



# Proactive Disclosure Assessment Report

**A Report on the Status of Public Institutions' Compliance with the Obligation to Proactively Disclose Information under Section 2(3) & (4) of the Freedom of Information (FOI) Act, 2011**

**Right to Know, Nigeria**

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## **INTRODUCTION**

Right to Know (R2K) Nigeria is a dynamic organization established to advance advocacy for public access to information and open government in Nigeria.

This report presents the findings of an assessment undertaken by Right to Know (R2K) Nigeria, of the implementation of the obligation of proactive disclosure in Nigeria's Freedom of Information (FOI) Act, 2011. R2K assessed the level of compliance by a ***selected number of*** public institutions in Nigeria with the proactive disclosure mandate in accordance with Section 2 (3) and (4) of the FOI Act.

The information sought under the survey is information that ought to be readily available either to guide the daily routine activities of the public institution, or created as a matter of course during its routine activities. The FOI Act also specifically creates an obligation on every public institution to "ensure that it records and keeps information about all its activities, operations and businesses"<sup>1</sup> and to "ensure the proper organization and maintenance of all information in its custody in a manner that facilitates public access to such information."<sup>2</sup> As such the information specified under Section 2 (3) ought to be already available to enable disclosure.

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<sup>1</sup> See the Freedom of Information (FOI) Act (2011); Section 2 (1).

<sup>2</sup> See the FOI Act (2011); Section 2 (2).

All ministries, departments and agencies of government fall within the definition of what is a public institution under the FOI Act, and, as such, are duty-bound to comply with the obligations the act imposes. However, with over 800 government ministries, departments and agencies at the Federal level alone, this assessment was restricted to government MDAs that have taken the commendable strides to comply with their statutory obligation to comply with submission of their annual FOI Compliance reports to the Office of the Attorney General's office, in compliance with Section 29 of the FOI Act<sup>3</sup>, as an indication of some level of effort to implement the FOI Act.

This report is presented in 5 parts. Part One provides a background on the Freedom of Information (FOI), and principles most relevant to proactive disclosure in particular, within the broad framework of Access to Information. Part Twodistinguishes proactive disclosure from information requests as a method of accessing information under the framework of the FOI Act. It discusses the principle and rationale behind this method of disclosure and establishes the standards for proactive disclosure under the FOI Act. Part Threepresents the methodology by which the survey was carried out. Part Four presents the assessment and observations of the survey which has the

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<sup>3</sup> Based on reports received by the Office of the Attorney General of the Federation in 2012, and 2013 from GOVERNMENT MDAs whose offices are located in Abuja.

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objective of measuring government's openness using proactive disclosure as an indicator. To do this, the survey assessed the overall level and methods of proactive disclosure by public institutions; and considered the disparities in the level of proactive disclosure of different categories of information, if any; that is, if any particular types of information are more likely to be proactively disclosed than other kinds of information. The key findings, recommendations and conclusion form the latter part of the report.

## **PART 1: Background to the Survey**

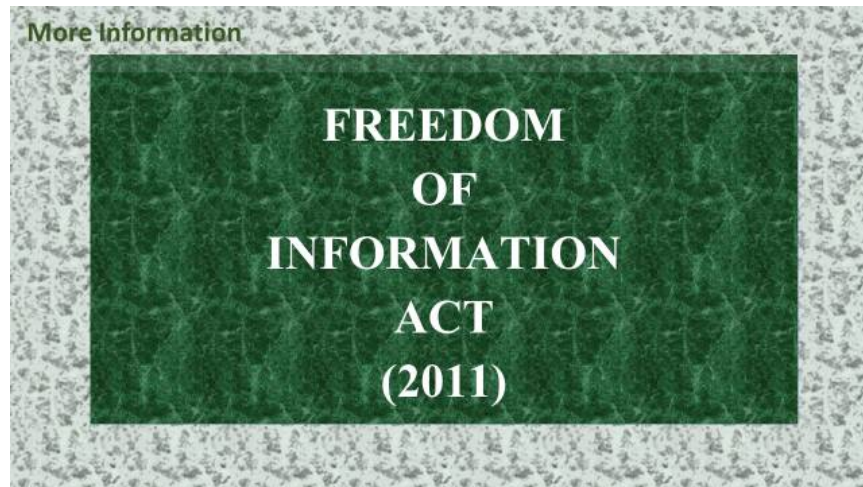
Access to government-held information is definitive of and pivotal to the effective practice of democracy and Nigeria's constitutional norms. The 1999 Constitution reflects the democratic principle of the vestiture of sovereignty in the Nigerian people, from whom government derives its powers.<sup>4</sup> Democracy holds that Government should be open to public scrutiny and receptive and responsive to public opinion, and that public participation in governance must be fuelled by accurate, up-to-date information, documents and proceedings of government or effective public oversight. Thus, government is the custodian and guardian of information that ultimately belong to the public.

This right to information is affirmed constitutionally under Section 39 of the 1999 Constitution of the Federal Republic of Nigeria, and protected under Nigeria's Freedom of Information (FOI) Act which was passed on 28 May 2011, and which consolidates a regime which purposes to make information and records in the custody of government more freely and readily available to the public, with the objective of enhancing effective and purposeful participation of the public in the practice of good governance.

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<sup>4</sup> See the Preamble and Section 14 (1) & (2) of the 1999 Constitution of the Federal Republic of Nigeria (CFRN). Available @ <http://www.nigeria-law.org/ConstitutionOfTheFederalRepublicOfNigeria.htm> .

Nigeria's FOI regime, such as is operationalized by the FOI Act, outlines the methods by which the public can exercise this right to government-held information.



[\*Click image to read Nigeria's Freedom of Information \(FOI\) Act 2011\*](#)

One of the methods prescribed under the FOI Act for accessing information and records is Proactive Disclosure. Proactive disclosure is simply the systematic and regular dissemination of information by public institutions at its own initiative; i.e. without first receiving an information request. In summary, the FOI Act requires the publication by all public institutions as defined under the FOI Act, of all records and information relating to the relevant public institution's activities, services, finances, decisions, policies and procedures, contracts, etc. The FOI Act prescribes what is to be disclosed; it also prescribes various modes for effecting proactive disclosure, in order to ensure as broad dissemination as possible.

Proactive Disclosure is a crucial element of the FOI composite, which together work to facilitate a robust FOI regime. There are other fundamental principles which have specific implications for Proactive disclosure, in particular. Some of these, worthy of particular mention, include:

**i. Fees:**

The Principle of Low or No Cost, as its name implies, maintains that accessing information should be free, or at a minimum cost. Similarly, Section 8 of the FOI Act, in keeping with the principle of minimal fees, prescribes that where charged, fees shall be limited to the cost of duplication or transcription, where necessary. The value of this is that cost should not be used as a deterrent to the exercise of the right to information in any form.

**ii. Obligation to Create, Keep Organize and Maintain Records:**

The challenge of a poor culture of record keeping/maintenance and retrieval, capacity challenge in many public institutions is an immense hindrance to FOI. Records management is central to a successful FOI regime, with the entire premise of FOI hinged on the existence and proper organization and management so that it can be easily assessed and retrieved. It is for this reason that the FOI Act requires that all institutions institute a systematic control of all

records from creation or receipt, in organization and storage, and retrieval in a manner that facilitates ease of access.<sup>5</sup>

The combined impact of Section 2 (1), which requires that all public institutions are to ensure that it records and keeps all information about all its activities, operations and businesses, and Section 2 (2), which requires that they ensure proper organization and maintenance of all information in its custody in a manner that facilitates public access to such information, combined with Section 2 (4), which mandates wide dissemination and ready availability of the prescribed information through methods that recognise technological advances, implies a standard for data management that goes beyond the traditional paper based records management, to ensuring protocols for electronic management as well. This also sets the stage for immense possibilities for proactive disclosure by public institutions in Nigeria.

However, whether paper-based, or electronic, the successful implementation depends on establishing a requisite data management framework, which components, According to a report by the Global Partners and Associates, include the following:-

“ - Clear centralised records management policy and strategy on information security and archiving;

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<sup>5</sup> See the FOI Act (2011), Section 2 (1).



- Plain guidelines on how to keep and manage records for staff and managers;
- Identify and manage appropriate systems for holding information
- Adequate resources and capacity to properly manage records;
- Consistency during organizational or national transitions
- Centralised classification schemes
- Clearly identified retention and disposal policies and schedules
- Procedures for systematic reviews and assessments.”<sup>6</sup>

### **Obligation to Train:**

Section 13 of the FOI Act requires that institutions ensure the provision of appropriate training on access to information or records under the FOI Act, and

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<sup>6</sup> Towards Open And Transparent Government International Experiences And Best Practice By Rebecca Zausmer Global Partners and Associates, December 2011; <http://www.gp-digital.org/wp-content/uploads/pubs/Towards%20open%20and%20transparent%20government-%20International%20experiences%20and%20best%20practice.pdf> [As adapted from Hagan, H., 2011. Developing Records Management in Support of Access to Information, National Records of Scotland [online] [http://www.cgu.gov.br/cessoainformacao/arquivos/Hugh-Hagen\\_Desenvolvendo-um-sistema-de-gestao-de-registros.pdf](http://www.cgu.gov.br/cessoainformacao/arquivos/Hugh-Hagen_Desenvolvendo-um-sistema-de-gestao-de-registros.pdf) as assess on 15/11/2011]

for the full implementation of the Act. This is in consonance with the fifth principle of FOI which requires that government institutes processes to ensure the facilitation of access to information. While such training definitely encompasses a holistic understanding of the FOI Act in itself, and to be fully trained in their responsibilities under the law, it also refers to ensuring adequate training and capacity building on all processes necessary to ensure the effective implementation of the FOI Act, such as development, maintenance, and usage of information and documentation systems and indexes; and of up-to-date IT Services to make provision for archiving and retrieval of information. Training should be ongoing, especially since, as the law is implemented, new technologies or challenges will emerge from time to time, needing evolving solutions and changes in approach and strategy.

### **Enforcement Mechanisms**

The FOI Act, under Section 1 (3) entitles any person to institute court proceedings to compel any public institution to comply with the provisions of the Act, including the obligation to proactively disclose.

## **PART 2: UNDERSTANDING PROACTIVE DISCLOSURE**

The purpose of an FOI regime is to reinforce public sector management by enhancing transparency and oversight of public resources, by providing the public with greater access to government-held information.

Towards achieving this, the FOI Act prescribes a series of measures to ensure maximum disclosure through a duality of processes, namely:

- i. Proactive disclosure<sup>7</sup>
- ii. Processing formal requests for information.<sup>8</sup>

### ***Distinguishing Proactive Disclosure from Information Requests***

The FOI Act expressly distinguishes between the two disclosure methods by identifying Proactive Disclosure, and Processing Information Requests as distinct obligations for public institutions. Proactive disclosure is distinguished from processing information requests in several ways. Two primary distinctions are set forth as follows:

First, with proactive disclosure, the onus is upon the public institution to publish information *suo motu*, without waiting to receive a request for information. Second, the proactive disclosure process is not subject to any timelines under the Act, such as transfer, extension of time under Sections 4,

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<sup>7</sup> The FOI Act (2011); Section 2 (3) & (4)

<sup>8</sup> The FOI Act (2011); Section 3

5 and 6 of the FOI Act. Rather, information is to be readily available and immediately accessible.

***Standards on the Obligation to Publish***

Proactive disclosure, which is the release of information as a matter of administrative course, without receiving a formal request as a pre-requirement, is guided by the 2<sup>nd</sup> principle of FOI – *“the Obligation to Publish”*, which requires that:

“Public bodies should, as a minimum, be under an obligation to publish the following categories of information:

- Operational information about how the public body functions, including costs, objectives, audited accounts, standards, achievements and so on, particularly where the body provides direct services to the public;
- Information on any requests, complaints or other direct actions which members of the public may take in relation to the public body;
- Guidance on processes by which members of the public may provide input into major policy or legislative proposals;

- The types of information which the body holds and the form in which this information is held; and
- The content of any decision or policy affecting the public, along with reasons for the decision and background material of importance in framing the decision.”<sup>9</sup>

Furthermore, the guiding principles of proactive disclosure<sup>10</sup> are that the published information should be available through various media, easily findable, relevant to a range of potential users, comprehensible and clearly presented and understandable including for those with physical or literacy challenges, free or low-cost, and up-to-date.

In keeping with these principles, Nigeria’s FOI Act prescribes the **minimum** standards for Proactive Disclosure that every public institution in Nigeria, as defined by the Act, must meet. The Proactive Disclosure framework outlined by the FOI Act enumerates the kind of information that is to be published, as well as the methods or means through which disclosure should be made.

Proactive disclosure is not left as a matter of institutional policy, but is a legal obligation with the standards for compliance clearly stated by the FOI Act.

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<sup>9</sup> <http://www.article19.org/data/files/pdfs/standards/righttoknow.pdf>

<sup>10</sup> recommendations outlined in Darbshire, 2010

Hence, there should be no confusion as to threshold and expectations for proactive disclosure by public institutions.

***The Legal and Regulatory Standards for Proactive Disclosure under the Nigerian Freedom of Information (FOI) Act 2011***

Section 2 of the FOI Act sets forth the framework for the publication scheme to guide proactive disclosure. First, by Section 2 (1) and (2) of the FOI Act, all public institutions are mandated to create, maintain and keep records and information about their activities, in order to facilitate the building blocks of access to information, through proactive disclosure and responding to requests for information, which value in combating a deteriorating record keeping practices in public institutions cannot be overstated.

The standards guiding what information is to be disclosed and how it is to be disclosed have been outlined by Section 2 (3) and (4) of the FOI Act, and further expanded by the Office of the Attorney General of the Federation, who is vested with regulatory powers over implementation of the FOI Act, in the revised Edition (2013) of the Attorney General (AGF)'s Guidelines on the FOI Act.

***i. What information should be proactively disclosed under the FOI Act?***

In Nigeria, the scope of information to be proactively disclosed may be in two categories, namely:-

**A. A core set of information classes prescribed by law**

All Public institutions<sup>11</sup> have an obligation under the FOI Act to proactively disclose a core set of specific categories of information as enumerated by the Act. The information to be proactively disclosed enumerated under Section 2 (3) may be broadly categorized into 3 classes, namely: information to be listed; information to be described; and information to be disclosed in full. The types of information under Section 2 (3) (a-f) generally pertain to information about a public institution, including its organogram and functions; services and activities; finances; opinions and decisions, policies and procedures, contracts, licenses, grants etc. including all applications related thereto, etc.

Section 2 (3) (a-f) provides:

A public institution shall cause to be published in accordance with subsection (4) of this Section, the following information -

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<sup>11</sup> See the FOI Act 2011; Section 2 (7) and Section 31 for the definition of a public institution under the FOI Act.

(a) a description of the organization and responsibilities of the institution including details of the programmes and functions of each division, branch and department of the institution;

(b) a list of all -

(i) Classes of records under the control of the institution in sufficient detail to facilitate the exercise of the right to information under this Act, and

(ii) Manuals used by employees of the institution in administering or carrying out any of the programmes or activities of the institution;

(c) a description of documents containing final opinions including concurring and dissenting opinions as well as orders made in the adjudication of cases;

(i) substantive rules of the institution

(ii) statements and interpretations of policy which have been adopted by the institution,

(iii) final planning policies, recommendations, and decisions;



(iv) factual reports, inspection reports, and studies whether prepared by or for the institution;

(v) information relating to the receipt or expenditure of public or other funds of the institution; (vi) the names, salaries, titles and dates of employment of all employees and officers of the institution;

(vii) the right of the state, public institutions, or of any private person(s)

(viii) the name of every official and the final records of voting in all proceedings of the institution;

(e) a list of –

(i) files containing applications for any contract, permit, grants, licenses or agreements,

(ii) reports, documents, studies, or' publications prepared by independent contractors for the institution, and

(iii) materials containing information relating to any grant or contract made by or between the institution and another public institution or private organization;

(f) the title and address of the appropriate officer of the institution to whom an application for information under this Act shall be sent, provided that the failure of any public institution to publish any information under this subsection shall not prejudicially affect the public's right of access to information in the custody of such public institution.

### **B. A user-driven Approach**

In addition to the legally prescribed minimum, the Revised Edition (2013) of the AGF's Guidelines on the FOI Act further advises that where information has been disclosed subject to an information request, the public institution should consider proactively releasing the information under its Publication Scheme subject to Section 2 (3)&(4).<sup>12</sup> The AGF's guidelines also state that where an institution receives a minimum of three requests for information on the same subject matter, the records should be proactively disclosed.<sup>13</sup> The rationale behind this is that the multiple requests indicate a public interest in the information being requested.

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<sup>12</sup> See the Revised Edition (2013) of the Attorney General of the Federation (AGF)'s Guidelines on the FOI Act; Section 1.12 - Stage 10 of the Response Process on Page 11.

<sup>13</sup> See the Revised Edition (2013) of the AGF's Guidelines on the FOI Act; supra

Note however that for the purpose of this survey, the assessment has been limited to the classes of information listed under Section 2 (3) of the Act.

**ii. How should information be proactively disclosed under the FOI Act?**

Furthermore, the FOI Act prescribes the minimum standard for the *HOW* of proactive disclosure, regarding format, accessibility and availability. To this end, the FOI Act mandates each public institution to publish and disseminate widely, and make readily available information outlined under Section 2 (3) of the FOI Act. Section 2 (4) provides:

(4) A public institution shall ensure that information referred to in this section is widely disseminated and made readily available to members of the public through various means, including print, electronic and online sources, and at the offices of such public institutions.

Thus, Section 2 (4) provides that various means for dissemination should be employed, including – but not limited to – print, electronic and online sources, and at the offices of the public institution. In addition, Section 2 (5) provides that the disclosed information should be updated periodically, and

promptly, as and when any change occurs. The potential of each disclosure method is highlighted below:

- i. Online Platforms: In the age of Information and Communication Technology, the internet has opened up many opportunities for communication and information sharing, and offers a powerful tool for disseminating information proactively and efficiently. Online platforms can potentially share a high information load with a large audience quickly, and at a relatively low cost. However, its limitations include initial costs for development, equipment and personnel to create and maintain these platforms. Other related challenges may include availability of adequate internet bandwidth, and other infrastructural challenges such as erratic power supply. Its success as an information-sharing tool also hinges on the level of the public's access and competent usage of the internet. In addition, the internet should not be an unnavigable dumping ground of unimportant information.
  
- ii. Electronic and Hardcopy Official Registers: Public institutions may publish information via electronic register or in hardcopy which may be accessed where online access is limited. However, as with

information online, it may be difficult to sift through the voluminous information to find relevant or important information. The limitation for hardcopy registers, is the relative expense of producing significant copies. This may not be the most efficient method of proactively disclosing information that must be updated frequently, and as at when change occurs in keeping with the requirements of the FOI Act.

- iii. Repositories, Libraries and Designated Access Points: Public institutions may create in-house facilities for reading rooms and public computers within their institutions, and may elect to have internet, electronic and hardcopy access within these premises. Some institutions are mandated by law to create registries to make some records available for scrutiny by the public. An example of this includes Registries for Environmental Impact Assessment Reports.
- iv. News Media:Through the news media can potentially reach a large audience at relatively little or no cost, and can reach the cross-section of the public whose primary sources of information are print, broadcast and online news forums. However this method of disclosure can limit the institutions' control over how information is

presented, construed or edited. Because such publication is time-bound and transitional, it may be more appropriate for the publication of institutions' notices or bulletins

The broad spectrum of platforms for disclosure provides alternative means for information sharing, which theoretically means that a wider proportion of the differentiated demographics of the populace can access information.

### ***The Value of Proactive Disclosure & Best Practices***

Proactive disclosure is an integral component of an FOI regime, and forms a core aspect for the success or failure of the efficient and effective implementation and sustainability of such a system.

Proactive disclosure has benefits for both the public and the public institution, including the speed and ease, and cost effectiveness of disseminating information with the public. Through Proactive disclosure, all members of the public have equal and contemporaneous opportunity to be routinely better-informed about the workings of government.

On the part of government, proactive disclosure is a vehicle through which governments are better able to systematically inform the public of the

services it provides for the public, and how to access them. Some institutions do this by employing a centralized access point whereby all institutions' information is disclosed through a centralised access point. Others may opt for individual institutions maintaining information platforms, while yet others may employ a combination of options. Proactive disclosure publication schedules – which are designed using parameters outlined by legislation or regulation - are widely used as a means of presenting the disclosed information in an organized and more easily navigable manner.

Proactive disclosure also reduces the institution's time spent on processing individual requests, and may even preclude the need for members of the public to make information requests, if the information of interest is already proactively disclosed. It can also aid requesters to crystallise the scope of their subsequent requests, and to avoid misdirected or fishing requests to the wrong institution. As such, public institutions are therefore spared the cost of processing and responding to such avoidable and unnecessary requests. By institutionalizing data management and data sharing protocols, proactive disclosure enables planned release, eliminating unplanned strain on public institutions' resources, thus promoting institutional efficiency.

The benefits of proactive disclosure in curbing corruption by allowing the public to track expenditure is put into practice by several countries. In

Canada, the law requires the proactive disclosure, to include of all travel and hospitality expenses of senior government officials, internal audits, budget expenditure, and contacts, as well as grant contributions over a specified amount.<sup>14</sup> Chile, in an effort to increase transparency in government procurement, also established an electronic public procurement system which requires the disclosure *inter alia* of public spending, staffing contacts.<sup>15</sup>

Thus, proactive disclosure also is a demonstration of a public institutions' commitment to openness, and accountability, which also contributes to engendering public trust in government's institutions and processes.

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<sup>14</sup>This information can be accessed online through the Treasury Board of Canada @ <http://www.tbs-sct.gc.ca/tbs-sct/common/trans-eng.asp>

<sup>15</sup> Darbyshire, H.; Proactive Transparency: The Future of the Right to Information? (World Bank Institute Governance Working Paper Series); Page 12 available @ [http://siteresources.worldbank.org/WBI/Resources/213798-1259011531325/6598384-1268250334206/Darbyshire\\_Proactive\\_Transparency.pdf](http://siteresources.worldbank.org/WBI/Resources/213798-1259011531325/6598384-1268250334206/Darbyshire_Proactive_Transparency.pdf)



### **PART 3: METHODOLOGY**

The FOI Act came into force immediately upon its passage on May 28, 2011, and three years down the line, the strength of the argument often touted for non-implementation was that a period of transition would be necessary in order to effect such change is beginning to wane.

It has oft been stated that the success of FOI implementation largely hinges on information management and proactive disclosure, that by institutionalising the necessary protocols and processes, the efficiency of government administration, and information sharing is enhanced. It was pertinent, therefore, for a light to be shone on the status of implementation of the FOI Act, as regards Proactive disclosure, 3 years along.

Thus, the purpose of this study is to examine the level of compliance public institutions in Nigeria with the proactive disclosure mandate in accordance with Section 2 (3) and (4) of the Nigeria's Freedom of Information Act 2011 (FOI Act).

#### ***Sample Population & Sampling Frame***

The definition of 'public institution' under the FOI Act includes "... all authorities whether executive, legislative or judicial agencies, ministries, extra-ministerial departments of the government, corporations established

by law and all companies in which government has a controlling interest..."<sup>16</sup>.

While the Act includes under the definition of public institution private bodies utilizing public funds, carrying out public functions or providing public services<sup>17</sup>, the survey was limited to government Ministries, Departments and Agencies (MDAs).

With over 800 government ministries, departments and agencies at the Federal level alone, the survey was further limited to a sampling frame of those government MDAs that have taken the commendable strides to meet their statutory obligation to submit annual FOI Compliance reports to the Office of the Attorney General's office, in compliance with Section 29 of the FOI Act<sup>18</sup>. This sampling frame was selected on the assumption that government MDAs that have not made any attempt to comply with their obligations under Section 29 are not complying with their obligations under Section 2. On this basis, a total of 39 government MDAs were assessed. These are listed below:

1. Federal Ministry of Justice
2. National Primary Healthcare Development Agency
3. Federal Ministry of Power

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<sup>16</sup> See Section 2 (7) and Section 31 of the FOI Act 2011 for the definition of a public institution under the Act.

<sup>17</sup> See Section 2 (7) and Section 31 of the FOI Act 2011 for the definition of a public institution under the Act.

<sup>18</sup> Based on reports received by the Office of the Attorney General of the Federation in 2012, and 2013 from GOVERNMENT MDAs whose offices are located in Abuja.

4. Federal Ministry of Works
5. Nigerian Law Reform Commission
6. Federal Ministry of Information
7. Federal Ministry of Environment
8. Federal Ministry of Land, Housing & Urban Development
9. Federal Ministry of Communication Technology
10. Office Of The Secretary General of the Federation
11. Legal Aid Council of Nigeria
12. Ministry of Mines and Steel Development
13. Federal Ministry of Transport
14. Federal Ministry of Youth Development
15. Man Power Development Office
16. Nigeria Football Federation
17. National Planning Commission
18. Office of the Accountant General of the Federation
19. National Sport Commission
20. National Centre For Women Development
21. National Youth Service Corps
22. National Pension Commission
23. Federal Road Safety Corps

24. National Orientation Agency
25. Federal Capital Territory Administration
26. National Judicial Institute
27. Federal Ministry of Women Affairs
28. Central Bank of Nigeria
29. Police Service Commission
30. Nigeria Press Council
31. National Agency For The Prohibition of Traffic In Persons
32. Nigerian Electricity Regulatory Commission
33. News Agency of Nigeria
34. Head of Civil Service of the Federation
35. National Automotive Council
36. Federal Ministry of Aviation
37. Federal Ministry of Culture and Tourism
38. National Drug Law Enforcement Agency
- 39. Independent National Electoral Commission**

### ***Survey Methodology***

In an effort to reduce nonresponse by the assessed institutions, while this is clearly not a legal requirement, the sampled public institutions received an advance letter informing them about the upcoming survey, describing the context and content as derived from the FOI Act, and the duration of the assessment. Upon each monthly visit, the data collectors introduced themselves with institution ID cards.

### ***Data Collection***

The primary data gathering instrument was a questionnaire/survey derived from the listed information that should be proactively disclosed under Section 2 (3) of the FOI Act. The mode of data collection was through monthly physical visits over a period of 11 months to the public institutions' offices in Abuja, and online searches of the websites of the surveyed public institutions. In addition, the researchers employed qualitative data gathering strategies, using descriptive and observational tools to assess the approachability of each public institution, recording the type of reception at each public institution, the responses given and the ease of access to the institution itself, as well as the ease of access to the requested information. The survey was carried out monthly over a period of 11 months, from February 2014 to December 2014.

### ***Benchmarks for Assessment and Scores***

Based on the modes of disclosure prescribed under Section 2 (4) of the FOI Act, a point was given for every mode of disclosure as required by the law's minimum standard including, in print, in electronic format and online.

Every month each institution could potentially be awarded a Maximum of 246 points. The assessment was based on 41 types of information, whereby each type of information was attributed a maximum of 6 points, based on the following criteria:

- A point for if there was disclosure in any form.
- A point for each of the various forms of disclosure, i.e. if they were given in print copy, electronic copy or if the information was found online.
- A point for if the information was easily accessible.
- And a point for if the information was easily understandable.

On months where the public institution declined to participate or the data gatherer was denied access, the public institution was scored zero on every indices for the physical visit. However, the online search was still conducted for those months.

### ***Assumptions and Limitations***

The survey did not investigate the Accuracy or contemporaneity of the information provided where there was disclosure. The survey assumes that where there is disclosure by an MDA by any of the various means, that such information is factual and up-to-date. No further steps were taken to authenticate whether the information was updated and accurate.

The survey was also carried out by members of the general public who had been given sensitisation on the Freedom of Information Act, and then deployed, thus the survey relies on their perception of disclosure compliance. The survey does not assess the extent of disclosure, whether the information is disclosed in full, or in part. Since only the institution is fully cognisant of the information it holds, it remains that the assessors cannot of a fact determine that full disclosure has been made. Therefore, marks were allocated where basic disclosure is identifiable and seen to have been made.

### ***Ranking Order***

Based on an aggregate of the monthly scores, the public institutions were ranked in descending order, with the most compliant public institution ranked as #1 and less compliant public institutions ranking progressively lower on the scale.

## PART 4: ASSESSMENT, OBSERVATIONS AND KEY FINDINGS

### Assessing Aggregate Levels of Compliance and Ranking

The overall compliance with the public disclosure obligation is sub-par, with none of the institutions attaining 20% compliance. The average level of compliance was 9.35%, with Federal Ministry of Justice attaining the highest score of for compliance of 19.52%, Nigeria Football Federation attaining the lowest score of 2.96%.

The table below itemises the scores and rankings of the assessed institutions from the highest to the lowest.

Rank	Public Institution	Total Score Possible	Actual Score Attained	%
1	Federal Ministry of Justice	246	48.00	19.52
2	Federal Ministry of Information	246	47.27	29.22
3	Nigerian Electricity Regulatory Commission	246	39.00	14.85
4	Central Bank of Nigeria	246	36.27	14.75
5	Federal Ministry of Communication Technology	246	36.09	14.67
6	National Orientation Agency	246	35.45	14.41
7	Police Service Commission	246	31.45	12.79
8	National Planning Commission	246	29.82	12.12
9	National Pension Commission	246	29.00	11.79
10	National Centre For Women Development	246	28.73	11.68
11	National Agency For The Prohibition of Trafficking In Persons	246	28.00	11.32
12	National Youth Service Corps	246	27.82	11.30
13	Nigeria Press Council	246	27.55	11.20
13	National Drug Law Enforcement Agency	246	27.55	11.20
15	Legal Aid Council of Nigeria	246	26.73	10.87

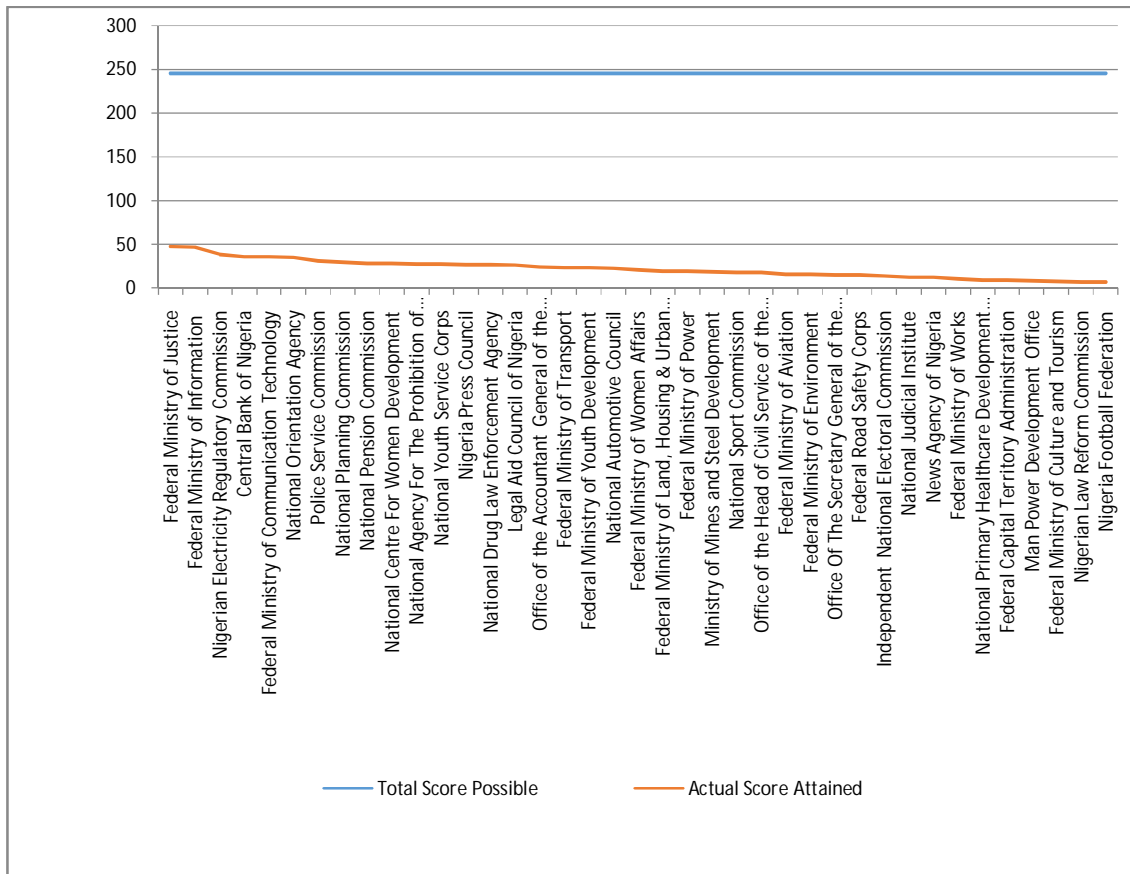


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16	Office of the Accountant General of the Federation	246	24.55	9.98
17	Federal Ministry of Transport	246	24.00	9.76
17	Federal Ministry of Youth Development	246	24.00	9.76
19	National Automotive Council	246	23.36	9.50
20	Federal Ministry of Women Affairs	246	21.09	8.57
21	Federal Ministry of Land, Housing & Urban Development	246	20.00	8.13
22	Federal Ministry of Power	246	19.82	8.06
23	Ministry of Mines and Steel Development	246	18.73	7.61
24	National Sport Commission	246	18.64	7.58
24	Office of the Head of Civil Service of the Federation	246	18.64	7.58
26	Federal Ministry of Aviation	246	16.18	6.58
27	Federal Ministry of Environment	246	15.91	6.47
28	Office Of The Secretary General of the Federation	246	15.45	6.28
29	Federal Road Safety Corps	246	15.27	6.21
30	Independent National Electoral Commission	246	14.45	5.88
31	National Judicial Institute	246	12.91	5.25
31	News Agency of Nigeria	246	12.91	5.25
33	Federal Ministry of Works	246	10.55	4.29
34	National Primary Healthcare Development Agency	246	9.36	3.81
35	Federal Capital Territory Administration	246	9.18	3.73
36	Man Power Development Office	246	8.55	3.47
37	Federal Ministry of Culture and Tourism	246	7.64	3.10
38	Nigerian Law Reform Commission	246	7.55	3.07
39	Nigeria Football Federation	246	7.27	2.96

The chart below illustrates the level of compliance in proportion to the legally required threshold for proactive disclosure under the FOI Act.

**Proactive Disclosure - Overall Institutional Compliance**



**Reasons for Low Compliance Rates**

Several general challenges were cited for non-compliance with Section 2 (3), including the non-availability of the appropriate attending officer, non-availability of the information on the institution’s official website, non-existence of an official website, in some cases, denial of access to the

premises for various reasons, Lack of knowledge of the existence and/or content of the FOI Act; lack of understanding of the distinction between Proactive Disclosure with Information Requests. In some instances, the requesters were referred to the institutions' website that did not host the requested information.

Several MDAs erroneously approached the exercise by dealing with the process as though it were an information request under Section 3 of the FOI Act. However, even based on this assumption, none of the institutions that did respond in this regard, did so within the statutory time limit of 7 days. Thus, there is need for MDAs to ensure that they understand and distinguish between their duties under proactive disclosure mandate under Section 2 (3) & (4) of the FOI Act, as differentiated from the duty to process information requests under Sections 3 and 4.

In other instances, the staff at the institution did not understand what kind of information was being requested and state that the records were not stored in a manner that facilitated such access. Many reported that they were not aware of the FOI Act, nor of its implications. Another response was that the information resides severally in various department and would require the arduous task of collection and collation. Others stated that they were not authorised to disclose information.

**Assessing disaggregated levels/categories of compliance**

**A. By Subsection (Section 2(3) (a)-(f))**

The broad and diverse spectrum of information to be proactively disclosed under Section 2 (3) is considered by the content clusters under paragraphs (a-f), as follows:

a. Organisation's Structure and Functions

Section 2 (3) (a) outlines the disclosure of the institution's organogram, including details outlining the programmed and functions of each division, branch and department within the institution.

b. Administrative Records, Manuals, etc.

Section 2 (3) (b) mandates the disclosure of a list of the classes or types of records under the control of the institution, and of manuals that are used in the administration of the institution's programmes and activities, in other words, outlining the administrative protocols and guidelines of the institution. However, the study found that there was no proactive disclosure of any list of the classes of records or documents in the custody or under the control of the institutions in conformity with the mediums of disclosure specified under Section 2 (4) of the FOI Act.

c. Opinions and Orders

Section 2 (3) (c) requires a description of all documents in matters requiring adjudication, which contain concurring or dissenting opinions, and all orders made. It is unclear whether this refers specifically to the court system of adjudication, or whether it also refers to internal adjudicatory proceedings, such as disciplinary committee hearings, etc.

Once again, the study findings showed that there was no compliance with the obligation to disclose documents relating to matters of adjudication, including concurring or dissenting opinions, by any of the public institutions in conformity with the assessed mediums of disclosure.

d. Administrative Policies, related studies and reports & Information related to Staffing

Section 2 (3) (d) deals with a range of information to be disclosed, dealing the substantive rules governing the institution, policy statements and interpretations, planning policies, recommendations and decision, studies and reports prepared for or on behalf of the institution, information regarding receipt and expenditure of institutional funds, whether public or otherwise, comprehensive lists of the personnel of the institution, including names, salaries, job title and date of employment, and the final records of voting in all institutional proceedings. Once again, disclosure was negligible.

- e. Public spending, including Procurement, Contracts, third party agreements

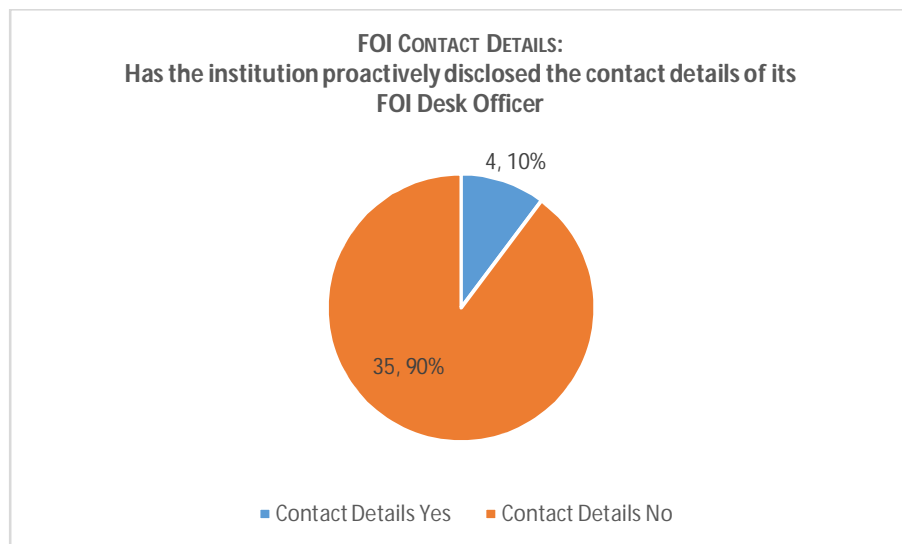
Section 2 (3) (e) relates to procurement, grants, licensing, contracts and agreements, etc., and requires that the institution provides a list of documents containing all applications for such, as well as resulting reports, documents, studies or publications conducted by independent contractors, and all materials containing information relating to grants or contracts by or between the institution and another public institution, or private organization. No information in this regard was obtained - there was no proactive disclosure.

- f. Contact Details of Institution's FOI Officer

Section 2 (3) (f) the title and address of the appropriate officer to whom an application for information shall be sent.

The FOI Act requires that every public institution appoint an appropriate officer to whom FOI requests should be directed, and pursuant to Section 2 (3) (f), the AGF's guidelines require that this FOI desk officer have the ranking of a deputy director or higher. The FOI Act, under Section 2 (3) (f) requires that Contact details of the appropriate officer to whom FOI requests should be directed. However, there was only 3 institutions who made proactive

disclosure of the FOI desk officer in conformity with the mediums of disclosure specified under Section 2 (4) of the FOI Act. Specifically, the National Orientation Agency (NOA) fully lists the name, title phone number and email addresses of all members of the FOI Unit<sup>19</sup>. The National Youth Service Corp (NYSC) lists the phone number and email of the FOI PPRU Unit, but does not list the title of the designated officer<sup>20</sup>. Similarly, the Police Service Commission recently updated its official website and currently proactively discloses same and contact details, including phone number and email addresses of its FOI Committee members<sup>21</sup>. The National Planning Commission lists the information of its FOI Committee members<sup>22</sup>. All institutions made this disclosure online. The compliance rate, therefore is at 10%, with 90% of surveyed institutions.



<sup>19</sup><http://www.noa.gov.ng/index.php/foia-unit>

<sup>20</sup>[http://nysc.gov.ng/news-and\\_events/freedom-of-information.php](http://nysc.gov.ng/news-and_events/freedom-of-information.php)

<sup>21</sup><http://www.psc.gov.ng/node/300>

<sup>22</sup><http://nationalplanning.gov.ng/index.php/about-us/committee1/2014-03-17-15-38-32>

The FOI Act, however, clearly stipulates that the failure of any public institution to publish the title and address of the appropriate officer cannot limit the exercise of the public's right to information.

**B. Assessing Disclosure Methods (Section 2(4))**

As mentioned earlier, the FOI Act prescribes disclosure in print, electronic, online and in hard copy. These disclosure methods are not mutually exclusive, and one disclosure method is not intended to be given precedence over another. Similarly, the form of disclosure may fit into more than one of the prescribed categories. For example, print may refer to publication in newspapers or newsletters, bulletins, or other periodicals which would also qualify as hard copy, or may be an institutional brochure register or annual report. Similarly, all online disclosure is electronic. However, electronic disclosure is not limited to the internet, as disclosure may also refer to electronic mass media such as radio or television, or may be electronically obtained from a disclosure point at the offices of the institution, or other designated disclosure point.

For the purpose of this survey, the distinction is made between disclosure in print and hardcopy. The hard copies of printed materials, which were

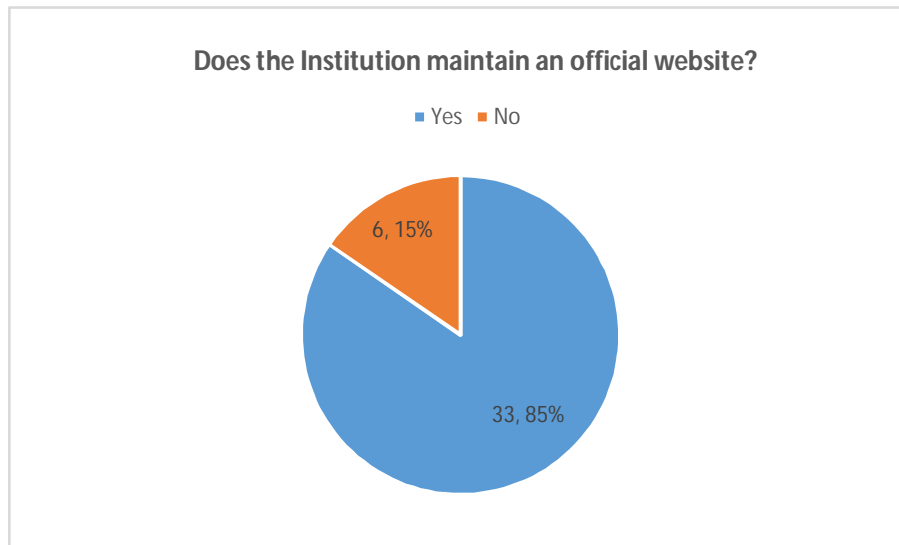


obtained at the offices of the various institutions, primarily in the form of information brochures and manuals, were considered as printed in hardcopy. However, the distinction is made between online disclosure, and disclosure at an officially designated electronic access point other than the internet. It does not consider disclosure methods through the mass media. The AGF's Guidelines recognise that electronic disclosure may be through such channels as using CD-ROMs, or flash drives for example, to access the information from an electronic access point.

### **1. Online Proactive Disclosure**

The internet has opened up many opportunities to communicate more effectively with stakeholders. Agencies publish documents on the internet that the public is interested in; it is a way of reducing the number of requests received. Government institutions now have access to computer systems and internet access that can make enormous amounts of data and information immediately accessible to the public, from an officially designated access point, such as a website.

The survey findings show that during the pendency of the assessment, 85% of



the MDAs have a functional official website, with 15% without a website.

However, while the majority (85%) of surveyed MDAs do maintain an official website, this medium is underutilised as a medium for proactive disclosure. Rarely does the information provided on the website exceed a level of compliance with Section 2 (3) (a) of the FOI Act, and most disclosure are limited to basic information about the structure and general functions of the relevant institution. The websites are also used as a medium for ad-hoc or incidental/occasional events, activities and some projects of the institution, which by no means meets the statutory standards for proactive disclosure. The sad news is that although the use of the internet as a tool for proactive disclosure is underutilised, it remains the primary medium for disclosure, at

approximately 80 %, with the second 20% being disclosure in hard copy, collected at the offices of the various institutions.

Another issue that arose was ease of access and navigation of the websites. For the most part, the existing websites did not have a designated FOI portal or information schedule for proactive disclosure in which information was organized and disclosed in order to facilitate ease of accessing and understanding information. While some of the MDA's websites had a link to an FOI-related page, disclosure through these platforms was negligible. Central Bank of Nigeria (CBN)'s FOI section simply outlines the major responsibilities of the CBN FOI Unit; the Ministry of Information lists the names of its contact officers including zonal and state contacts, however this is in relation to the ministry's mandate, and not specifically related to FOI. The Office of the Secretary General of the Federation (OSGF) links an excerpt, and a full e-copy of the FOI Act; the legal Aid Council redirects to the Ministry of Justice FOI page; National Electricity Regulatory Commission (NERC) portal also is not utilized for online disclosure.

In summary, none of the institutions websites used specific FOI portals or information schedules as such, for proactive disclosure.

## **2. Disclosure in Hard Copy**

Disclosures in hardcopy were through annual reports, and institution's brochures. The manuals were often dated, and had limited copies available, although it was suggested that the lack of availability of hard copy from some institutions may have been as a result of 'Survey Frequency fatigue' from the periodic visits made to the institutions. Other limitations to accessing information in hard copy include refusal of access to the institution's premises, or that the designated officer was not on seat to attend to the requestor.

Upon physical inquiry made at the offices of the institutions, many MDAs referred requesters to their websites to access the information. However the information is often not contained on the website. Information that is proactively disclosed is primarily limited to the MDA's mandate, general functions and organogram, which corresponds to the information to be proactively disclosed as itemised under Part A of Section 2(3).

### **3. Disclosure through an officially designated electronic access point**

During this survey, no disclosure from an electronic access point other than online, via the internet was observed. Despite, technological strides, and opportunity for government institutions to take advantage of such disclosure method, it is wholly untapped.

## **PART 5: FINDINGS, RECOMMENDATIONS AND CONCLUSION:**

### **A. Summary of Findings**

#### **Overall compliance:**

This survey shows that little to no effort overall is being made to comply with the requirement to proactively disclose information prescribed under Section 2(3) & (4) of the FOI Act. The average disclosure rate of 9.35% indicates a very low level compliance with the proactive disclosure mandate of the law. Compliance with the proactive disclosure obligation under section 2 (3) & (4) is very low, with none attaining up to 20% compliance. The information was not readily available outside of the traditional practice of often dated annual reports, basic manuals and basic information available on the institutions' websites. .

#### **What is being disclosed?**

For the most part, the information being disclosed is limited to the basic administrative information, such as the institutions' organogram, its structure and functions; as well as highlighting some events and activities conducted by the various institutions. In this regard, the level of disclosure has not changed after the law came into force. Relatively more sensitive and specific information was not disclosed overall.

**Methods of disclosure:**

The primary disclosure methods are online, and in hard copy obtained from the offices of the institution. However, neither method of disclosure is being optimized to meet the standard of wide dissemination as prescribed under Section 2 (4) of the FOI Act. All potential disclosure methods are being underutilized, or not at all.

**Organization of records:**

A lack of archival and record-keeping practice in a manner that facilitates access surely impedes effective compliance with the Law.

The lack of a coherent, organised and electronic document management systems poses the biggest obstacle to providing information, both proactively and in response to information requests. This highlights the importance of developing and adequately funding record-keeping infrastructure.

**Information-sharing protocols:**

The lack of systematic, coherent, organised information sharing practices also impedes access to information at the legally prescribed standard. Additionally, intra-institutional Information sharing protocols are not adequate for the

successful implementation of the FOI Act. This is also compounded by bureaucratic red-tape and chain of command, especially as it regards inter-departmental communications necessary for the effective implementation of proactive disclosure.

**Attitudinal Challenges:**

In addition to the infrastructural challenges, there is also an attitudinal opposition and resistance to proactive disclosure. Primarily, this opposition is often grounded in the practice of institutionalized secrecy premised on the provisions of the Official Secrets Act, which specific provisions have been nullified by the FOI Act. In spite of this, many refuse to disclose information in compliance with Section 2 (3) & (4) of the FOI Act.

Furthermore, even where some institutions make a perfunctory effort towards proactively disclosing information, such disclosure has not extended to what is perceived as more penetrating information about institutional income and expenditure, staff remuneration and benefits, procurement and contracts, etc. This omission is in direct contravention of the legal obligation to do disclose such.

**Other related issues:**

**Fees:** At no point during the survey did the public institutions require a fee to obtain what information was accessed. Commendably, all information obtained was at no cost, in compliance with the FOI principle of No or Low Cost.

**Training:**

The staff and officers of the institutions do not have the requisite training to ensure successful implementation of the FOI Act. Staff are not adequately trained on the FOI Act and the right to information, as well as possibly other required capacities. There is need for training of officers and staff of MDAs in compliance with the statutory mandate under Section 13 of the FOI Act. There is a lack of understanding of the distinction between proactive disclosure and information request.

**B. Recommendations**

On the basis of the findings above, the following recommendations are enumerated as follows:



- I. Information should be arranged in a clearly identifiable, and easily navigable schedule, guided by the FOI Act, and recommendations of the AGF within his regulatory powers.
- II. There is a clear need to embed records management in the public sector and to develop recommendations regarding record-keeping and data management from best practice examples of developing countries that have already acquired experience.
- III. Public institutions should ensure adequate funding and capacity building for record-keeping infrastructure.
- IV. Public institutions should develop protocols for routine information-sharing as necessitated by the FOI Act.
- V. Public institutions should ensure that the distinct processes of proactive disclosure and processing information requests are distinguished, and processes developed for both.
- VI. Public institutions should ensure full disclosure of all the classes of information prescribed under Section 2 (3) (a-f) of the FOIA.
- VII. Public institutions need to train staff and officers on the FOI Act, including records management, and proactive disclosure

- VIII. Public institutions should explore and take advantage of the diverse platforms and technologies to expand the avenues for proactive disclosure.
- IX. Available remedies should be used to compel compliance by public institutions with the provisions of the FOI Act generally, and the obligation to proactively disclose information.

### **C. Conclusion**

This survey shows significant public sector non-compliance with the proactive disclosure mandate under the FOI Act. Bearing in mind that proactive disclosure is an integral component of an FOI regime, and forms a core aspect for the success or failure of the efficient and effective implementation and sustainability of such a system, active steps must be taken to overcome the challenges that hinder compliance. This includes ensuring the transformation of mind-sets, as well as infrastructural capacities of public institutions to understand the need, value of proactive disclosure and FOI, in general, as well as the realization of the cost implications of non-compliance.

To be successful, implementation of the FOI Act must be holistic and across board since every obligation created under the Act has a vital role in ensuring that the right of the public to information is duly exercised. Therefore, the

imperative for the public and civil society to demand for compliance with the provisions of the FOI Act by public institutions cannot be overemphasised. There is danger in allowing the FOI Act to remain simply a paper legislation, and not allowing the promotion of meaningful access to information. Citizens should protect their right to accountable government through the full expression of their right to information, by demanding for implementation of all aspects of the FOI Act.

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### List of Annexes

#### ***Annex 1: Names and addresses of Surveyed MDAs***

0	<b>PUBLIC INSTITUTION</b>	<b>ADDRESS</b>	<b>WEBSITE</b>
1.	National Orientation Agency	Federal Secretariat Area 1, Garki Abuja	<a href="http://www.noa.gov.ng">www.noa.gov.ng</a>
2.	Federal Capital Territory Administration	FCDA Secretariat, 1 Kapital b` Road, Area 11 Abuja	<a href="http://www.fct.gov.ng">www.fct.gov.ng</a>
3.	National Primary Healthcare Development Agency	Plot 681/682 Port Harcourt Crescent, off Gimbiya Street, Area 11, Garki-Abuja	<b>Not available</b>
4.	Federal Ministry of Information	Radio House, Herbert Macaulay Way Garki- Abuja	<a href="http://www.fmi.gov.ng">www.fmi.gov.ng</a>
5.	Office of the Accountant General	Ministry of Finance, Central Area, Abuja	<a href="http://www.oagf.gov.ng">www.oagf.gov.ng</a>

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6.	Central Bank of Nigeria	Central Area, Abuja	<a href="http://www.cenbank.org">www.cenbank.org</a>
7.	National Centre for Women Development	Central Area, Abuja	<a href="http://www.ncwd.gov.ng">www.ncwd.gov.ng</a>
8.	Nigerian Electricity Regulatory Commission	Plot 1099 First Avenue, off Shehu Shagari Way, Central Business District-Abuja	<a href="http://www.nercng.org">www.nercng.org</a>
9.	Office of The Secretary General of the Federation	Three Arms Zone, Abuja	<a href="http://www.osgf.gov.ng">www.osgf.gov.ng</a>
10.	Federal Ministry of Works	Headquarters, Mabushi , Abuja	<a href="http://www.works.gov.ng">www.works.gov.ng</a>
11.	Federal Ministry of Housing and Urban Development	Mabushi, Abuja	<b>Not available</b>
12.	Federal Ministry of Environment	Mabushi, Abuja	<b>Not available</b>
13.	National Judicial Institute	Adjacent Jabi Junction Fly-over, Airport Road, Wuse Abuja	<a href="http://www.nji.gov.ng">www.nji.gov.ng</a>

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14.	National Automotive Council	No.23, Parakou Street, Wuse II Garki Abuja	<a href="http://www.nac.org.ng">www.nac.org.ng</a>
15.	Federal Ministries of Mines and Steel Development	Mineral And Metal Complex, No. 2, Luanda Crescent, Wuse II, Off Ademola Adetokumbo Crescent	<a href="http://www.mmsd.gov.ng">www.mmsd.gov.ng</a>
16.	National Pension Commission	Federal Secretariat, Annex 2, First Floor, Shagari Way Abuja	<a href="http://www.pencom.gov.ng">www.pencom.gov.ng</a>
17.	Independent National Electoral Commission	Zambezi Crescent, Maitama District, Garki Abuja	<a href="http://www.inecnigeria.org">www.inecnigeria.org</a>
18.	National Youth Service Corps	Yakubu Gowon House Plot 416, Tigris Crescent, off Aguyi Ironsi Street, Maitama District, Garki Abuja	<a href="http://www.nysc.gov.ng">www.nysc.gov.ng</a>
19.	Federal Ministry of Power	Federal Secretariat Annex III, Shehu Shagari Way	<a href="http://www.power.gov.ng">www.power.gov.ng</a>

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20.	Federal Ministry of Communication Technology	Federal Secretariat Complex, Phase I Annex III, Shehu Shagari Way, Abuja	<a href="http://www.commtech.gov.ng">www.commtech.gov.ng</a>
21.	National Drug Law Enforcement Agency	5 <sup>th</sup> Floor , "B" Wing, Federal Secretariat Complex, Phase I, Shehu Shagari Way	<a href="http://www.ndlea.gov.ng">www.ndlea.gov.ng</a>
22.	Police Service Commission	8 <sup>th</sup> Floor Federal Secretariat Phase 1, Shehu Shagari Way	<a href="http://www.psc.gov.ng">www.psc.gov.ng</a>
23.	Federal Ministry of Justice	Shehu Shagari Way, Abuja	<a href="http://www.justice.gov.ng">www.justice.gov.ng</a>
24.	Federal Ministry of Culture and Tourism	Federal Secretariat Complex, Shehu Shagari Way, Garki, Abuja	<a href="http://www.tourism.gov.ng">www.tourism.gov.ng</a>
25.	Federal Law Reform Commission	Federal Secretariat Complex, Abuja	<b>Not available</b>
26.	Legal Aid Council of Nigeria	Federal Secretariat Phase 1, Ground Floor, Shehu Shagari Way, Abuja	<a href="http://www.legalaidcouncil.gov.ng">www.legalaidcouncil.gov.ng</a>

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27.	Federal Ministry of Aviation	Annex 3, Federal Secretariat Complex, Shehu Shagari Way, Abuja	<a href="http://www.aviation.gov.ng">www.aviation.gov.ng</a>
28.	Federal Ministry of Women Affairs and Social Development	Federal Secretariat Shehu Shagari Way, Central Area, Abuja	<a href="http://www.womenaffairs.gov.ng">www.womenaffairs.gov.ng</a>
29.	Head of Civil Service of the Federation	Federal Secretariat Complex, Phase II, Shehu Shagari Way, Abuja	<a href="http://www.ohcsf.gov.ng">www.ohcsf.gov.ng</a>
30.	Manpower Development Office	Federal Secretariat Complex, Phase II, Block A, Shehu Shagari Way, Abuja	<b>Not available</b>
31.	Federal Ministry of Youth Development	Federal Secretariat Complex, Shehu Shagari Way, Abuja	<a href="http://www.youthdevelopment.gov.ng">www.youthdevelopment.gov.ng</a>
32.	National Sport Commission	New Federal Secretariat, Annex 2, First Floor, Shehu Shagari Way, Abuja	<a href="http://www.sportscommission.gov.ng">www.sportscommission.gov.ng</a>
33.	Federal Road Safety	No. 4 Maputo Street, Wuse Zone 3, Abuja	<a href="http://www.frsc.gov.ng">www.frsc.gov.ng</a>



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	Commission		
34.	Nigeria Football Federation	Plot 2033, Olusegun Obasanjo Way, Zone 7 Wuse, Abuja	<b>Not available</b>
35.	Nigerian Press Council	No. 26, Bisau Street, Wuse Zone 6, Abuja	<a href="http://www.presscouncil.gov.ng">www.presscouncil.gov.ng</a>
36.	National Agency For The Prohibition of Trafficking In Persons	Plot 2028, Dalaba Street, Wuse Zone 5, Wuse Abuja	<a href="http://www.naptip.gov.ng">www.naptip.gov.ng</a>
37.	National Planning Commission	Plot 421 Constitution Avenue, Central Business District, Abuja	<a href="http://www.nationalplanning.gov.ng">www.nationalplanning.gov.ng</a>
38.	News Agency of Nigeria	Independent Avenue, Central Business District Abuja	<a href="http://www.nannewsnigeria.com">www.nannewsnigeria.com</a>
39.	Federal Ministry of Transport	Bukar Dipcharima House Central Area, Abuja	<a href="http://www.fmt.gov.ng">www.fmt.gov.ng</a>

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