Muslims' Responses to Violations of Religious Freedom And Expression in Lagos State: The Ḥijāb Question in Focus

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Abstract

This paper examines the contestation of religious freedom in Lagos State, focusing on Muslim responses to ḥijāb-related rights violations in public institutions. Despite constitutional guarantees of freedom of religion and expression, evidence from judicial records, institutional practices, and media reports shows that the wearing of ḥijāb continues to face regulatory and administrative restrictions in some public spaces. These tensions reflect a gap between constitutional provisions and their implementation in a pluralistic society. Using a qualitative and analytical approach, the study draws on legal documents, media reports, and Islāmic oriented literature. It examines incidents involving restrictions on the ḥijāb in public schools and institutions, as well as media representations of Muslim identity in the public sphere. The Lagos ḥijāb litigation is also analyzed as a key reference for interpreting constitutional guarantees of religious freedom. Findings show that, although the constitutional framework strongly protects religious liberty, its enforcement remains inconsistent. In response, Muslim individuals and organizations have adopted lawful strategies, including litigation, advocacy, and media engagement, to challenge violations and assert their rights. The activities of the Muslim Students Society of Nigeria (MSSN), the Muslim Rights Concern (MURIC), and the Hijab Rights Advocate Initiative (HRAI) illustrate sustained non-violent engagement with state and public institutions. The study concludes that the contestation of religious freedom in Lagos State underscores the need for consistent institutional compliance with constitutional provisions. It also calls for balanced representation of religious identities within the civic space to strengthen rights protection and support peaceful coexistence in a plural society.

Keywords: religious freedom, ḥijāb, muslim responses, rights violations, Lagos State

Introduction

Lagos is arguably the most cosmopolitan State in Nigeria. It is also highly heterogeneous and multi-religious, with Islām and Christianity sharing almost equal dominance, while Yoruba Traditional Religion exists peripherally between them. Despite the State's religious diversity, these religions and their adherents interact across all spheres of life: religious, political, economic, social, and cultural. However, these interactions have been both cordial and conflictual. One cannot, of course, expect otherwise, nor assume the existence of absolute cordiality in relations among these differing religions. This is particularly so in an environment often polarized by mutual religious distrust.

Considering the multi-religious nature of Nigeria, especially Lagos State, legal provisions have been put in place to ensure that the rights of one religion are not trampled

upon by another. Studies have, however, shown that despite these thoughtful provisions, human rights, especially those relating to religious freedom and expression, are still significantly violated in Nigeria, including Lagos State. According to Ogbuehi, unabated human rights violations regarding religious freedom and expression have partly accounted for ethnic violence, loss of lives, political tensions, marginalisation, religious crises, and inequality in the country.[1]

Nwauche's study also highlights Islām and Christianity as the two main religions from which conflicts often arise in Nigeria. He however concludes that for individuals to enjoy freedom of religion, and for religious conflicts to be effectively managed in Nigeria's multi-ethnic and multi-religious context, the country's dominant religions must adhere to constitutional obligations of equality and nondiscrimination.[2] These obligations entail respect for, recognition of, and promotion of the beliefs, values, and practices of other religions. According to him, this is because many cases of religious intolerance across Nigeria stem from a lack of understanding of the practical implications of these constitutional obligations.

With regard to the violation of Muslim rights, Akintola argues that, on various fronts, such rights are being infringed upon in Nigeria across the economic, political, and social spheres. He emphasizes examples such as victimization, molestation, and the denial of Muslim students' right to use the ḥijāb in some schools, often by non-Muslims.[3] Specifically, in Lagos State, the issue of molestation and denial of Muslim girls' and women's right to use ḥijāb, especially in public institutions, remains perhaps the most prominent area where violations of the rights to freedom of religion and expression are evident. While some studies[4] have extensively discussed the ḥijāb saga in Lagos, its relationship with human rights, as well as Muslim responses to it, has not attracted sufficient academic attention.

This gap is significant because the United Nations' Universal Declaration of Human Rights (1948) and the Constitution of the Federal Republic of Nigeria (1999, as amended) provide for the rights to freedom of religion and expression. Similarly, Muslims are guided by a divine injunction, as stated in Qur'ān 2:256: "There is no compulsion in religion…" These provisions permit Muslims to express their religious beliefs in both words and actions, and also guarantee religious freedom and expression of others, so as to ensure and foster peaceful coexistence, which is an essential ingredient for the stability and development of the state.

Methodology

This study adopts a qualitative documentary research design, relying on documentary analysis, legal analysis, and media discourse analysis. The study draws on constitutional and international legal instruments, particularly the Constitution of the Federal Republic of Nigeria (1999, as amended) and the Universal Declaration of Human Rights (1948), as well as judicial decisions, books, journal articles, postgraduate dissertation, newspaper reports, official statements, and relevant online media publications. These materials were purposively selected because they provide documented evidence on the legal framework of religious freedom, reported ḥijāb-related incidents in Lagos State, and institutional and organizational responses. The data were analyzed through qualitative thematic analysis, focusing on legal provisions, reported cases, media represen-

tations, and advocacy responses in order to identify recurring patterns and assess the implementation of religious freedom and expression in Lagos State.

Legal and Institutional Framework of Human Rights: Religious Freedom and Expression

The recognition of human rights as essential to sustainable and peaceful coexistence, particularly in relation to religious freedom and expression, has necessitated the development of both international and domestic legal frameworks. Since 1948, the United Nations has institutionalized global attention to these rights, notably through the Universal Declaration of Human Rights (UDHR), which defines human rights as those inherent to all human beings irrespective of "race, sex, nationality, ethnicity, language, religion, or any other status." Article 18 of the UDHR specifically guarantees the right to freedom of thought, conscience, and religion, including the freedom to manifest religion or belief, individually or collectively, in public or private, through teaching, practice, worship, and observance.

At the domestic level, Nigeria gives constitutional force to these protections under Section 38(1) of the Constitution of the Federal Republic of Nigeria (1999, as amended), which similarly guarantees freedom of thought, conscience, and religion, including the freedom to manifest and propagate one's religion in worship, teaching, practice, and observance. These provisions, on paper, establish a strong normative foundation for religious liberty within Nigeria's plural religious landscape.

Within this framework, Lagos State, one of Nigeria's most religiously diverse and cosmopolitan jurisdictions, presents a particularly significant site for examining the practical limits of religious freedom and expression. The coexistence of Islām, Christianity, and indigenous religious traditions has required continuous negotiation of competing rights claims, especially within public institutions such as schools. While the constitutional framework appears sufficiently robust to accommodate such diversity, the practical application of these rights has been shaped by institutional policies, sociopolitical dynamics, and historical administrative practices that often produce uneven outcomes in relation to religious expression.

This tension is most clearly illustrated in the Lagos ḥijāb litigation, where disputes over the permissibility of the Islamic headscarf in public schools generated a significant body of judicial interpretation. In October 2014, the Lagos State High Court upheld a restriction on the wearing of ḥijāb in schools.[5] However, this decision was overturned by the Court of Appeal in July 2016 in suit CA/L/135/15, instituted by Asiyat AbdulKareem (through her father) and the Muslim Students' Society of Nigeria against the Lagos State Government.[6] The Court of Appeal affirmed the right of Muslim female students to wear the ḥijāb in public schools, holding that such practice constitutes a protected expression of religious freedom under Section 38(1) of the Constitution of the Federal Republic of Nigeria (1999, as amended). It further rejected blanket prohibitions on the ḥijāb, reasoning that school regulations must not impose unjustifiable limitations on constitutionally guaranteed religious rights.

This position was further consolidated by the Supreme Court of Nigeria affirmation of the right of Muslim female students to wear the ḥijāb in public schools under the case name and number Lagos State Government & Ors. v. Asiyat AbdulKareem & Ors.

(Suit No. SC/910/16).[7] The Court emphasised that while school authorities possess regulatory powers to maintain discipline and uniformity, such powers must be exercised in a manner that does not abrogate or unduly restrict constitutional freedoms. Importantly, the Court introduced a proportionality-based reasoning, effectively requiring that any limitation of religious expression must be reasonable, justifiable, and demonstrably necessary in a democratic society.

From these decisions, three key legal principles emerge. First, the principle of constitutional supremacy over institutional rules, meaning that school regulations cannot override fundamental rights. Second, the principle of reasonable accommodation of religious expression, which obliges public institutions to adjust uniform or administrative policies where such adjustment does not undermine core institutional objectives. Third, the principle of proportionality in rights limitation, which requires that any restriction on religious expression must be narrowly tailored and justified by legitimate public interest considerations. These principles have far-reaching implications for schools, public institutions, and administrative agencies in Lagos State and beyond. Educational authorities are now required to design policies that balance uniformity with religious diversity, ensuring that disciplinary codes do not inadvertently infringe on constitutionally protected rights.

Human Rights Issues: The Challenges of Freedom of Expression in Lagos State

Human rights issues in Lagos as they affect Muslims are most noticeable in the area of religious freedom and expression. Particularly in public institutions, such as schools, government establishments, and workplaces, the recognition, respect, and adherence to constitutional provisions sometimes translates into restrictive interpretations of religious expression. This creates a tension between the constitutional and legal framework and ideal of religious freedom and the lived experiences of adherents, thereby raising critical questions about the effectiveness of existing legal protections in a pluralistic society such as Lagos State.

The Ḥijāb Saga

The challenges to Muslims' religious freedom and expression in Lagos State have taken multiple, interconnected forms, ranging from overt restrictions to more subtle institutional limitations. Among the most prominent has been the contestation over the use of the ḥijāb by Muslim female students in public schools, a controversy that has also extended to certain government institutions and professional settings. The significance of this issue has generated a growing body of scholarship, including Ḥijāb and the Nigerian Press[8] and the master's dissertation A Study of the Ḥijāb Controversy in Lagos State,[9] both of which examine the origins, development, and implications of the dispute. Abubakar traces the origins of the controversy to a series of incidents in Lagos public schools, highlighting the widely publicised case of 5 February 2013 in which Aisha Alabi, a student of Kadara Junior Grammar School, Ebute-Metta, was reportedly flogged by a teacher for wearing the ḥijāb. Such incidents heightened concerns among Muslim parents and organizations over what they perceived as systematic violations of the constitutional rights of Muslim female students to freedom of religion and non-discrimination.

The recurring disputes eventually shifted from public debate to judicial determination. Following the Lagos state government's position that the ḥijāb did not form part of the approved school uniform, Muslim students, represented by their parents and supported by the Muslim Students' Society of Nigeria (MSSN), instituted legal proceedings challenging the restriction as an infringement of their constitutional rights to freedom of thought, conscience, religion, and education. On 17 October 2014, the Lagos State High Court, presided over by Justice Modupe Onyeabor, dismissed the suit and upheld the government's position. Dissatisfied with the judgment, the applicants appealed.[10]

On 21 July 2016, the Court of Appeal, Lagos Division, in Lagos State Government v. Asiyat AbdulKareem & Ors (CA/L/135/15), overturned the High Court's decision, holding that prohibiting Muslim female students from wearing the ḥijāb in public schools amounted to religious discrimination and violated their constitutionally guaranteed right to freedom of religion.[11] The Lagos State Government subsequently appealed to the Supreme Court after its application for a stay of execution proved unsuccessful. Pending the determination of the appeal, the government issued an administrative circular in November 2018 directing public schools to maintain the status quo by permitting Muslim female students to wear neat and properly fitted ḥijābs in colours matching their school uniforms while prohibiting discriminatory treatment or disciplinary measures on religious grounds.[12]

Despite the administrative directive, reports of non-compliance persisted. In January 2019, the Muslim Rights Concern (MURIC) alleged that female Muslim students at Iba Housing Estate Senior Secondary School were prevented from wearing the ḥijāb during a student capture exercise after school officials claimed that the restriction was required by the West African Examinations Council (WAEC). According to MURIC, its intervention established that WAEC had issued no such directive, leading to the immediate reversal of the restriction.[13]

As noted earlier, the ḥijab litigation was conclusively resolved in 2022 when the Supreme Court, in Lagos State Government & Ors v. Asiyat AbdulKareem (SC/910/16), dismissed the State's appeal and affirmed the judgment of the Court of Appeal. The Court held that restricting the use of the ḥijāb by Muslim female students in Lagos State public schools was discriminatory and inconsistent with the constitutional guarantee of freedom of religion. By affirming the right of Muslim students to wear the ḥijāb in public schools, the Supreme Court established an authoritative precedent with significant implications for educational institutions, public authorities, and the protection of religious expression in Nigeria.

Notwithstanding the Supreme Court's decision and subsequent sensitisation efforts regarding the permissibility of the ḥijāb in schools, biometric registration exercises, and examinations conducted by WAEC[14] and the Joint Admissions and Matriculation Board (JAMB), instances of non-compliance have continued to emerge. For example, on 22 April 2024, officials at Duntro High School, Ijeshatedo, Surulere, Lagos, reportedly harassed Muslim candidates and compelled them to remove their headscarves before they were permitted to sit for the Unified Tertiary Matriculation Examination (UTME).[15] This incident illustrates the continuing gap between judicial pronouncements and their implementation within some public institutions.

Beyond the educational sector, restrictions on the use of the ḥijāb have also been

reported in government agencies and workplaces. Female Muslims have experienced harassment and, in some instances, have been denied access to biometric registration and other official documentation because of their religious attire. Barrister Mutiat Orolu-Balogun, as recorded by Abdullah,16 recounted being harassed at an immigration office in FESTAC, Lagos, while processing an international passport for 'Umrah (Islāmic lesser pilgrimage).

Comparable experiences have also been reported in employment settings. For example, Olatunji Saliu Hawaw was denied the opportunity to participate in a job interview at the Federal Medical Centre, Ebute Metta, in 2016 solely because she wore the ḥijāb. She subsequently instituted an action before the National Industrial Court, which held that the refusal to interview her constituted unlawful discrimination contrary to Section 42 of the Constitution of the Federal Republic of Nigeria 1999 (as amended). The judgment reaffirmed that discrimination based on religious dress in public employment violates the constitutional guarantee of freedom from discrimination.[17]

Media Representation and Muslim Freedom of Expression

The media plays an important role in shaping narratives around freedom of religion and expression. In principle, it functions as a platform for public information and accountability by reporting and interpreting social and institutional developments. However, in Lagos State, its ability to fully reflect the concerns of all religious groups appears uneven, particularly in relation to Muslim-related issues. Scholarly discussions and media commentaries suggest an imbalance in representation within the public sphere, especially in discourse and narrative formation.[18] This raises questions about the extent to which diverse religious perspectives are adequately reflected in mainstream media content and institutional structures.

Within television media, the present study observes that among some major outlets in Nigeria such as Channels Television, Arise TV, and Television Continental (TVC), Muslim representation among frontline presenters and editors appears limited. An example noted in this regard is TVC's Ibrahim Shitta, one of the presenters on the station's breakfast programme, whom this study identifies, based on the author's qualitative observation of mainstream television personnel patterns, as one of the few visibly identifiable Muslim frontline media personnel. Similarly, the Secretary General of the Nigerian Supreme Council for Islamic Affairs (NSCIA), Prof. Is-haq Oloyede,[19] citing earlier institutional communications, has raised concerns regarding the scheduling of Islamic-oriented programmes on Channels Television, a matter reportedly brought to the attention of the National Broadcasting Commission (NBC).[20] While such concerns do not necessarily indicate a uniform pattern across all programming, particularly given the occasional broadcast of Islāmic content during periods such as Ramaḍān,[21] they are often referenced in discussions on representation and visibility.

In the print media, concerns about representation and framing have also been noted in scholarly literature. Abubakar, in Muslims and the Threats of the Media,22 argues that Nigerian print media have, in several instances, portrayed Islām and Muslims in ways that may undermine balanced representation, particularly in relation to issues of religious freedom and expression. These portrayals, according to him, often fall short of the standards of neutrality and fairness expected in both national and international frameworks governing media practice. With specific reference to Lagos State, he notes

that only a limited number of media houses reported the legal contestation between the Muslim Students Society of Nigeria (MSSN), Lagos State Area Unit, and the Lagos State Government over the use of the ḥijāb, suggesting selective attention to Muslim-related legal and social issues within mainstream reporting.

The point being made is not necessarily that there is complete exclusion of Muslim perspectives from the media, but rather that perceived limitations in representation and visibility may shape how issues affecting Muslim communities are reported and framed. From the standpoint of this study, such patterns of representation appear to influence public interpretation of events and the responsiveness of media coverage to religiously sensitive issues. Consequently, even within existing regulatory frameworks aimed at ensuring fairness and balance, questions of representation continue to arise in discussions on media practice and religious freedom in Lagos State, and may benefit from further empirical investigation.

Muslim Groups' Responses to Religious Freedom Violations: The Ḥijāb Case

In response to the challenges of human rights as related to religious freedom of expression, Muslim individuals, leaders, and organizations in Lagos State have adopted a range of strategies aimed at defending and promoting religious freedom and expression. Notably, these responses have largely been pursued through lawful and institutional channels, reflecting both a commitment to constitutionalism and adherence to Islamic ethical principles. While there are numerous individuals and groups towards this cause, three are identified in this paper. There are MURIC, MSSN, Ḥijāb Rights Initiative Advocate (HRIA), and Al-Fahm Magazine.

The Muslim Rights Concern (MURIC)

The Muslim Rights Concern (MURIC) stands out as a major Muslim organization that has, over several decades, responded to breaches of human rights affecting Muslims in Lagos State and Nigeria at large. Among its various interventions, the issue of ḥijāb remains particularly prominent. As noted by Abubakar, the story of ḥijāb in Nigeria is incomplete without MURIC's role.[23] The organization has maintained a strong presence through timely press releases and sustained advocacy, justifying its name by actively engaging in efforts to protect Muslims' rights, in Lagos and beyond.

MURIC's activities include press statements, memoranda, peaceful protests, and conferences, with its office serving as a central channel for complaints on ḥijāb-related harassment, denial, and persecution. A notable example is the Iba Housing Estate Senior Secondary School incident, earlier cited, where MURIC intervened to stop officials from compelling Muslim girls to remove their ḥijāb during a WAEC capturing exercise.[24] Beyond such cases, MURIC has submitted memoranda to the Lagos State House of Assembly, calling for justice for affected students and urging legislative recognition of the ḥijāb as part of approved school uniforms for willing Muslim girls.[25] MURIC further advocates policy reform, asserting that denying students the right to wear the ḥijāb contributes to stigmatization and educational disadvantage. To strengthen its efforts, the organization promotes peaceful advocacy under its motto, "Dialogue, Not Violence," and encourages the establishment of hijab task forces (HITAF) across mosques, local governments, and states to address violations at the grassroots level.

Muslim Students' Society of Nigeria (MSSN)

Since its establishment in 1954, MSSN has continued to serve as a strong rallying point for Muslims, particularly young people in various academic institutions across Nigeria, in the struggle for the rights of young Muslims. From the early stages of ḥijāb molestation and denial, through various court proceedings, to the final verdict of the Supreme Court of Nigeria, the MSSN Lagos State Area Unit, in particular, organized a series of peaceful protests that significantly awakened the Muslim community to the need to defend their fundamental human right to wear the ḥijāb in schools, especially government-owned ones.

The World Ḥijāb Day has also served as a valuable platform, giving MSSN Lagos and a few other Muslim organizations the opportunity to speak out against the persistent harassment, victimization, and abuse faced by numerous Muslim girls and women, beginning with the case of Aisha Alabi. The MSSN and the wider Muslim community in Lagos State also made the recognition of the ḥijāb a precondition for participation in the 2015 general elections in Nigeria. At the height of the political campaign, the slogan "NO ḤIJĀB, no vote" was widely promoted.[26]

Ḥijāb Rights Initiative Advocate

The Ḥijāb Advocacy Coalition (Initiative), led by Barrister Mutiat Orolu-Balogun, is noteworthy. The initiative has been relentless in its dogged intellectual and legal battles, particularly in regularly countering the misinformation and consequent disaffection often caused by the media.[27] To promote ḥijāb advocacy, a Facebook page was created to address, update, and inform Muslims about ḥijāb-related issues. The initiative also attends to various forms of ḥijāb discrimination and harassment and has consistently been at the forefront of the struggle for ḥijāb rights. Indeed, it has secured justice for some oppressed users of the ḥijāb. For example, in the case involving Olatunji Saliu Hawaw and Dr. Mrs. Yewande Jinadu of the Federal Medical Centre, Ebute Metta, Barrister Mutiat successfully obtained justice for Olatunji Saliu Hawaw at the National Industrial Court of Nigeria, Lagos Judicial Division, on 10 January 2019.[28]

Al-Fahm Magazine and Muslim News Nigeria

It is unarguable that, in the print media, only a few notable national dailies, such as Daily Trust and Vanguard, have consistently maintained Friday Islāmic columns. This continuity is largely attributable to the efforts of veteran journalists who secured space for Islāmic discourse within these platforms. A notable example is the Vanguard column pioneered by the late Alhaji Kola Animashaun.29 Some other Islām-inclined publications such as Al Haqq, Deenul Haqq, Him & Her, Muslim Herald, and Truth Bearer have also contributed to Islāmic engagement.[30] However, most of these outlets have struggled to survive.

In the absence of a strong media platform to protect the image of Islām and Muslims, particularly at a time when Islamophobic tendencies are increasingly promoted by media outlets largely dominated by non-Muslims, the need to establish dedicated media institutions in Lagos State, and Nigeria at large, became imperative. Among those that have emerged for this purpose, Al-Fahm Magazine and Muslim News Nigeria stand out. Their founder, Abdur-Rasheed Abubakar, has consistently utilized both print and other media platforms to promote Islāmic ideals, defend the image of Islām, and

correct the misrepresentation of Muslims in Nigeria. This commitment is evident in the editorials of Al-Fahm Magazine, where ḥijāb-related developments are consistently documented. For instance, in the March–June 2014 editorial titled: "The Court Drama and Lagos Ḥijāb case," he provides an account of the proceedings and events that unfolded in court on Wednesday, 12 February.

His contributions also extend to book publications mentioned earlier: Muslims and the Threats of the Media and Ḥijāb and the Nigerian Press. In these works, he critically examines media bias against the ḥijāb, particularly in headlines and reportage. He also explores the genesis of harassment and victimization related to the ḥijāb, as well as the legal developments and outcomes of the struggle. Through these efforts, Abubakar has made a significant contribution to advocacy for Muslims' rights and freedom of expression in Lagos and Nigeria at large.



Fig. 1: ***Front pages of Al-Fahm magazine and Muslim News Nigeria, illustrating both outlets' promotion of Muslim rights in Lagos and Nigeria at large.***

In a nutshell, the responses of Muslim groups and individuals in Lagos State to the ḥijāb controversy reveal a coordinated, multi-layered process that ultimately culminated in judicial victory, first at the Court of Appeal and finally at the Supreme Court. These responses transformed the ḥijāb issue from a series of isolated grievances into a coherent constitutional question grounded in the right to freedom of religion. By sustaining visibility, framing the matter in rights-based terms, and consistently insisting on lawful redress, the claim was normalized within public consciousness and legal discourse.

Indeed, the convergence of advocacy, public engagement, and legal contestation generated both jurisprudential clarity and societal legitimacy, creating conditions under which the judiciary could confidently affirm the constitutional protection of the ḥijāb. Consequently, the favourable decisions at the Court of Appeal and later at the Supreme Court can be understood as the culmination of a sustained process in which consistent, rights-oriented pressure shaped both the interpretive framework and the

eventual affirmation of Muslims' entitlement to manifest their religion in public institutions and beyond, in line with Section 38(1) of the Nigerian Constitution and relevant international human rights norms.

Beyond the courtroom, these developments have also influenced broader public attitudes toward Muslim women in ḥijāb, particularly in relation to education and professional participation. The gradual normalization of the ḥijāb in public institutions reflects an emerging recognition that religious expression is compatible with civic engagement and professional competence. This is further demonstrated in leadership appointments within the public sector, including the appointment of Dr. Shareefah Adejoke Yusuf as Tutor-General/Permanent Secretary, Education District VI, by the Lagos State Government, which has been widely interpreted as evidence of growing institutional inclusion.[31]

More fundamentally, educational and professional outcomes indicate that the use of the ḥijāb does not hinder academic performance or intellectual achievement. The uniform worn by a student, therefore, is not determinative of her learning ability, as Muslim women in ḥijāb continue to excel across disciplines. This is exemplified by the academic achievement of Aminah Yusuf, who made history at Lagos State University (LASU) by graduating with a perfect 5.0 CGPA in Law, becoming the first student in the institution's approximately four-decade history to attain such a record.[32] Similarly, a ḥijāb-wearing female academic, Aminat Olawunmi Ige, from LASU has also distinguished herself by emerging as the best PhD graduate at the University of Lagos,[33] further illustrating the presence of high academic excellence among Muslim women who observe the ḥijāb. These achievements collectively underscore the compatibility of religious expression with academic and professional excellence and reinforce the view that inclusionary practices align with merit and broader societal development.

Findings

The analysis of this paper reveals a persistent gap between constitutional and international guarantees of religious freedom and their practical implementation in Lagos State. Although legal frameworks such as Section 38 of the 1999 Constitution of the Federal Republic of Nigeria (as amended) provide robust protection for freedom of religion and expression, enforcement within public institutions remains uneven. The evidence suggests that administrative discretion and institutional culture significantly shape how these rights are applied, particularly in educational and bureaucratic settings where visible religious expression is sometimes constrained.

A recurring pattern that emerges in this study is the centrality of the ḥijāb in the negotiation of religious rights. The incidents examined indicate that disputes frequently arise in contexts such as school regulations, examinations, and administrative procedures. These situations reflect an ongoing tension between institutional uniformity and the recognition of religious identity, where the application of rules at times produces outcomes that indirectly limit the expression of Islāmic religious practice.

The evidence further points to the role of media structures in shaping public understanding of these issues. Muslim-related concerns do not always receive balanced representation in mainstream media discourse, and when they are covered, the framing is sometimes limited by inadequate contextualization. This influences how such issues

are interpreted publicly, as media visibility and narrative framing shape both perception and response to religiously sensitive matters.

The study also shows that responses to these challenges have largely taken institutional and lawful forms. Muslim individuals and organizations have engaged through litigation, advocacy, policy engagement, and media participation, demonstrating sustained reliance on constitutional channels rather than informal or confrontational approaches. These efforts have contributed to increased awareness and, in some instances, judicial affirmation of religious rights.

However, the study indicates that these responses have not fully resolved the structural conditions underpinning these tensions. This is because, as shown, legal victories do not always translate into consistent compliance at the institutional level, while media advocacy remains constrained by broader structural factors such as ownership patterns and editorial priorities. The persistence of these gaps points to challenges that are simultaneously legal, institutional, and cultural in nature.

Generally, the evidence highlights an interwoven relationship between constitutional guarantees, institutional practices, and media narratives in shaping the lived experience of religious freedom in Lagos State. Thus, the contribution of this study lies in demonstrating that the contestation of religious expression is not only a matter of legal interpretation, but also of institutional implementation and representational visibility. By integrating these dimensions, the study provides a more holistic account of how religious rights are negotiated in practice, particularly through the sustained example of the ḥijāb as a focal point of rights, regulation, and public discourse in a pluralistic urban setting.

Recommendations

On the basis of the findings of this study, it is recommended that government agencies and public institutions in Lagos State ensure stricter and more consistent enforcement of Section 38 of the 1999 Constitution of the Federal Republic of Nigeria (as amended), as well as full compliance with relevant judicial pronouncements on religious freedom. This should be supported with clear operational guidelines to prevent arbitrary or discretionary restrictions on religious expression, particularly in schools, examination bodies, biometric registration centres, and other administrative processes.

In addition, mechanisms should be established to ensure institutional compliance with court decisions, especially the Supreme Court judgment affirming the right of Muslim female students to wear the ḥijāb in public schools. This may include designated compliance officers within educational and public service institutions, as well as inter-agency monitoring frameworks to ensure uniform application of constitutional standards across sectors.

There is also a need for harmonised and clearly defined policies across educational institutions, public service agencies, and examination bodies such as WAEC and JAMB regarding religious attire and practice. This would help reduce ambiguity, minimise conflicting interpretations, and prevent recurring rights violations arising from administrative discretion.

Furthermore, regular capacity-building and sensitisation programmes should be institutionalized for teachers, examination officials, immigration officers, and civil ser-

vants on constitutional provisions and judicial decisions relating to religious freedom. Such training would contribute to reducing bias in enforcement and promoting rights-compliant administrative practices.

Additionally, accountability mechanisms should also be strengthened through the consistent application of disciplinary measures and legal sanctions against individuals or institutions that deliberately violate constitutional provisions and approved guidelines on religious freedom. This would serve both corrective and deterrent purposes and reinforce institutional respect for the rule of law.

In addition, sustained public enlightenment campaigns are necessary to address misconceptions regarding religious dress and professional competence. Empirical evidence of academic and professional excellence among Muslim women in ḥijāb, including record-breaking academic achievements in universities, underscores the need to challenge stereotypes that associate religious appearance with limited capability.

Media organizations are also encouraged to adopt more inclusive editorial practices that fairly represent Muslim perspectives in public discourse. Regulatory bodies such as the Nigerian Broadcasting Commission (NBC) should strengthen compliance monitoring to ensure adherence to existing standards of fairness and balance. In addition, Muslim communities, Islamic organizations, and relevant stakeholders may consider supporting the development and sustainability of media platforms that promote more balanced religious representation.

Finally, structured interfaith dialogue should be sustained among religious organizations, civil society actors, and government stakeholders. This remains essential for promoting mutual understanding, reducing tensions, and strengthening peaceful coexistence in a pluralistic society such as Lagos State.

Conclusion

This study has examined religious freedom and expression in Lagos State, focusing on Muslim responses to ḥijāb-related rights violations within the framework of international and national human rights instruments, including the Universal Declaration of Human Rights and the Constitution of the Federal Republic of Nigeria (as amended). It establishes that although constitutional guarantees of religious freedom are firmly entrenched and have been judicially affirmed up to the Supreme Court, their implementation within public institutions remains inconsistent. The findings reveal that disputes over the ḥijāb persist across key institutional settings, particularly in public schools, examination bodies, and administrative processes, despite clear legal and policy directives permitting its use. This persistence reflects a gap between constitutional interpretation and administrative compliance, resulting in recurrent rights violations at the point of enforcement.

At the same time, Muslim responses have been largely institutional and lawful, expressed through advocacy, litigation, and engagement with public discourse. These efforts not only produced landmark judicial outcomes but also clarified the constitutional protection of religious expression in public education. The study further notes a gradual but uneven shift toward greater social recognition of Muslim women who observe the ḥijāb, particularly in educational attainment and public service participation. It therefore concludes that the core challenge lies not in the absence of legal protection,

but in weak enforcement, limited institutional coordination, and gaps in compliance with judicial authority. Strengthening these areas is essential for the effective realisation of religious freedom and the consolidation of equitable and peaceful coexistence in Lagos State.

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