain common. The use of the word “faceless” or “fake” civil society organisations in political disputes and smear campaigns dominates reports in Nigerian newspapers, often accusing these anonymous groups of being paid to attack politicians or undermine public officials. A June 2025 [report by Punch Newspapers](#) details how the Nigeria Extractive Industries Transparency Initiative (NEITI) warned against “fake” and “faceless” NGOs for misusing the Freedom of Information (FOI) Act to blackmail and extort money from public officials. Similarly, a report by [Sun Newspapers](#) highlighted a claim by a civil society coalition that “faceless civil society organisations” are planning to sabotage the

banking sector reforms. These narratives are frequently used to counter legitimate criticism and undermine activism.

At the same time, CSOs do engage in constructive dialogue with authorities in certain contexts, such as humanitarian response. This duality reflects a “partially enabling” environment where recognition of CSO contributions exists but is overshadowed by negative narratives and hostility.

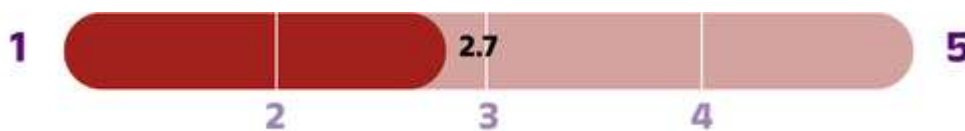
Civic engagement is declining. Voter turnout fell from 35.72% in 2019 to 26.7% in 2023, according to a [Yiaga report](#). Although civic education is part of school curricula, citizen trust in influencing political decisions is weak. Nigeria is largely a low trust society according to an [Afrobarometer survey](#). While interpersonal trust is more nuanced, distrust in influencing political decisions is often caused by corruption, governance failure, lack of accountability and economic hardship. Participation in local decision-making is minimal. [An Invictus Africa report](#) found that women hold just 2.8 % of senate seats as of 2023, far below regional and global averages. Persons with disabilities face barriers such as lack of braille voting materials and poor accessibility. While legal frameworks like the [Disabilities Act](#) exist, implementation is weak. Systemic inequalities continue to exclude marginalised groups from meaningful participation.

Negative public narratives around civil society have implications for public trust and could continue to jeopardise the security of nonprofit staff, particularly in communities hostile to their activities. Public trust and confidence are needed to support the ability of organisations to raise and use resources, including access to beneficiaries, and a supportive culture of public discourse would enhance this trust.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:



No nationwide shutdowns have occurred recently, [but selective censorship, surveillance, and arrests for online criticism persist](#). Mass accounts and post removals amounting to more than 13 million were reported by the Nigerian government in the [2024 Code of Practice Compliance Report](#) which highlights social media platforms' efforts on online harm protection in Nigeria. Because they are closer to the citizens who are within their reach, State-level actors are often more aggressive than federal authorities, as confirmed by a [FIJ report](#). The new [Nigeria Data Protection Act \(NDPA\)](#), which was enacted on 12 June 2023, and the [Cybercrimes \(Prohibition, Prevention, etc.\) \(Amendment\) Act](#), signed into law on 28 February 2024, provide some safeguards, but enforcement is inconsistent.

Evidence of cyberattacks and spyware use exists but is not widespread. In the first half of 2025, [Kaspersky blocked](#) over 1.46 million online attack attempts and 4.97 million on-device attacks against Nigerian users. The Nigeria Computer Emergency Response Team (ngCERT) [advisory in 2024](#) reported a rise in ransomware attacks on critical institutions in Nigeria, warning that nonprofits are at risk. Legal protections through the data protection and cybercrime laws exist but are only partially effective.

Internet penetration is [estimated at 44%](#). Poor connectivity in rural areas, low digital literacy, and concentration of ICT skills in urban centres limit CSO effectiveness and public engagement. Grassroots CSOs struggle to use digital tools effectively without external support.

With old, new and emerging technologies such as artificial intelligence becoming a must-have for nonprofit organisations amidst increased threats to the sector and existing vulnerabilities associated with accessibility and affordability of internet, devices and tools, the enabling environment for the civil society sector remains largely threatened and is susceptible to attacks through errors of omission or commission. External attacks remain an existential threat to organisations, often in confrontation with government.

C) Recommendations

The Enabling Environment landscape for the civil society sector is complex, characterised by formal protections that are often undermined by bureaucratic hurdles, discretionary administrative practices, and a persistently hostile public discourse. Following the severity of the constraints and the immediate opportunities available based on improved relationship with regulators and deepened engagement between civil society and the National Assembly, the following recommendations represent the most critical targets for immediate action:

For the National Assembly and Civil Society

Working with civil society, the National Assembly must immediately move to substantively amend Section 839 of the Companies and Allied Matters Act (CAMA) 2020 to explicitly restrict the Corporate Affairs Commission (CAC) registrar's discretionary powers over suspension of trustees, requiring instead a pre-emptive judicial mandate as a safeguard.

For the Corporate Affairs Commission

Publish a standardised, transparent Service Charter for CSO registration, explicitly stating acceptable names/objectives and process for organisations registered as Incorporated Trustees to move to Limited by Guarantee to allow them to operate as a social enterprise and keeping the median processing time for companies limited by guarantee to the 30 day time period stipulated by CAMA 2020.

For Donors

Multilateral donors and foundations operating in Nigeria should commit a minimum of 50% flexible multi-year, new funding allocation focused on core-funding. This commitment must be embedded within the shifting power focus of the localisation agenda, de-linking support from restrictive, project-based models that undermine CSO autonomy and sustainability.

For the Police and Open Government Partnership (OGP)

Police and the Open Government Partnership secretariat must work with civil society to finalise the policing protest toolkit committed to by the Nigerian Government in its National Action Plan and actively monitor its use in managing protests in a democracy. The Inspector General of Police must issue a clear, binding and publicly disseminated directive prohibiting the use of excessive force against peaceful protesters while ensuring the rule of engagement remains civil when protests turn violent.

For the Federal Ministry of Finance & Federal Inland Revenue Service (FIRS)

Working with CSOs, simplify and digitise the process for claiming tax deductions related to philanthropic giving while making incentives accessible to small donors.

For State Governments and Assemblies

Engage in ongoing constitution review and amendment process towards an amendment that formally recognises state-registered CSOs for property ownership, asset management and contractual purposes to overcome barriers relating to sustainability,

For the Nigeria Data Protection Commission (NDPC) & Judiciary

In close collaboration and consultation with CSOs, issue clear regulatory guidelines on the legitimate limits of government surveillance and data requests targeting CSOs. Using the Nigeria Data Protection Act, proactively investigate state-level actors engaged in censorship and mass account removals to ensure consistency with the law.

For the Nigeria Computer Emergency Response Team (ngCERT)

Develop and disseminate a cybersecurity toolkit and advisory targeting the unique risk and capacity limitation of civil society organisations focusing on ransomware and data protection related issues.

For the Nigeria Network of NGOs

Work on countering the narratives currently disabling public culture marked by hostility and weaponisation of discrimination against civil society through:

- Engagement with media owners, editors' guilds and government spokespersons to adopt and enforce professional codes requiring verification of CSO status before publication while also recognising the right of CSOs not to register as an entity. Prohibit the use of unverified claims that link legitimate CSOs to terrorism or money laundering allegations.
- Explore the possibilities of an annual CSO-media dialogue to foster constructive dialogue and counter disinformation around civil society in Nigeria.

D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the [CIVICUS Monitor](#). However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as [V-Dem](#), the [Bertelsmann Stiftung Governance Index](#), the [RTI Rating from the Centre for Law and Democracy](#), and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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