

Strengthening financial integrity in Nigeria: the national identification harmonization project

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Abstract

Purpose – Nigeria needs to improve its national identification coverage to support improved anti-money laundering and combating of financing of terrorism and proliferation (AML/CFT) measures. This study aims to examine its ongoing identification harmonization project, which seeks to create a central database for digital identification across designated entities. It identifies the key stakeholders in the project, progress to date as well as key challenges, especially relating to the inclusivity and privacy and data protection concerns of the current scheme to provide national identification numbers.

Design/methodology/approach – The authors apply a doctrinal research methodology and use the Principles on Identification for Sustainable Development to identify and reflect on key challenges.

Findings – The national identification harmonization project and the ongoing drive to register National Identity Numbers for Nigerians could provide valuable support for more effective and efficient AML/CFT identity verification and authentication. The project and processes, however, hold significant risks in relation to data protection. These are exacerbated by the absence of a comprehensive data protection framework. National identity data can be vulnerable to political abuse and targeting by bad actors. National identity data systems must, therefore, be protected by clear, fair and comprehensive privacy and data protection rules and appropriate and accountable governance mechanisms. While Nigeria is adopting and implementing the relevant framework, the NIMC can do more to advance data protection by supporting informed consent and compliance by all participants and publishing this information to build public trust in the system. It can also be disciplined about only collecting minimal and necessary personal data and printing only basic personal details such as name and age on the general multi-purpose ID card. The NIMC should furthermore improve access to the national identification number by streamlining the process of registration, including supporting same day registration and on-the-spot card printing; setting up more registration points as well as mobile registration to cut down queues; and increasing the range of registration agents and points to include schools, police stations and health facilities. Consideration for social, cultural and religious norms is also vital to appropriately accommodate the variety of groups and cultures in Nigeria.

Research limitations/implications – Research materials include government policy documents as well as newspaper articles and reports on more recent developments and experiences that are not yet reflected in more formal documents. The research materials, however, reflect both the intention of the government and the reported experiences of those registering for a National Identification Number.

Practical implications – This study identifies the practical steps that can be taken to enhance data protection and increase the inclusivity of the measures to provide Nigerians with National Identification Numbers.



Social implications – The recommendations that are made are aimed at increasing the inclusivity of the National Identification Number scheme and at providing improved protection of personal data of applicants for, and holders of, these numbers.

Originality/value – This study contributes to the policy discussion around the national identification harmonization project by applying as a lens key elements of the Principles on Identification for Sustainable Development that are relevant from a financial integrity perspective.

Keywords Nigeria, Social inclusion, Data protection, Financial integrity, National identification

Paper type Research paper

1. Introduction

Identity is a complex concept and its meaning differs in different contexts ([Financial Action Task Force, 2020](#)). This article focuses on official identity, meaning the identity assigned to a person for government or bureaucratic use. This term is preferred as another generally used variant, “legal identity”, may incorrectly imply that millions of people who are known in and by their communities but who have not been assigned an official identity, have “illegal” or “non-legal identities” ([United Nations, 2021](#)).

The 1989 United Nations (UN) Convention on the Rights of the Child recognizes the right to an identity starting from birth. In spite of such commitments, an estimated 1.1 billion people lacked an official identity as of October 2017 ([World Bank, 2017](#)). This impacts negatively on their ability to access services and freely participate in social, political and economic life and also undermines the efficacy of anti-money laundering and combating of financing of terrorism and proliferation (AML/CFT) measures. The UN has therefore recognized as Sustainable Development Goal 16.9, the right to legal identification for all by 2030 ([United Nations, 2021](#)).

Having official identification is viewed by the UN as fundamental to national development. It provides the foundational data and documents allowing for the unique verification of citizens’ official identity. It facilitates access to a variety of social, agricultural, and financial services. It equally offers a sense of belonging, and aids socio-economic, civic, and political participation. With an efficient identification system, the government can better foster the social safety net, financial inclusion, good governance and transparency ([National Identification Management Commission \[NIMC\], 2017](#)). AML/CFT objectives are, for example, advanced when customers and beneficiaries have easily verifiable official identities.

The goal of achieving universal identification has therefore become a national objective in many countries, including Nigeria. The World Bank estimates that this could add 5–7% of economic value to Nigeria’s GDP by 2030 as a result of increased tax revenue, formalization, fraud reduction and financial inclusion, with a third of this growth accruing to individuals ([White *et al.*, 2019](#)).

1.1 Principles on Identification for Sustainable Development

National identification programmes have raised citizen concerns in the past. The failure of an attempt to introduce an Australian identity card ([Marshall, 1986; Bruce, 2010](#)) and the introduction and subsequent withdrawal of a UK national identification program ([Beynon-Davies, 2011](#)) are cautionary examples reflecting the need to address the concerns of citizens in the design of a national identification programme. These concerns include data security, for example the risk of misappropriation of national identity data ([Uren, 2018](#)). Data integrity of some systems in the past was undermined by corruption. Processes must therefore be designed with care to ensure that the identity data is and remains accurate. In

addition, equitable access to the identification also requires consideration, especially in relation to socially vulnerable groups.

In 2017, an influential group of stakeholders including the World Bank and UN agencies published a set of principles to guide the creation and use of national identification to advance development goals. The second edition of these principles was released in 2021. It sets out ten principles clustered in three pillars: (World Bank, 2021)

This paper focuses on four of these principles associated with financial integrity measures: Firstly, the principles addressing inclusion (Principles 1 and 2) as an effective system will need to be comprehensive and inclusive; and secondly, the privacy and data protection principles (Principles 6 and 8) as the identity system will fail to support financial integrity measures if the data is vulnerable and open to political and criminal abuse. These principles will be discussed in context in Section 3.

1.2 Identification and anti-money laundering and combating of financing of terrorism and proliferation in Nigeria

Nigeria implemented AML/CFT measures to combat the tide of financial crime in the country and comply with its international obligations. These measures require financial institutions and regulated non-financial businesses and professions to adopt various measures to ensure that their services are not abused to launder proceeds of crime, finance terrorism or finance proliferation of weapons of mass destruction in contravention of UN Security Council sanctions. Client identification is a key AML/CFT measure, but its efficacy depends on the availability and quality of official identity verification data. Availability of reliable identification infrastructure for AML/CFT use in Nigeria was, however, rated as low in 2016 [National (Money Laundering and Terrorist Financing) Risk Assessment Forum, 2016].

AML/CFT measures also require extensive use of formal services rather than usage of cash and unregulated services. Lack of official identity limits access to formal financial services (Bester *et al.*, 2008). Nigeria adopted a Financial Inclusion Strategy in 2012, revised in 2018, to enhance the levels of access to and usage of formal financial services (Central Bank of Nigeria [CBN], 2018). The Central Bank of Nigeria (CBN) furthermore issued a risk-based tiered client identification framework that allows for simplified due diligence measures for low- and medium-value savings accounts (CBN, 2013). While this framework is helpful, they do not solve the problem comprehensively. They restrict those without comprehensive official identification to products with significant usage constraints, e.g. even after post-2013 revisions Tier 1 mobile money transactions accounts are restricted to single deposits of ₦50,000, cumulative balances of ₦300,000 (approximately US\$ 120 and 720) and no international transfers are allowed (CBN, 2021). These constraints compel many users to continue to use cash. Integrity as well as inclusion policy objectives will therefore be advanced by a national identity system that responsibly collects and manages the identity data of all Nigerians.

1.3 Identification in Nigeria

Identification in Nigeria has historically taken different forms. Private organizations such as hospitals and orthodox churches have kept records of patients born in and members baptized by them, issuing birth certificates and baptismal cards, respectively. Local government and national pension and health authorities have also kept identity records. These records are however neither comprehensive nor widely accepted as proof of official identification. Hospital records for example do not cover babies birthed at home or in

unregistered Traditional Birth Attendants centres and the identity data of national health insurance and pension schemes pertain mainly to civil servants (Monye, 2019).

The first comprehensive attempt to officially identify all Nigerians was launched in 1978 by Department of National Civil Registration (DNCR). This lasted for 18 months, and was later continued by a private firm in 2001, recording 37.3 million registrations in five years (Punch, 2021). The latest attempt commenced in 2005 with the establishment of the Harmonization Committee (see Section 2) to advance national policy and institutional framework for a national identity management system (NIMC, 2014). Accordingly, the National Identification Management Commission Act 2007 was enacted, repealing the National Civic Registration Act of 1978 (NIMC, 2014). In addition, the NIMC, whose mandate is mainly the registration of citizens and legal residents, was established.

Citizen identity is currently fragmented across 13 government entities. There are also public-private data management arrangements such as the bank verification number (BVN), overseen by the Nigerian Interbank Settlement System (NIBSS), an alliance between deposit money banks in Nigeria and the CBN. This fragmentation leads to unnecessary duplication and inefficiencies. Each entity collects, manages and stores its data with no standardized data fields across the entities, although much of the personal data collected are similar (Thisday Live, 2020b).

The Federal Government initiated the national identification harmonization project in 2014 to address the fragmentation of this system. This project is aimed at integrating identity data held by the major ID management bodies and consolidating them within a central database. If successfully executed, the database is projected to be the largest in Africa and would serve as a gateway for accessing wide-ranging public and private sector services (Baker and Rahman, 2020). The NIMC champions this project in collaboration with Nigeria's major ID management bodies (Guardian, 2019).

Harmonization could support improved analysis and use of data, enhance governance, accountability and cybersecurity and support better social services to citizens (Thisday Live, 2020a). By linking the different data holdings, the harmonization process could improve the scope and reach of official identities. The Independent National Electoral Commission (INEC) has recorded more than 84 million eligible voters, the NIBSS has registered over 54 BVNs as of April 2022 while the Nigerian Communications Commission (NCC) had more than 198 million registered mobile subscriptions as of February 2022 (Channels Television, 2022; Nigeria Communications Commission, 2022b; Nigeria Interbank Settlement System, 2022). The centralized database may also provide a source of truth for ID verification by streamlining and aligning the work of the multiplicity of entities managing citizens' ID data. Over time, it could reform the current identification roles of the 13 ID management entities, resulting in much higher levels of efficiency. On the other hand, it is an ambitious endeavour that is accompanied by a range of risks.

In the remainder of this article the authors take a closer look at the implementation of the project and questions regarding inclusion and data protection associated with ongoing registration for the National Identity Number (NIN). Section 2 identifies the key players in the identity management ecosystem. Section 3 discusses the concerns relating to universal access to official identity data and data protection. Finally, the article concludes with observations and recommendations.

2. From fragmentation to harmonization and integration

2.1 The National Identification Management Commission's National Identification Number project

The NIN was introduced in 2014 with the vision of offering a sustainable world-class identity management solution to affirm identity, and enhance governance and service

delivery in Nigeria (NIMC, 2022d). The NIMC is the agency instituted by the NIMC Act No. 23 of 2007 to establish, own, operate, maintain and manage the national identity database in Nigeria (NIMC, 2022f). The NIN is an 11-digit number assigned upon successfully enrolling demographic data, capturing the ten fingerprints, head-to-shoulder facial picture and digital signature and de-duplicating these against existing data in the national identity database (NIMC, 2022g). The NIN can be used for a wide range of activities, including obtaining the international passport and opening bank accounts. (NIMC, 2022g).

The NIN is offered to Nigerians aged 16 and above as the NINs of children aged 0–15 are tied to their parents' (NIMC, 2022c; NIMC, 2017). To enroll, registrants must present their BVN or other supporting documents such as an old national ID card, driver's licence, voter card, international passport, certificate of origin, birth certificate, declaration of age, attestation letter from religious or traditional leader, national health insurance ID card, staff ID card of a government or registered private entity, school ID card or valid immigration documents (NIMC, 2022c). Enrolment is free at the offices or mobile centres deployed in all states across the country (NIMC, 2022b). Once enrolled, the Commission assigns a unique NIN, which is a temporary number printed on a slip and afterwards issues the General Multi-Purpose Card (GMPC) to all Nigerians and legal residents (NIMC, 2022f).

This temporary NIN slip has been recognized by the court as a valid means of identification for mobile phone SIM card registration purposes. In *Isabella Ijeoma Okeke v the Emerging Matters Telecommunication Services* (HC/0/103/2018), the defendant, a telecommunications company, refused to accept a temporary NIN slip to verify the identity of a customer. It argued that it was not included in the definition of "photo identification" of the NCC Guidelines on SIM Replacement. The High Court of Anambra State found the defendant erred. It held that the list contained in the NCC Guidelines was not exhaustive and that the inclusion of the slip in Section 27 of the NIMC Act (which is legal instrument of superior status as an Act of the National Assembly) ensured its validity.

Upon successful enrolment into the National Identity System, an applicant can apply for the National Electronic Identity Card (e-ID) (NIMC, 2022a). The proposal to issue the e-ID in collaboration with MasterCard to add payment functionality has raised concerns. Experts argue that the partnership with a private international company and the use of the MasterCard logo rather than a Nigerian emblem raise e-governance, copyrights and jurisdictional concerns (Mayhew, 2014).

2.2 The Nigerian Communications Commission mobile SIM registration

The NCC is the telecommunications regulator. It manages the regulatory framework for the industry and manages licensing of and competition among providers (NCC, 2022a). The NCC also oversees SIM card registration of subscribers by mobile network operators (MNOs) in Nigeria. The Commission issued the NCC (Registration of Telephone Subscribers) Regulations of 2011 to provide a regulatory framework for the registration of mobile telephone subscribers and to establish and manage a central database with their data. Subscribers are registered with their biometrics (live image and fingerprints) and other personal information to activate new lines or maintain access to existing lines. The Revised National Digital Identity Policy for SIM card registration mandates that the details obtained from prospective subscribers are checked against other identity databases to ascertain data integrity and accuracy and provide security assurances to the government, security agencies and MNOs (Federal Ministry of Communications and Digital Economy, 2021).

The NIMC is collaborating with NCC to manage the 2020 NIN-SIM integration initiative by linking the SIM cards of all Nigerians, including those abroad, to their NIN (Obayomi, 2021). It is envisaged that successful harmonization could mitigate identity fraud and other

online crimes; reduce non-compliance by MNOs; secure customer identity for KYC and e-governance; and enhance the NIMC national identity database. (Federal Ministry of Communications and Digital Economy, 2021). Registrants can submit the NIN number to respective MNOs for verification and telephone line linkage (*Thisday Live*, 2021).

2.3 Independent National Electoral Commission permanent voter card

INEC is responsible for registering and issuing voter cards in Nigeria (INEC, 2022a). INEC was established shortly before the 1999 general election to oversee matters relating to political party registration, conduct of elections and voter civic education, registration and participation (Federal government, 1999). INEC carries out the registration of persons eligible to vote at elections, described as citizens who are 18 years old and above, and duly registered in the register of voters (INEC, 2022a). Personal data such as the name, contact address, phone number, occupation, local government area and date of birth are collected. INEC issues the permanent voter card, necessary to cast election votes (INEC, 2019a).

Several institutions accept voter cards for a range of identity verification purposes, including opening bank accounts (INEC, 2019a; INEC, 2019b). There are about 84,004,084 registered voters and 119,973 polling units across various local government areas as of April 2022 (Channels Television, 2022).

The harmonization programme seeks to make the presentation of the NIN a pre-condition for obtaining the voter card (*Thisday Live*, 2020a). INEC, however, recognizes the NIN as merely one of the means of identification for registration. Prospective voters are free to present other identification documents such as the birth certificate, passport, national identity card or other documents that prove identity, age and nationality (Punch, 2021).

2.4 Federal Road Safety Corps: driver's licence

The Federal Road Safety Corps (FRSC) is entrusted with the authority to regulate, enforce and coordinate all road traffic and safety management activities, including issuing vehicle number plates and driver's licences (FRSC, 2022c). Driving without a licence attracts a fine of ₦10,000,00 (about \$24) (FRSC, 2007; NRTR, 2012).

Since December 2020, and in line with the harmonization project, an applicant for a driver's licence is expected to present a NIN to the FRSC (Channels TV, 2020). The NIN is also to be required for a digital driver's licence (Ayang, 2021). This is the digital version of the physical card, available on a users' smartphones with offline capabilities and protected by a PIN (FRSC, 2022b).

2.5 The bank verification number

The bank verification number (BVN) is issued by the NIBSS, a collaboration between the CBN and financial institutions in Nigeria. It is an 11-digit unique identification number assigned to bank clients during account opening, upon submitting one of the prescribed means of identification (NIBSS, 2022). The BVN identifies clients across all banks in Nigeria (NIBSS, 2022). To obtain the BVN, physical registration is needed to capture a client's name, contact address, fingerprints and facial image (NIBSS, 2022). Registration could take place in some country embassies and bank branches to accommodate Nigerians' enrollment abroad (Standard Chartered Bank, 2022; Nigeria Embassy Germany, 2022). By April 2022, more than 54 million clients have procured a BVN (NIBSS, 2022).

The BVN is said to improve the security of personal and sensitive information, harness the opportunities offered by biometric technologies for real-time client identity authentication and drive banking efficiency (NIBSS, 2022). Studies indicate that the use of the BVN has reduced the incidence of identity fraud in Nigerian commercial banks since

2014 (Nnachi, 2020) and has reduced funds diversion and money laundering too (Akyuz and Opusunju, 2019).

The NIMC is collaborating with the NIBSS to harmonize the BVN database with the NIMC. So far, the NIMC has harmonized 14 million numbers from the BVN records (Cable, 2020). Significantly, the Minister of Communications and Digital Economy has noted that the BVN will eventually be phased out and replaced by the NIN (Guardian, 2021b).

2.6 Other identification projects

There are other public and private identification management entities in Nigeria, some of which are integrating their data in the NIMC database. The National Population Commission (NPC), for example, is responsible for registering births, stillbirths, deaths, marriages, divorces, internal and international migration and important events at registration centres nationwide (NPC, 2022b). The deaths and births registration is proposed to be integrated into the national identity database (Office of the Secretary to the Federal Government).

The Nigeria Immigration Service (NIS) issues international passports. It will require the NIN to renew expatriates' residence permits and permit access to immigration facilities (Obayomi, 2021). The NIMC is also partnering with the Joint Admissions and Matriculation Board (JAMB) to make the NIN obligatory for young school leavers to sit for the tertiary institutions' qualifying examinations (Guardian, 2020).

3. Concerns about the harmonization project

The harmonization of identification databases in Nigeria was first advanced in 2005 (Ayamba and Ekanem, 2016). Progress was, however, slow, leading to a revitalization to align with the government's 2017 Economic Recovery and Growth Plan (NIMC, 2017).

The harmonized system will integrate existing and future identification schemes, institute a unique national identification scheme, deploy government applications and develop a national identity database (Office of the Secretary to the Federal Government). The NIMC estimates that all Nigerians will be enrolled in the central database by 2025 (Okonji, 2020). Reports show that to register 100 million Nigerians in the next three to five years, a monthly enrollment of 2.5 million people is required, a target which the NIMC asserts is viable as 2.6 million registrations are completed monthly (Thales, 2021).

The project is, however, meeting with challenges. The requirement that partner organizations should require applicants to provide their NIN before issuing or renewing individual partner ID cards is not observed by all partners. The NIS for instance, is not strict with requiring a NIN for the renewal of the international passport. According to their website, providing a NIN when applying for an e-passport is optional (NIS, 2022). INEC has equally noted that while the NIN is acceptable for voter registration, other means of ID verification such as the birth certificate, national passport and national identity card are also suitable and the requirement to insist on the presentation of the NIN as a pre-condition for voter registration will not be implemented (Olorok, 2021). INEC's position is reportedly informed by the Electoral Act 2022 and by the Constitution of the Federal Republic of Nigeria 1999 which do not set a NIN as a prerequisite to register as a voter (Guardian, 2021a).

More specifically, the NIN-SIM integration, especially the NIN verification and linkage, is criticized for being slow (Thisday Live, 2021). A number of deadlines were set that had to be postponed. The latest extension from 30 October 2021 to 4 April 2022 is the ninth postponement since the beginning of the exercise (Premium Times, 2021).

The initial plan to block SIMS by April 2021 deadline was challenged in the Federal High Court in Lagos State by a human rights activist who successfully submitted that the deadline was unrealistic and resulted in disregard of COVID-19 protocols as many Nigerians were compelled to gather at offices of the NIMC to avoid disconnection (*Onyekachi Ubani v the Federal Government of Nigeria and others* FHC/L/CS/1834/2020). It was further submitted that a two-week ultimatum was both inconvenient and an infringement of the fundamental right to freedom of speech and the right to own property recognized in Sections 39(1) and 44(1) of the Constitution. Agreeing with the counsel's submissions, the court ordered a two-month extension.

In relation to the collaboration with JAMB, it has been noted that the process is unsettling for students that have to queue up at NIN centers to get enrolled while managing their COVID-19 exposure ([Vanguard, 2021](#)). The insufficiency of funding concerning the NIMC-BVN collaboration has also been highlighted. It is asserted that access to more funds would have enabled bulk NIN verification to speed up the integration process ([Thisday Live, 2021](#)). Accordingly, only about 57.3 million subscribers have been registered ([Punch, 2021](#)).

More fundamentally, however, are concerns about universal access and privacy and data protection of the system. In the next section, a number of concerns clustered around these two key elements of the Principles on Identification for Sustainable Development are highlighted.

3.1 Universal access for individuals

The Principles on Identification for Sustainable Development require non-discriminatory access to national identification for citizens and residents. Non-discrimination is required in policy, in practice and by design. This includes ensuring that legal frameworks, requirements and procedures to register or obtain identification do not enable or reinforce discrimination against particular groups. Importantly, for purposes of this article, the Principle states that such groups include people living in poverty, women, children and persons with disabilities ([World Bank, 2021](#)).

The Principles also require the removal of barriers to access and use of identity credentials. This includes ensuring that costs to the individual are never a barrier to obtaining identity credentials required to fulfil rights or access basic services or entitlements. The indirect costs of obtaining identification such as fees for supporting documents and travel costs must also be minimized ([World Bank, 2021](#)). Against the backdrop of these elements of the Principles, the following concerns are identified.

3.1.1 Slow and inconvenient registration processes. The pace and efficiency of registering for the NIN, which is now being made a foundational document for accessing other services, is not yet optimal. The shortage of registration centres, underfunding of the project, issues around staffing and lack of coordination among participating entities decelerate the speed of registration ([Thisday Live, 2020b](#)). The registration process is also inconvenient for many registrants. Prospective registrants have to queue for hours to obtain the cards and need to make repeat visits to complete the enrolment ([World Bank Group, 2021](#)).

Presently, there is no provision for same day registration and a minimum of three visits is needed to obtain the GMPC. During the first visit, a transaction slip is generated for use in obtaining the temporary NIN slip, which is handed out on the next visit. The GMPC is issued afterwards. The situation is particularly inconvenient for persons that travel from faraway places and have to miss work and budget for transport fare for each day ([Baker, 2020](#); [World Bank Group, 2021](#)). For persons with disability, the budget for transport fares may double to accommodate their caregivers ([World Bank Group, 2021](#)). There are also

lengthy delays in processing the NIN application (Maina, 2021). The process could be streamlined by completing registration on the spot and printing out cards once registration is complete. Many banks in Nigeria issue credit and debit cards on the spot. The NIMC could, therefore, replicate this practice.

3.1.2 Inadequate consideration for sociocultural and religious norms. Concerns pertaining to cultural, social and religious preconceptions have also been raised. One study reported that some women find waiting on the same queue as men to be stressful and disconnected from cultural and religious values (Baker and Rahman, 2020). In another study, some women found it uncomfortable for men to hold their hands for fingerprinting or ask them questions when filing the forms and some men expressed concerns about male officials attending to their wives (World Bank Group, 2021). The removal of hijabs to take facial photos left some study participants feeling violated (World Bank Group, 2021). These issues are sensitive and have to be addressed with a great degree of tact. Social norms already reduce the ability of many women to visit registration centres, and practices that create additional barriers should be avoided (World Bank Group, 2021).

3.1.3 Inadequate consideration for disability inclusivity. Concern has been expressed that some NIN registration centres are not disability inclusive. One study found that registration centres do not have accessible structures, including special seats for persons with disability (Baker, 2020). Forms in braille for the blind and sign language interpreters to adequately respond to questions posed by the deaf are not consistently available (Baker, 2020). This breaches Regulation 2 of the NIMC Registration of Persons and Contents of the National Identity Database Regulations 2017, which requires assistance to be provided to affected persons, e.g. with filling out forms.

The NIMC can do more to ensure that people living with disabilities enjoy unimpeded access to the registration processes including registering people at home or at disability centres, offering travel vouchers, setting up suitable grievance redress mechanisms (Lord, 2020) and ensuring that sign language interpreters are available (World Bank Group, 2021).

3.1.4 Limited mobile registration options. Mobile registration centres are important to serve individuals who are unable to get to registration centres. The elderly, women in purdah, nursing mothers, those who lack of funds or transport or suffer from ill health have difficulty travelling to registration centres. The NIMC periodically sets up mobile registration centers in busy places such as malls but not to the extent done in India and Pakistan. In Pakistan, registration figures were driven up to 98% of the target population with the adoption of door-to-door mobile registration using hikers, van drivers, mountaineers, bikers and skiers to reach socially disadvantaged groups residing in remote locations (Anderson *et al.*, 2016). Similarly, India deployed 50,000 enrolment centres for the Aadhaar ID program and enabled private and public centre partners that were paid per successful registrants (Gelb and Metz, 2017).

3.1.5 Risk of entrenching historic exclusion. The lack of identity verification documents adversely affects the most excluded population segments, these being low-income and vulnerable groups including marginalized women, girls, pastoralists, displaced persons and less-educated people who may not have the required documents to sign up (Thisday Live, 2020a). The NIMC needs to consider the risk of exclusion of people who lack the foundational identity documentation required for onboarding. Without the right policy, persons who have historically been unable to register will remain negatively affected (Maina, 2021). In Nigeria, it has been noted that some internally displaced persons who fled during insurgencies have lost their ID cards and risk being unable to secure the NIN (Hanmer *et al.*, 2021).

In some countries, marginalized communities and civil society are beginning to press for improved registration processes. In 2019, civil society organizations in Kenya filed a petition arguing that Kenyan Nubians, originally from South Sudan, would be further marginalized if a digital ID was to access government services, as they generally lack the birth certificates that are required to apply for a digital ID (Maina, 2021). A similar argument was raised in Cameroun, by the nomadic Ba'Aka forest tribe (Maina, 2021). There is therefore a real need for the NIMC to be sensitive to historic marginalization that may exclude Nigerian communities from the ID system.

3.1.6 The use of coercive rather than incentivizing means. The NIMC has been criticized for using coercive rather than incentivizing means to drive registration. The deactivation of the phone lines of persons that failed to link their NIN and the threat of deregistration of JAMB candidates are two examples.

A more positive approach that emphasizes the benefits of the national ID and addresses the concerns of Nigerians may result in a more sustainable system.

3.2 Privacy and data protection

The Principles on Identification for Sustainable Development require appropriate privacy and data protection measures. Principle 6 for example, requires that “Identification systems must be designed to prioritize and protect data and privacy as the default setting without requiring any additional special action on the part of an individual” (a so-called privacy by design approach) (World Bank, 2021). The design, policies and technology should meet global data protection norms, including data minimization and proportionality. The latter requires that only the minimum data required for identification purposes should be collected and, when required, disclosed. “For example, identification systems should limit the collection and exposure of data – particularly sensitive personal information – including in credentials and the structure of identification numbers”. (World Bank, 2021). Principle 8 requires that the system should respect the rights of data subjects and should be subject to an appropriate legal framework (World Bank, 2021).

3.2.1 Salient features of the Nigeria Data Protection Regulations 2019 (NDPR). The right to private and family life is enshrined in Section 37 of the Constitution. In 2019, the National Information Technology Development Agency (NITDA) issued Nigeria Data Protection Regulations 2019 that apply to all transactions intended for the processing of personal data, irrespective of the means used (NITDA, 2019). All the relevant data identity management bodies in Nigeria fall under the definition of “data controller” in the Regulations as they process personal data and determine how the data are used.

According to Regulation 2.1, every data controller in Nigeria owes a duty of care to data subjects and is accountable for acts and omissions regarding data processing. Personal data should only be collected and processed in accordance with the specific, legitimate and lawful purpose consented to by the data subject. (NITDA, 2019). Data subjects must be informed of the purpose of the collection and must be informed that they can withdraw their consent to sharing personal data (NITDA, 2019).

Breaching the rights of the data subject as stipulated by the Regulations attract a fine of 2% of the Annual Gross Revenue (AGR) for a data controller with more than ₦10,000 data subjects or 10 million (about \$24,000) or 1% of the AGR or ₦2m (approximately \$4 800) for one with less than 10,000 data subjects.

Although it presents a major improvement, the NDPR has attracted some criticism. Authors have noted issues such as the uncertainty about NITDA’s regulatory mandate, the extraterritoriality of the NDPR, recognition of multiple data protection authorities and a licensing regime of data protection compliance organizations that ushers in legitimacy

problems (Babalola, 2021). Concerning the audits required by the regulations, 635 filings were recorded in the 2019/2020 NITDA data protection performance report, representing 13 sectors and 17 public sector organizations (NITDA, 2020). The low numbers of public data controllers' involvement has been noted as a reflection of slow implementation by government bodies (Babalola, 2021).

3.2.2 The National Identification Management Commission harmonization project and the NDPR. Principle 8 of the Principles on Identification for Sustainable Development requires that identification systems should be underpinned by legitimate, comprehensive and enforceable legal and regulatory frameworks and strong policies that promote trust in the system, ensure data protection and privacy (including cybersecurity) and mitigate risks of abuse (World Bank, 2021). Identification systems should, therefore, have the organizational, management and technology safeguards to reflect respect for the rights of the data subject and ensure legitimate and purposeful data collection, backed by appropriate data protection measures (Clark and Daly, 2019). From the preceding outline of the applicable provisions of the NDPR, it is clear that the Regulations reflect many of the key data protection principles.

In accordance with Regulation 1.3, "consent" of the data subject means a freely given, specific, informed and unambiguous indication of the data subject's wishes expressed, through a statement or a clear affirmative action, signifying agreement to the processing of personal data. Where processing is based on consent, the data controller must demonstrate that the data subject has consented to processing of their personal data and has the legal capacity to give this consent. The NIMC can obtain such consent from an applicant when issuing the NIN. The Commission must however be able to demonstrate that data subjects are informed of the purpose and extent of data collection and are aware that they can withdraw their consent to sharing personal information to conform to Regulation 2(3) of the NDPR. Proof of consent should be expressed and not implied before the commencement of any data collection.

While the consent principles are fairly clear, there are concerns that they are not fully adhered to in practice at the NIMC's registration centres. Baker (2020) reported that the mere presence of persons at registration centres is deemed to constitute consent and some officials make no further effort to explain the purpose, benefits and risks of data collection (Baker, 2020). Many IDPs were reported to register to gain access to food and other compensation (Baker, 2020). While consent in this case is not necessarily coerced, it is arguably not given free either. This may, however, differ from case to case, depending on the level of desperation of the person and the need to disclose personal information as a pre-condition to obtain vital services.

Appropriate information is needed to ensure that informed consent is provided. Ideally, individual consent to sharing personal data should also occur in a broader context of trust, fostered by appropriate government information programmes but also appropriate governance arrangements. These should support trust by highlighting the benefits of an official ID and how the data will be protected and used (Maina, 2021). Information about their right to request access to and rectification or erasure of personal data and the right to, and the grounds on which they can restrict data processing, will also build trust (NITDA, 2019). The trust should, however, be sustained by actions. Adopting measures such as frequent public consultation, privacy impact assessment and threat modelling exercises have been recommended as helpful not only to identify and address vulnerabilities but also to grow user confidence and buy-in in the programme (Clark and Daly, 2019).

As data protection and security are very important in relation to the personal data that are collected and processed in relation to the NIN, the discovery of a vulnerability in the

security system of the NIN retrieval USSD code was of concern. It allowed identification of a person's NIN by using only their date of birth and surname, thereby creating identity fraud risks. This was challenged in 2019 as an infringement of the right to private and family life, guaranteed by Section 37 of the Constitution^[1].

The court held that the NIMC had to do more in relation to data security to avoid breaching the privacy rights of citizens by adopting protective laws and parameters to ensure adequate implementation of the government's privacy and data protection policies. The court, held, however, that the application has become academic as the NDPR came into effect since the application was filed, rendering the applicant's argument moot.

While the NDPR provide important parts of the legal framework required to underpin the NIN, more is required to meet the Principles' requirements that identification systems must be supported by legitimate, comprehensive and enforceable legal and regulatory framework. The publication of the Data Protection Bill 2020 is therefore a welcome development. The objective of the Bill is to create a regulatory framework for the protection and processing of personal data and to safeguard the rights and freedoms of data subjects, as enshrined in the Nigerian Constitution. Lagos is also drafting a State Data Protection Bill to govern data processing by data controllers. The Nigeria Data Protection Bureau has been established to consolidate the gains of the NDPR and support the process for the development of the Bill ([Guardian, 2022](#)).

Though important, the adoption of policies and laws are only initial steps. Without compliance and enforcement, they provide little protection and foster little trust in the system. The Nigeria Data Protection Regulation Performance Report 2019-2020 (NITDA, 2020) contains some sobering perspectives. This report covered the first year of the implementation of the NDPR, reflecting progress from near-zero levels of compliance to the filing of 635 statutory audit reports (NITDA, 2020). NITDA also reported serving 51 enforcement notices on data controllers who were perceived to have breached the Regulations.

Of concern is that it served 180 compliance notices on Ministries, Departments and agencies of government, including the Lagos Internal Revenue Service (LIRS). The LIRS was found to have exposed personal data of some tax payers while harmonizing historical tax data, which attracted a fine of ₦1m(about \$2,500) (NITDA, 2020). NITDA also noted a number of challenges, including a geographically limited compliance footprint (over 93% of the organizations that filed a statutory audit report were based in Lagos) and, more concerning in relation to the NIN harmonization project, that public institutions had been slow to comply with the NDPR. The report did, however, note that the number of enquiries and requests for support that they received are indicative of a change.

4. Concluding remarks

The national identification harmonization project is a laudable project that could provide valuable support for more effective and efficient AML/CFT identity verification and authentication.

The project and ongoing registration for the NIN, however, hold significant risks in relation to data protection. These are exacerbated by the absence of a comprehensive data protection framework. National identity data can be vulnerable to political abuse and targeting by bad actors. National identity data systems must therefore be protected by clear, fair and comprehensive privacy and data protection rules and appropriate and accountable governance mechanisms. While Nigeria is adopting and implementing such a framework, the NIMC can do more to advance data protection, for example by supporting informed

consent and compliance by all participants and publishing compliance-related data and information to build public trust in the system.

The NIMC should furthermore improve access to the NIN by streamlining the process of registration including supporting same day registration and on-the-spot card printing; setting up more registration points as well as mobile registration to cut down queues; and increasing the range of registration agents and points to include schools, police stations and health facilities. Consideration for social, cultural and religious norms is also vital to appropriately accommodate the variety of groups and cultures in Nigeria.

Finally, it is important to pursue public consultation and stakeholder engagement by driving awareness about the benefits of registering among persons in positions of authority, including traditional rulers, religious heads, women leaders, heads of associations, leaders of age-grade groups and government agents.

These adjustments will bring Nigeria closer to reaching its goals of providing all of its citizens and permanent residents with an official identity. Ultimately, progress with a fair and comprehensive official national identity system for Nigeria will help the country to advance its policy goals of financial integrity.

Note

1. *Incorporated Trustees of Paradigm Initiative for Information Technology, Sarah Solomon-Eseh v National Identification Management Commission and Attorney General of the Federation*, judgment delivered on 28 June 2019, as discussed in *Anderson Tax Alert*, 30 August 2019, available at: <https://ng.andersen.com/federal-high-court-affirms-the-data-privacy-rights-of-nigerian-citizens> (accessed 29 April 2022).

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