

**INFORMATION LAW REFERENTS AND ADMINISTRATIVE ACCOUNTABILITY IN
MINISTRIES, DEPARTMENTS AND AGENCIES: A THEORETICAL AND DOCTRINAL
DISCOURSE**

AMADI, Dike Vincent, PhD

Department of Law, School of Legal Studies, Captain Elechi Amadi Polytechnic, Port Harcourt,
Rivers State, Nigeria

Email: dike.amadi@portharcourtpoly.edu.ng

ALIKORNWO, Peter Mezenye, PhD

Department of Office Technology and Management, School of Business and Administrative
Studies, Captain Elechi Amadi Polytechnic, Port Harcourt, Rivers State, Nigeria

Email: peter.alikornwo@portharcourtpoly.edu.ng

ORCID: <https://orcid.org/0009-0008-7266-3731>

WOS ResearcherID: PEV-3695-2025

Abstract

This study examines the relationship between information law referents and administrative accountability in Ministries, Departments and Agencies operating within Rivers State, Nigeria. Adopting a doctrinal and analytical approach, the study interrogates how statutory instruments such as the Freedom of Information Act 2011 and the Nigeria Data Protection Act 2023 function as normative referents that shape the conduct, disclosure practices, and answerability of public officials within subnational bureaucracies. The paper situates its argument within agency theory and stewardship theory, contending that information law operates simultaneously as a constraint on bureaucratic discretion and as an enabling mechanism for citizen oversight. Drawing on Nigerian and international literature, the study finds that although Rivers State Ministries, Departments and Agencies have made appreciable progress in digitisation and administrative reform, the translation of information law referents into demonstrable accountability outcomes remains uneven, constrained by weak enforcement, an underdeveloped records culture, and limited institutionalisation of freedom of information desks and data protection officers. The paper suggests deliberate alignment of subnational digital governance reforms with the substantive obligations imposed by information law and proposes specific administrative and legal measures for strengthening accountability within Rivers State Ministries, Departments and Agencies. The study contributes to the growing interdisciplinary scholarship linking information law and public administration in Nigeria's federating states.

Keywords: *Information Law, Administrative Accountability, Freedom of Information Act, Nigeria Data Protection Act, Ministries Departments and Agencies, Records Management, Information Stewardship*

Introduction

Public administration in Nigeria's federating states operates increasingly within a legal architecture that recognises information as both a public asset and a citizen's entitlement. The relationship between law and administration has never been more consequential than in the present era, in which Ministries, Departments and Agencies are simultaneously custodians of public records, generators of administrative data, and subjects of statutory disclosure obligations. Rivers State, as one of Nigeria's most economically significant subnational entities,

presents an instructive site for examining how information law referents, meaning the statutory provisions, subsidiary regulations, and administrative directives that define what information must be created, kept, protected, or disclosed, interact with the practical exercise of administrative accountability.

Administrative accountability, broadly understood as the obligation of public officials to explain, justify, and answer for the exercise of delegated authority, is not self-executing. It depends on institutional mechanisms that make administrative conduct visible and contestable. Information law supplies much of this institutional scaffolding (Orisah-Godfrey & Alikornwo, 2026). The Freedom of Information Act 2011 grants citizens a statutory right to demand records held by public institutions (Federal Republic of Nigeria, 2011), while the Nigeria Data Protection Act 2023 imposes obligations on public institutions regarding the collection, processing, and safeguarding of personal data (Federal Republic of Nigeria, 2023). Together with sector circulars on records management and the emerging framework for digital government, these instruments constitute what this study terms information law referents, the normative points of reference against which the information conduct of Ministries, Departments and Agencies can be assessed.

Yet the existence of a legal referent does not guarantee its observance. Nigerian scholarship has long noted the gap between the promulgation of transparency legislation and its practical implementation (Anokam, 2015; Duru, 2018; Ononamadu, 2015). Compliance data collected under the Open Government Partnership process indicate that only a small fraction of Nigerian Ministries, Departments and Agencies, whether federal or state, have institutionalised functional Freedom of Information desks or dedicated budgetary provisions for information disclosure (Open Government Partnership, n.d.-a, n.d.-c). Reports as recent as 2025 indicate that only a marginal proportion of the country's Ministries, Departments and Agencies had allocated budgetary resources to freedom of information compliance (AllAfrica, 2025). This pattern of legal enactment without corresponding institutional embedding raises the central problem addressed in this study, namely how information law referents actually shape, or fail to shape, administrative accountability within Rivers State Ministries, Departments and Agencies.

This paper adopts a theoretical and doctrinal orientation rather than a primary empirical survey, given the objective of establishing a conceptual and legal foundation upon which subsequent empirical inquiry in Rivers State can be built. It draws on a broad base of Nigerian and comparative literature, legal instruments, and documented administrative reform initiatives to construct an analytical account of the subject. The specific objectives of the study are to clarify the concept of information law referents within Nigerian public administration, to examine the theoretical basis for linking information law to administrative accountability, to review the legal and institutional architecture applicable to Rivers State Ministries, Departments and Agencies, and to propose measures for strengthening the accountability function of information law at the subnational level.

Conceptual Clarification: Information Law Referents

Information law, in the Nigerian context, encompasses the body of statutory and subsidiary rules governing the creation, custody, protection, and disclosure of information held by public and private bodies. It is not a single code but a composite of instruments including the Freedom of Information Act 2011, the Nigeria Data Protection Act 2023, the National Digital Economy and e-Governance Act 2024, sector specific circulars on records management, and constitutional provisions on freedom of expression under Section 39 of the 1999 Constitution. The term information law referents, as used in this study, denotes the specific legal provisions

that Ministries, Departments and Agencies must consult, apply, or comply with when handling official records, whether in responding to a citizen's request for information, processing personal data of employees and members of the public, or maintaining institutional archives.

The referents operate on two axes. The first is a disclosure axis, obliging public institutions to make certain categories of information available proactively or on request, as codified in the Freedom of Information Act (Federal Republic of Nigeria, 2011). The second is a protective axis, restricting the processing and dissemination of personal or sensitive data, as codified in the Nigeria Data Protection Act (Federal Republic of Nigeria, 2023) and the accompanying guidelines for the management of personal data by public institutions (International Comparative Legal Guides, 2025). Ministries, Departments and Agencies in Rivers State, like their federal counterparts, must navigate both axes simultaneously, often without adequate institutional capacity to reconcile disclosure obligations with privacy obligations.

Administrative Accountability

Administrative accountability refers to the mechanisms and processes through which public officials are held answerable for decisions and the use of public resources. It comprises several dimensions, including legal accountability, meaning answerability to courts and statutory bodies, political accountability, meaning answerability to elected representatives and the electorate, and social accountability, meaning answerability to citizens and civil society through mechanisms such as public disclosure and civic monitoring. Scholars have observed that accountability in Nigeria's public sector has historically depended on formal audit and financial reporting mechanisms, with comparatively little attention paid to information based accountability tools such as freedom of information requests (Orisah-Godfrey & Alikornwo, 2026; Ezeajughu, 2021). This study situates information law as a distinct and increasingly consequential accountability mechanism, complementing rather than replacing financial and political accountability structures.

Ministries, Departments and Agencies in Rivers State

Ministries, Departments and Agencies constitute the operational arm of subnational government, responsible for policy implementation, service delivery, and resource management. In Rivers State, these institutions range from core ministries to specialised agencies and parastatals. The Rivers State civil service has, in recent years, embarked on a programme of administrative reform anchored on digitalisation, with the state government committing to sovereign digital platforms and a paperless administrative environment (Guardian Nigeria, 2025; Punch Newspapers, 2025). These reforms carry direct implications for information law compliance, since digitised records systems alter both the capacity of Ministries, Departments and Agencies to disclose information promptly and their exposure to data protection obligations.

Theoretical Framework

This study anchors its analysis in two complementary theories, agency theory and stewardship theory.

Agency theory conceives of the relationship between citizens, as principal, and public officials, as agent, as one characterised by information asymmetry, in which the agent possesses superior knowledge of administrative processes and outcomes than the principal. Information law referents function as a corrective mechanism within this framework, compelling agents to disclose information that would otherwise remain asymmetrically held. The Freedom of Information Act operationalises this correction by according citizens a legally enforceable right

to demand records (Federal Republic of Nigeria, 2011), a right whose exercise is intended to narrow the information gap between citizens and public officials and thereby reduce the scope for opportunistic or unaccountable conduct.

Stewardship theory, by contrast, presumes that public officials, properly structured and motivated, act as trustworthy custodians of public resources and information, oriented toward collective rather than purely self-interested outcomes. Under this theory, records management and information stewardship duties imposed on Ministries, Departments and Agencies are not merely restrictive obligations but expressions of a custodial relationship between the administrator and the public whose affairs are being managed. Effective records management, encouraged under provisions of the Freedom of Information Act that impose record keeping and maintenance obligations on public institutions (Open Government Partnership, n.d.-c), reflects this stewardship orientation, requiring Ministries, Departments and Agencies to organise records not for the convenience of internal bureaucracy alone but for the ultimate benefit of the citizenry whose information rights depend on the integrity of those records.

The two theories, taken together, capture the dual character of information law referents identified earlier. Agency theory explains the disclosure axis, emphasising information law as a check on official discretion, while stewardship theory explains the protective and custodial axis, emphasising information law as an expression of institutional trustworthiness. Rivers State Ministries, Departments and Agencies, operating under both axes, illustrate the tension and complementarity between the two theoretical postures.

Literature Review

The Legal Architecture of Freedom of Information in Nigeria

The Freedom of Information Act, signed into law in May 2011, was intended to entrench transparency and accountability in Nigerian public institutions by granting citizens the right to access records held by Ministries, Departments and Agencies (HumAngle Foundation, 2025). Anokam (2015) argued that the Act was designed to institutionalise transparency and accountability as pillars of governance, while Owuamalam (2015) identified the prospects of the Act as including a better understanding of government processes and a justification for excellence in public administration. However, more than a decade after enactment, compliance has remained low. Reports under the Open Government Partnership indicate that only a small fraction of federal Ministries, Departments and Agencies had designated Freedom of Information officers in the years following enactment (Open Government Partnership, n.d.-b), and subsequent commitments to expand the number of desk officers and electronic portals have shown incremental rather than transformative progress (Open Government Partnership, n.d.-a, n.d.-d).

The persistence of low compliance has been attributed to several factors, including the unwillingness of subnational governments to domesticate the Act, ambiguity regarding its applicability to state institutions, and the invocation of competing secrecy provisions such as the Official Secrets Act (HumAngle Foundation, 2025). A Supreme Court judgment clarifying that the Freedom of Information Act binds all three tiers of government has narrowed the scope for states to resist compliance on jurisdictional grounds (AllAfrica, 2025), a development of direct relevance to Rivers State Ministries, Departments and Agencies, which, like most state institutions, have not historically treated the Act as self-executing at the subnational level.

Duru (2016, 2018) has extensively examined the relevance of the Act to Nigeria's anti-corruption efforts, arguing that the denial of access to information does more harm to society

than any injury that might arise from disclosure. Comparative scholarship reinforces this argument. Ackerman and Sandoval-Ballesteros (2006) documented the global proliferation of freedom of information laws as a response to demands for transparency, while Calland and Bentley (2013) and Gaventa and McGee (2013) found that the impact of transparency initiatives on accountability outcomes is often contingent on complementary factors such as civil society capacity and institutional receptivity, rather than the mere existence of legislation.

Records Management as a Foundation for Accountability

Effective compliance with disclosure obligations presupposes an underlying capacity to create, organise, and retrieve records. The Freedom of Information Act obliges public institutions to keep records organised in a manner that facilitates timely responses to information requests (Open Government Partnership, n.d.-c). Poor records management has repeatedly been identified as a structural impediment to accountability in the Nigerian public sector, with administrative procedures coupled with paper based systems contributing to the inability of Ministries, Departments and Agencies to meet statutory response timelines (Open Government Partnership, n.d.-d). The transition toward electronic document management, promoted through the National E-Government Master Plan and related initiatives, is intended to address this deficiency by improving information security, reducing cost, and improving access to information (Federal Ministry of Communications, Innovation and Digital Economy, n.d.).

Data Protection as a Countervailing Information Law Referent

While disclosure obligations push Ministries, Departments and Agencies toward openness, data protection obligations constrain the same institutions from indiscriminate disclosure of personal information. The Nigeria Data Protection Act 2023 established the Nigeria Data Protection Commission with powers to regulate the processing of personal data by data controllers, including government ministries, departments, and agencies (Federal Republic of Nigeria, 2023; Nigeria Data Protection Commission, n.d.). Public institutions that process personal data of over ten thousand data subjects annually, or that process sensitive personal data, are required to appoint a dedicated Data Protection Officer (International Comparative Legal Guides, 2025). This obligation applies with particular force to Ministries, Departments and Agencies responsible for civil registration, taxation, health, and social welfare functions, many of which exist at the state level in Rivers State.

The interaction between the Freedom of Information Act and the Nigeria Data Protection Act creates a structural tension that Ministries, Departments and Agencies must resolve in practice. The Freedom of Information Act obliges a public institution to deny an application for information containing personal data unless the individual concerned consents to disclosure or the information is already publicly available (DLA Piper, 2025). The proper administration of this exception requires personnel to possess sufficient legal literacy to distinguish disclosable public interest information from protected personal data, a competency that is unevenly distributed across Nigerian subnational bureaucracies (Mondaq, 2024; OAL Legal, 2023).

Whistleblowing as a Complementary Information Law Referent

Beyond formal disclosure and data protection statutes, the Federal Government's Whistleblowing Policy, introduced in December 2016, constitutes an additional information law referent bearing on administrative accountability. The policy encourages public officials and citizens to report corruption, financial misconduct, and mismanagement of public funds through designated channels (Federal Ministry of Finance, 2025). However, the policy remains

an administrative guideline rather than a substantive law, offering monetary incentives without a comprehensive legal framework for protecting whistleblowers from retaliation (TheCable, 2026). Successive attempts to enact a Whistleblower Protection Bill have not secured presidential assent (PPLAAF, n.d.), leaving public officials in Ministries, Departments and Agencies, including those in Rivers State, without robust legal protection should they elect to disclose administrative wrongdoing. This gap constrains the practical utility of whistleblowing as an accountability referent, notwithstanding its conceptual alignment with the broader information law framework (First Fiduciary, 2026).

Digital Governance Reforms and Information Law Compliance

The Federal Government's ongoing digitalisation of civil service operations, including the deployment of an enterprise content management system and the migration of thirty eight ministries to paperless workflows, has direct implications for information law compliance (Guardian Nigeria, 2026; Office of the Secretary to the Government of the Federation, 2026). Digitisation, properly implemented, can strengthen both disclosure capacity and data protection compliance by creating auditable, retrievable records and reducing the informal handling of sensitive data (Alexa.ng, 2026; Technology Times, 2026). The National Digital Economy and e-Governance Act 2024 mandates the establishment of information and communications technology units in public institutions to facilitate electronic governance (Afriwise, 2024), a provision of direct relevance to Rivers State Ministries, Departments and Agencies undergoing similar reform.

Rivers State has pursued a parallel digitalisation agenda, with the state civil service announcing sovereign digital platforms intended to streamline administrative processes and protect sensitive data within Nigerian jurisdiction (Guardian Nigeria, 2025; Punch Newspapers, 2025). The alignment of subnational reform with federal digital governance frameworks is significant because information law referents, particularly data protection obligations, apply uniformly across federal and state institutions, meaning that Rivers State Ministries, Departments and Agencies cannot treat digitalisation purely as an efficiency measure without also attending to its legal compliance dimensions.

The Rivers State Administrative Triangulation

Existing scholarship on the Rivers State civil service indicates a hybrid administrative culture in which reform tools associated with New Public Management, including performance appraisal systems and digitalisation, coexist with established bureaucratic practices (Victor & Tochi, 2026). This hybridity has produced incremental rather than transformative improvements in accountability outcomes, constrained by weak enforcement mechanisms and limited integration between performance systems and incentive structures (Victor & Tochi, 2026). The Federal Civil Service Strategy and Implementation Plan, which Rivers State has been encouraged to domesticate, similarly emphasises digital transformation as a vehicle for accountability, though its ultimate success depends on sustained institutional commitment rather than the mere adoption of digital tools (John, 2024).

Comparative Perspectives

Comparative experience illuminates both the promise and the limits of information law as an accountability mechanism. South Africa's access to information legislation, one of the earliest such statutes on the African continent, has faced persistent implementation challenges rooted in limited political commitment among government officials (Centre for Information Integrity, 2025). India's Right to Information Act of 2005, widely regarded as one of the strongest

transparency statutes globally, has demonstrated that technocratic legal design alone is insufficient for accountability outcomes, and that sustained citizen demand, civil society coalitions, and engaged public officials are necessary complements to the legal framework (Pakanati & Schwalbe, 2020). These comparative findings reinforce the central argument of this study, namely that information law referents in Rivers State Ministries, Departments and Agencies will yield accountability benefits only to the extent that they are embedded within a supportive institutional culture, rather than treated as a formal compliance exercise.

Methodology

This study adopts a doctrinal and analytical methodology, situating the inquiry within legal and public administration scholarship rather than primary empirical fieldwork. The approach is appropriate given the study's objective of establishing the conceptual and legal foundations linking information law referents to administrative accountability, prior to more granular empirical investigation of specific Rivers State Ministries, Departments and Agencies. Data were drawn from primary legal instruments, including the Freedom of Information Act 2011, the Nigeria Data Protection Act 2023, and the National Digital Economy and e-Governance Act 2024, alongside secondary sources comprising peer reviewed literature, Open Government Partnership monitoring reports, and documented administrative reform initiatives in Rivers State and at the federal level. The analytical technique applied is qualitative content analysis, involving the identification of recurring themes across the legal and administrative literature, and the interpretation of these themes through the lens of agency and stewardship theory.

Discussion

The preceding review demonstrates that information law referents in Nigeria operate as a composite framework rather than a single instrument, comprising disclosure obligations, data protection duties, records management standards, and complementary mechanisms such as whistleblowing policy. For Rivers State Ministries, Departments and Agencies, the practical significance of this framework lies in its capacity to convert administrative conduct that would otherwise remain opaque into conduct that is documented, retrievable, and, in principle, contestable by citizens.

Three observations emerge from the analysis. First, the disclosure axis of information law, anchored in the Freedom of Information Act, remains underutilised at the subnational level in Rivers State, consistent with the broader national pattern in which few Ministries, Departments and Agencies have institutionalised functional Freedom of Information desks (Open Government Partnership, n.d.-b). Without a designated point of contact and a functioning records system, the statutory right of access conferred on citizens by the Act remains largely aspirational rather than actionable within Rivers State Ministries, Departments and Agencies.

Second, the protective axis of information law, anchored in the Nigeria Data Protection Act, imposes fresh institutional obligations on Rivers State Ministries, Departments and Agencies that were not squarely addressed under the earlier and less enforceable Nigeria Data Protection Regulation of 2019 (Future of Privacy Forum, 2023). The requirement to appoint Data Protection Officers, conduct compliance audits, and maintain lawful bases for processing personal data introduces a new dimension of administrative accountability that intersects with, but is analytically distinct from, the transparency obligations imposed by the Freedom of Information Act. Rivers State Ministries, Departments and Agencies handling sensitive categories of data, including health, taxation, and civil registration records, bear a heightened obligation to reconcile these two axes.

Third, the ongoing digitalisation of the Rivers State civil service presents both an opportunity and a risk for information law compliance. Digitisation can strengthen records integrity and retrievability, supporting both disclosure and protection obligations simultaneously, provided that the underlying information governance policies are deliberately aligned with statutory requirements (Alexa.ng, 2026). However, digitisation pursued primarily as an efficiency or political showcase, without corresponding investment in staff training on information law obligations, risks entrenching a form of accountability without substance, in which technological modernisation proceeds without a genuine change in the culture of official answerability, a concern already flagged in relation to the formalistic character of some Rivers State civil service reforms (Victor & Tochi, 2026).

The theoretical framework adopted in this study helps to explain why these gaps persist. Agency theory predicts that, absent external enforcement, agents will under supply information disclosure because disclosure narrows their informational advantage over the principal. This prediction is borne out in the consistently low compliance rates documented across Nigerian Ministries, Departments and Agencies generally (AllAfrica, 2025). Stewardship theory, meanwhile, suggests that where administrative culture is oriented toward custodianship rather than mere compliance, records management and disclosure practices improve organically, a dynamic partially visible in Rivers State's investment in sovereign digital platforms intended to safeguard and manage public data (Guardian Nigeria, 2025). The coexistence of both dynamics within Rivers State Ministries, Departments and Agencies suggests that accountability outcomes will depend on which theoretical logic predominates in a given institution, a question that invites further empirical investigation at the level of individual ministries and agencies.

Challenges to the Effective Application of Information Law Referents in Rivers State

Several challenges constrain the translation of information law referents into demonstrable administrative accountability within Rivers State Ministries, Departments and Agencies. The first is institutional, relating to the absence of dedicated Freedom of Information units and Data Protection Officers within most Ministries, Departments and Agencies, a deficiency that mirrors the national pattern in which official designations have lagged far behind statutory requirements (Open Government Partnership, n.d.-b). The second is cultural, relating to an entrenched administrative disposition toward secrecy that predates the Freedom of Information Act and that continues to shape officials' instinctive response to information requests (HumAngle Foundation, 2025). The third is technical, relating to the uneven state of records digitisation across Ministries, Departments and Agencies, which affects the capacity of institutions to retrieve and disclose information within statutory timelines (Open Government Partnership, n.d.-d). The fourth is legal, relating to the incomplete protection afforded to whistleblowers and the resulting reluctance of public officials to report administrative wrongdoing even where information law would otherwise support such disclosure (TheCable, 2026). The fifth is normative, relating to the tension between disclosure and data protection obligations, which requires a level of legal literacy among personnel that is not uniformly available across Rivers State's public service (Mondaq, 2024).

Conclusion

This study has examined the relationship between information law referents and administrative accountability in Ministries, Departments and Agencies within Rivers State, Nigeria. It has shown that information law in Nigeria operates through a composite

architecture comprising disclosure obligations under the Freedom of Information Act, protective obligations under the Nigeria Data Protection Act, records management standards, and complementary mechanisms such as whistleblowing policy. Anchored in agency theory and stewardship theory, the study has argued that these referents function simultaneously as constraints on bureaucratic discretion and as expressions of institutional custodianship over public information. The evidence reviewed indicates that Rivers State Ministries, Departments and Agencies, while participating in a broader national and subnational digitalisation agenda, have yet to fully institutionalise the structures, including designated Freedom of Information and data protection officers, that would allow information law referents to translate into demonstrable accountability outcomes. The study suggests formal domestication of the Freedom of Information Act at the state level, institutional designation of compliance officers, alignment of digitalisation initiatives with substantive legal training, and the establishment of subnational whistleblower protections. Future empirical research should test the propositions advanced in this study through direct investigation of specific Rivers State Ministries, Departments and Agencies, in order to generate granular evidence on the practical operation of information law referents within the state's administrative system.

Suggestions

Based on the foregoing analysis, the study proposes the following measures for strengthening the accountability function of information law referents within Rivers State Ministries, Departments and Agencies:

1. The Rivers State Government should formally domesticate the Freedom of Information Act, placing beyond doubt its applicability to all Ministries, Departments and Agencies within the state, notwithstanding the clarificatory effect of recent judicial pronouncements on the Act's binding force across all tiers of government.
2. Every Ministry, Department and Agency in Rivers State should designate a Freedom of Information desk officer and a Data Protection Officer, with the two roles coordinated to ensure that disclosure decisions are made with due regard to data protection obligations, consistent with the dual axis character of information law identified in this study.
3. The state government should extend its digitalisation agenda beyond efficiency oriented workflow automation to encompass structured training of civil servants on the substantive content of information law referents, ensuring that digital records systems are designed from inception to support both disclosure and protection functions.
4. Rivers State should establish a subnational whistleblowing mechanism with clear protective guarantees for public officials who report administrative misconduct, complementing the federal policy and addressing its acknowledged weaknesses regarding retaliation protection.

References

- Ackerman, J. M., & Sandoval-Ballesteros, I. E. (2006). The global explosion of freedom of information laws. *Administrative Law Review*, 58(1), 85-130.
- Aelex Partners. (2023, October 17). *Highlights of the Data Protection Act, 2023*. CLEX Legal. <https://www.aelex.com/highlights-of-the-data-protection-act-2023-nigeria/>

- Afriwise. (2024). *Transforming Nigeria's digital landscape: Review of the National Digital Economy and e-Governance Bill, 2024*. <https://www.afriwise.com/blog/transforming-nigerias-digital-landscape-review-of-the-national-digital-economy-and-e-governance-bill-2024>
- Alexa.ng. (2026, May 19). *Digital revolution in the corridors of power: How AI, GovMail, and end-to-end digitization are eradicating leaked memos and red tape in Nigeria's civil service*. <https://www.alexang.ng/2026/05/digital-revolution-in-corridors-of.html>
- AllAfrica. (2025, April 21). *Nigeria: Editorial. FOI Act verdict, now no escape for dodgy states, MDAs*. <https://allafrica.com/stories/202504210025.html>
- Anokam, S. (2015). *Freedom of Information Act and bureaucratic processes in Nigeria [Paper presentation]*. Roundtable on MDAs Compliance with the FOI Act in Nigeria, Abuja, Nigeria.
- Blueprint Newspapers. (2026, May 20). *Nigeria: Tinubu orders full digitalisation of MDAs*. <https://blueprint.ng/nigeria-tinubu-orders-full-digitalisation-of-mdas/>
- Bureau of Public Service Reforms. (n.d.). *FG initiates 43 reforms in civil service in five years*. <https://bpsr.gov.ng/fg-initiates-43-reforms-civil-service-five-years/>
- Calland, R., & Bentley, K. (2013). The impact and effectiveness of transparency and accountability initiatives: Freedom of information. *Development Policy Review*, 31(1), 69-87.
- Centre for Information Integrity. (2025, May 12). *Access to information*. <https://cinia.africa/12-access-to-information/>
- Darch, C., & Underwood, P. (2010). *Freedom of information in the developing world: The citizen, the state and models of openness*. Chandos Publishing.
- DLA Piper. (2025). *Data protection laws in Nigeria. Data Protection Laws of the World*. <https://www.dlapiperdataprotection.com/index.html?t=law&c=NG>
- Duru, C. W. (2015). *Freedom of Information Act and the burden of obscurity in Nigeria [Paper presentation]*. Roundtable on MDAs Compliance with the FOI Act in Nigeria, Abuja, Nigeria.
- Duru, C. W. (2016). The relevance of Nigeria's FOI Act to the country's anti-corruption war. *International Journal of Journalism and Mass Communication*, 6(12), 757-762.
- Duru, C. W. (2018). Nigeria's Freedom of Information Act: Opportunities and challenges. *Global Journal of Applied, Management and Social Sciences*, 15, 51-58.
- Ezeajughu, C. (2021). Accountability and transparency in Nigerian civil service. *SAPIENTIA Global Journal of Arts, Humanities and Development Studies*.

- Federal Ministry of Communications, Innovation and Digital Economy. (n.d.). *E-Government initiative*. <https://fmcide.gov.ng/initiative/e-government-initiative/>
- Federal Ministry of Finance. (2025, September 18). *FG launches nationwide sensitization programme on whistleblowing policy to combat corruption*. <https://finance.gov.ng/fg-launches-nationwide-sensitization-programme-on-whistleblowing-policy-to-combat-corruption/>
- Federal Ministry of Finance. (n.d.). *Federal Government to strengthen whistle-blowing policy with legal framework*. <https://finance.gov.ng/federal-government-to-strengthen-whistle-blowing-policy-with-legal-framework/>
- Federal Republic of Nigeria. (2011). *Freedom of Information Act, 2011*.
- Federal Republic of Nigeria. (2023). *Nigeria Data Protection Act, 2023*.
- First Fiduciary. (2026, May 23). *Whistleblowing mechanisms: Legal considerations and practical implementation in Nigeria*. <https://firstfiduciary.ng/whistleblowing-mechanisms-legal-considerations-and-practical-implementation-in-nigeria/>
- Future of Privacy Forum. (2023). *Nigeria's new data protection act, explained*. <https://fpf.org/blog/nigerias-new-data-protection-act-explained/>
- Gaventa, J., & McGee, R. (2013). The impact of transparency and accountability initiatives. *Development Policy Review*, 31(1), 3-28.
- Guardian Nigeria. (2025, September 12). *Rivers civil service leads Nigeria's digital shift to paperless future*. <https://guardian.ng/news/rivers-civil-service-leads-nigerias-digital-shift-to-paperless-future/>
- Guardian Nigeria. (2026, May 21). *Tinubu orders MDAs to adopt digital systems as 38 ministries go paperless*. <https://guardian.ng/news/tinubu-orders-mdas-to-adopt-digital-systems-as-38-ministries-go-paperless/>
- HumAngle Foundation. (2025, November 17). *The Freedom of Information (FoI) Act in Nigeria*. <https://humangle.org/the-freedom-of-information-foi-act-in-nigeria/>
- International Comparative Legal Guides. (2025, July 21). *Data protection laws and regulations report 2025-2026: Nigeria*. <https://iclg.com/practice-areas/data-protection-laws-and-regulations/nigeria/>
- John, O. M. (2024). An appraisal of the Federal Civil Service Strategy and Implementation Plan 2021-2025 (FCSSIP25) for the transformation of Nigeria's federal civil service. *Annals of Social Sciences and Management Studies*, 10(2), Article 555783. <https://doi.org/10.19080/ASM.2024.10.555783>
- Media Rights Agenda. (2010). *Ask and you may receive: Report from monitoring of access to information in West Africa*. Africa FOI Centre.

- Mondaq. (2024, February 29). *Understanding the Nigeria Data Protection Act 2023: Obligations of digital platforms and businesses*. <https://www.mondaq.com/nigeria/privacy-protection/1430338/understanding-the-nigeria-data-protection-act-2023-obligations-of-digital-platforms-and-businesses>
- Nigeria Data Protection Commission. (n.d.). *About us*. <https://ndpc.gov.ng/about-us/>
- OAL Legal. (2023, June 19). *Unveiling the Nigeria Data Protection Act, 2023: An expert appraisal of key provisions*. <https://oal.law/unveiling-the-nigeria-data-protection-act-2023-an-expert-appraisal-of-key-provisions/>
- Office of the Secretary to the Government of the Federation. (2026, May 20). *Tinubu directs MDAs to embrace technology as 38 ministries adopt e-workflow*. <https://www.osgf.gov.ng/tinubu-directs-mdas-to-embrace-technology-as-38-ministries-adopt-e-workflow/>
- Ojo, O. (2015). *Combating corruption through the FOI Act [Paper presentation]*. Media/Civil Society Roundtable on Nigeria's Anti-Corruption Situation, Lagos, Nigeria.
- OIML Bulletin. (2024). *A case study of Nigeria's public sector: Digitalization of the legal metrology agency*. <https://www.oiml.org/en/publications/oiml-bulletin/online-bulletin-1/2024-10/a-case-study-of-the-digitalization-of-the-legal-metrology-agency>
- Ononamadu, E. (2015). *Nigeria's FOI Act: Opportunities and challenges [Paper presentation]*. Roundtable Meeting organised by J4A (DFID)/MIIVOC for CSOs and the Media in South-South Nigeria.
- Open Government Partnership. (n.d.-a). *FOIA compliance for annual reporting (NG0010)*. <https://www.opengovpartnership.org/members/nigeria/commitments/NG0010/>
- Open Government Partnership. (n.d.-b). *FOIA compliance for disclosure (NG0011)*. <https://www.opengovpartnership.org/members/nigeria/commitments/NG0011/>
- Open Government Partnership. (n.d.-c). *Improve compliance with Freedom of Information Act (NG0023)*. <https://www.opengovpartnership.org/members/nigeria/commitments/NG0023/>
- Open Government Partnership. (n.d.-d). *Improved compliance with mandatory publication provisions requirement (NG0024)*. <https://www.opengovpartnership.org/members/nigeria/commitments/NG0024/>
- Open Government Partnership. (2025). *Nigeria: Advance inclusive and responsible digital governance*. <https://www.opengovpartnership.org/the-open-gov-challenge/nigeria-advance-inclusive-and-responsible-digital-governance/>

- Orisah-Godfrey, L. A. & Alikornwo, P. M. (2026). Information governance strategy: Assessing the administrative accountability referents in Public Sector Institutions in Rivers State. *International Journal of Accounting, Auditing and Management*, 13(1), 76-88.
- Owuamalam, E. (2015). *Mainstreaming FOI into extant developmental policies in Nigeria: Issues and prospects [Paper presentation]*. Roundtable on MDAs Compliance with the FOI Act in Nigeria, Abuja, Nigeria.
- Pakanati, R., & Schwalbe, E. (2020). *More than a decade in the making: A study of the implementation of India's Right to Information Act*. World Development. <https://www.sciencedirect.com/science/article/abs/pii/S0305750X2030214X>
- PPLAAF. (n.d.). *Nigeria*. <https://www.pplaaaf.org/country/nigeria.html>
- PRNigeria. (2026, May 20). *Tinubu tasks MDAs on digital transformation, targets paperless governance*. <https://prnigeria.com/2026/05/20/tinubu-tasks-mdas-digital/>
- Punch Newspapers. (2025, September 12). *Rivers State leads digital civil service overhaul in Nigeria*. <https://punchng.com/rivers-sets-pace-with-digital-civil-service-overhaul/>
- Rivers State Government. (n.d.). *Official portal*. <https://www.riversstate.gov.ng/>
- Secure Privacy. (2025, September 26). *Nigeria data protection law: Complete NDPA compliance guide 2025*. <https://secureprivacy.ai/blog/nigeria-data-protection-law>
- TheCable. (2026, February 24). *Nigeria needs more than a whistleblowing policy to fight corruption*. <https://www.thecable.ng/nigeria-needs-more-than-a-whistleblowing-policy-to-fight-corruption/>
- Technology Times. (2026). *BPSR taps digital to strengthen Nigeria's public sector reforms*. <https://technologytimes.ng/bpsr-digital-strengthen-nigeria-public-sector/>
- Victor, W. M., & Tochi, O. (2026). New Public Management and performance management in Rivers State civil service. *Central Asian Journal of Social Sciences and History*, 7(2), 287-296. <https://doi.org/10.17605/cajssh.v7i2.1332>
- Wilson, D. (2015). *Donor role in freedom of information implementation in Nigeria [Paper presentation]*. Roundtable on MDAs Compliance with the FOI Act in Nigeria, Abuja, Nigeria.