NiTDA

Compliance Report (2024) on the Code of Practice for Interactive Computer Service Platforms/Internet Intermediaries (CoP for ICSPs/IIs)

July 2025

Introduction

This report presents an overview of the 2024 compliance submissions received from social media platforms operating in Nigeria, in accordance with the Code of Practice for Interactive Computer Service Platforms and Internet Intermediaries (CoP for ICSP/II), issued by the National Information Technology Development Agency (NITDA). The Code provides a proactive regulatory framework to guide platforms in addressing online harms, enhancing user safety, and promoting responsible digital engagement within Nigeria's digital space. The 2024 compliance cycle marks the second round of submissions, following the inaugural reporting exercise conducted in 2023. This demonstrates a growing culture of accountability and regulatory alignment among participating platforms.

The submissions reviewed in this report reflect the efforts of platforms such as Google, TikTok, and LinkedIn to align with the Code's provisions. These platforms have continued to demonstrate their commitment to mitigating harmful content, curbing misinformation and disinformation, and supporting a secure and inclusive online environment for Nigerian users.

Through annual submissions of this platform's compliance report, the platforms reaffirm their alignment with the regulatory objectives of the Code and their dedication to supporting digital well-being. The measures outlined in the Code ranging from content moderation and complaint handling to cooperation with lawful directives form the foundation for a collaborative effort between industry and regulators to strengthen the integrity of Nigeria's cyberspace. This report reflects both a fulfilment of regulatory obligation and a shared commitment to safeguarding the digital rights and safety of all users.
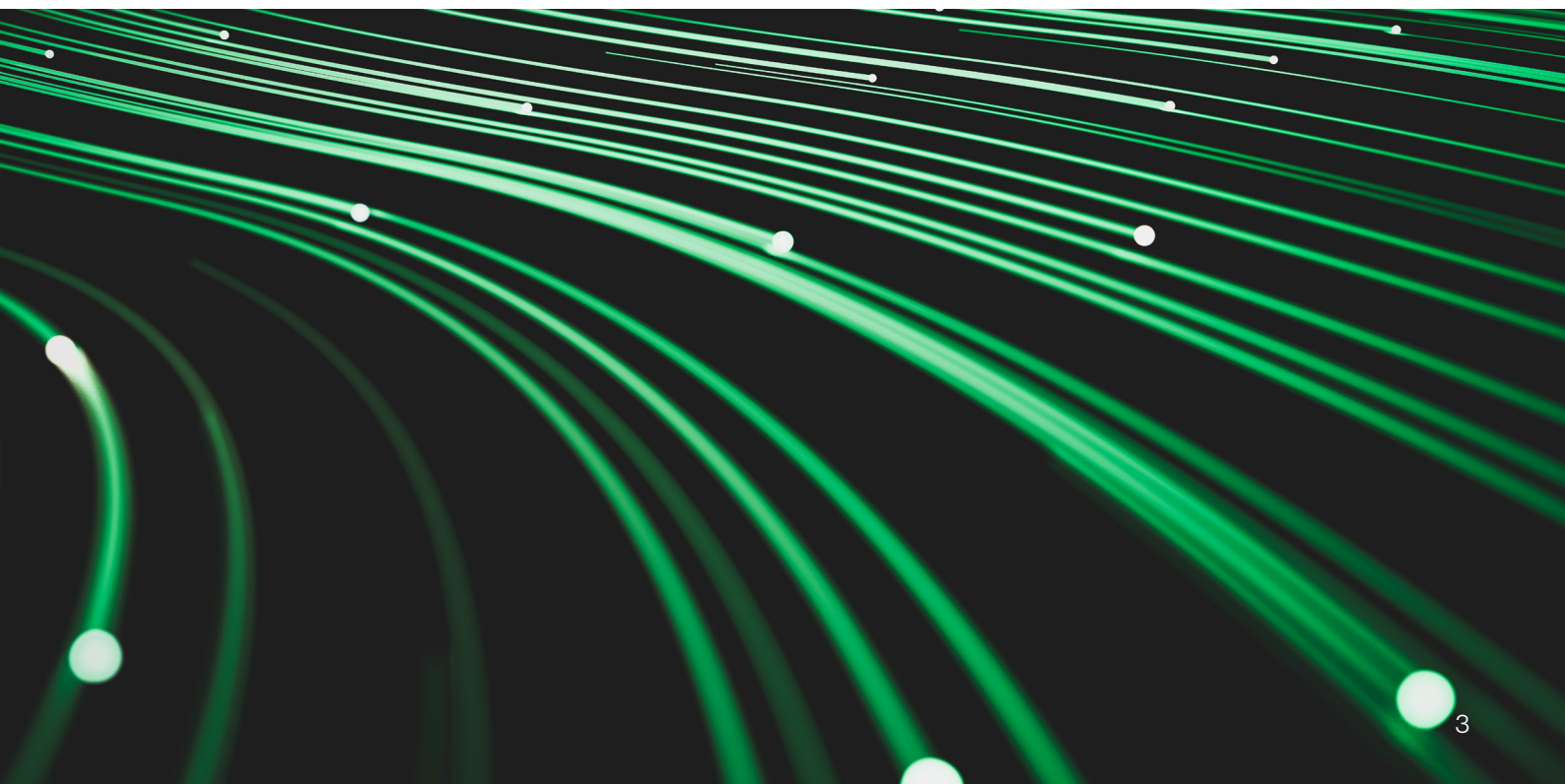
Compliance Status

Part II, Section 10 of the Code mandates that a compliance report is submitted by Large Service Platforms (LSP) to NITDA. The rationale behind the annual compliance report is significant, as it plays a crucial role in cultivating a safer and more accountable digital environment in Nigeria. By requiring LSP to submit compliance reports, the Code aims to ensure transparency, increased accountability, and enforce adherence to regulatory standards, thereby bolstering user safety and fostering a reliable cyberspace.

The Code sets various compliance requirements for Platforms to meet, aligning with the broader objectives of safeguarding user interests and combatting online harms. These compliance requirements amongst others include:

1. Account Deactivations: Platforms must promptly close and deactivate accounts of bad actors to protect users from potential risks.

2. Content Removals: Platforms are obligated to remove harmful content, whether flagged by users, authorities, or through internal reviews, to maintain a safe online environment.

3. Content Reinstatement: Platforms must provide mechanisms for users to appeal for the reinstatement of removed content, promoting fairness and user empowerment.

4. User Complaint Handling: Platforms must establish effective complaint resolution mechanisms to address user concerns promptly and improve the overall user experience.

Compliance with these requirements is crucial for prioritising the well-being of Nigerians online by reducing exposure to harmful content, enhancing user trust, and fostering a positive digital experience. Each Platform's compliance effort reflects a commitment to meeting these standards and ensuring a safer online space for all users.

Compliance Analysis

Analysing how each Platform complied with the Code revealed their tailored approaches and commitment to user protection:

1. Google's proactive content moderation measures, responsive feedback handling, and reinstatement procedures, showcasing a user-centric approach to compliance.

2. LinkedIn's enforcement of community guidelines and professional policies, swift content takedowns, and resolution of user complaints underlines its dedication to maintaining a trusted platform for professionals.

3. TikTok's collaborative efforts with stakeholders, strict moderation policies, and user empowerment initiatives highlight its commitment to combating harmful content and facilitating a safe online environment.

By complying with the Code's requirements, these Platforms not only fulfil regulatory obligations but also contribute to cultivating a safer, healthier, and more responsible digital landscape that prioritises user well-being and fosters trust among Nigerian users. Below is the highlight of the reports submitted by the Platforms in accordance with Part II, Section 10 of the Code:

A. **The number of closed and deactivated accounts in Nigeria:**

Accounts are closed and deactivated due to violations of the provisions of the Code of Practice and the Platforms' community rules. These violations encompass issues such as fake accounts, bullying, harassment, child pornography, hate speech, and more. In the year 2024, the following number of accounts were closed and deactivated:
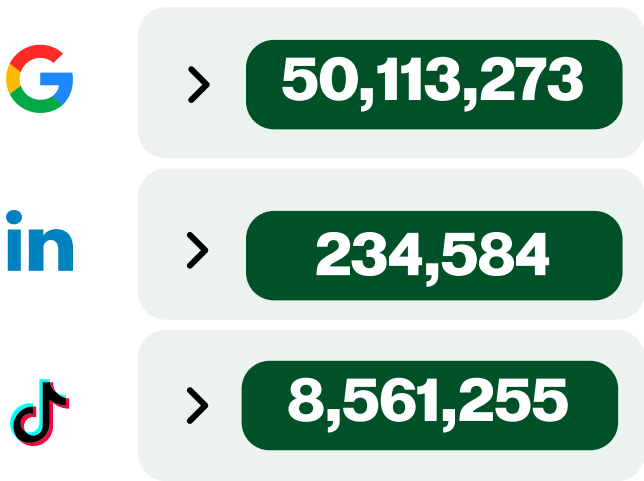
| Platform	Number
G	9,680,141
in	16,121,996
♪	2,303,920

B. Number of removed content with and without notice or Court order

The content was removed for violating the provisions of the Code of Practice and the Platforms' community rules. These violations include issues such as child endangerment, hate speech, fake news, and more. In the year 2024, the following number of contents were removed:

G > **50,113,273**

in > **234,584**

♪ > **8,561,255**

C. Number of contents removed and re-uploaded

Where content is removed for violating the provisions of the Code of Practice or the Platforms' community rules, Platforms are required to have a transparent and accessible redress mechanism in place for users to appeal content removals they believe were made in error or without due justification. This ensures transparency and accountability in the implementation of the Code. In the year 2024, the following number of contents were removed and re-uploaded based on user appeals:

G > **4,717**

in > **637**

♪ > **415,085**
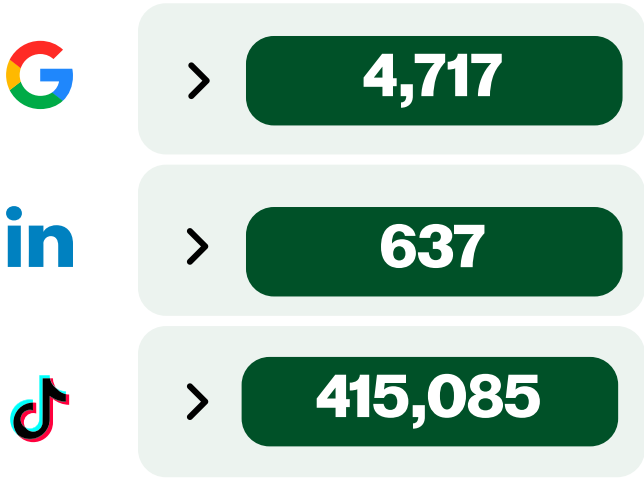
D. Information on how children and adults are protected from harmful content that they may encounter

Part II, Section 4 of the Code mandates all Platforms to take measures to mitigate and manage the impact of harmful content and ensure that their community rules or guidelines specify how children and adults will be safeguarded from encountering harmful content. Upon reviewing the reports, it is evident that the Platforms have demonstrated a commitment to maintaining safe and secure online environment for users in Nigeria. The reports illustrate that the Platforms utilise various unique approaches to content moderation, user safety, and privacy to facilitate positive interactions and safeguard vulnerable populations, especially minors. As outlined in the reports, these Platforms leverage advanced technologies, human oversight, and robust policies to establish secure environments where users can interact freely and securely. Here is an overview of the safety measures and strategies implemented by these Platforms:

Google

Google reported that it sets clear content policies across all its products to ensure a safe, positive, and high-quality experience for users, advertisers, publishers, and developers. These policies govern what content is allowed, how data is handled, and which materials can be monetised, with enforcement guided by both automated systems and human review. Google's policies define acceptable content and behaviour across its platforms. Community Guidelines and developer policies ensure proper use of user data and responsible platform interactions. Monetisation guidelines determine what content is eligible for revenue generation while promoting a safe and innovative digital ecosystem.

To enforce policies at scale, Google uses a mix of machine learning and human moderators. Automated systems quickly identify violations like spam, while humans handle more complex, context-sensitive decisions. Human-reviewed content is used to train AI models, making enforcement smarter and more adaptive over time.

Google places strong emphasis on combating child sexual abuse material (CSAM). It uses advanced tools like machine learning classifiers and hash-matching technology to detect and remove both known and unknown CSAM. Offending content is reported to the National Center for Missing and Exploited Children (NCMEC), and accounts involved are often disabled. Google applies safety-by-design principles to deter users from searching for CSAM, filters results for sensitive queries, and issues warnings in many countries when illegal searches are attempted. These steps have proven effective in reducing harmful behaviour.

Google also works with NGOs and industry partners to fight online child abuse. It provides free tools like the CSAI Match API and Content Safety API, helping others detect and prioritise abusive content. This collaborative approach strengthens the global child safety ecosystem and expands the detection of both known and new CSAM. On YouTube, creators can self-impose age restrictions, while YouTube can also enforce permanent age restrictions when necessary. These controls limit access to mature content and reduce monetisation potential for videos that may not be suitable for all audiences.

Linked in

LinkedIn report demonstrates the platform's commitment to maintaining a safe, trusted, and professional platform by ensuring transparency for its members, the public, and regulators. Upon joining, members agree to LinkedIn's User Agreement and Professional Community Policies, which set the standards for acceptable behaviour and content. When violations occur, LinkedIn removes the offending content to protect users.
To safeguard users especially children and adults from harmful content, LinkedIn employs a three-layer content moderation system as part of its Trust ecosystem.

→ **First Layer: Automated, Proactive Prevention**
Content is evaluated at the point of creation using machine learning models. Within milliseconds, AI systems assess whether the content violates policies based on previously flagged examples (such as

certain keywords or images). If flagged, the content is blocked before it becomes visible to others. LinkedIn continually tests and refines these models with human-reviewed samples to maintain accuracy and avoid over-filtering.

→ **Second Layer: AI and Human-Led Review**
Content that may violate policies but lacks clear signals for automatic removal is flagged by AI for human moderation. Trained reviewers evaluate such content and remove it if found in breach of LinkedIn's standards. This process also helps improve the performance of LinkedIn's moderation models over time.

→ **Third Layer: User Reporting and Human Review**
LinkedIn encourages users to report inappropriate content via an in-product reporting tool. Reported content is reviewed by LinkedIn's moderation team and removed if it violates platform policies.

→ Additionally, LinkedIn enforces strict age restrictions, explicitly prohibiting users under 16 from joining. The platform's professional focus makes it generally unappealing to minors, and LinkedIn does not market or design features to attract them even those aged 16 or 17 who are allowed to use the platform.

TikTok

TikTok reported that their approach is dedicated to creating a safe, inclusive, and joyful environment for its users, especially teenagers. This commitment is supported through a combination of zero-tolerance policies, innovative technologies, educational resources, and collaboration with governments, NGOs, and industry partners. TikTok's Community Guidelines, which apply to all users regardless of profile type or follower count, are the foundation for acceptable behaviour and content.

These guidelines are regularly updated and enforced through a mix of automated systems and human moderation.

Three-Layer Content Moderation System
→ **Automated Prevention:**
When a user uploads content, AI systems immediately evaluate it for policy violations using various signals such as text, images, and audio. If content is clearly harmful (e.g., nudity or threats to youth safety), it is automatically removed before publication. These systems are continuously refined to improve accuracy and reduce wrongful removals.

→ **AI and Human Review:**
Content that may violate policies but is not clearly flagged is passed to human moderators for further review. These human decisions also help train TikTok's AI models for better future detection.

→ **User Reporting and Human Review:**
Users can report problematic content using in-app tools. Moderators then assess the reports and remove content if it violates the guidelines. Specialized moderation teams handle sensitive issues like

misinformation, and TikTok supports content moderation in over 70 languages.

Trust and Safety Investment

TikTok has invested heavily in trust and safety, employing tens of thousands of professionals, including former law enforcement personnel and child safety experts, and dedicating over $2 billion globally in safety efforts. These teams focus on areas such as minor sexual exploitation, product safety, and technical detection of harmful behaviour and content.

Safety Campaigns and Partnerships in Nigeria

In Nigeria, TikTok launched the #SaferTogether campaign, aimed at educating parents, guardians, and creators about available safety tools. Phase two of the campaign, conducted in partnership with NITDA and Data Scientists Network (DSN), included school-based workshops to raise awareness on digital safety for young people. TikTok also works with local organisations such as NgCERT, The Nigerian Film and Video Censor Board, and NGOs like Mentally Aware Nigeria and Paradigm Initiative through its Community Partner Channel (CPC). These partners use the TikTok Safety Enforcement Tool (TSET) to flag harmful content for review.

Empowering Users with Tools and Resources

TikTok offers an extensive safety toolkit, accessible to all users, providing instructions for reporting content and managing in-app experiences such as videos, live streams, comments, and direct messages. Guides are also available for parents and caregivers to better understand the platform's features and ensure a safe experience for teens.

Empowering Users with Tools and Resources

Introduced in 2020 and recently enhanced, TikTok's Family Pairing feature allows parents to link their accounts to their teens' profiles to manage:

+   Screen time limits
+   Content filters
+   Privacy and comment settings
+   Blocked and followed accounts

New updates include:

+   A meditation feature after 10pm to help teens relax.
+   A Time Away tool and customizable schedules for healthier app usage.
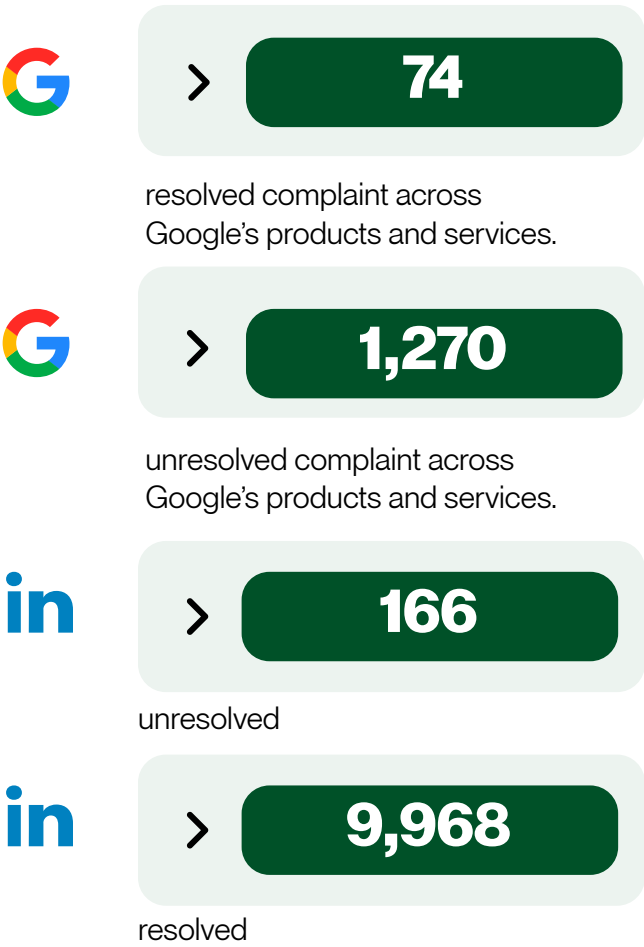+   The option for parents to see who their teen interacts with on the platform.

E. Information on the number of complaints registered with a Platform

This requirement provides an overview of the total number of complaints registered with each Platform. During the year 2024, the following number of complaints were registered:

G > **951**

in > **10,134**

♪ > **743,544**
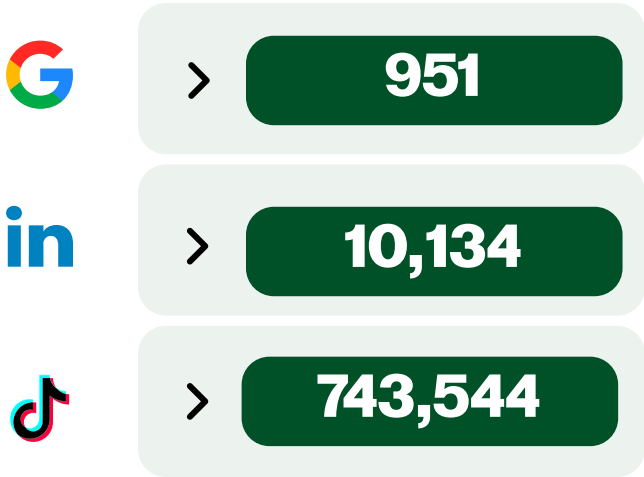
F. Number of resolved and unresolved complaints

This requirement provides visibility on the number of resolved and unresolved complaints based on the total number of complaints registered with each Platform. In the year 2024, the following are the number of resolved and unresolved complaints:

G > **74**

resolved complaint across Google's products and services.

G > **1,270**

unresolved complaint across Google's products and services.

in > **166**

unresolved

in > **9,968**

resolved

G. Number of Closed and Deactivated Accounts in Nigeria

This requirement provides visibility on the number of closed and deactivated accounts based on the total number of complaints registered with each Platform. In the year 2024, the following are the number of closed and deactivated accounts:

G > **9,680,141**

in > **16,121,996**

♪ > **2,303,920**
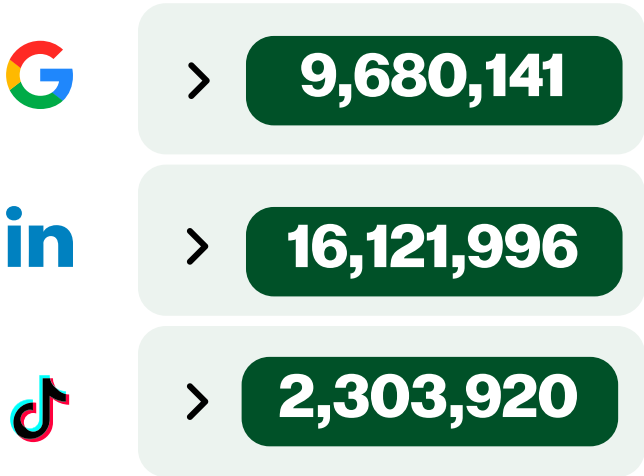
G. Information on how children and adults are protected from harmful content that they may encounter

Disinformation, as defined in the Code, refers to verifiably false or misleading information that, when cumulatively created, presented, and disseminated, aims to achieve economic gain or intentionally deceive the public, potentially causing public harm. Conversely, misinformation involves the unintentional dissemination of false information. These issues pose multidimensional growing challenges without a singular root cause or solution. According to Part V of the Code of Practice, Platforms operating in Nigeria must take proactive measures to address disinformation and misinformation. Below are some of the initiatives implemented by the Platforms to combat these challenges in Nigeria:

According to Google's report, it's platforms are committed to elevating high-quality information and reducing harmful misinformation across its platforms, including Search, YouTube, and Ads. This aligns with its mission and core principles of openness, user choice, and inclusivity. Google addresses misinformation through;

+ **Policy enforcement**

    Google removes illegal content, disinformation, and harmful misinformation (regardless of intent), especially when it threatens public health, democratic processes, or societal trust.

+ **Detection and moderation**

    Content is monitored using a combination of AI, human moderation, and external partnerships. Google's Threat Analysis Group (TAG) identifies and disrupts coordinated influence operations by analysing behavioural patterns and working with industry peers to improve global threat response.

Platform-Specific Enforcement

i.   **Google Ads:** Enforces strict policies against misrepresentation, insufficient original content, and inappropriate content. In Nigeria alone, millions of ad creatives were removed for violating these rules.

ii. **YouTube:** Removes harmful content including election misinformation, medical misinformation, and manipulated media. Over 360,000 videos were removed globally in one period for misinformation violations. YouTube prioritises high-quality content in recommendations and rewards credible creators.

iii. **Google Search:** Applies content policies to demote or remove deceptive and misleading content, using spam detection systems like SpamBrain. More than 23 million domains were actioned globally for spam-related violations. Search also improves user experience through ranking updates, content advisories, and dedicated SOS Alerts during crises.

Google deploys features across platforms to elevate authoritative sources and support informed decision-making:
Tools to Promote High-Quality Information

i. **YouTube Recommendations:** Personalised based on viewing behaviour, with controls for users to manage what is shown.

ii. **YouTube Information Panels:** Provide verified context on topics such as elections or health.

iii. **Search Ranking & Signals:** Uses machine learning and human quality raters to highlight credible content while reducing low-quality and misleading results.

iv. **'About This Result' & 'About This Image':** Help users evaluate the trustworthiness of web pages and images by offering background information and usage context.

Google empowers users to report harmful content through built-in feedback tools across Search, YouTube, and Ads. Users can:

User Empowerment and Feedback

i. Flag inappropriate videos, channels, or ads,
ii. Report inaccurate search results or snippets,
iii. Use recommendation controls and visibility settings to shape their content experience.

LinkedIn reported combating misinformation by enforcing compliance with its user agreement. Upon joining LinkedIn, members agree to abide by its User Agreement and Professional Community Policies, which explicitly prohibit the sharing of false or misleading content, including misinformation or disinformation.

With over a billion users creating and sharing content, TikTok reported combatting misinformation a combination of strict policies, expert partnerships, and user empowerment tools.

TikTok removes harmful misinformation regardless of intent including disinformation especially when it relates to civic processes, public health, climate change, and emergencies. Repeated violations can lead to account removal. The definition of harmful misinformation includes not only content that causes physical harm, but also that which may result in psychological or societal damage, property loss, or loss of trust in public institutions.

Misinformation is detected through a combination of technology, user reports, and expert input. Specially trained content moderators review flagged content, supported by TikTok's partnerships with 21 IFCN-accredited fact-checkers working in over 50 languages. These fact-checkers help verify claims so that moderation is both accurate and fair.

When content cannot immediately be confirmed as true or false such as during elections or unfolding events TikTok may label the content, make it ineligible for the For You feed, and prompt users to reconsider sharing it.

During high-risk events, TikTok actively monitors for local misinformation trends and scans the platform for similar content once new misinformation claims are identified. Through its Global Fact-checking Program and close work with experts, TikTok ensures it responds quickly and effectively to evolving threats.

Table 1: Figures in the Compliance Report

The table below shows the 2024 compliance status of social media platforms in terms of their incorporation with the Corporate Affairs Commission of Nigeria, the establishment of physical offices, the appointment of liaison officers for effective communication with the government, and content moderation efforts, pursuant to Parts III, sections 3–1, and Part II, section 10 of the Code of Practice for Interactive Computer Service Platforms and Internet Intermediaries (CoP for ICSP/II).

S/N	COMPLIANCE REQUIREMENT	Google	Linked in	TikTok	X	Meta
1.	Must be Incorporated in Nigeria	Yes	Yes	No	Not Ascertained	Yes
2.	Have a Physical Contact Address	Yes	Yes	Yes	Not Ascertained	Yes
3.	Appoint a Liaison Officer who shall serve as a communication channel between the government and the Platform	Yes	Yes	Yes	Yes	Yes
4.	Tax Filing	Yes	Yes	No	No	Yes
5.	Engage the Services of Fact-checkers	Yes	Not Applicable	Yes	Community Note	Yes
6.	Submission of Annual Compliance report (2024)	Yes	Yes	Yes	No	No
7.	Number of Closed and Deactivated Accounts in Nigeria	9,680,141	161,2996	230,3920	Not Provided	Not Provided
8.	Number of removed content with and without notice or Court order	50,113,273	234,584	856,1255	Not Provided	Not Provided
9.	Number of contents removed and re-uploaded	4717	637	415,085	Not Provided	Not Provided
10.	Information on the number of complaints registered with a Platform	951	10,134	743,544	Not Provided	Not Provided
11.	Number of unresolved complaints	1270	166	Not Provided	Not Provided	Not Provided
12.	Resolved complaints	74	9968	Not Provided	Not Provided	Not Provided

Conclusion

An analysis of the 2024 compliance reports submitted by social media platforms operating in Nigeria now in the second year of reporting under the Code indicates modest progress toward meeting the Code's requirements. While platforms such as Google, TikTok, and LinkedIn have taken visible steps to improve compliance, including account deactivations, harmful content removals, and enhanced user reporting mechanisms, overall adherence remains inconsistent and uneven across key obligations.

Notable efforts have been observed in the content moderation efforts and user complaint resolution by some platforms. Google, TikTok, and LinkedIn have exhibited compliance efforts, resulting in the deactivation of over 28 million accounts and the removal of more than 58 million pieces of harmful content. Their commitment to transparency is evident in efficiently handling appeals for content re-uploads and resolving millions of user complaints.

However, some platforms have yet to demonstrate the level of accountability and proactive engagement required to meet the spirit and letter of the Code. Of particular concern is Meta's failure to submit its content moderation report using the template prescribed by NITDA, which undermines comparability and limits the ability to assess compliance uniformly. Most concerning is the complete lack of compliance by X (formerly Twitter), which has failed to adhere to submission of 2024 compliance report, and other requirements of the Code, which include failure to incorporate in Nigeria, have a physical contact address, and designate a local compliance officer.

Moving forward, it is imperative that platforms strengthen their internal compliance processes, scale up investment in trust and safety operations tailored to Nigeria, and engage more constructively with regulators. Greater collaboration, transparency, and consistency will be essential to build meaningful trust with Nigerian users and regulators alike.

The 2024 reporting cycle reflects a growing awareness of regulatory expectations but also underscores the need for stronger enforcement and sustained commitment from platforms. NITDA remains committed to its role in promoting a safe and secure digital environment through active oversight, multi-stakeholder engagement, and continued public awareness.

As Nigeria advances toward building a resilient digital future, the full and genuine implementation of the Code of Practice by platforms is not only a regulatory expectation but a shared responsibility necessary for safeguarding users and upholding the integrity of the country's digital space.