

EVALUATING THE EFFECTIVENESS OF NIGERIA'S INSTITUTIONAL RESPONSE TO
TERRORISM

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Abstract

Nigeria has faced a range of serious security challenges, including kidnapping, cattle rustling, pipeline vandalism, armed banditry, and terrorism. Among these, terrorism has been the most devastating, claiming the lives of men, women, and children particularly in Northern Nigeria. In 2022, the southern region also experienced a major terrorist attack when the Catholic Church in Owo, Ondo State, was targeted by suspected terrorists. This incident exposed significant lapses in intelligence gathering and sharing, revealed weaknesses within the security architecture, and highlighted institutional ineffectiveness, particularly on the part of the police. These realities underscored the need to evaluate Nigeria's institutional framework for combating terrorism. This study adopted the doctrinal research method, relying on both primary and secondary sources. Primary sources included relevant legislation such as the Terrorism (Prevention and Prohibition) Act, 2022, while secondary sources consisted of textbooks, academic journal articles, and credible online materials. The paper found that, despite the existence of multiple institutional mechanisms intended to address terrorism, the threat has persisted largely due to poor implementation and structural deficiencies. It concluded that Nigeria's counter-terrorism efforts will remain ineffective unless institutions particularly the police conduct thorough investigations, present credible evidence in court, and ensure diligent prosecution. Currently, many terrorism-related cases are undermined by inadequate investigations, poorly presented evidence, and a lack of prosecutorial commitment, often resulting in the dismissal of cases by the courts.

Keywords: Institution, Response, Terrorism and Security Challenges

1.0 Introduction

Terrorism has become increasingly brazen, sophisticated, and deadly in the 21st century. Modern terrorism involves wide range of operational tactics including vehicle-ramming attacks, suicide bombings, kidnappings, and the use of explosives.² In Nigeria, terrorism has persisted for more than two decades, evolving into one of the country's most formidable security threats. Despite concerted efforts by successive governments, the activities of groups such as Boko Haram and the Islamic State West Africa Province (ISWAP) continue to endanger national security. In January 2015, the Nigerian government revitalized the Multinational Joint Task Force (MNJTF), a collaborative military initiative comprising Nigeria, Niger, Chad, Cameroon, and Benin, aimed at degrading terrorist operations in the Lake Chad region.³ Although the Nigerian Army has repeatedly claimed victories over Boko Haram, including the reclaiming of territories previously under the group's control,⁴ such claims have often been countered by renewed and more daring attacks.⁵ Some of the most notorious terrorist incidents in Nigeria include: The Chibok schoolgirl abduction on 14 April 2014;⁶ Dapchi schoolgirl abduction on 19 February 2018;⁷ the Owo Catholic Church bombing

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² Paul H and Sneha M, 'Ramming Attacks, Pedestrians, and the Secularization of Streets and Urban Public Space: A Case Study of New York City' *PMC Journal* <https://pmc.ncbi.nlm.nih.gov/articles/PMC8900474> accessed on 10th February 2025

³ *ibid*

⁴ Nasir Ayitogo, '18 Killed, 43 Injured, 50 Missing as Boko Haram Attacks Military Base in Borno' *Premium Times* <https://www.premiumtimesng.com/news/headlines/457775-18-killed-43-injured-50-missing-as-boko-haram-attacks-military-base-in-borno.html> accessed 1 November 2024.

⁵ *ibid*

⁶ BBC News, 'Nigeria Chibok Abduction: What We Know' <https://www.bbc.com/news> accessed on 10th March 2025.

⁷ Leadership Newspapers, 'Nigeria Ranking on Terrorism Index' <http://www.leadership.ng/2019> accessed 13 February 2025.

in June 2022⁸; the mass abduction of 160 villagers in Niger State in February 2024⁹; the execution of 40 civilians in Borno State on 15 January 2025.¹⁰

These tragic events highlight persistent gaps in intelligence gathering, inter-agency coordination, law enforcement capabilities, and community-based counterterrorism strategies. Despite the development of various military and institutional responses, terrorist groups continue to exploit systemic institutional weaknesses. This raises fundamental questions about the effectiveness of Nigeria's counter-terrorism architecture. This paper aims to evaluate the effectiveness of Nigeria's institutional responses to terrorism. It focuses on the counter-terrorism actors, including the Nigeria Police Force, the Armed Forces, the Office of the National Security Adviser (ONSA), and the National Security Adviser (NSA), alongside the judiciary and others. The objective is to assess whether these institutions are legally equipped, operationally coordinated, and effectively implementing their mandates in the fight against terrorism in Nigeria.

2.0 Understanding Nigeria's Institutional Counter-Terrorism Framework

Nigeria adopts a multi-agency approach in its effort to combat terrorism. This approach involves the collaboration of various security, intelligence, and law enforcement agencies working together to achieve a unified national security objective. The rationale behind this framework is that terrorism is a complex and multifaceted threat which no single agency can tackle effectively in isolation. In Nigeria, this model has become the cornerstone of its counter-terrorism strategy, especially given the overlapping jurisdictional and operational responsibilities of different security bodies. This section identifies and discusses the core institutions that make up Nigeria's counter-terrorism infrastructure and explores their formal mandates and operational roles in addressing terrorism.

2.1 Office of the National Security Adviser (ONSA)

The Office of the National Security Adviser (ONSA) was first established under Section 4 of the National Security Agencies Act, 1986. Its counter-terrorism mandate was formally outlined in the Terrorism (Prevention) Act 2011, and later reinforced by the Terrorism (Prevention) (Amendment) Act, 2013, which designated ONSA as the lead coordinating agency for Nigeria's counter-terrorism efforts.¹¹ Under Section 1 of the 2013 Amendment, ONSA is empowered to provide strategic support to security, intelligence, law enforcement, and military services in preventing and combating acts of terrorism.¹² Specifically, it is mandated to; formulate and ensure the effective implementation of a comprehensive counter-terrorism strategy;¹³ build institutional capacity for relevant agencies to fulfil their responsibilities under the Act or any other applicable law;¹⁴ and to undertake other necessary activities to enhance the effectiveness of relevant security and enforcement agencies.¹⁵

As a statutory member of both the National Security Council (NSC) and the Federal Executive Council (FEC), the National Security Adviser (NSA) plays a key role in coordinating inter-agency intelligence and security operations. ONSA aggregates intelligence from all national security outfits, including paramilitary agencies. Notably, the NSA is appointed directly by the President and does not require Senate confirmation.¹⁶ Additionally, the 2013 Amendment empowers the NSA to establish the National Counter Terrorism Centre

⁸ BBC News, 'Owo Church Attack – Gunmen Kill Catholic Worshippers in Owo' <https://www.bbc.com> accessed December 2024.

⁹ Chiagozie Ewokor, 'At Least 160 Villagers Reported Taken in Deadly Raid' (BBC) <https://www.bbc.com/news/articles/ce55y1p7xxmo> accessed 20 February 2025.

¹⁰ Amnesty International (n 12).

¹¹ Terrorism (Prevention) (Amendment) Act, 2013, s.1.

¹² *ibid*, s.1(a).

¹³ *ibid*, s.1(b).

¹⁴ *ibid*, s.1(c).

¹⁵ *ibid*, s.1(d).

¹⁶ Ailemen A 'Ribadu's Appointment Returns Internal Security to the Police' <https://businessday.ng/news/article/ribadu-appointment-returns-internal-security-to-police/>. Accessed 10th February, 2025

(NCTC), a specialised body responsible for integrated planning, information sharing, and operational coordination.¹⁷ However, despite the broad legal latitude conferred on ONSA by the 2013 Amendment, its impact has been hampered by persistent inter-agency rivalry, overlapping mandates, and bureaucratic inefficiencies. These issues have undermined coherent national action. Moreover, inadequate funding, institutional corruption, and delayed implementation continue to serve as significant obstacles to achieving a robust and well-coordinated counter-terrorism response in Nigeria.¹⁸

2.2 Nigeria Police Force (NPF)

The Nigeria Police Force (NPF) is tasked with maintaining public law and order.¹⁹ According to Section 4 of the Nigeria Police Act 2020, the Police are empowered to protect lives and property, preserve law and order, prevent and detect crime, and enforce all laws and regulations.²⁰ In line with Nigeria's multi-agency counter-terrorism strategy, the NPF has established specialised units, including the Anti-Terrorism Squad (ATS), trained specifically to respond to terrorism threats. The creation of the ATS exemplifies the institutional recognition of terrorism as a major threat to national security. However, despite these efforts, the persistence, boldness, and growing sophistication of terrorist attacks suggest that the NPF's counter-terrorism operations remain largely ineffective.²¹ Challenges such as poor remuneration, weak intelligence gathering, inadequate logistics, limited forensic capacity, and a lack of inter-agency coordination continue to hamper the Police's role in Nigeria's counter-terrorism effort.²²

2.4 Armed Forces and Joint Task Force (JTF)

The Armed Forces of Nigeria (AFN) have played a central role in the federal government's counter-terrorism strategy, particularly in the North-East. Since the emergence of Boko Haram in 2009, the military has maintained a continuous presence in affected areas. In 2012, following a state of emergency declared in parts of Borno, Yobe, and Adamawa States, the government established Joint Task Forces (JTFs) composed of personnel from the Army, Navy, and Air Force.²³ The JTFs were mandated to conduct counter-insurgency operations, restore public order, and neutralise the operational capacity of terrorist groups.²⁴ As part of its strategy, a senior military officer was appointed to oversee day-to-day operations within the affected zones, with authority to impose curfews and adopt other security measures. In a symbolic and tactical move, the military command headquarters was relocated to Maiduguri, Borno State, the epicentre of Boko Haram activity.²⁵

Despite these interventions, terrorist groups such as Boko Haram and the Islamic State West Africa Province (ISWAP) remain active, raising questions about the long-term effectiveness of a militarised response.²⁶ Although the military has achieved tactical victories, deeper structural issues such as poor civil-military relations, inadequate intelligence coordination, and logistical challenges have continued to hamper overall counter-terrorism outcomes. In addition to kinetic military force, Nigeria has at times employed non-military

¹⁷ *ibid*, s.1(e); see also National Security Agencies Act, Cap. N74, Laws of the Federation of Nigeria 2004, s.4.

¹⁸ Oyeyemi O, David A, 'Inter-Agency conflict and its implication on National Security in Nigeria' (2020) 6(2) *Kampala International University Journal of Social Sciences* 47-53.

¹⁹ Abuloye A, 'State Policing as a Panacea for Ineffective Policing in Nigeria' (2018) 3(1) *Obafemi Awolowo University Law Faculty Journal* 2.

²⁰ Nigeria Police Act 2020, s 4.

²¹ *ibid*

²² Oyeyemi O, David A, (n 18).

²³ Akpan F et al, 'Boko Haram Insurgency and the Counterterrorism Policy in Nigeria' (2014) <https://www.questia.com/library/journal/1P3-3330435321/boko-haram-insurgency-and-the-counter-terrorism-policy> accessed 12 January 2025.

²⁴ *ibid*

²⁵ Moore J, 'Nigerian Military Enter "Final Stages" of Boko Haram Offensive' *Newsweek* (New York, 23 April 2015) <https://www.newsweek.com/authors/jack-moore> accessed on 5th January 2025.

²⁶ *ibid*

strategies, including dialogue, amnesty programmes, deradicalisation initiatives, and legislative reforms.²⁷ However, the federal government's overwhelming dependence on the military is unsustainable and ineffective in addressing the root causes of terrorism. Furthermore, the Armed Forces have been accused of excessive force and human rights violations, including extrajudicial killings, torture, and the use of lethal force against civilians.²⁸ During operations, especially in the early stages of the insurgency, the military adopted aggressive tactics that alienated local communities, undermined trust, and compromised the flow of critical intelligence. For instance, Amnesty International reported instances where JTF operatives allegedly executed prisoners and buried them in shallow mass graves.²⁹ Beyond the battlefield, the military has also been deployed to suppress civil unrest, including peaceful protests and student demonstrations. This reliance on the military to settle civil matters has eroded public trust, reinforced fears rooted in Nigeria's history of military rule, and blurred the lines between security enforcement and civic engagement. The 2012 fuel subsidy protests, where civilians were reportedly killed or injured by heavily armed military personnel, highlight the dangers of deploying combat-ready troops in civilian contexts.³⁰ The combined effect of these missteps, ranging from militarised suppression to abuses of power, has undermined the legitimacy of the Armed Forces in the eyes of many Nigerians. Consequently, this poses significant challenges to intelligence gathering, community cooperation, and the overall success of Nigeria's counter-terrorism efforts.

2.5 Civilian Joint Task Force (CJTF)

The Civilian Joint Task Force (CJTF) covers a crucial but often overlooked institution in Nigeria's counter-terrorism framework. The Civilian Joint Task Force (CJTF) has emerged as a critical component of Nigeria's counter-terrorism efforts, particularly in the North-East. Formed in response to intelligence and operational failures of formal security forces, the CJTF consists of local residents who volunteered to assist in identifying, apprehending, and resisting terrorist actors especially Boko Haram.³¹ The CJTF is made up of diverse individuals, including hunters, former military personnel, civil servants, youth, and traditional vigilante groups known locally as *Yan Gora* or *Kato da Gora* (literally, "the man with the cane").³² Members typically operate with rudimentary weapons such as machetes, swords, bows and arrows, daggers, and clubs.³³ Though lacking formal training, their deep integration into local communities has given them a unique intelligence-gathering advantage, enhancing the effectiveness of formal security forces.³⁴ CJTF personnel operate under the direction of sector commanders, often aligned with the operational framework of the military Joint Task Force (JTF).³⁵ The group's contribution has been instrumental in degrading Boko Haram's influence by supplying actionable intelligence to the military, facilitating arrests, and disrupting terrorist operations. Their embeddedness in local communities makes them trusted partners, thus boosting civilian cooperation in intelligence sharing.³⁶

In some instances, former abductees and deradicalised youth have joined the CJTF. Despite its success, the CJTF faces significant challenges, including lack of training in rules of engagement, tactical operations, and human rights compliance. Scholars and civil society actors have called for their formal integration into the

²⁷ Olatubosun A and Ekundayo B, 'Deradicalisation of Terrorists Through Judicial and Non-Judicial Schemes in Nigeria' (2018) *Indian Socio-Legal Journal* 32.

²⁸ Murtala W, 'Challenges and Prospects in the Counterterrorism Approach to Boko Haram: 2009–2018' (2020) 16 *Global Politics Review* <http://idea.repec.org> accessed on 2nd February 2022.

²⁹ Amnesty International, 'Nigeria: Threats from the Military Will Not Deter Us from Defending Human Rights' (2018) <https://amnesty.org/en/latest/news/2018/06/nigeria-threats-from-the-military-wont-deter-us-from-defending-human-rights> accessed 3 January 2022.

³⁰ *ibid*

³¹ Cropley E, 'On Boko Haram Front Line, Nigerian Vigilantes Amass Victories and Power' <https://www.reuters.com/article/us-nigeria-security-vigilantes-idUSKBN1960FK> accessed on 10th January 2025.

³² Aigbobia D, 'Resistance to Boko Haram: Civilian Joint Task Force in North Eastern Nigeria' (2015) <https://www.csq.ro/wp-content/uploads/1-Daniel-AGBIBOA.pdf> accessed 2 February 2025.

³³ *ibid*

³⁴ Bamidele O, 'Civilian Joint Task Force (CJTF) A Community Security Option: A Comprehensive and Proactive Approach to Counterterrorism' (2016) *Journal for Deradicalisation* 137

³⁵ Aigbobia D (n 2).

³⁶ Bamidele O (n 4).

national counter-terrorism framework as a short-term, community-based solution.³⁷ Institutionalising the CJTF through training, oversight, and legal safeguards could further enhance their utility while minimising risks associated with vigilantism or human rights abuses.

2.6 National Counter-Terrorism Centre (NCTC)

A notable improvement introduced by the Terrorism (Prevention and Prohibition) Act, 2022 (TPA 2022) over the repealed 2011 version is the formal establishment of the National Counter-Terrorism Centre (NCTC).³⁸ The Centre is positioned under the Office of the National Security Adviser (NSA) and is designated as the coordinating body for all counter-terrorism policies, strategies, and plans in Nigeria. The Centre is mandated to coordinate national responses to terrorism, including intelligence gathering, prosecution, and public sensitisation.³⁹ Its functions are elaborated under Section 6 (2) of the Act, which include the following; the establishing a Joint Terrorism Analysis Branch (JTAB), responsible for research, analysis, and provision of intelligence reports to law enforcement agencies;⁴⁰ creating a legal team made up of qualified prosecutors to ensure that prosecutions comply with international humanitarian law and the laws of armed conflict;⁴¹ overseeing the implementation of a National Counter-Terrorism Strategy and Plan;⁴² conducting public awareness campaigns on terrorism prevention and response;⁴³ coordinating national efforts to counter terrorist financing;⁴⁴ engaging with international bodies and civil society organisations in combating terrorism and its financing;⁴⁵ facilitating research and academic collaboration on terrorism-related issues;⁴⁶ and ensuring that all relevant anti-terrorism bodies have access to the intelligence and operational data necessary for effective performance.⁴⁷

Furthermore, under Section 7 of the Act, the President, on the recommendation of the NSA, is required to appoint a National Coordinator for the Centre.⁴⁸ The Coordinator is responsible for the daily operations of the Centre and reports directly to the NSA.⁴⁹ The establishment of the NCTC marks a critical institutional step toward a more unified, intelligence-driven, and strategic response to terrorism in Nigeria. By integrating coordination, analysis, enforcement, and public engagement into one centre, the NCTC has the potential to address the fragmentation that has long characterised Nigeria's counter-terrorism efforts.

2.7 Nigeria Sanctions Committee (NSC)

Another institutional innovation introduced by the Terrorism (Prevention and Prohibition) Act, 2022 (TPA 2022) is the creation of the Nigeria Sanctions Committee (NSC).⁵⁰ This Committee was absent in the repealed 2011 Act. It is vested with the responsibility of coordinating Nigeria's domestic sanctions regime in line with international obligations, particularly on terrorism, terrorist financing, and the proliferation of weapons of mass destruction. The Attorney-General of the Federation chairs the NSC, and its membership includes the Ministers of Finance, Foreign Affairs, and Interior; the National Security Adviser (NSA); the Director-General of the Department of State Services (DSS); the Governor of the Central Bank of Nigeria (CBN); the Inspector General of Police (IGP); the Chairmen of the Economic and Financial Crimes Commission (EFCC), the Independent Corrupt Practices and Other Related Offences Commission (ICPC), and the National Drug Law Enforcement Agency (NDLEA); a representative of the Chief of Defence Staff;

³⁷ Bamidele O (n 4) 137.

³⁸ See Terrorism (Prevention and Prohibition) Act, 2022, s 6(1).

³⁹ *ibid*

⁴⁰ TPA 2022, s 6(2)(a).

⁴¹ *ibid*, s 6(2)(b).

⁴² *ibid*, s 6(2)(c).

⁴³ *ibid*, s 6(2)(d).

⁴⁴ *ibid*, s 6(2)(e).

⁴⁵ *ibid*, s 6(2)(f).

⁴⁶ *ibid*, s 6(2)(g).

⁴⁷ *ibid*, s 6(2)(h).

⁴⁸ TPA 2022, s 7(1).

⁴⁹ TPA 2022, s 7(1).

⁵⁰ Terrorism (Prevention and Prohibition) Act, 2022, s 9.

the Director-General of the National Agency for the Prohibition of Trafficking in Persons (NAPTIP); and the Director of the Nigerian Financial Intelligence Unit (NFIU), who serves as secretary.⁵¹ The President may also appoint additional members as deemed necessary.⁵²

The powers and functions of the NSC are wide-ranging. Under Section 10 of the Act, the Committee is mandated to; formulate policy guidelines relating to the designation of persons or entities as terrorists whether listed under the United Nations Consolidated List or the Nigerian List;⁵³ advise on the implementation of relevant international instruments, including UN Security Council Resolutions (UNSCRs), African Union (AU), and ECOWAS resolutions on terrorism and terrorist financing;⁵⁴ serve as a communication channel for the receipt and transmission of requests from the UN Security Council or other foreign states, through the Attorney-General;⁵⁵ Recommend individuals or entities for designation based on their role in financing or facilitating terrorism;⁵⁶ take steps to implement UNSCRs concerning the proliferation of weapons and the financing of terrorism;⁵⁷ solicit and recommend sanctions or policy actions based on credible intelligence;⁵⁸ recommend sanctions against designated persons-including travel bans, asset freezes, and restrictions on fund transfers;⁵⁹ maintain and update a publicly accessible website reflecting any modifications to the UN and Nigerian sanctions lists.⁶⁰ The NSC, therefore, represents a critical mechanism for aligning Nigeria's domestic anti-terrorism sanctions regime with global counterterrorism frameworks. It also facilitates inter-agency coordination, ensures due process in designation and delisting, and provides transparency through public-facing communications.

2.8 Special Victims Trust Fund

The Terrorism (Prevention and Prohibition) Act, 2022 (TPA 2022) also introduces the Special Victims Trust Fund (the Trust Fund), a marked shift from the earlier framework under the repealed 2011 Act.⁶¹ The Fund is to be established under the supervision of the Attorney-General of the Federation, and the President is empowered to provide financial resources to kick-start its operations.⁶² The objectives of the Trust Fund are two-fold: first, to provide compensation or financial support to victims or persons affected by acts of terrorism;⁶³ and second, to fund programmes aimed at preventing terrorism and related offences.⁶⁴ This represents a humanitarian and preventive shift in Nigeria's counter-terrorism architecture, addressing both the immediate and systemic effects of terrorism. To ensure accountability, a Trust Fund Committee is established to administer and oversee the Fund.⁶⁵ The Committee is chaired by the Attorney-General and includes representatives from relevant government ministries, departments, and agencies.⁶⁶ The Committee is responsible for designing policies for the disbursement of funds, ensuring transparency, and advising on priority areas for support and rehabilitation. The establishment of the Special Victims Trust Fund demonstrates an institutional effort to address the long-neglected welfare of terrorism victims, while also serving as a tool for community resilience and deradicalisation.

⁵¹ *ibid*, s 9(a)–(q).

⁵² *ibid*

⁵³ TPA 2022, s 10(a), s 53.

⁵⁴ *ibid*, s 10(b), s 49.

⁵⁵ *ibid*, s 10(d).

⁵⁶ *ibid*, s 10(e).

⁵⁷ *ibid*, s 10(f).

⁵⁸ *ibid*, s 10(g).

⁵⁹ *ibid*, s 10(h)

⁶⁰ *ibid*, s 10(i).

⁶¹ Terrorism (Prevention and Prohibition) Act, 2022, s 91.

⁶² *ibid*, s 91(a).

⁶³ *ibid*, s 91(4)(a).

⁶⁴ *ibid*, s 91(4)(b).

⁶⁵ *ibid*, s 92.

⁶⁶ *ibid*, s 91(1)–(4).

2.9 Judiciary

The court plays a vital role in Nigeria's institutional response to terrorism. As terrorism is a criminal offence, those responsible must be promptly arraigned before a court with the requisite jurisdiction. Timely and effective prosecution not only serves justice but also deters potential offenders. However, the track record of terrorism-related prosecutions in Nigeria suggests limited progress, casting doubt on the efficacy of judicial interventions in the broader counter-terrorism architecture. In practice, the prosecution of terrorists has often been undermined by political considerations. The federal government has, at various times, prioritised negotiations with Boko Haram members over prosecution. Reports indicate that some members of Boko Haram have been released in exchange for abducted persons, undermining judicial accountability.⁶⁷ Prosecutors must also adhere to ethical guidelines. Rule 37 (4) of the Rules of Professional Conduct (RPC) stipulates that the prosecutor's duty is not to secure a conviction at all costs, but to serve the interests of justice.⁶⁸ This includes disclosing exculpatory evidence, even when it weakens the prosecution's case.⁶⁹ These principles are echoed in the Code of Conduct and Prosecutorial Guidelines for Prosecutors. Nonetheless, the prosecution of terrorism offences faces significant challenges; inadequate protection for judges and prosecutors; poor inter-agency cooperation; weak investigative groundwork, and limited prosecutorial resources. For the court to play a more effective role in the counter-terrorism landscape, systemic reforms, particularly in witness protection, evidence gathering, and judicial security are essential.

3.0 Conclusion

This paper has evaluated the effectiveness of Nigeria's institutional response to terrorism by examining the existing legal and institutional frameworks, including but not limited to the Office of the National Security Adviser (ONSA), the Nigeria Police Force, the Armed Forces, the Judiciary, and the National Counter Terrorism Centre (NCTC).

The study found that despite the presence of multiple institutions empowered to combat terrorism, factors such as corruption, inter-agency rivalry, overlapping mandates, and a general lack of coordination have significantly undermined their effectiveness.

It concludes that unless genuine efforts are made to foster synergy, clarify agency roles, and eliminate institutional rivalries, Nigeria's counter-terrorism response will continue to be fragmented and ineffective. A unified and cooperative national security strategy remains imperative if the country is to successfully combat terrorism.

⁶⁷ *News Wire*, 'Boko Haram Releases 82 Chibok Girls in Exchange for Detained Prisoners' (2017) <https://newswirengr.com> accessed on 20th January 2022.

⁶⁸ Rule 37(4) RPC 2023. *Omisade v Queen (1964)* NMLR 67; *Odofin Bello v State (1967)* NMLR 1

⁶⁹ *Brady v Maryland* 373 U.S. 83 (1963) See also Rule 37(6) RPC