

Policy Brief

**Expanding Voter
Access to Polling
Units in Nigeria:
Matters Arising**

April 2021





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Executive Summary

The planned expansion of voter access to polling units in Nigeria by the Independent National Electoral Commission (INEC) may resolve an age-long crisis of insufficient polling units and poor polling units' management. Elections in Nigeria are currently conducted in 119,973 polling units across the 774 Local government areas in 36 states and the Federal Capital Territory (FCT) Abuja. These polling units were established in 1996, to serve approximately 50 million voters at the time. Notwithstanding the exponential population growth in the country, twenty-five years later, the same number of polling units now serve approximately 84,004,084 voters. The continued use of the same number of polling units regardless of emerging trends in population growth and population movement dynamics has resulted in limited voter access to polling units, crowded and congested voting facilities, and susceptibility of the voting process to manipulation. While INEC's plan to commence expanding voter access to polling units is crucial for addressing these challenges, INEC must ensure that the process is fair, transparent, inclusive and acceptable by citizens and key actors. Yiaga Africa seeks to draw the attention of critical stakeholders to the necessity of expanding voter access to polling units, while ensuring that the process is data-driven and meets integrity standards.

Although the Electoral Act confers administrative powers on INEC to establish polling units and allocate voters to polling units, previous attempts by INEC were unsuccessful.

The legality of the process, human rights considerations, necessity and timeliness, are important considerations informing Yiaga Africa review of the policy. In INEC's Discussion Paper on the State of Voter Access to Polling Units in Nigeria, the Commission highlighted three approaches for expanding voter access to polling units. The Commission's discussion paper highlighted justifications for their preferred approach of 'converting existing voting points and voting point's settlements to polling units'. While this approach seems to be more accessible and less controversial, the practicality in its implementation raises questions which the commission has not sufficiently addressed. Informed by the findings from Yiaga Africa's previous election observation initiatives, this analysis seeks to respond to the following issues: the strategy for the relocation of polling units, allocation of voters to polling units, the guiding principles, the communication strategy for citizens engagement, the time-frame for the process, the framework for future expansion of voter access and the prospects of harmonising voter registration data with the national database of citizens. Within the conversation for expansion of polling units is also the issue of the national census and how the absence of accurate and updated data on the voter population impacts the credibility of the voter's register and the polling unit's expansion.

In the light of these matters arising, Yiaga Africa recommends that:

- 1| The process of expanding voter access to polling units should be informed and driven by data to ensure that decisions adopted truly addresses the challenges identified; this should also include ensuring a disability and inclusivity approach;
- 2| INEC should commence a comprehensive performance audit of the required capacity to guarantee a successful access expansion process through a SWOT analysis;
- 3| The commission should consider the balanced and fair distribution of the proposed additional polling units with clarity on the principles and criteria applied;
- 4| INEC should develop a comprehensive framework to institutionalize future expansion of voter access to polling units. Such a framework will guide the Commission in establishing sufficient polling units in different electoral cycles in Nigeria;
- 5| INEC and stakeholders should invest in strategic awareness campaigns on the access expansion exercise;
- 6| INEC should conduct a thorough audit of the existing polling units as a vital step before converting Voting Points (VP's) and Voting Point Settlement (VPS) to polling units especially ensuring that relocation of polling units considers disability and other inclusivity needs;
- 7| The commission should update its voter register to address cases of transfer of registration and ensure integration of the voter's database to the National Identity Management System (NIMS) hosted by the National Identity Management Commission (NIMC);
- 8| INEC should consider a phased expansion of the polling units process to indicate that the process is continuous, to meet voters' access needs truly; and
- 9| The Commission should engage the electoral risk management tool as the process commences to ensure immediate response to the risk that may arise concerning this process at different levels.
- 10| With the last national population census conducted in 2006, the government should commence the process for a National Census.

Background

The Independent National Electoral Commission (INEC) plan to expand voter access to polling units is an effort to resolve the challenge of insufficient polling units. INEC, as an Institution, had made attempts to create additional polling units to accommodate the growing voting population of Nigeria in 2014. This attempt did not achieve the desired results mainly due to the poor reception by political actors. The electoral commission had to suspend the process and instead created voting points (VPs) and voting points settlement (VPS) to aid voting on election day. Accordingly, Nigeria's national elections are currently conducted in 119,973 polling units across the 774 Local government areas in 36 states and the Federal Capital Territory (FCT) Abuja. These are the same polling units created in 1996, which were at the time projected to serve approximately 50 million voters. The population of Nigeria in 1996 was 110 million.¹ To address the challenge of voter access, INEC in its 'Discussion Paper on The State of Voter Access to Polling Units in Nigeria' proposes three approaches. They include:

- 1| Conversion of voting Points and Voting Points Settlements to Polling Units
- 2| Application by residents of a new area/settlement of Polling Units
- 3| Creation of Polling Areas

As studies have shown², Nigeria has experienced exponential growth in population since 1996³ and a youth bulge, with young people constituting a more significant part of the population. Beyond population growth, the youthfulness of Nigeria's population makes it consistently mobile. The population movement influenced by the youth population has a significant influence on the voting population and the allocation of polling units. Based on the official data on voter registration for the 2019 elections, young people between 18-35 years constitute 51.11% of the voting population. In 2012 the Nigeria Bureau of Statistics and the Ministry of Youth Development conducted a youth baseline survey which revealed that 60% of Nigeria's population were below 35 years. The youthfulness of the population is further emphasized in the United Nations' projections that Nigeria will be one of the nine countries contributing to more than half of the world's population growth between 2019 and 2050.⁴ With the median age of 18⁵, the youthfulness of Nigeria's population remains one of the driving forces influencing population movement, including intra-state and inter-state migration and population growth. Population movement is also driven by the security context and trends of economic opportunities. Accordingly, different states in Nigeria have experienced expanding communities with new settlements/areas of

¹ <https://countryeconomy.com/demography/population/nigeria?year=1996#>

² Population 2030 Demographic Challenges and Opportunities for Sustainable Development Planning, United Nations, 2015

³ <https://www.macrotrends.net/countries/NGA/nigeria/population-growth-rate>

⁴ United Nations World Populations Prospects 2019: Highlights

<https://www.un.org/development/desa/publications/world-population-prospects-2019-highlights.html>

⁵ Nigeria: Average Age of the Population 1950-2050

<https://www.statista.com/statistics/382229/average-age-of-the-population-in-nigeria>

residence emerging either informed by economic, social and security reasons. This is especially the case in the urban centres—Abuja, Lagos, Port Harcourt Kano amongst others. For instance, the FCT-Abuja is projected to experience an annual growth rate of 35% and had grown by 139.7% between 2000 and 2010.⁶ This growth is significant and has impacted all spheres of planning for the Federal Capital Territory. For elections, this planning includes effective polling units management to meet the growing voting population's needs. Noteworthy that Abuja is not the only location experiencing population growth, population movement and community expansion.

Yiaga Africa's analysis of the proposed expansion of voter access to polling units is informed by the necessity of the process and the need to accord it the urgency it demands. This analysis is most crucial because the commencement of polling unit's expansion must seek to bring the polling units closer to the people and ensure that the process is guided by principles of transparency, equity, inclusion, and accountability. The current number and location of polling units are not sufficient in guaranteeing the full participation of all eligible voters on election day. This has an impact on voter's turnout in Nigeria. Beyond the issue of population growth and movement, there are also contextual factors that strengthens the argument for expansion of PU access. One context-specific consideration is the requirement for restriction of movement on election day in line with the INEC guideline for election. Voters

are therefore required to register to vote at a location that is within walking distance. This has caused some hardship to voters whose allocated polling units are a significant distance from their place of residence and may require some form of transportation to access their polling units (recalling that vehicular movement on election is prohibited by law). This also raises a human rights concern as it relates to the unequal access for voters in rural vs urban areas. To address this challenge, as a first step, INEC created Voting Points (VP's) and Voting Point Settlements (VP's).

However, the creation of VP's and VPS does not address this issue; many voters are still disenfranchised from voting because of this challenge. While the creation of VP and VPS was to aid manage congestion in polling units, they are still inadequate in addressing this challenge. This is because some VP's are in the same vicinity as the polling units, which creates some level of disorganisation in the voting area. Yiaga Africa's election observation reports from 2018 to 2020 have consistently indicated how congestion and the lack of space in polling units limit participation and increase the chances of electoral malpractices. During the Ekiti 2018 governorship election, Yiaga Africa noted that the secrecy of the votes was compromised in 16% of polling units it observed.⁷ As observed by Yiaga Africa during Nigeria's 2019 presidential election, based on reports from 24% of 1,399 sampled polling units, the voting cubicles were not in locations that guaranteed the secrecy of the ballot.⁸

⁶https://www.researchgate.net/publication/345166243_Origin_and_Meaning_of_Abuja_the_Capital_city_of_Nigeria

⁷<https://www.yiaga.org/watchingthevote-preliminary-process-statement-on-the-2018-ekiti-gubernatorial-election-2/>

⁸<https://www.yiaga.org/yiaga-africa-watchingthevote-preliminary-statement-on-the-2019-presidential-election/>

Similarly, Yiaga Africa's report on the September and October 2020 governorship elections in Edo and Ondo States revealed that people could see how voters marked their ballots in 16% and 5% of polling units, respectively. During the same Edo and Ondo Elections, voters crowded polling officials in 20% and 13% of polling units during voting, respectively. These observations highlight some challenges with the geographical location of the polling units or additional voting points situated in locations without adequate space to facilitate an efficient flow of the voting and counting process. Congestion of polling units and the location of some polling units have also opened the process to irregularities such as polling materials snatching, vote selling and buying, ballot-box stuffing and multiple voting. Also, the VP's and VPS create an additional layer to the collation process because the results from the VP's and VPS are computed at the PU level before transmission to the ward collation center. This creates some challenges like computational errors considering that voting sometimes extends to late evening when polling officials are already exhausted and also the likelihood of manipulation especially in PU's with high numbers of VP's. Yiaga Africa observation in 2019 revealed that states like Kogi, Nassarawa, Katsina, Lagos, Ogun, Rivers and the FCT had some polling units with as many as 15-30 voting points each. Furthermore, the expansion of voter access to polling units is necessary because it also provides INEC an opportunity to ensure the polling units are disability-friendly to plan ahead to meet the needs of the

projected 28, 500, 000 citizens with disability.⁹ Access for persons with disability is a rights-based conversation to ensure that no voter is left behind. Currently, the existing polling units are majorly not accessible to persons with disability (PWD). A 2016 Audit of polling units by the Inclusive Friends Association (IFA) in Edo and Ondo states for instance, revealed that "65% of the polling units observed in Edo state and 77% of those in Ondo state were located in places that were inaccessible to persons with disability."¹⁰ According to the report, of the total number of polling units audited, it was difficult for PWDs to access 64% of the PU's in Edo and 79% of the PU's in Ondo states. This report was not far from the findings in Kogi state in 2019, with 54% of the polling units inaccessible for voters with disability.¹¹

These issues remain pertinent in the discussion on expanding voter access to polling units. Accordingly, the analysis in this policy brief is informed by three broad considerations;

1| The Question on Legality:

The Electoral Act in Section 42 provides that "the Commission shall establish a sufficient number of polling units in each Registration Area and shall allot voters to such polling units. Therefore, the establishment of polling units is one of the mandates of the Election Management Body-INEC in the Electoral Act. INEC must ensure that polling units are 'sufficient' to serve voters' needs. Legal interpretation posits that using the word "shall" in

⁹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5433448/>

¹⁰ http://inclusivefriends.org/wp-content/uploads/2020/11/DISABILITY_VOTES_MATTER_REPORT_FINAL_P_RINT.pdf

¹¹ Inclusive Friends Association (2020), Breaking the barriers: 2019 Kogi State Accessibility Audit Report

any piece of legislation suggests that such power, function, right or whatsoever may be the case is mandatory.

Sufficiency requires that the polling units are adequate to meet the population needs and that the polling units are structured to guarantee the participation of eligible voters, which includes voters with disability.

The mandatory nature of section 42 also affirms the vital need polling units serve in ensuring that fundamental right to vote and be voted for in an election.

2| Human Rights Considerations:

Access to polling units is a matter of fundamental rights that facilitates the exercise of the right to participate in government by voting or contesting in an election. For conversations on polling units, voter access must include the broader principle of inclusion to ensure equal participation of all eligible voters in the electoral process. Accordingly, this must extend to access for persons with disability, access concerning gender sensitivities and access for disadvantaged and displaced communities. Voter access to polling units as a human right issue also requires the polling units are conducive for voters. This is significantly related to polling units situated in locations where communal conflicts are rife, areas

where communities are displaced due to insecurity or areas prone to natural disasters like flood.

3| Considerations of Necessity and Timeliness:

The failure of previous attempts by INEC to create/expand polling units led to the Commission's adoption of temporary measures like baby polling units/voting points and voting point's settlements. These interim measures come with peculiar challenges and still do not respond to polling units' voter access and overcrowding. These measures though germane introduced more election administration challenges relating to transparency in the election results process, accuracy in computation of polling units level results, overcrowding of polling units that enables; manipulation, intimidation of polling officials and commercialisation of votes. In preparation for the 2019 general elections,

Yiaga Africa observed that states like Kogi, Nassarawa, Katsina, Lagos, Ogun, Rivers and the FCT had some polling units with as many as 15-30 voting points each. Some other polling units had between 5-14 voting points, with additional 309 Voting Point Settlements (VPS) created in Abuja (See appendix section).

This information was gathered in drawing its sample of polling for election observation using the Parallel Vote Tabulation (PVT) election day observation

methodology. Finally, the necessity for expansion of Polling units also goes along with due considerations for the timeliness of these interventions

The Polling Units Expansion Discourse in Nigeria

Polling units are at the core of the electoral process; they are the gateways for participation in an election. The polling unit is ordinarily a designated location where voting takes place, where voters get to exercise their franchise to choose their leaders¹² and sometimes, voter registration is conducted. Section 156 of the Electoral Act 2010 (as amended) defines a Polling Unit (PU) as “the place, enclosure, booth, shade or house at which voting takes place under this Act”. Accordingly, Polling Units (PUs) constitute a basic structure required to facilitate voting in Nigeria’s elections. They are the nerve centres at which voters interact with the Election management body and express their aspiration for a new government through the ballot. To this end, it is exceedingly crucial that Polling Units are not only ready, accessible and conducive to receive voters, but that they are also well-organized and

secured to guarantee the free exercise of the right to vote and be voted for in an election.

Access to polling units is a critical factor for citizens democratic participation, as this is crucial for voters’ fundamental rights to choose their leaders freely. ”

Article 21 of the Universal Declaration of Human Rights recognises citizens’ rights to participate in the public affairs of their countries and the right to free and fair elections. Data from INEC shows that Nigeria currently has 119,973 polling units. These polling units were created in 1996 and originally intended to serve 50 million voters. By the 1999 general election, the number of registered voters had increased to 57, 938, 945, with the polls conducted in

¹² The state of access to polling units in Nigeria, Discussion Paper No. 1/2020. A publication on of the Independent National Electoral Commission (INEC)

the 119,973 polling units. This trend continued with the subsequent electoral cycles, and by the 2011 general election, the number of registered voters had increased by 26.9%. With a further increase in the number of registered voters, in August 2014, INEC attempted to create additional 30,027 polling units to bring the number of polling units to about 150,000. The proposal to create additional polling units led to political agitations and controversies, which later escalated to regional agitations. The plan at the time, indicating that 21,615 of the additional polling units will be in the North while 8,412 polling units will be in the South, contributed to the ethno-political basis for discontent. Accordingly, creating additional polling units did not continue, and the Electoral Commission proceeded to conduct the 2015 general election.

The timeline for creating the additional polling units in 2014 also contributed to the failure of the process. INEC had released the plan to create additional polling units, six months to the 2015 general elections. From Yiaga Africa's observation, the 2014 process revealed three significant learnings: Firstly, any attempt to create/expand polling units must consider the timeliness of the initiative, to situate at an appropriate time within the Electoral Cycle. For instance, a year before elections and an election year may fail the test of appropriate timing for any conversation on the polling unit's expansion. Secondly, while polling unit's expansion is ordinarily administrative, it is very

political in Nigeria because they are informed by voter distribution. Population census and voter distribution are politicised and politically sensitive issues in Nigeria. This is because population size informs revenue allocation and political power and in Nigeria, regional and local identities are still very dominant over national identities.¹³ Accordingly, this controversy also plays out in any process that informs voter distribution, as such, the expansion of voter access to polling units requires a multi-stakeholder driven approach that cuts across party lines and balances regional interest. Nigeria is a diverse and dynamic country. A clear strategy on managing diversity and ensuring the inclusion of identified/relevant leadership structures should inform decisions concerning polling unit expansion. This will include adopting a participatory model that informs its communication strategy. Thirdly, the 2014 attempt by INEC to create a polling unit was not driven by an institutional framework to guide the process and set standards for continuous expansion of voter access to polling units. Developing and institutionalising a detailed adaptive framework on creating additional polling units will enable transparency and inspire citizens trust.

The current effort to expand voter access to polling units must therefore consider the learnings highlighted above. The failure of the 2014 process resulted in the retention of the 119, 973 polling units created in 1996 where

¹³ S.B.O Gutto, A.G Velthuisen; Management of Democratic Elections in Africa; Understanding Key Issues and processes for democratic election in an African Context, University of South Africa, 2012

elections are conducted. However, as more citizens registered to vote, INEC devised a strategy to manage the increasing voting population. For instance, in 2019, a total of 84, 004, 084 citizens were registered to vote in the general elections. To manage the crisis of overpopulated polling units, overcrowding of polling units, and voting process administrative challenges, INEC created 57, 023 voting points out of congested polling units across the states (Discussion Paper No.1/2021, INEC). These voting points (VP) and voting points settlements (VPS) served as a temporary measure to ensure that polling units are not

congested, that new settlements in the FCT are served, and that the voting process is made easier to manage for the polling officials. On election day, voting and counting of results happen at the VP and VPS. However, the results for the VP were computed under the Polling units from which they were created to serve as the PU results, while the results from VPS are integrated into the nearest polling units for collation purposes (Discussion Paper No.1/2021, INEC). This strategy may have been a quick fix, but it remains problematic, calling for an urgent expansion of polling units.

Election Day Scenario in PUs Divided into Voting Points



Issues with this process in the image above are:

- Possibility of computational errors with presiding officers adding up the results from the VP's/VPS under the PU.
- Reduced transparency as most voters and sometimes party agents do not move with the results from VP/VPS to PU
- Creates an additional layer of collation which was not originally envisioned in the results collation process
- Reduces the effectiveness of both INEC and Independent observers oversight of the process.

The Independent National Electoral Commission (INEC) has the administrative power under the protection of Section 42 of the electoral act to establish polling units and to allocate voters to polling units. The consultation by INEC with Civil Society Organisations in February 2020 suggests that the approach to be adopted by INEC to expand voter access to polling units will be the **'Conversion of Voting points and Voting Points Settlement to Polling units'**.¹⁴ This approach will result in two main processes: converting the 57,023 existing voting points and voting points settlements to stand-alone polling units. Then the relocation of these VP's, VPS's now PU's to relevant locations expectedly closer to the people. Presently, there are some uncertainties with the proposed conversion and relocation of VP and VPS as Polling units and with the operational plans. These uncertainties raise fundamental questions like the sufficiency of the proposed conversion of existing VPs and VPS into Polling units. The adequacy of the proposed 'conversion' in responding to the already identified challenge of voter access to polling units and the clarity of the principles guiding the conversion and decision for relocation. In addition, is the issue of the apparent absence of official data on the national population especially in supporting a more data-driven process. Considering that the last national census was conducted in 2006, there is currently no accurate official data on the national population in Nigeria. An official data on national population provides INEC with accurate data that can checkmate the data in the voter's

register and ensure some measure of accuracy in the allocation of voters to polling units.

In the interim, some critical questions for the Independent National Electoral Commission (INEC) include the required estimated distance for relocating the suggested polling unit from the former. What will determine the proximity of registered voters to the new polling units converted and relocated? What is the budgetary implication of this process? How will this impact the workforce and human resources of the commission? Finally, does the Commission have a detailed framework that ensures these questions and many more are addressed?

Key Considerations

The proposed approach of converting existing voting points and voting points settlements appears to be the most accessible approach for polling units expansion. Current data from INEC on Voting Points and Voting Points settlement indicates that Nigeria currently has 57,023 VP's and VPS created for the 2019 general election. The VP's and VPS were designed to reduce congestion in polling units serving a large population of voters by limiting the number to a maximum of 750 for those congested polling units. This proposed approach by INEC of converting the VPs and VPS to polling units was in adopted for the following reasons:

¹⁴ This approach was one of the three approaches proposed. The other two were: Application by Residents for New area/Settlement for Polling Units and the Creation of Polling Areas.

- The prolonged usage of VP's and VPS in Nigeria's elections makes it a familiar idea,
- The unserved areas can be verified by map,
- It is quicker and easier,
- It addresses increasing demands for more PUs and
- It will be less controversial¹⁵

While these justifications are pertinent, the practicality in implementing this approach raises further questions not sufficiently discussed in the Discussion Paper, which are also important points for consideration for INEC. These include:

1| Relocation of the Voting Points and Voting Points Settlements:

creating additional polling units serves the purpose of ensuring voter access to polling units. This includes bringing the polling units closer to voters, reducing overcrowding and ensuring efficient layout of polling units. VP's and VPS's conversion to polling units will require relocating these VP's and VPS locations closer to the actual voter. This relocation will require that the affected voters who have previously experienced a major challenge of access have the access challenge addressed. The Voter's Register initially informed Polling units' division to VP's and VPS with voters divided into VPs based on the chronological placement of their names in the Voters' register. Three critical issues here are that voters' residence must

be the determining factor in deciding voters allocation to VP's and VPS. The relocation of polling units should also extend to disaggregating voter registration data to determine geo-locations of the polling units. With voters providing their residential address during registration, the polling unit relocation must be determined by voters' registered place of residence. Secondly, the relocation will be determined by population and raise concerns when the number of "new" polling units may defer per location. This means that balancing the justification for such relocation with the politics of the number of polling units allocated will require clarity on the framework/modalities for relocating polling units and effective communication.

The third will be to ensure that in relocating voting points and voting points settlements, the locations are disability-friendly. Access to polling units for voters with a disability remains a fundamental human rights issue that INEC must incorporate as we plan for a more inclusive democracy.

2| Allocation of Polling Units to Voters:

This goes alongside the relocation

¹⁵ The state of access to polling units in Nigeria, Discussion Paper No. 1/2020. A publication on of the Independent National Electoral Commission (INEC)

of VP's and VPS. However, the allocation of polling units to voters should extend to addressing both the access and conduciveness considerations in establishing polling units. As noted earlier, voters were divided into voting points on an alphabetical basis from the voter's register. This principle will not be sufficient in allocating voters adequately with the approach of converting VP's and VPS to Polling units. The critical determinant of allocating voters to polling units will be the location (residential address as captured during registration) For instance, what will be the distance from the current areas? How will the commission ensure that they are within short distance for the prospective voters? Is there a system of verifying voter information on the register that ensures voters' data are updated? Are there community dynamics (conflicts, cultural differences etc.) that should inform which locations are conducive to voters within a community?

Different countries adopt different principles concerning polling units' proximity to voters. For instance, a country like India, with a large voting population of over 900 million registered voters (data as of 2019), has an average of 900 voters per polling station. Some polling stations serve more voters, and others are serving a fewer number of voters.¹⁶

One of the determining factors in allocating polling stations to voters is the distance between voters and assigned polling units.

India's Election Commission applies a 2km rule in determining the maximum distance a voter has to travel to cast his/her vote with due consideration based on topography and ease of travel.¹⁷ This means that the distance may be shorter in some locations and the number assigned to polling units fewer when topography and ease of travel principles are applied.

3| Auditing of Existing Polling units:

The expansion of voter access to polling units will also require an audit of the existing polling units to ensure that the polling units exist and can be located and sufficiently guarantee voter access to the ballot. While deploying the Parallel Vote Tabulation (PVT)- an election day observation methodology that uses statistics and technology to observe the voting process and verify the accuracy of the election results,

¹⁶ India Election 2019, 'Roads, boats and Elephants; How India mobilised million polling stations', Simon Scarr, Manas Sharma and Marco Hernandez, May 22, 2019 <https://graphics.reuters.com/INDIA-ELECTION-STATIONS/010092FY33Z/index.html>

¹⁷ Article 2.7 Polling Station Manual, October 2020, Election Commission of India

Yiaga Africa had analysed the Polling units in Nigeria. The findings revealed that some polling units have been relocated, while names of others were updated without communicating the changes to voters in some instances.



Yiaga Africa compared polling units' names from the 2015 and 2019 INEC list of Polling units and discovered that the names of 107 PU's from a sample of 1,515 polling units have been altered or updated. Some polling units in Oshimili South LGA in Delta State were moved to make space for the construction of the Asaba Airport. Based on interactions in 2019, some residents of the area expressed concerns that their voting rights have been denied as they were not aware of where the polling units were relocated to. There were also reports about partially deserted communities in Nasarawa Toto LGA in Nasarawa State, Aniocha North, Aniocha South and Bomadi LGAs in Delta States due to communal conflicts. Elections have not been conducted in those communities in a while, and the voters are left without alternatives. For instance, in Lagos State, it was difficult to locate some polling units in Ikorodu LGA during the 2019 general elections. Yiaga Africa's personnel could not find Isele III polling unit with code 003 at the Junction of Iwolo/Adenaike Alagbe Str. Similarly, Yiaga Africa could not locate polling unit with code 089 that is supposed to be

located at Adeyeye Street, in front of house 18 and 19, in Kosofe LGA. This could be due to the improper naming of polling units. However, it shows the need for an audit of existing polling units.

4| Guiding Principles, Balancing Sufficiency with Impact on Transparency:

The decision to convert existing voting points and voting points settlements INEC may also need to consider the possibility of additional numbers to cater to unserved communities. More importantly, the learnings from previous efforts highlight the need for clear principles to guide the 2021 process. These guiding principles include; transparency, integrity, equity and equality to ensure that the process inspires citizens confidence in the Electoral Commission. For instance, one major challenge of the 2014 attempt to create polling units was to announce numbers allocated to geopolitical zones without clarifying how the numbers were derived and the justification for allocating to each state. In 2014, a projected 21000+ was reported to be allocated to the North without a breakdown to reflect the underserved communities. By INEC's breakdown, about 21,615 polling units were to be allocated to the North and 8, 414 to the South. Further broken down per geopolitical zone, the total figures are as follows: North-West, 7,909 polling units; North-Central, 6,318; North-East, 5,291; South-West,

4,160; South-South, 3,087; and South-East 1,167. Abuja was supposed to receive an additional 1,120, Lagos 2,870, Kano 2,053 and Kaduna 2,878 polling units. These numbers may have been pertinent, but they did not communicate a clear message in a diverse country like Nigeria, where regional division is a significant fault line.

The 2021 process must therefore consider projected population data, voter registration data, existing polling units and voting points in decisions for expanding voter access to polling units. This will require a hybrid approach of extending the approach of converting VP's and VPS to polling units to introduce additional numbers of polling units to ensure that unserved communities' needs are truly addressed. States like Kogi, Nasarawa and the FCT may not receive sufficient allocation of polling units if the approach of converting VP's and VPS is strictly adhered to. The process must therefore ensure that the identified principles guide the decision for sufficiency and remains transparent.

5| Effective and Strategic Communication to Voters on the Location of their Polling Units:

The communication on expanding voter access to polling units must address a list of concerns that can be broadly summed into two significant issues. These issues are

the justification for, and methodology adopted in the process and the polling unit allocated to each voter. The first issue covers a list of concerns which include:

- Why the expansion is necessary as more of a human right driven and administrative process
- The implementation of the expansion,
- The principles guiding the process,
- The timeline regulating process, How voters will benefit from the process, and
- the expectations of improved and better elections in Nigeria.

This list of concerns must inform the communication strategy of INEC and the messages to engage voters at all levels. Communication on this process will also require a feedback channel that collates emerging concerns from the voters who understand their community better, especially regarding polling units' location. The second issue focuses strictly on;

- The allocation of polling units to voters
- How voters can identify their polling units.

This is important because there are concerns that INEC did not inform some voters about the polling units assigned to them in past elections. The implication of this was that, for instance, on election day during the 2019 general elections, some voters were unable to locate their polling

units. This challenge was mainly because voter registration was/is conducted at INEC LGA offices and some special centres in large cities. After this exercise, voters are not provided adequate and timely information on their allocated polling units. Opportunities like the Display, Claims and Objections process are not adequately integrated as an essential process which is reflected in both the level of seriousness INEC staff deployed accord to the process and the vibrancy of INECs citizens engagement in the process. The timeline, reason and importance of the Display, Claims and Objections of the Voter Register were not adequately communicated, and voters did not understand the value of the process.

According to Yiaga Africa's report, the display claims and objections exercise conducted by INEC from November 6th to November 12th, 2018,¹⁸ exposed the lack of human resources and capacity gaps in INEC. INEC staff mainly were not seen at the Registration Areas to attend to registrants. They were also scantily deployed to some wards and some of INEC's LGA offices. Some of these staff could not take the registrants through completing the forms for claims and objections. The Commission seems to treat the process as a mere ritual that to be fulfilled rather than seeing it as a laid down process designed to address sundry issues around voter registration. There was the challenge of poor publicity about the exercise. Most registrants were not aware of the activity, and some

were unaware of where to visit to make their claims or objections.

The 2021 process by INEC to expand voter access to polling units must adopt a robust communications strategy that ensures timely, detailed and targeted information on the process adopted. In addition, voters will require adequate information on the polling units allocated to them.

There are fears that if these concerns are not adequately addressed, INEC may only be scratching the problem on the surface. INEC needs to adopt the root and branch approach and ensure everyone from the grassroots to the urban centre is properly included in the process

6| Institutionalising a Framework for Future Expansion of Voter Access to Polling Units;

This must be guided by a well-defined and developed policy framework of polling units created by INEC. The current plans to convert voting points to polling units seem like a temporary solution to continuously expanding voters' access to polling units. In the 1999 elections, the voting population had exceeded the planned 50 million in 1996 by 7 million. Society will also

¹⁸<https://www.yiaga.org/low-citizens-awareness-poor-deployment-of-officials-wanes-inecs-display-claims-and-objections-exercise/>

expand, and new communities will emerge. A practical approach will be to make projections and develop a detailed and adaptive framework for the future expansion of polling units, to avoid this circle of creating voting points or voting points settlements from the existing polling units. For instance, if the voting population increases to 130 million in 2023, INEC may require a minimum of 185,714 polling units, with an average of 700 voters per polling unit. The Commission will therefore require a more comprehensive approach to establishing sufficient polling units within the electoral cycle. Such a framework can include:

- an INEC principle on the maximum number of voters and the accepted average of voters per polling unit.
 - the maximum distance which a voter has to walk to their polling units- proximity benchmark
 - The preferred locations and facilities where polling units will be designated especially considering disability needs
 - Timeline for creating additional polling units
 - Methodology guiding the process which can highlight different approaches for the Commission
- Exceptions to some of the general rules to take care of emergencies, peculiarities in different locations and contingencies.

7| **Harmonisation of the Registered Voters Data with the National Identity Management System:**

In an evolving world where more intentionality is deployed to ensure a safeguarded centralised national database. The commission will need to explore partnerships with state institutions like the National Identity Management Commission (NIMC) to harmonise registered voters' existing records into the National Identity Management System. This creates a more transparent system and will address voter eligibility issues such as like underage and also checkmate multiple registration. In addition, it also supports the drive for a more wholesome and unified database on citizens in Nigeria. An integrated system, for instance, helps regulate the instances of multiple registrations of voters, early registration of voters on a truly continuous basis and the instances of underage voting.

Recommendations

1| Data-Driven Expansion of Access:

The process of expanding voter access to polling units must be informed and driven by data to ensure that decisions adopted truly addresses the challenges identified. INEC, amongst others, will need to revisit and review its voter's register database, refer to previous reports on the process, engage communities and stakeholders to assess needs and understand peculiarities of a region and review election data from earlier elections in its decision.

2| Conduct Internal Audit to ensure the Availability of Requisite Capacity:

INEC should commence a comprehensive internal audit through a SWOT analysis to identify capacity gaps, provide the right skill sets so as to guarantee a successful process. This audit should include assessing existing human resources, institutional capacity at all levels and additional resources required. This assessment will help the commission appreciate its

weakness, strengthen its implementation plan and seek the necessary support.

3| Adopting principles of Equality and Equity, Transparency and Integrity in the Exercise:

The commission should consider the balanced and fair distribution of the proposed additional polling units with clarity on principles applied.

4| Developing an Effective and Comprehensive Framework for Expansion of Voter Access to PU:

Beyond creating VP's and VPS, this will be the first (successful) attempt by the electoral commission to create additional polling units in line with its legal mandate since 1996. INEC should develop a comprehensive framework to ensure that a more institutional process for exercising the Commission's mandate of establishing sufficient polling units in Nigeria is

adopted. Such a framework should highlight specific rules and principles to guide the process of expanding polling units.

5| Stakeholder Partnership for Citizen Engagement and Targeted Communication:

INEC and stakeholders should invest in strategic awareness campaigns on the exercise. Regional and state by state sensitisation exercise should be considered as a strategy for engagement with citizens and voters as this will help inform the public about the planned addition of polling units and all the necessary measures that will be taken to make the process easier. This in turn will mobilise citizen's buy-in to the process and eliminates unnecessary apprehension from them.

6| A comprehensive audit of existing polling units:

INEC should conduct a thorough audit of the existing polling units as a vital step before converting VP's and VPS to polling units. This audit will provide context and location-specific information on existing polling units, especially concerning communities displaced due to natural disasters or insecurity and disability-friendly locations. The audit will also reveal locations where the polling units are only on paper and not conducive to serving as polling units.

7| Ensure that expanding voters' access to polling units is done through a Disability Lens:

the consideration for polling unit expansion must ensure a disability-based approach to ensure that polling units are accessible to persons with disability. It is over two decades of democracy in Nigeria, and yet we have elections conducted in polling units that are inaccessible for PWD's. We must learn to plan better for voters with a disability to ensure that no voter is left behind.

8| Adopting a Unified Data-Integration System:

The commission should update its voter register to address cases of transfer of registration and ensure integration of the voter's database to the National Identity Management System (NIMS).

9| Developing an Institutional Framework for Establishing Polling Units:

INEC should map out plans for phase by phase expansion of the polling units to indicate that the process is continuous to truly meet voters' access needs. There is a need to make projections on the commissions' future plans regarding polling units. The Commission should reel out a ten-year roadmap of polling unit creation and integrate the same into its

implementation policy, such expansion of voter access to PU's that it will hardly be interfered with, irrespective of successive leadership in the commission. Such a framework will provide minimum standards to guide the process and include a gender and disability checklist.

10|Developing Conflict Mitigation Mechanism:

The Commission should engage their risk management tool as the process commences to ensure immediate response to the risk concerning this process at different levels.

Conclusion

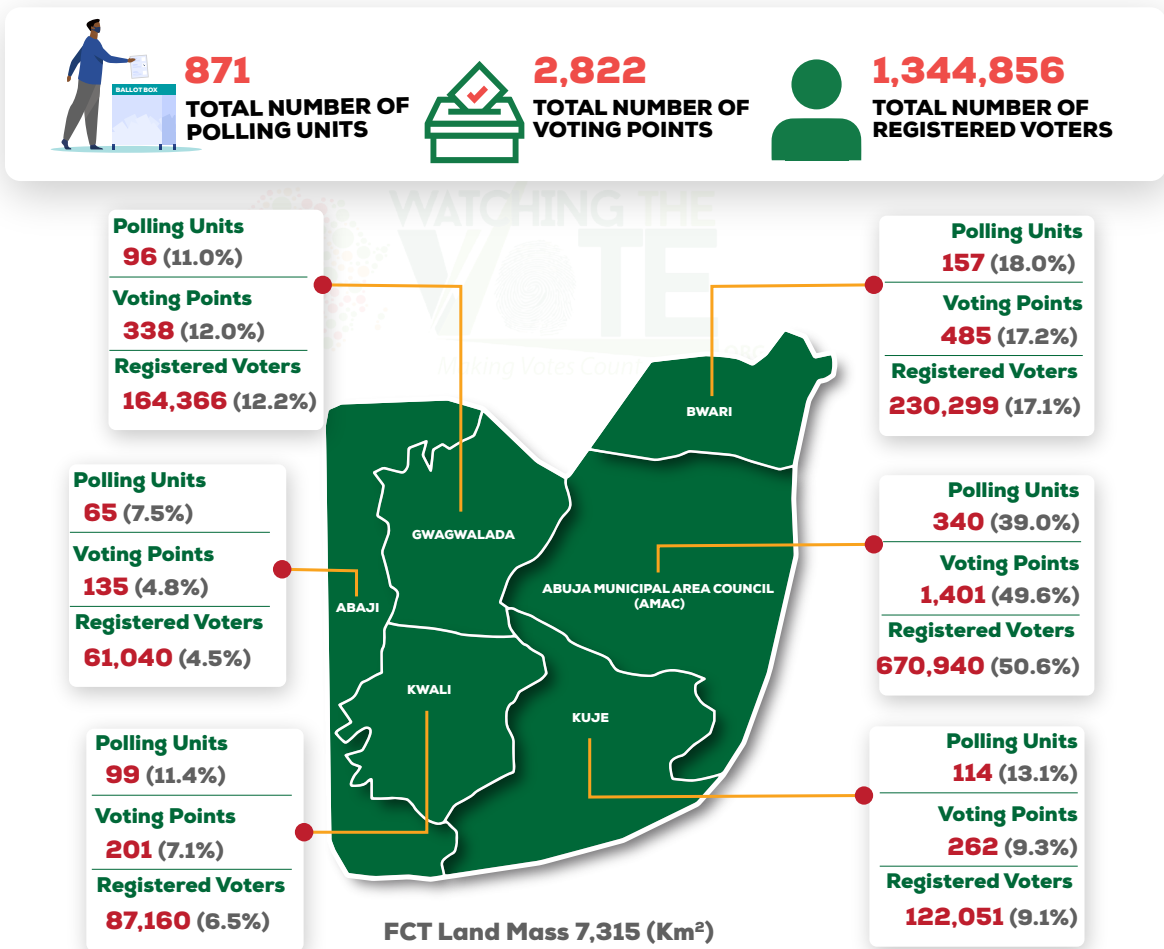
The contest of power has created a political scenario where decisions like the need to create polling units, though germane, are scrutinised through the lenses of regional, ethnic and sometimes religious politics. This challenge has led to the failure of previous efforts that have left our electoral process with this prolonged problem. The recent approach adopted by INEC to have several consultations at the Federal and state levels indicates the need to garner stakeholders support of the process. However, the success of this process will be determined by the ability of INEC to ensure that the process is fair, free, transparent and meets key standards of

integrity. In addition, the success of the process is not just dependent on INEC but will also be determined by the political will of political actors and political parties to support the process and the collaboration of the civil society and other stakeholders. Finally, the absence of credible official data on the national population has remained an enabler for poor governance and failure in national planning and poses a threat to sustainable development. This also impacts the quality of critical processes in Nigeria's election cycle and can no longer be ignored. The Federal government should as a matter of urgency commence the planning for a national census.

Appendix

Distribution of Polling Units, Voting Points and Registered Voters by Area Councils in Abuja

Image 1

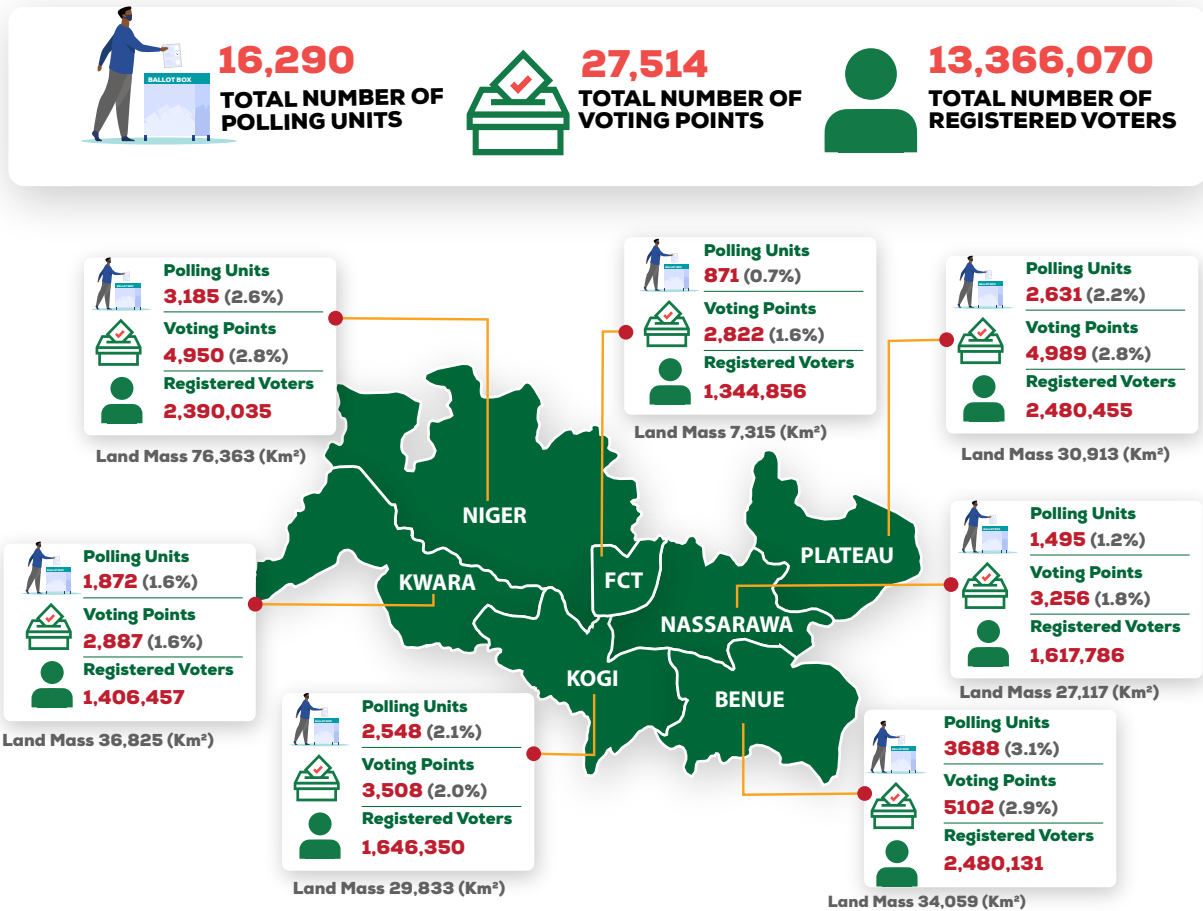


Data Source: INEC 2019 general elections polling units data
National Population Commission, April 2010, Population Distribution

PU includes both 562 PUs, and 309 Voting Point Settlements (VPSs) in the FCT

Distribution of Polling Units, Voting Points and Registered Voters by States in North Central, Nigeria

Image 2



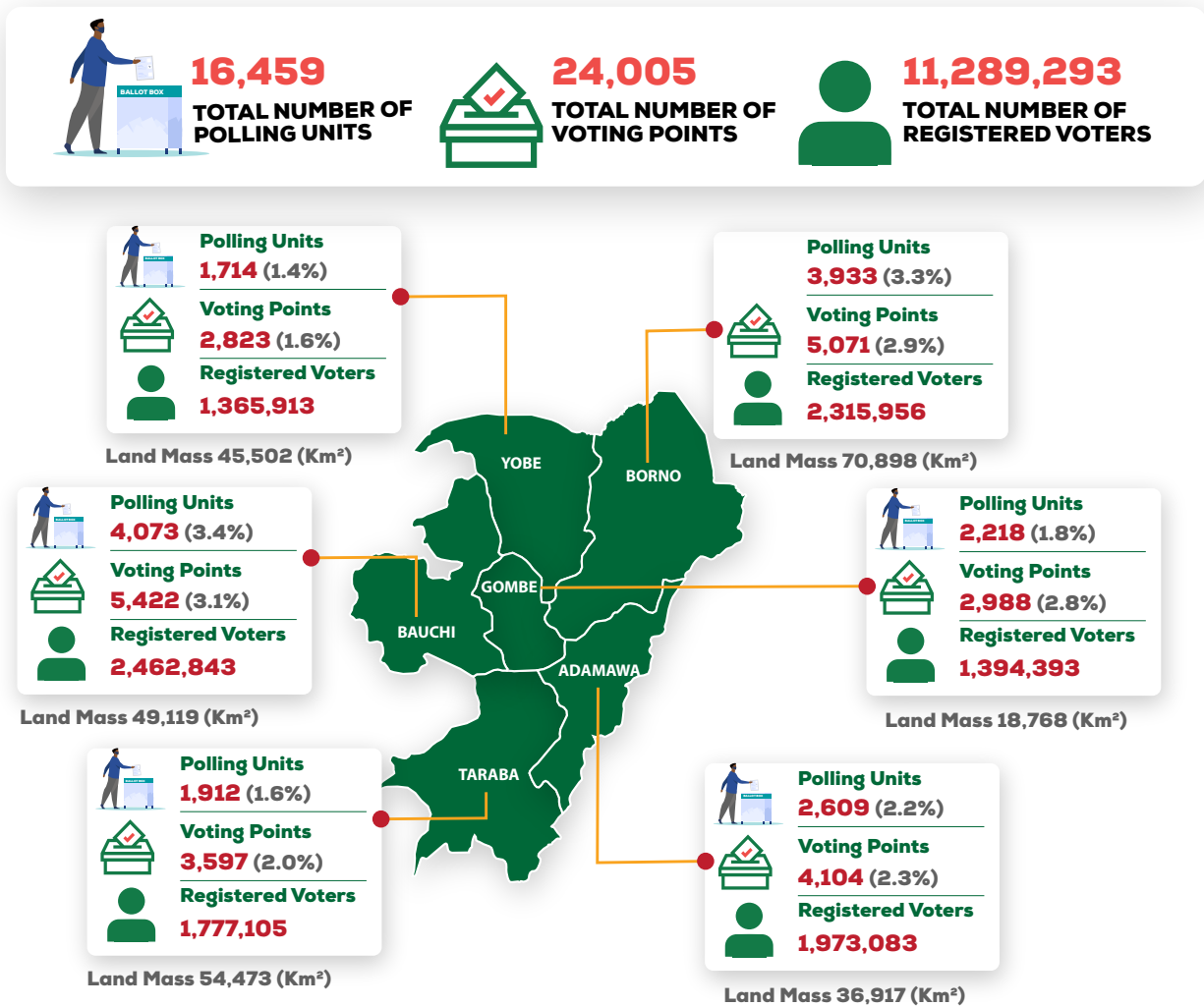
Data Source: INEC 2019 general elections polling units data
National Population Commission, April 2010, Population Distribution

Note: The PU includes both 16,290 PUs, and 27,514 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km²)	Reg. Voters
Benue	3688	3.1%	5102	2.9%	34,059	2,480,131
Kogi	2548	2.1%	3508	2.0%	29,833	1,646,350
Kwara	1872	1.6%	2887	1.6%	36,825	1,406,457
Nasarawa	1495	1.2%	3256	1.8%	27,117	1,617,786
Niger	3185	2.6%	4950	2.8%	76,363	2,390,035
Plateau	2631	2.2%	4989	2.8%	30,913	2,480,455
Fct	871	0.7%	2822	1.6%	7,315	1,344,856
Sub Total	16290	13.5%	27514	15.6%	242,425	13,366,070

Distribution of Polling Units, Voting Points and Registered Voters by States in North East, Nigeria

Image 3



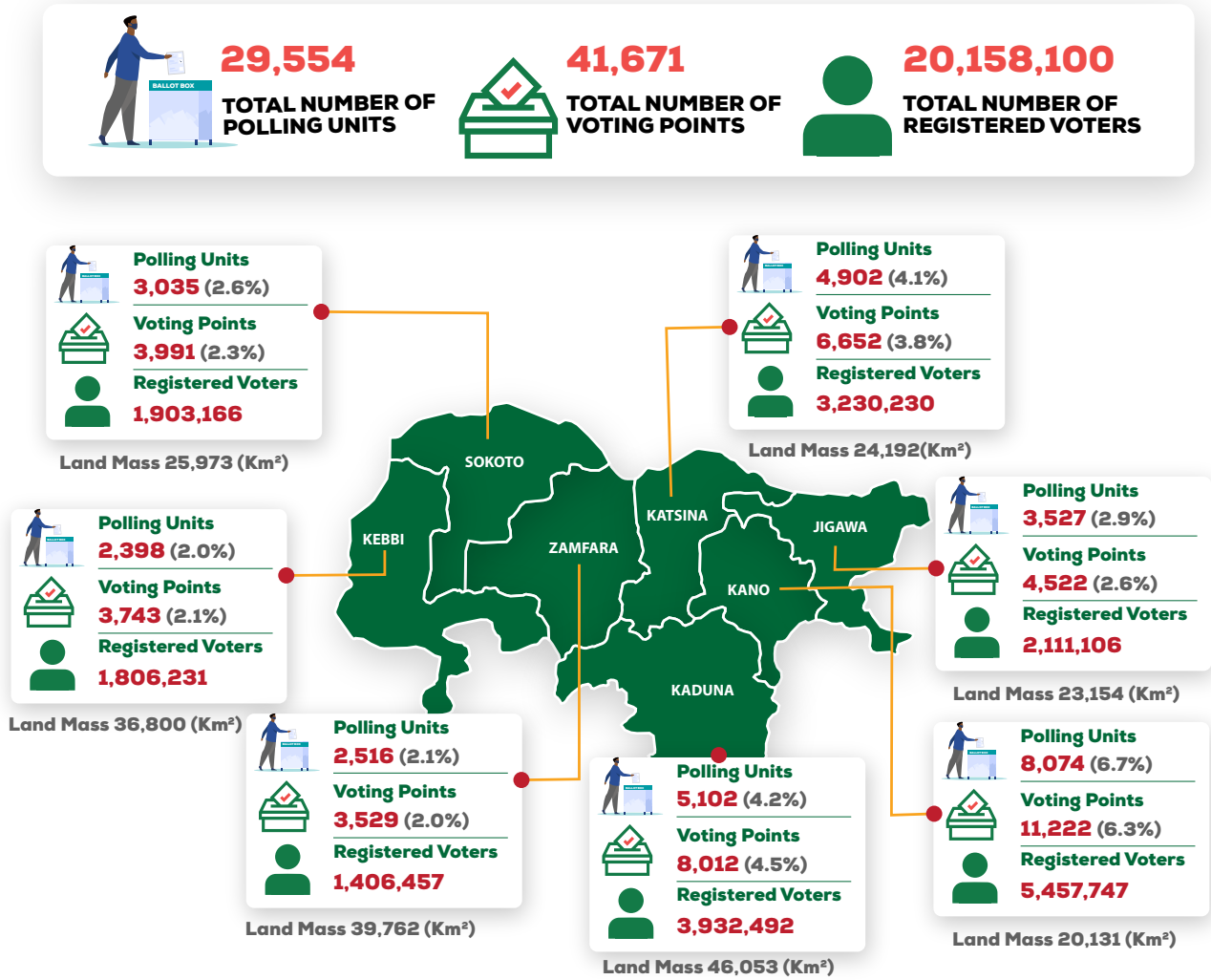
Data Source: INEC 2019 general elections polling units data
National Population Commission, April 2010, Population Distribution

Note: The PU includes both 16,459 PUs, and 24,005 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km ²)	Reg. Voters
Adamawa	2,609	2.2%	4,104	2.3%	36,917	1,973,083
Bauchi	4,073	3.4%	5,422	3.1%	49,119	2,462,843
Borno	3,933	3.3%	5,071	2.9%	70,898	2,315,956
Gombe	2,218	1.8%	2,988	1.7%	18,768	1,394,393
Taraba	1,912	1.6%	3,597	2.0%	54,473	1,777,105
Yobe	1,714	1.4%	2,823	1.6%	45,502	1,365,913
Sub Total	16,459	0	24,005	13.6%	275,677	11,289,293

Distribution of Polling Units, Voting Points and Registered Voters by States in North West, Nigeria

Image 4



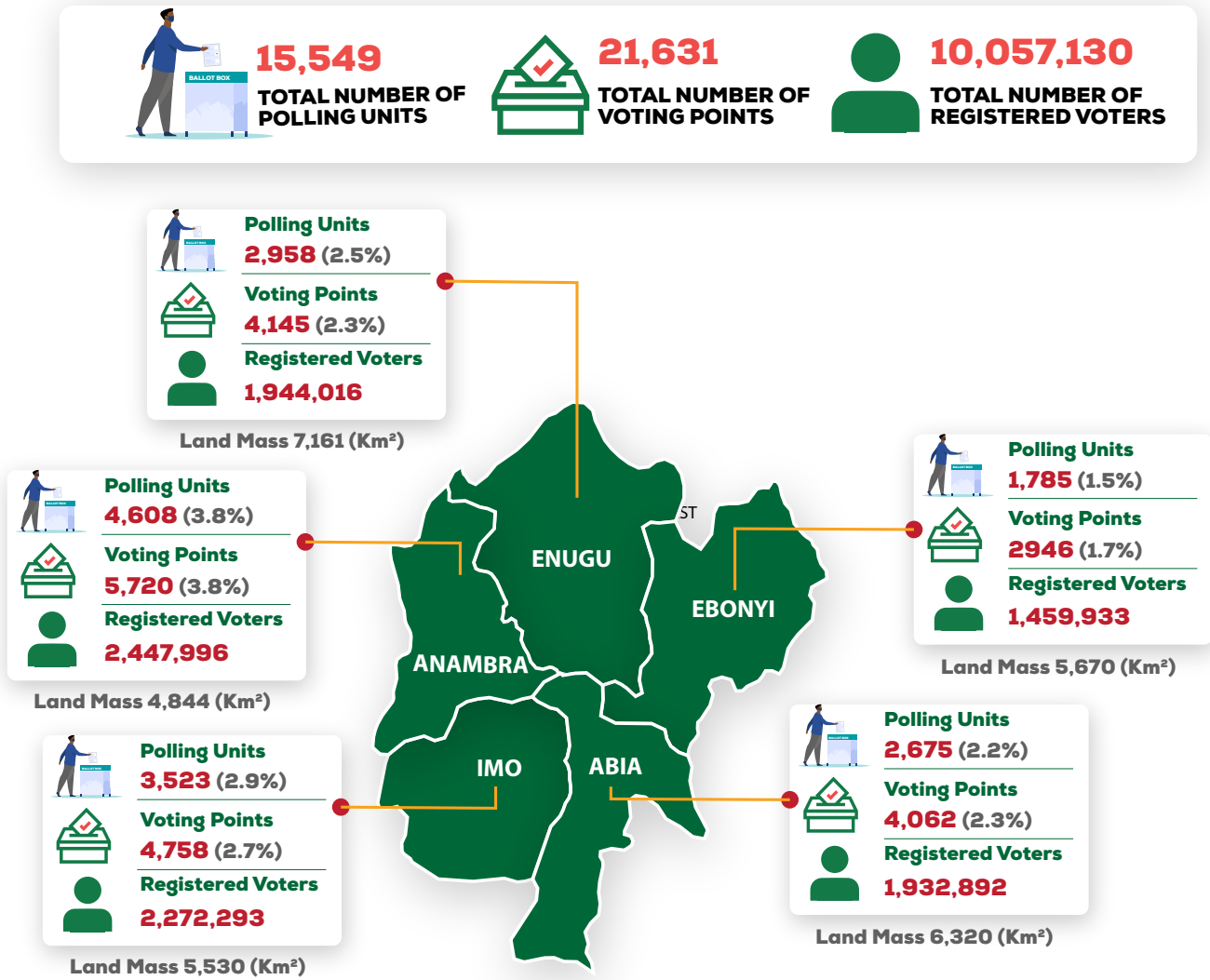
Data Source: INEC 2019 general elections polling units data
National Population Commission, April 2010, Population Distribution

Note: The PU includes both 29,554 PUs, and 41,671 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km ²)	Reg. Voters
Jigawa	3,527	2.9%	4,522	2.6%	23,154	2,111,106
Kaduna	5,102	4.2%	8,012	4.5%	46,053	3,932,492
Kano	8,074	6.7%	11,222	6.3%	20,131	5,457,747
Katsina	4,902	4.1%	6,652	3.8%	24,192	3,230,230
Kebbi	2,398	2.0%	3,743	2.1%	36,800	1,806,231
Sokoto	3,035	2.5%	3,991	2.3%	25,973	1,903,166
Zamfara	2,516	2.1%	3,529	2.0%	39,762	1,717,128
Sub Total	29,554	24.6%	41,671	23.6%	216,065	20,158,100

Distribution of Polling Units, Voting Points and Registered Voters by States in South East, Nigeria

Image 5



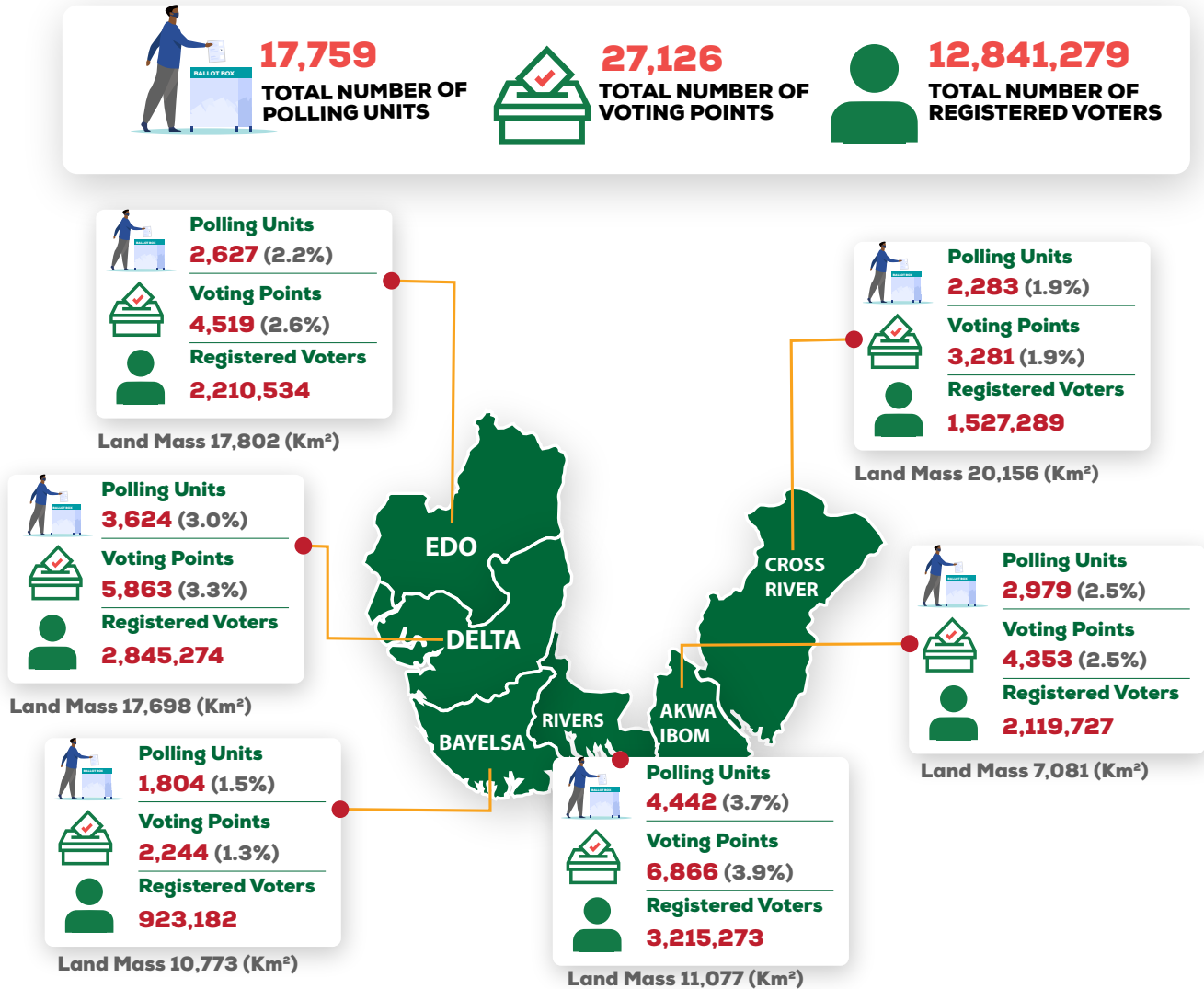
Data Source: INEC 2019 general elections polling units data National Population Commission, April 2010, Population Distribution

Note: The PU includes both 15,549 PUs, and 21,631 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km ²)	Reg. Voters
Abia	2675	2.2%	4062	2.3%	6,320	1,932,892
Anambra	4608	3.8%	5720	3.2%	4,844	2,447,996
Ebonyi	1785	1.5%	2946	1.7%	5,670	1,459,933
Enugu	2958	2.5%	4145	2.3%	7,161	1,944,016
Imo	3523	2.9%	4758	2.7%	5,530	2,272,293
Sub Total	15549	12.9%	21631	12.2%	29,525	10,057,130

Distribution of Polling Units, Voting Points and Registered Voters by States in South South, Nigeria

Image 6



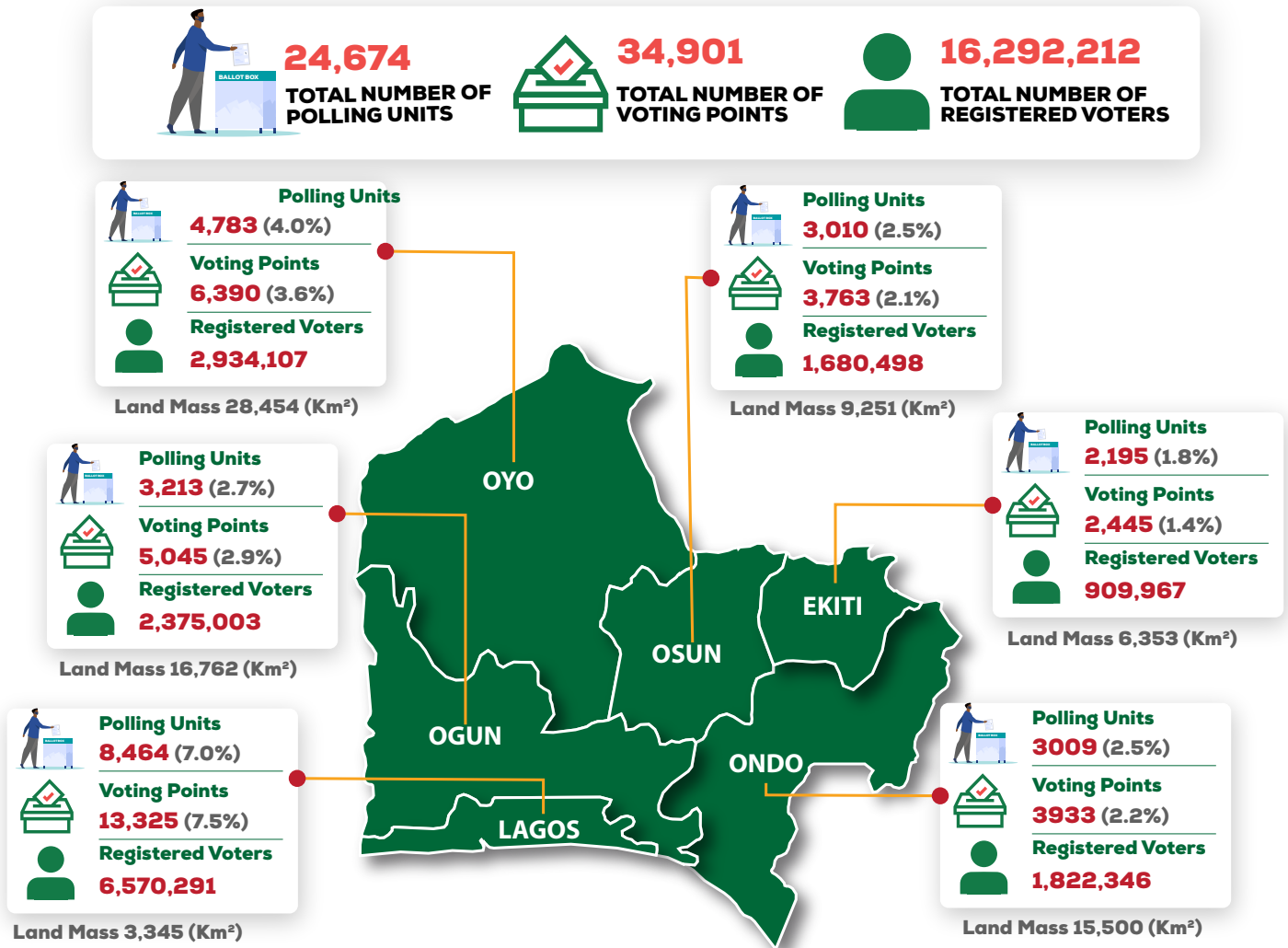
Data Source: INEC 2019 general elections polling units data National Population Commission, April 2010, Population Distribution

Note: The PU includes both 17,759 PUs, and 27,126 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km ²)	Reg. Voters
Akwa Ibom	2,979	2.5%	4,353	2.5%	7,081	2,119,727
Bayelsa	1,804	1.5%	2,244	1.3%	10,773	923,182
Cross River	2,283	1.9%	3,281	1.9%	20,156	1,527,289
Delta	3,624	3.0%	5,863	3.3%	17,698	2,845,274
Edo	2,627	2.2%	4,519	2.6%	17,802	2,210,534
Rivers	4,442	3.7%	6,866	3.9%	11,077	3,215,273
Sub Total	17,759	14.8%	27,126	15.3%	84,587	12,841,279

Distribution of Polling Units, Voting Points and Registered Voters by States in South West, Nigeria

Image 7



Data Source: INEC 2019 general elections polling units data
National Population Commission, April 2010, Population Distribution

Note: The PU includes both 24,674 PUs, and 34,901 Voting Points

State	No. PUs	% PUs	VP SUM	% VP SUM	Land Mass (Km ²)	Reg. Voters
Ekiti	2195	1.8%	2445	1.4%	6,353	909,967
Lagos	8464	7.0%	13325	7.5%	3,345	6,570,291
Ogun	3213	2.7%	5045	2.9%	16,762	2,375,003
Ondo	3009	2.5%	3933	2.2%	15,500	1,822,346
Osun	3010	2.5%	3763	2.1%	9,251	1,680,498
Oyo	4783	4.0%	6390	3.6%	28,454	2,934,107
Sub Total	24674	20.5%	34901	19.7%	79,665	16,292,212

Appendix 2: States and Locations with Voting Points between 15 and 30

S/N	Zone	STATE	SD	LGA	RA	PU	DELIMITATION	REGD. VOTERS	VOTING POINT(S)
1	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MARARABA GARAGE II	25/04/11/008	15,061	30
2	NC	KOGI	KOGI CENTRAL	AJAOKUTA	GANAGA/TOWNSHIP	LGEA SCH. GANAJA VILLAGE	22/02/14/009	13,425	27
3	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MASAKA GARAGE	25/04/11/012	13,082	26
4	NC	NASARAWA	NASARAWA WEST	KARU	ASO / KODAPE	ASO - OP	25/04/01/007	10,376	21
5	NC	NASARAWA	NASARAWA WEST	KARU	ASO / KODAPE	KODAPE PRI.SCHOOL - PB	25/04/01/001	10,136	20
6	NC	NASARAWA	NASARAWA WEST	KARU	KARU	NYANYAN GBAGYI PRI.SCHOOL	25/04/11/005	9,866	20
7	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MARARABA GARAGE I	25/04/11/007	10,214	20
8	NC	NASARAWA	NASARAWA WEST	KARU	KARU	BAKIN ADO PRI. SCHOOL	25/04/11/006	9,325	19
9	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MARARABA SHARP CORNER - OP	25/04/11/009	9,732	19
10	NW	KATSINA	KATSINA SOUTH	MALUFASHI	YABA	TSAUNIN CINYA - OPEN SPACE	20/25/03/009	9,128	18
11	SW	LAGOS	LAGOS WEST	IFAKO-IJAYE	IJU-OBAWOLE	OGUNDIMU PRY. SCH.	24/10/06/008	8,919	18
12	SW	OGUN	OGUN CENTRAL	OBAFEMI/OWODE	OFADA	O.O.L.G. SCHOOL, MAGBORO	27/15/02/010	8,806	18
13	SW	LAGOS	LAGOS WEST	ALIMOSHO	IGANDO/EGAN	2, AROWOJOYE STREET	24/03/06/017	8,353	17
14	SW	OGUN	OGUN CENTRAL	OBAFEMI/OWODE	OFADA	OPP. REDEMPTION CAMP	27/15/02/017	8,445	17
15	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MASAKA PRI.SCHOOL	25/04/11/011	8,153	16
16	SW	LAGOS	LAGOS CENTRAL	ETI-OSA	LEKKI/IKATE AND ENVIRONS	LEKKI SCHEME I - V	24/08/04/016	8,159	16
17	NC	FCT	FCT 2	MUNICIPAL	KABUSA	KABUSA/KABUSA PRI. SCH.	37/06/03/001	7,349	15
18	NC	NASARAWA	NASARAWA WEST	KARU	KARU	MARARABA WHITE HOUSE - OP	25/04/11/010	7,704	15
19	SS	RIVERS	RIVERS EAST	OMUMA	UMUOGBA II COMMUNITY	UMUROKE I COMMUNITY HALL	32/19/08/003	7,574	15
20	SS	RIVERS	RIVERS EAST	OMUMA	UMUOGBA II COMMUNITY	UMUROKE COMMUNITY HALL	32/19/08/004	7,401	15

Appendix 3: States and Locations with Voting Points between 14 and 10

S/N	Zone	STATE	SD	LGA	RA	PU	DELIMITATION	REGD. VOTERS	VOTING POINT(S)
1	SS	RIVERS	RIVERS EAST	ETCHE	IGBO I	UMUEBULU	32/11/03/008	6,827	14
2	SW	LAGOS	LAGOS EAST	IKORODU	ODOGUNYAN	WITHIN AGBEDE AG-BAJE VILLAGE	24/12/16/001	6,839	14
3	NC	FCT	FCT 2	BWARI	DUTSE ALHAJI	DUTSE ALHAJI I & II/ DUTSE PRIMARY SCHOOL	37/02/07/001	6,440	13
4	NC	FCT	FCT 2	MUNICIPAL	KABUSA	LUGBE II / LUGBE PRI. SCH.	37/06/03/009	6,553	13
5	NC	NASARAWA	NASARAWA WEST	KARU	KARU	NYANYA GWANDARA PRIMARY SCH.	25/04/11/013	6,687	13
6	NW	KADUNA	KADUNA CENTRAL	IGABI	RIGASA	ABUJA ROAD	18/04/12/005	6,728	13
7	NW	KADUNA	KADUNA CENTRAL	IGABI	RIGASA	LAST BUS STOP ADARAWA	18/04/12/011	6,717	13
8	NC	FCT	FCT 3	GWAG-WALADA	KUTUNKU	KUTUNKU I/ PRIMARY SCHOOL	37/03/02/001	5,856	12
9	NC	FCT	FCT 2	MUNICIPAL	KABUSA	LUGBE F.H.A. GATE	37/06/03/014	6,048	12
10	NC	FCT	FCT 2	MUNICIPAL	OROZO	OROZO/OROZO PRI. SCHOOL	37/06/09/001	5,939	12
11	NC	FCT	FCT 2	MUNICIPAL	KARU	JIKOYI/JIKOYI PRI. SCH.	37/06/10/014	6,209	12
12	NE	GOMBE	GOMBE CENTRAL	AKKO	GARKO	TUMPURE, K. J. TUMPURE	15/01/02/028	6,089	12
13	SS	RIVERS	RIVERS EAST	OBIO/AKPOR	WORJI	WORJI ESTATE	32/15/06/001	5,906	12
14	SW	LAGOS	LAGOS WEST	ALIMOSHO	IGANDO/EGAN	ISUTI ROAD AT ORORI B/STOP	24/03/06/009	6,144	12
15	SW	LAGOS	LAGOS EAST	IBEJU/LEKKI	P1, (IWEREKUN I)	PREMISES OF C.H.S. LAKOWE	24/09/06/004	5,979	12
16	NC	FCT	FCT 2	BWARI	BYAZHIN	BYAZHIN /BYAZHIN PRIMARY SCHOOL	37/02/08/001	5,339	11
17	NC	FCT	FCT 2	MUNICIPAL	WUSE	MAITAMA I/MODEL PRI. SCH.	37/06/04/026	5,616	11
18	NC	KOGI	KOGI WEST	LOKOJA	OWORO	FELELE AREA, FELELE LGEA SCH.	22/12/08/004	5,592	11

States and Locations with Voting Points between 14 and 10

S/N	Zone	STATE	SD	LGA	RA	PU	DELIMITATION	REGD. VOTERS	VOTING POINT(S)
19	NC	NASARAWA	NASARAWA	KARU	KARU	KARU PADA - OP	25/04/11/004	5,548	11
20	NW	KADUNA	KADUNA CENTRAL	CHIKUN	KAKAU	GONIN GORA I L.E.A PRY. SCHOOL	18/02/03/010	5,725	11
19	NC	NASARAWA	NASARAWA WEST	KARU	KARU	KARU PADA - OP	25/04/11/004	5,548	11
20	NW	KADUNA	KADUNA CENTRAL	CHIKUN	KAKAU	GONIN GORA I L.E.A PRY. SCHOOL	18/02/03/010	5,725	11
21	SE	ABIA	ABIA NORTH	ISUIKWUATO	UMUANYI / ABSU	ABIA STATE UNIVERSITY - UTURU	01/08/10/001	5,560	11
22	SS	EDO	EDO SOUTH	UHUN-MWODE	UMAGBAE SOUTH	EYAEN -EYAEN P/ SCHOOL	12/18/06/007	5,482	11
23	SS	RIVERS	RIVERS EAST	OBIO/AKPOR	RUMUEME (7A)	APAOGODO RUMUEPIRI KOM	32/15/09/006	5,301	11
24	SW	LAGOS	LAGOS WEST	BADAGRY	ILOGBO-ARAROMI	INSIDE ARAROMI/ ILOGBO SEC. SCH.	24/06/08/003	5,359	11
25	SW	LAGOS	LAGOS CENTRAL	ETI-OSA	ILADO/ETI-OSA AND	AJIWE VILLAGE	24/08/05/027	5,329	11
26	SW	LAGOS	LAGOS CENTRAL	ETI-OSA	ADO/LANGBASA/ BADOORE	BADORE PRY. SCH.	24/08/07/008	5,619	11
27	SW	OGUN	OGUN CENTRAL	IFO	COKER	ABULE OKE	27/07/10/009	5,417	11
28	NC	FCT	FCT 2	BWARI	USHAFA	USHAFA I & II/USHAFA PRIMARY SCHOOL	37/02/06/001	5,045	10
29	NC	FCT	FCT 2	BWARI	DUTSE ALHAJI	SAGWARI/SAGWARI	37/02/07/003	5,004	10
30	NC	FCT	FCT 3	KUJE	KUJE	SAUKA/ KOFAR SARKI	37/04/01/005	5,167	10
31	NC	FCT	FCT 2	MUNICIPAL	GWARINPA	UTAKO/UTAKO VILLAGE CENTRE	37/06/05/012	4,820	10
32	NC	FCT	FCT 2	MUNICIPAL	GWARINPA	GWARINPA/GWARINPA ESTATE I (FEDER-	37/06/05/023	5,224	10
33	NC	FCT	FCT 2	MUNICIPAL	OROZO	KURUDU/KURUDU PRI. SCH.	37/06/09/004	5,237	10
34	NC	KOGI	KOGI WEST	LOKOJA	LOKOJA - A	ADANKOLO NEW LAYOUT, OPEN SPACE	22/12/01/007	4,838	10

States and Locations with Voting Points between 14 and 10

S/N	Zone	STATE	SD	LGA	RA	PU	DELIMITATION	REGD. VOTERS	VOTING POINT(S)
37	NE	TARABA	TARABA NORTH	JALINGO	MAYO GOI	MODEL PRIMARY	34/07/06/004	5,188	10
38	SE	ABIA	ABIA CENTRAL	OSISIOMA	AMASATOR	UMUODE CIVIC CENTRE - UMUODE I	01/11/03/007	4,861	10
39	SS	CROSS RIVER	CROSS RIVER NORTH	OBUDU	IPONG	ST. THERERA'S PRIMARY SCHOOL KAKUM	09/14/04/003	5,023	10
40	SS	CROSS RIVER	CROSS RIVER NORTH	OBUDU	IPONG	BEBUABIE HEALTH CENTRE	09/14/04/009	5,157	10

 Data Source: INEC 2019 general elections polling units data

Acknowledgement

This Policy Brief was produced by the Yiaga Africa's Team led by Cynthia Mbamalu, Paul James, Safiya Bichi, Olusegun Ogundare and Samuel Folorunsho. Yiaga Africa is grateful for the review by Olufunto Akinduro.



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