



THE STATE OF VOTER ACCESS TO POLLING UNITS IN NIGERIA

Discussion Paper No. 1/2021



Contents

07

Background to the
Challenge of Voter
Access to Polling Units

18

Previous Attempts to
Expand Voter Access to
Polling Units

31

Need to Engage
with Stakeholders

39

Conversion of Voting
Points and Voting
Point Settlements to
Polling Units

41

Evidence from
Across the Country

52

Conclusion



Preface

Polling Units are central to the electoral process and therefore democracy at large. Voter access to Polling Units is at the very heart of electoral democracy because Polling Units are the basis on which citizens exercise their fundamental rights to vote and to make electoral choices freely. Consequently, Polling Units largely shape citizens' confidence in the electoral process, the levels of either participation or apathy, as well as security and safety during elections.

Voter access goes beyond the number of Polling Units available to voters. It also entails citing Polling Units in places that are conducive to voting as well as the extent to which the environment of each Polling Unit provides a good voter experience and implementation of the regulations and guidelines of the Commission on Election Day.

Over the years, voter access to Polling Units in Nigeria has been declining. For the 2019 General Election, the average number of voters per Polling Unit was about 700 nationally, rising to over 2,000 in the Federal Capital Territory while a specific Polling Unit in Nasarawa State had over 15,000 voters. Furthermore, some Polling Units are located in very difficult places that do not encourage voters to participate in elections, particularly persons living with disability. Others are located in places experiencing conflicts or in places under the control of partisan actors. Moreover, because of inadequate Polling Units, many voters have to travel long distances to their Polling Units on Election Day. All these have contributed to low voter turnout at elections, egregious violation of election regulations and guidelines, violence and insecurity. Crowding at Polling Units also constitute health and safety issues in this period of the global COVID-19 pandemic.

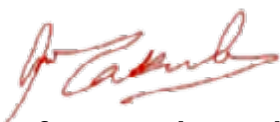
Repeated attempts by the Commission to expand voter access to Polling Units by establishing new ones and relocating some to better sites have not been successful. Consequently, the Commission resorted to stopgap measures such as the creation of "Baby Polling Units", Voting Points and Voting Point Settlements. All these have not adequately solved the problem and, in fact, in some cases have created new challenges of their own. The inability of the Commission to routinely expand voter access to Polling Units when necessary has been principally due to politicization of the process by sundry interests in the country, especially by propagating unfounded claims and conspiracy theories about the Commission's intentions. Delays arising from opposition to the establishment of Polling Units have meant that the process comes too close to elections and therefore is impossible to complete. Also, the level of consultation with stakeholders by the Commission may not have been adequate.

As the Commission enters a new electoral cycle (2019-2023), with some major upcoming activities such as the Continuous Voter Registration (CVR) and several off-cycle elections which will culminate in the 2023 general election, it decided to embark early enough on a major programme of engagement with stakeholders on expanding voter access to Polling Units ahead of the activities in the electoral calendar.

Therefore, this Discussion Paper is the Commission's framework for the planned engagement. Among other things, it presents the Commission's concerns about the worsening challenge of voter access to Polling Units, provides a historical background to this challenge, outlines some indicative issues to be addressed by the engagements and provides the Commission's thinking on how to solve the challenge of declining voter access to Polling Units in Nigeria.

As a Commission, we do not take the important contributions of stakeholders to the electoral process for granted. These engagements and this Discussion Paper are indeed a continuation of the commitment of the Commission to always listen to stakeholders and to do our best to carry them along in all cardinal issues of election management in Nigeria. Accordingly, this document should be seen not as an end in itself but as a means to an end for open, genuine and fruitful engagement with stakeholders in the electoral process.

I look forward to both the engagements with stakeholders and to rejoinders to this Discussion Paper in the best interest of our electoral process.



Professor Mahmood Yakubu

Chairman, INEC

Abuja, 26th January 2021

Introduction

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” (Section 156-interpretation). Consequently, Polling Units (PUs) constitute the basic structure of Nigeria’s electoral system and democracy. They are the nerve centres at which voters make contact with the Commission during elections. As such, it is exceedingly important that Polling Units are not only ready and conducive to receive voters, but that they are also well-organized and secure for the beehive of activities that occur in them on Election Day. Indeed, well-organized and efficiently run Polling Units are emblematic of the quality of the entire election ecosystem. Voter access to Polling Units is therefore fundamental to our elections and democracy at large. Over the years, several challenges have confronted INEC with Polling Units. First, there is the problem of inadequate number of Polling Units available to voters. As a result of population growth, demographic shifts and establishment of new settlements and residential areas, existing Polling Units have become inadequate. Since the law ties registration of voters and voting to specific Polling Units, it means that voters have to walk long distances on Election Day to vote. Often, they are not able to do so because of restrictions on movement.

Second, inadequacy of Polling Units implies that many of them are overcrowded during elections, which is a recipe for delays, disruptions, violence and apathy. To be sure, overcrowding varies from one area to another due to uneven growth in population. Still, practically all Polling Units have experienced increased population of voters. Thus, during the 2011 elections, most of the Polling Units saw turnouts exceeding the 500 voters designated per Polling Unit. In fact, a review carried out by the commission in 2014 revealed that many Polling Units recorded very large number of voters. Some had exceeded the designated figure of 500 voters per Polling Unit by a couple of thousands while some had over 4,000 registered voters. These huge numbers pointed to the urgency of reorganizing Polling Units.

Third, the location of some of the Polling Units make access very difficult. For instance, some are located in very physically inaccessible locations, particularly for persons living with disability. And, at least until recently, some were even located in the homes of important people and religious groups, who often have political leanings capable of discouraging some voters from voting. Also, some Polling Units are located in highly charged and contested areas, including areas experiencing communal conflicts.



Fourth, there is the problem of organization of Polling Units. This is related to location. Many of them are in the open, with little cover. Others have inadequate space to cater for the official schema for organizing Polling Units. As a result, arrangement of Polling Units during elections to facilitate voting is difficult to achieve. For example, this has been conducive to vote-buying whereby voters are able to reveal their choices to “party agents” to enable them to consummate the buying and selling of votes. This particular problem has become even more serious in the context of the COVID-19 pandemic because the constricted spaces available at Polling Units do not support the necessary social distancing recommended by health authorities.

Finally, even the actual number and exact locations of Polling Units were unknown for a long time. The Jega Commission (2010 – 2015) had to embark on a verification exercise to enumerate and locate the Polling Units. In fact, it was only after this verification that the number of Polling Units was established as 119,973, instead of the round figure of 120,000 that was assumed for many years.







Background to the Challenge of Voter Access to Polling Units

The Polling Unit is the lowest level of the electoral structure in Nigeria. As such, it is probably the most critical point in delivering qualitative elections. Polling Units aggregate into Registration Areas (Wards in the Federal Capital Territory) and, subsequently, into constituencies. The Independent National Electoral Commission (INEC) is empowered by the Electoral Act 2010 (as amended) to establish adequate number of Polling Units in the country and assign voters to them. Specifically, Section 42 of the Act provides that: ***'The Commission shall establish sufficient number of Polling Units in each Registration Area and***

allot voters to such Polling Units.'

However, voter access to Polling Units is not exclusively about their sufficiency because availability may in fact not guarantee access. The suitability of the locations of Polling Units is also very important in determining voter access to them. Consequently, the Commission has chosen to address both the establishment of sufficient Polling Units and their location in good accessible places.

For instance, it has been the policy of the Commission that as far as practicable, Polling Units are to be located in:

-  Public places, preferably centrally located and accessible.
-  Non-partisan, non-sectarian locations such as schools, town halls, etc.
-  Spacious facilities to cater for adequately sitting election officials, political party agents, election observers and voters, if necessary.
-  Adequately sheltered/covered locations such as classrooms and halls.
-  Locations that can take several Polling Units, if required.
-  Locations that can be easily secured.



“The Commission shall establish sufficient number of Polling Units in each Registration Area and allot voters to such Polling Units.”

Section 42 of the Electoral Act 2010 (as amended)

Also, the Commission does not encourage the location of Polling Units in private compounds, royal palaces, government houses, political party buildings, or facilities that are in dispute, as well as very isolated or inaccessible locations such as forests or shrines. Consequently, by voter access to Polling Units we designate three things: first, it means adequacy of Polling Units, which has to do with establishment of Polling Units under Section 42 of the Electoral Act 2010 (as amended). Second, location of Polling Units in places that are conducive for voters to participate freely in the process. Third, ensuring that the environment at specific Polling Units is conducive to good voter experience, implementation of Commission's guidelines on organizing Polling Units, as well as adequate security and safety of voters, especially in the context of the COVID-19 pandemic. As a result, the Commission prefers to talk of voter access to Polling Units given the fact that accessibility to voting locations

as guaranteed in the electoral legal framework, is a democratic right for all citizens. In other words, the intent of the Commission is best captured by expanding access to Polling Units, rather than just the establishment of Polling Units, which is more limited in scope.

The current configuration of 119,973 Polling Units was established by the defunct National Electoral Commission of Nigeria (NECON) in 1996. In the nearly 25-year period since then, every attempt to review or reconfigure the Polling Unit structure has been unsuccessful for sundry reasons. Consequently, the 1996 Polling Unit configuration was used for the 1999, 2003, 2007, 2011, 2015 and 2019 General Elections. When the Polling Unit structure was established in 1996, it was projected to serve about 50 million registered voters. However, the number of registered voters for the 1999 General Election was 57.93 million. This rose to 60.82 million in 2003, 61.56

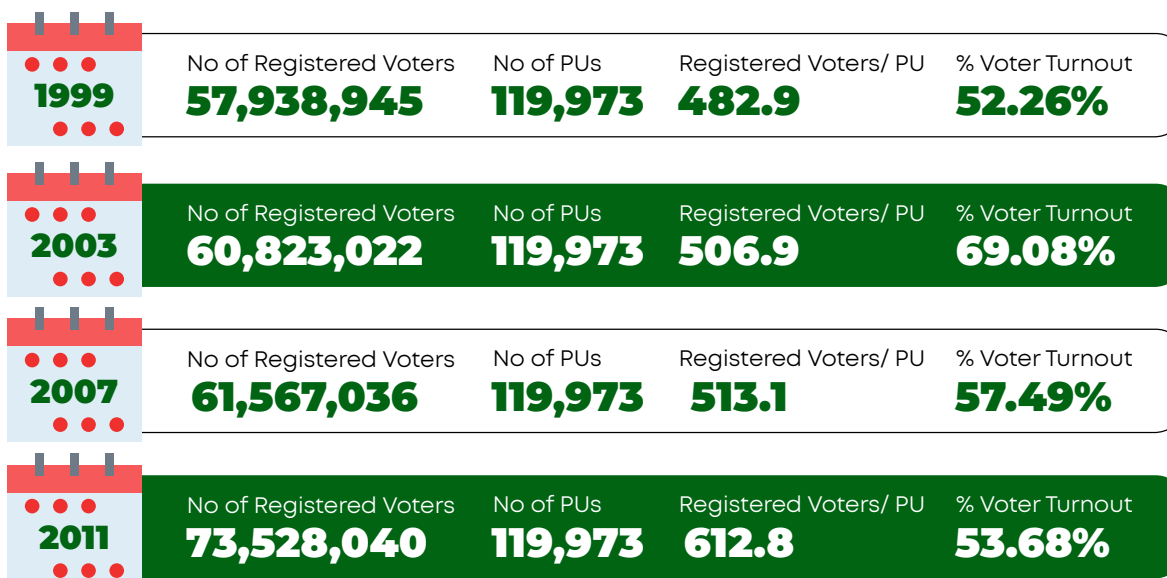
“The current configuration of 119,973 Polling Units was established by the defunct National Electoral Commission of Nigeria (NECON) in 1996.”



million in 2007 and 73.52 million in 2011. Although the number declined to 68.83 million for the 2015 General Election following the cleaning up of the register through the use of Automated Fingerprints Identification System (AFIS) to eliminate double registrants, it rose to 84.04 million in 2019 as a result of the Commission embarking on a robust continuous voter registration exercise, as prescribed by law. The import of this development is that while the number of registered voters increased from 57.93 million in 1999 to 84.04 million in 2019, which is an increase of 45 percent, the number of Polling Units remained the same. This lack of correlation between the number of registered voters and the number of Polling Units since 1999 has resulted in congested Polling Units

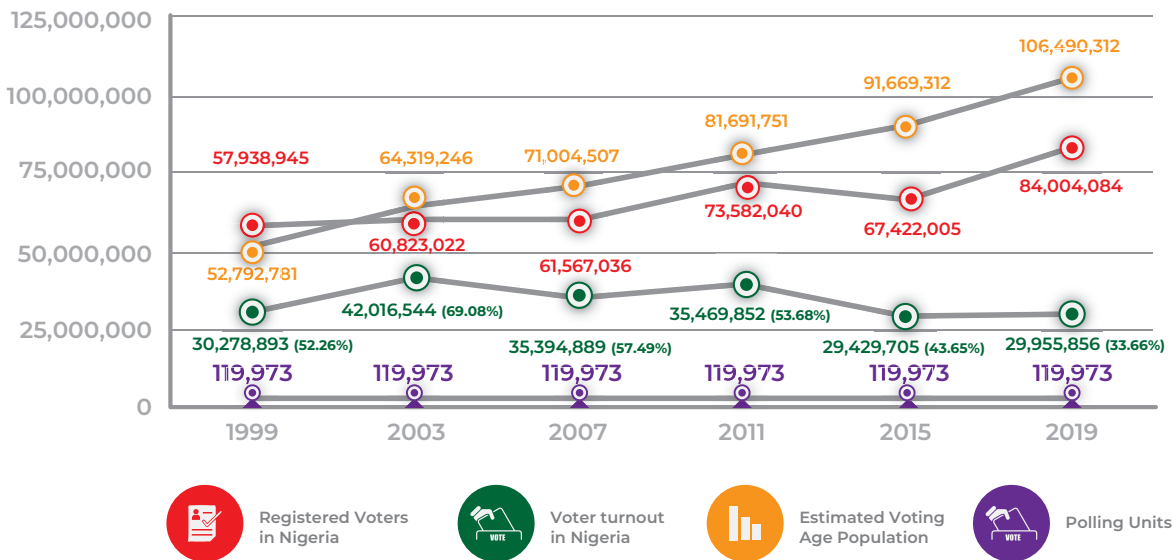
on Election Day and lack of Polling Units in many developing suburban and newly established settlements. The effects have been low voter turnout and voter apathy, insecurity at the Polling Units, disruption of elections and, in the context of the COVID-19 pandemic, unsafe voting environments. Indeed, presently, the average number of voters per Polling Unit in Nigeria, which stands at 700, is 37% more than the situation in Ghana. Yet, this could be quite misleading because in some States in Nigeria, the average number of voters per Polling Unit is well over 4,000. Indeed, in one Polling Unit, Mararaba Garage II in Karu Local Government Area of Nasarawa State, there are 15,061 voters, which is more than 2000% above this national average.

Registered Voters and Access to Polling Units in Nigeria 1999 – 2019



2015	No of Registered Voters 67,422,005	No of PUs 119,973	Registered Voters/ PU 561.9	% Voter Turnout 43.65%
2019	No of Registered Voters 84,004,084	No of PUs 119,973	Registered Voters/ PU 700.1	% Voter Turnout 35.66%

Registered Voters and Access to Polling Units in Nigeria 1999 – 2019



*Nigeria has maintained the same number of polling units since 1999 despite shifts in voting population and number of registered voters.

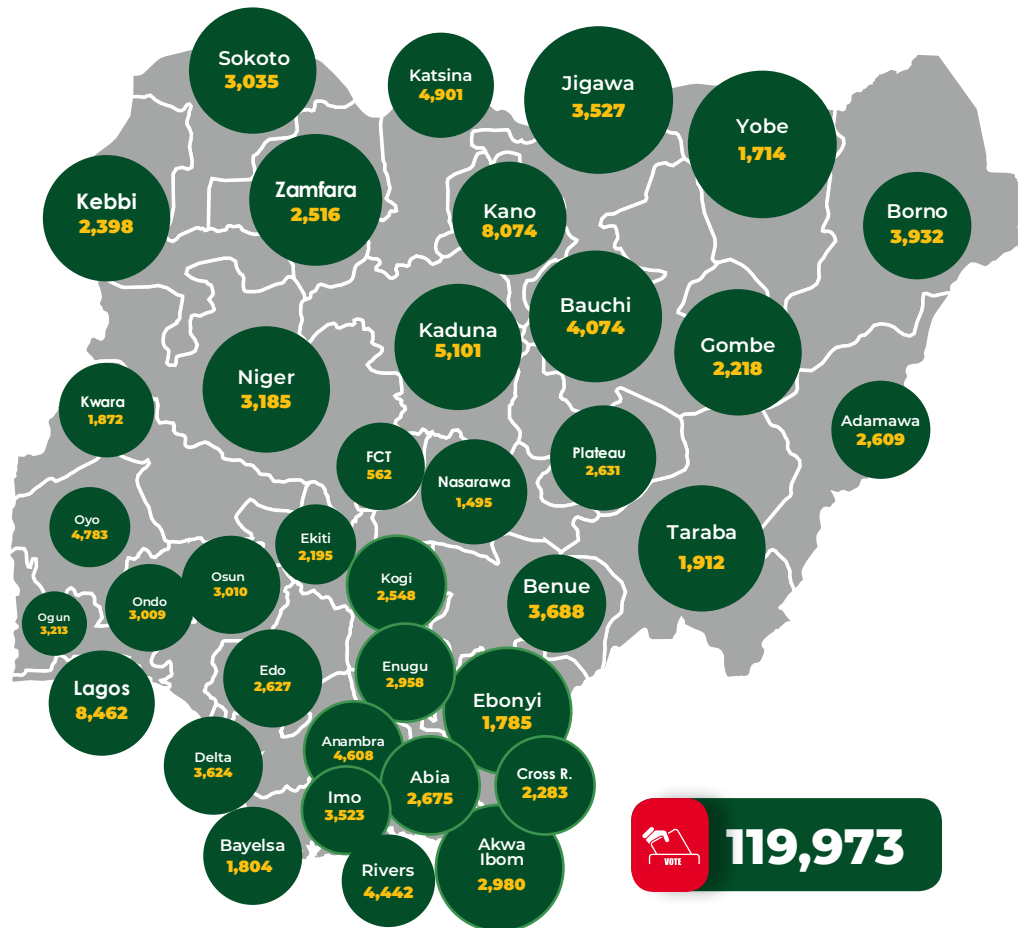


Number of Registered Voters per State

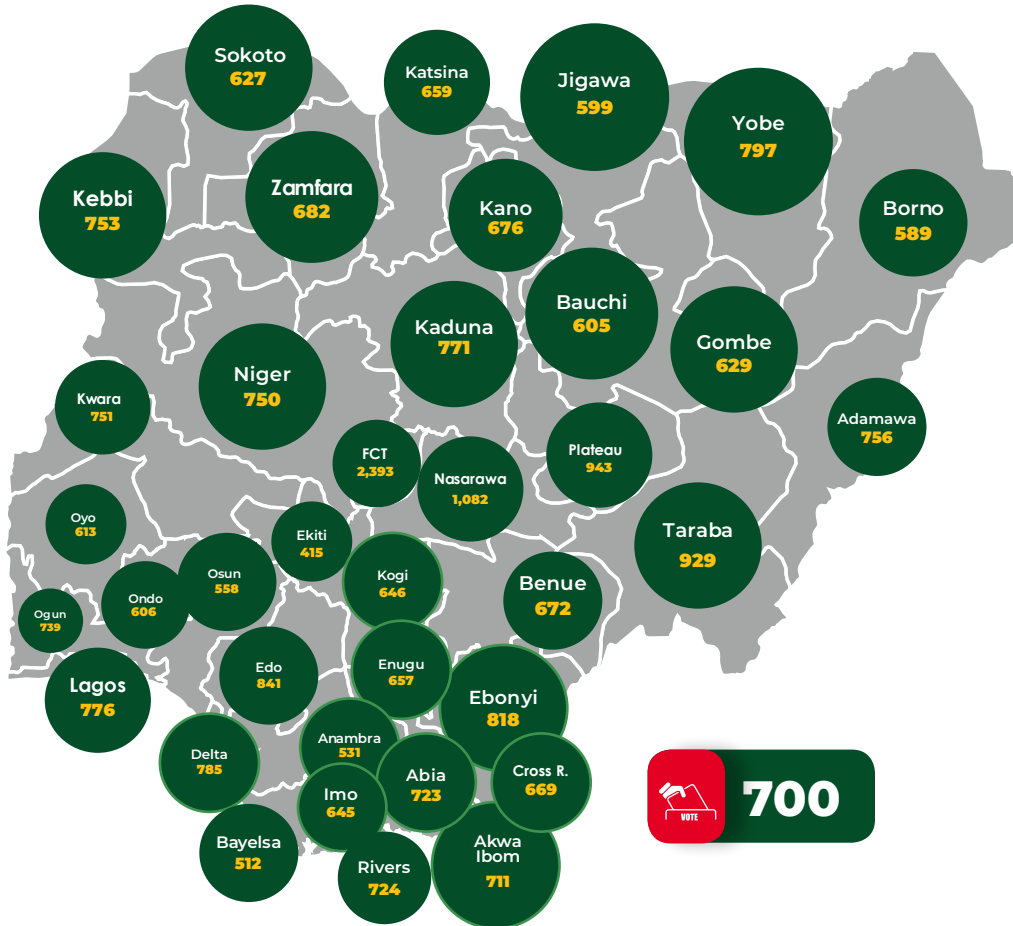


 **84,004,084**

Number of Polling Units per State



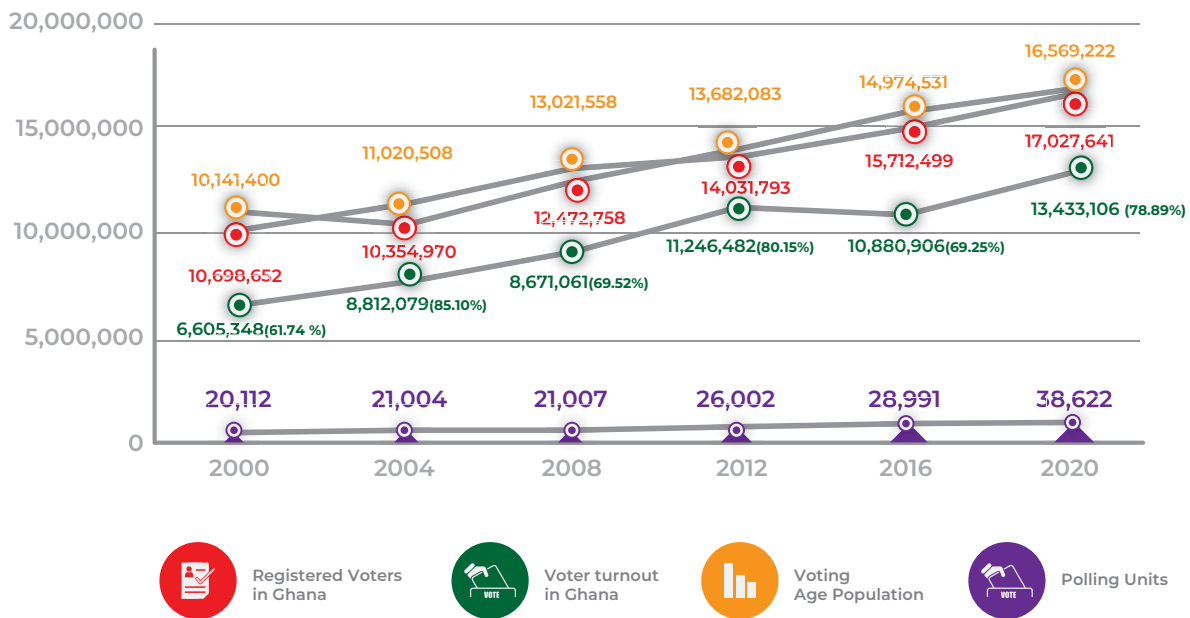
Number of Voters per PU per State



Registered Voters and Access to Polling Station in Ghana 2000 – 2020

Year	Est. Total Population	Est. Voting Age Population	No of Registered Voters	No of PS	Registered Voters/ PU	% Voter Turnout
2000	20,000,000	10,141,400	10,698,652	20,112	532	61.74 %
2004	22,000,000	11,020,508	10,354,970	21,004	493	85.10 %
2008	22,000,000	13,021,558	12,472,758	21,007	594	69.52 %
2012	25,824,920	13,682,083	14,031,793	26,002	540	80.15 %
2016	28,308,301	14,974,531	15,712,499	28,991	542	69.25 %
2020	30,000,000	16,569,222	17,027,641	38,622	441	78.89 %

SOURCE: R & M Department, Ghana Electoral Commission, January 2021



**In Ghana, as voting population and the number of registered voters increases, additional polling stations are created*



As a result of population growth and establishment of new settlements and residential areas, existing Polling Units are increasingly inadequate to guarantee sufficient access to voters. The present ecosystem of Polling Units in Nigeria has been conducive to overcrowding during elections, which is a recipe for delays, disruptions, violence and apathy. In addition, some Polling Units are located in inaccessible locations, some in the homes of persons with political leanings and others in areas of communal conflicts. Many of them are in the open, with little cover, thus exposing voters, election staff and election materials to the elements. This situation has adverse effects on the overall conduct of elections. For instance, the Commission has established that when the Smart Card Reader is exposed to glaring sunshine during accreditation of voters, its overall performance declines substantially. As the Commission works towards introducing full electronic voting in the

near future, the sensitive equipment that will drive it will be undermined if Polling Units remain as they largely are presently.

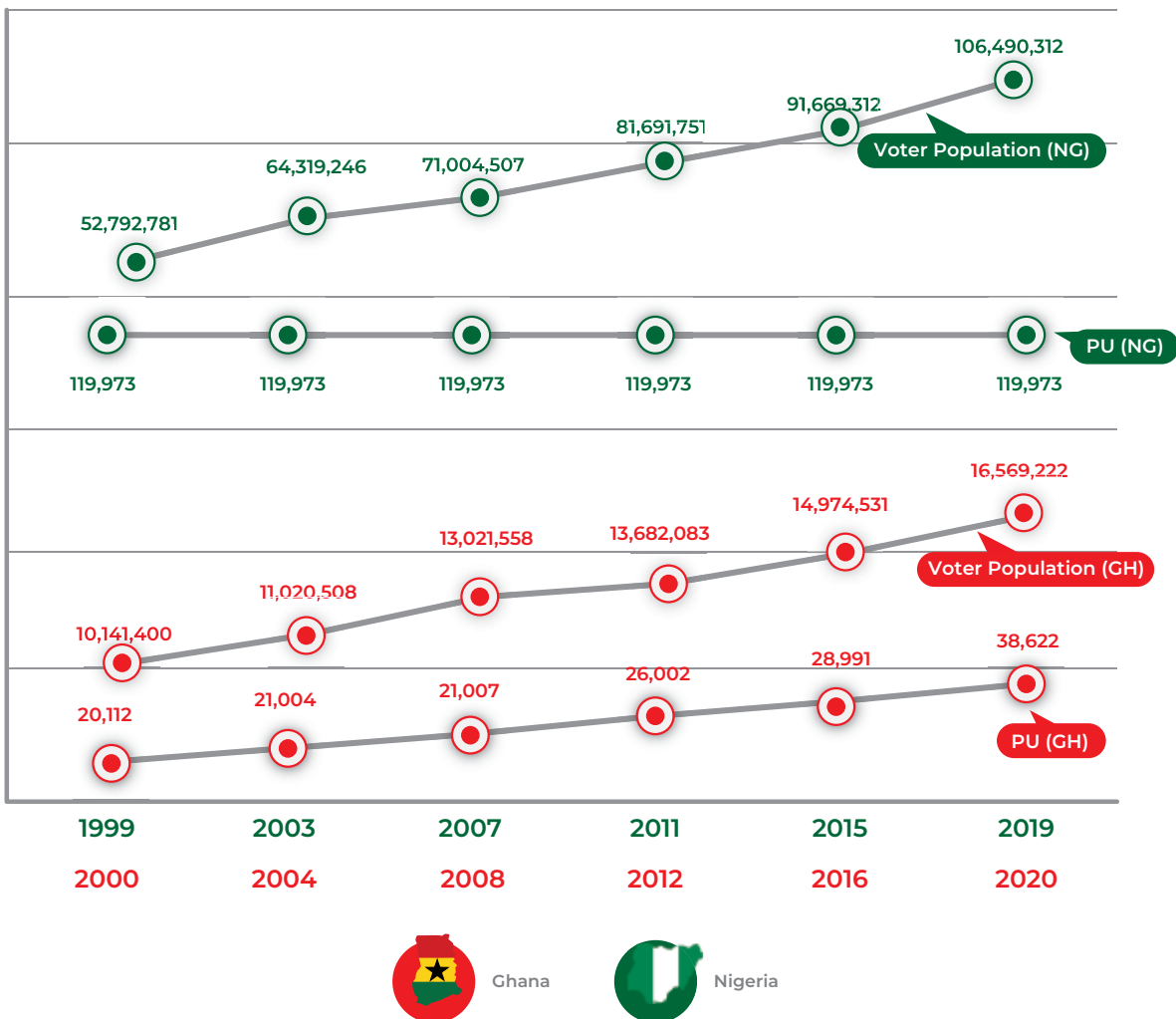
The problem of voter access to Polling Units has far reaching implications for the quality of elections and democracy in Nigeria. For one thing, it is tied to a most fundamental aspect of democratic governance which is the right to vote. This fundamental right will be empty if voters do not have the requisite access to Polling Units. For another thing, inadequate access to Polling Units is conducive to declining participation in elections among Nigerians. As a system built on majority rule, electoral democracy requires that as large segments of the population as possible, who are legally permitted, participate in choosing those who govern them. That is the reason voting is compulsory in countries such as Australia, Luxemburg, Uruguay, Costa Rica and Belgium, while in New Zealand, enrolment to vote is

“The problem of voter access to Polling Units has far reaching implications for the quality of elections and democracy in Nigeria. For one thing, it is tied to a most fundamental aspect of democratic governance which is the right to vote.”

compulsory. In addition, declining voter access to Polling Units, which correlates strongly with violence in Polling Units, also impacts negatively on democracy. Besides, the quality of elections would remain a challenge if Polling Units are disorganized, rowdy and prone to violence. The situation whereby Polling Unit results are hotly contested and sometimes destroyed by contending

political thugs, is not unrelated to the poor conditions. It is in consideration of such disruptions, which includes snatching of ballot boxes and Smart Card Readers, destruction of Polling Unit results, violent attacks on election staff and rampant vote-buying that the Commission has made repeated attempts to “sanitize” Polling Units.

Polling Units/Polling Station & Voter Population in Nigeria & Ghana 1999 – 2019



Previous Attempts to Expand Voter Access to Polling Units

The Commission had in the past made several attempts to address the challenge of expanding voter access to Polling Units with varying degrees of success. In 2007, it created for the rapidly growing Federal Capital Territory of Abuja, what became popularly known as Baby Units. They were offshoots of existing Polling Units, which were located in areas of need. At the end of polling, the results were moved back to the Mother Units for integration. It is not surprising that results from the Baby Units became contentious during integration with accusations of manipulation by candidates and parties who performed poorly. Subsequently, the Baby Units solution was abandoned.

In 2011, the Commission introduced Voting Points by grouping voters in

large Polling Units into smaller clusters to make voting easier. This has become widely accepted by Nigerians and has remained in use to date. However, these Voting Points are still in the same location and thus have not addressed the issue of congestion of Polling Units. Many voters still have to travel long distances to get to their Polling Units and Voting Points during elections. The Commission's investigation suggests strongly that this has been a major contributory factor to low voter turnout during elections. Several voters are not able to travel the distances to their Polling Units because of restriction of movement on Election Day. Consequently, for Voting Points to be more useful, they have to "go closer to voters, rather than voters going to them". There is a general correlation between access to Polling Units and

“In 2007, it created for the rapidly growing Federal Capital Territory of Abuja, what became popularly known as Baby Units. They were offshoots of existing Polling Units, which were located in areas of need.”

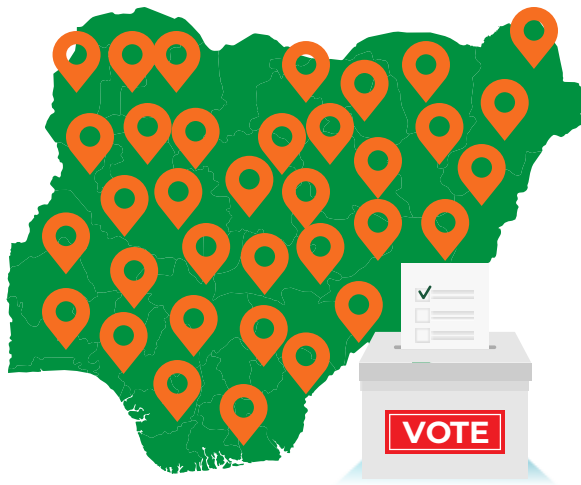
voter turnout in elections. As average number of registered voters per Polling Unit has increased, voter turnout has generally decreased. In Ghana, we see that average number of voters per Polling Unit has plateaued between 500 and 600 voters and this has enabled a steady rise in voter turnout between 2000 and 2020.

In 2014, in the build-up to the 2015 general election, the Commission proposed the “creation and distribution” of “additional 30,027 new Polling Units”. This was with the objective of decongesting overcrowded Polling Units and dispersing voters as evenly as possible to prevent disruptions, delays and violence on Election Day. Furthermore, the exercise was aimed at a spatial distribution of voters, the relocation of Polling Units from unsuitable places to more suitable places and the location of Polling Units within reasonable commuting distances of voters. But the effort was jettisoned as a result of unfounded allegations by various political interest groups and the negative propaganda from some sections of the Media. For instance, the Commission was accused of engaging in a “disproportional distribution of Polling Units in Nigeria aimed at fostering the dominance of one section of the country over the others for political advantage.” Eventually, the Commission reverted to the use of Voting Points for the 2015 General Elections.

“In 2014, in the buildup to the 2015 general election, the Commission proposed the “creation and distribution” of “additional 30,027 new Polling Units”. This was with the objective of decongesting overcrowded Polling Units and dispersing voters as evenly as possible to prevent disruptions, delays and violence on Election Day.”



“The Voting Points and Voting Point Settlements have been used for three electoral cycles and they have been widely accepted.”



57,023

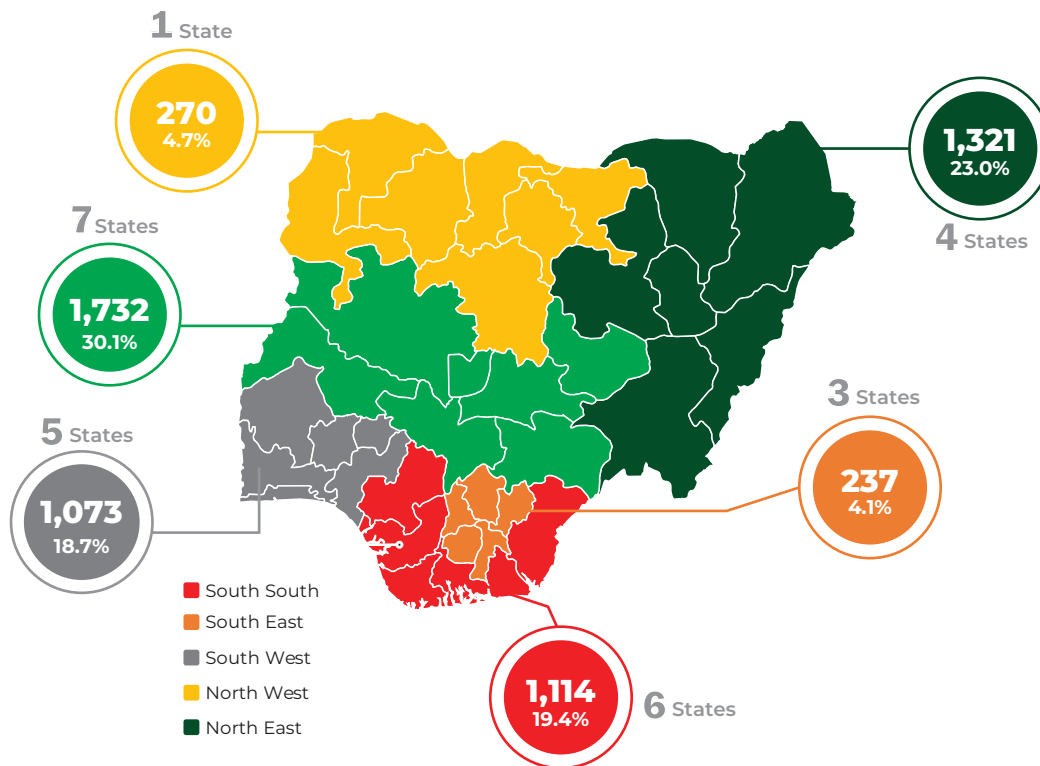
Voting Points and Voting Points Settlements were created out of congested Polling Units with each serving a maximum of 750 voters, as a means of improving the accessibility of electoral services to voters.

In April 2016, during the Area Council elections in the Federal Capital Territory, Abuja the Commission created what it called Voting Point Settlements. These entailed the creation of Voting Points in several new and unserved settlements in the FCT, following the Continuous Voter Registration (CVR) conducted in preparation for the Area Council elections. Voting Point Settlements are treated in the same manner as Polling Units, each with its own specialized identification code. However, for purposes of collation, their results are integrated into the nearest Polling Units. The Voting Points and Voting Point Settlements have been

used for three electoral cycles and they have been widely accepted. For the 2019 general elections, 57,023 Voting Points and Voting Point Settlements were created out of congested Polling Units with each serving a maximum of 750 voters, as a means of improving the accessibility of electoral services to voters.

Still, these solutions are stopgap in nature and have not adequately addressed the challenges already noted. In fact, sometimes they created new challenges. For instance, the Voting Points, though useful, created new challenges of their own, not the

Requests for Polling Units by Geopolitical Zones as at October 2020



least the problem of “collating” their results into a single Polling Unit result. Often, there was mutilation of the Form EC8A, given the tense atmosphere in which staff worked as they sought to collate from the Voting Point Results (EC8A [VP]). An even more important legal issue arose regarding Section 53 (2) of the Electoral Act on over voting. The use of Voting Points created the possibility of voiding the result of an entire Polling Unit due to over voting in one Voting Point. This obviously made it easier for persons who desire to make an election inconclusive to have the result of an entire Polling Units voided by simply orchestrating over voting in a singly Voting Point.

A clear evidence that these stopgap measures have not solved the problem of voter access to Polling Units is that from the period between the last two general elections until the present, the Commission has received a total of 5,747 requests from communities and groups across the country for the establishment of Polling Units in their areas. Table 1 gives a breakdown of these requests (as at October 2020) by State and Local Government Area, as well as the main reasons for the requests. The Table shows a number of things. First, the requests cut across the entire country. This clearly indicates that the dwindling voter access to Polling Units is a national problem,



rather than sectional. By implication, the establishment of more Polling Units will be beneficial to voters all over the country, contrary to conspiracy theories that some parts of the country would be favoured or disfavoured. Secondly, in the 5,747 requests received from 24 States and the Federal Capital Territory, population growth, difficult terrain and new settlements were the main reasons given for the requests. These point to the fact that perhaps the most important cause of declining access to Polling Units is the nonavailability of Polling Units, which leads to overcrowding in the few available ones. Finally, these requests do not actually capture the totality of States and localities in need of more Polling Units. This is understandable

because sending such requests to the Commission entails a level of organization. In fact, a good number of requests came from organizations representing communities. In several urban areas, such organization and coordination are lacking, which makes it difficult for them to organize to make formal requests for more Polling Units. For instance, it is instructive that there has been no request from Mararaba, an area in Nasarawa State which is also a suburb of the Federal Capital Territory, where the Polling Unit with the highest number of registered voters in the country is located. In fact, two Polling Units named Mararaba Garage I and Mararaba Garage II have between them 25,275 voters.

“In fact, a good number of requests came from organizations representing communities. In several urban areas, such organization and coordination are lacking, which makes it difficult for them to organize to make formal requests for more Polling Units.”

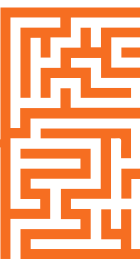
TABLE 1: Requests for Polling Units Received by the Commission

S/N	State	LGA	Number of PUs requested	Main Reason(S) For Request	State Totals
1.	Abia	Ikwuano	9	Difficult Terrain; Increased Population	79
		Umuahia North	8	Difficult Terrain, Increased Population & Distance	
		Bende	34	Difficult Terrain	
		Isuikwuato	28	Increased Population & Distance	
2.	Adamawa	Numan	Not specified	Increased Population, Distance & New Settlements	14
		Hong	14	Increased Population & Distance	
3.	Anambra				56
		Oyi	1	New Settlement	
		Nnewi North	3	Increased Population & Distance	
		Aguata	17	Increased Population & Distance	
		Nnewi South	32	Increased Population	
	Njikoka	3	Increased Population, Distance & Difficult Terrain		
4.	Akwa Ibom				15
		Ibendo	1	Conflict	
		Etim Ekpo	1	Increased Population	
		Ikot Abasi	8	The Community Has No Polling Unit & the Nearest PU in neighbouring Community Is Between 4km & 7km	
		Ukanafun	5	Population & Distance	
5.	Bauchi	Tafawa Balewa	2	Difficult Terrain	2
6.	Bayelsa				51
		South Ijaw	3	Overpopulation	
		Ekeremor	23	Nil	
		Sagbama	10	Congestion, Distance, Conflict & Difficult Terrain	
		Ogbia	10	Population	
	Yenagoa	5	Increase in Population		



7.	Benue				108
		Idelle	23	Distance, Road, River Barrier /Bad Road	
		Oju	46	Difficult Terrain	
		Obi	29	Population, Difficult Terrain, Distance	
		Oju	6		
		Makurdi	4	Population, & Distance	
8.	Borno	Guzamala	117	Population Increase, Distance & New Settlement	1,235
		Mobbar	80	Proximity, New Settlement & Population	
		Monguno	37		
		Maiduguri Metropolitan Council (MMC)	306	Increased Population & New Settlement	
		Hawul	60	Splitting of The Present Pus	
		Magumeri	123	New Settlement/Population, Proximity	
		Damboa	7	SPLIT Pus	
		Kwaya Kusar	45	New Settlement	
		Gubio	69	Distance & Difficult Terrain	
		Shani	55	New Settlement	
		Bayo	58	New Settlements/ Population Increase, Distance	
		Chibok	42	New Settlements/ population Increase, Distance	
		Damboa	162	New Settlements/ population Increase, Distance	
		Konduga	74	New Settlement	
9.	Cross River	Odukpani	1	Not Stated	356
		Obubra	76	Difficult Terrain & Increased Population	
		Etung	71	Difficult Terrain & Increased Population	
		Yakurr	16	Population Density & Expansion of Development	
		Akpabuyo	13	Not Given	
		Ikot Eyo	11	Not Given	
		Nak&a	10	Not Given	

		Idundu/Anyaganse	13	Not Given	
		Atimbo East	12	Not Given	
		Atimbo West	14	Not Given	
		Eneyo	14	Not Given	
		Akamkpa	105	Creation of New Ra, Distance & New Settlement, Nat. Disaster	
10.	Delta	Ethiope West	9	Overpopulation, New Settlement & Distance	138
		Ughelli South	9	Difficult Terrain	
		Aniocha South	1	Distance	
		Udu	10	POpulation, Distance	
		Burutu	4	None Given	
		Aniocha North	8	Over POpulation	
		Warri South	33	Population	
		Warri North	5	Not Given	
		Oshimili North	41	Not Given	
		Ika North East	10	Not Given	
		Aniocha North	8	Increase in Population	
11.	Edo	Oredo	4	Population	4
12.	Imo	Nwangele	52	Congestion/ New Settlement, Distance	102
		Ahiazu Mbaise	1	Population, Distance	
		Orsu	25	Population, Distance	
		Obowo	13	Population	
		Ohaji Egbema	6	Population	
		Ngor Okpala	5	Population, Distance	
13.	Kebbi	Danko / Wasagu	124	Proposed New RA, High Voting Population, Vast Land mass	270
		Sakaba	38	Population, Distance	
		Zuru	108	Distance	
14.	Kogi	Okene	61	Population, Expansion of New Settlement, Terrain & Lack of Contiguity	180
		Okehi	41		
		Ajaokuta	39		
		Ogori-Magongo	5		
		Ofu	1	Distance	
		Olamaboro	2	Population	
		Bassa	11	Difficult Terrain & Distance	



		Olamaboro	2	Distance	
		Ofu	1	Distance	
		Bassa	10	Difficult Terrain, Distance	
		Ankpa	3	Increased Population	
		Dekina	3	Increased Population	
		Kogi Koton-Karfe	1	Increased Population	
15.	Kwara	Offa	145	Population Surge in These Communities	151
		Patigi	6	Not Given	
16.	Lagos	Amuwo Odofin	18	Population	29
		Ibeju-Lekki	5	Distance, Population	
		Ojo	6	Population	
17.	Nasarawa	Karu	2	Population Increase, Distance to P U, New Settlement	63
		Obi	4	Population	
		Karu	57	Population	
18.	Niger	Gbako	22	Not Given	1,042
		Agai	55	Not Given	
		Bosso	143	Not Given	
		Chanchaga	176	Not Given	
		Munya	93	Not Given	
		Paikoro	167	Not Given	
		Shiroro	323	Not Given	
		Tafa	5	Not Given	
		Lapai	57	Distance/Population	
19.	Ogun	Ifo	27	Population Growth	239
		Imeko/Afon	21	Population Growth, Difficult Terrain	
		Odeda	9	Increased Population	
		Ifo	11	Increased Population	
		Imeko/Afon	115	Increased Population/Historical Factor,	
		Obafemi Owode	1	New Settlement & Population	
		Ijebu Imusin	3	Distance	
		Ijebu East	52	Distance	

20.	Ondo	Akure North	10	Distance & Increased Population	101
		Ose	1	Not Given	
		Idanre	90	Distance & Increased Population	
21.	Osun	Iwo	44	Increase in Population & Expansion of Town	358
		Egbedore	107	Historical Factor, Overpopulation/ Distance	
		Osogbo	43	Population	
		Ayedaade	37	Over Population, New Settlement	
		Ede South	77	Not Given	
		Ede North	50	Not Given	
22.	Oyo	Saki West	30	Distance	346
		Atisbo	10	Distance	
		Ido	1	Not Given	
		Oorelope	40	Distance	
		Irepo	21	Distance	
		Saki East	28	Distance, Distance & Expansion	
		Oorelope	42	Population, Difficult Terrain, Distance & New Settlement	
		Ibadan South West	1	Population	
		Iseyin	159	Over Population, Distance	
23.	Plateau	Pankshin	1	Not Given	114
		Jos North	11	Not Given	
		Shendam	102	Population, Difficult Terrain	
24.	Rivers	Eleme	39	Not Given	550
		Ikwere	17	Not Given	
		Ahoada West	5		
		&oni	96	Population	
		Obio/Okpor	146	Population, Distance	
		Akuku-Torru	179	Difficult Terrain, Distance & Riverine	
		Etche	10	Not Given	
25.	Taraba	Donga	66	Over Population	70
		Taraba	4	Not Given	
26.	FCT	AMAC	21	Population	74
		Kuje	48	Terrain, Population	
		Gwagwalada	5	Distance, Population	
		GRAND TOTAL			5,747



Why has it been difficult to solve such an obvious problem on which most stakeholders do not fundamentally differ? The answer lies in two things. First, it has been over politicized by stakeholders. The impression is usually given that Polling Units confer some (imaginary) political advantages to areas where they are located. Thus, some stakeholders canvass for more Polling Units, even when they are not necessary. This pervasive mentality of “allocation” (rather than expansion of access) has made it impossible to solve what is purely a challenge of improving the administration of elections. As a result of this over politicization, the Commission has been unfairly accused of being partial and lopsided in allocating Polling Units among sections of the country. The conspiracy theories and unfounded allegations regarding the intention of the Commission in establishing Polling Units have only served to delay the process. Thus, the interference of political calculations in

what should be a purely administrative process delays the process of expanding access to Polling Units by establishing more Polling Units, such that it gets too close to general elections. This delay intensifies the politicking, thereby creating an impression of wrong timing by the Commission.

Second, the Commission may not have engaged enough with stakeholders to fully explain the reasons expansion of voter access to Polling Units is central to democratic elections, share its plans with them and get their buy-in before proceeding. Therefore, this Commission believes that these two preconditions namely, depoliticization of solutions and effective engagement with stakeholders, have to be present before we can implement any plan that will guarantee adequate access to Polling Units for Nigerian voters. These encapsulate the broad purpose of this stakeholder engagement.

“The impression is usually given that Polling Units confer some (imaginary) political advantages to areas where they are located. Thus, some stakeholders canvass for more Polling Units, even when they are not necessary.”

Current State of Polling Units



84,004,084

Total Number of Voters
(2019 general election)



119,973

Number of
polling units



15,061

Highest Number of Voters in a Polling Unit - [Mararaba
Garage II, Karu Nasarawa State, PU No. 25/04/11/00]



415

Lowest Average Number of Voters Per Polling Unit (2019
general election) - [Ekiti State]



2,393

Highest Average Number of Voters Per Polling Unit (2019
general election) - [FCT]



700

Average Number
of Voters per Polling
Units (2019)



57,023

Total Number of
voting points and voting
point settlements (2019
general election)



117,781

Number of geo-
referenced polling units -
(2003/2004)



2,197

Number of PUs yet to
be geo-referenced



Current State of Polling Units



16,362

Number of relocated polling units (2014)



150

Number of relocated polling units (2018)



152

Number of PUs temporarily relocated in Kaduna and Yobe for security reasons (2018)



5,798

Number of requests for Polling Units creation from the public (December 2020)

Need to Engage With Stakeholders

It is in realization that the Commission may not have engaged adequately with stakeholders in the past that the present Commission decided to embark on this far-reaching series of engagements. There are several purposes that these engagements will serve. First, explain to stakeholders the prevailing condition across the country regarding the challenges that voters and, indeed, the Commission experience during elections due to declining access to Polling Units. Second, discuss the likely solutions to these challenges with stakeholders and get their buy in regarding the future plans of the Commission in this regard. Third, listen to concerns that different stakeholders

may have around expanding voter access to Polling Units and to seek to address them. Fourth, establish a framework for the Commission and stakeholders in the electoral process such as voters, communities, political parties, civil society organizations and the media to work collectively to find a lasting solution to the problem of constricting voter access to Polling Units in Nigeria. Fifth, share experiences from other jurisdiction on how they handle this challenge, which is a global one in election management. Sixth, develop a widely accepted and routinized approach to expanding voter access to Polling Units in the run-up to the next general elections in 2023 and beyond.

Stakeholders to be Engaged

The Commission has identified several stakeholders for this engagement. This is based on the work of the Commission and its past engagements with stakeholders. These stakeholders have a direct bearing on the work of the Commission. Some of them

such as political parties, civil society organizations and the Inter-Agency Consultative Committee on Election Security (ICCES) already have programmed regular (quarterly) engagements with the Commission.

“It is in realization that the Commission may not have engaged adequately with stakeholders in the past that the present Commission decided to embark on this far-reaching series of engagements.”



TABLE 2: Stakeholder Engagements

SN	CLUSTER A	CLUSTER B	CLUSTER C	CLUSTER D	CLUSTER E
1	Socio-cultural Organizations	The Executive Arm of Government (Federal Executive Council - FEC & National Economic Council - NEC). National Council of State	Select Departments & Agencies	Labour Unions	Judiciary
2	Religious Organizations (CAN & NSCIA)	The National Assembly (Senate Committee on INEC & House Committee on Electoral Matters)	Development Partners/Diplomatic Community	Committee of Vice-Chancellors.	Professional Bodies
3	Traditional Rulers	Media (Nigeria Press Organization, Newspapers Proprietors Association, Broadcasting Organization of Nigeria)	Inter-Agency Consultative Committee on Election Security (ICCES)		-----
4	Political Parties	Civil Society Organizations	-----	-----	-----

Major Issues to be Discussed at the Engagements

Several issues are germane to discussions regarding expanding voter access to Polling Units in Nigeria. The following cardinal issues, which are by no means exhaustive, have been identified by the Commission to be explored during the engagements.

i. The role of adequate and conducive Polling Units in conducting credible elections and democratic consolidation

The link between adequate and well-managed Polling Units and improved electoral and democratic processes cannot be overemphasized. As this paper has argued, inadequate Polling Units are conducive to low voter turnout, electoral violence, disruption of elections, health and safety hazards and lack of confidence in the electoral process among voters. Adequate and conducive Polling Units are particularly important for quick conclusion of voting and announcement of results. Above all, since the extant law provides for people to vote where they are registered, Polling Units are also central to the whole process of Continuous Registration of Voters (CVR). In fact, discussion at the engagement should also focus on sharing with the stakeholders the Commission's plans for CVR in 2021. The establishment of more Polling Units and the relocation of badly sited ones will dovetail into reviewing the Polling Units that will be on offer to both new registrants and all others whose

additional biometrics will be captured during the CVR.

ii. The legal framework for establishing and managing Polling Units, including the powers vested in the Commission and how to strengthen the legal framework

It is important for stakeholders to understand and appreciate the legal provisions for establishing Polling Units. It is a lack of such understanding that partly fuels the misunderstanding of the Commission when it seeks to expand voter access to Polling Units. It is also important that discussions bring out the powers of the Commission not only in establishing Polling Units, but also in managing them during elections, as well as the fundamental place of Polling Units in the electoral process, as established by the legal framework for elections.

iii. History of expanding voter access to Polling Units, the challenges and how to overcome them

Discussion in this area will emphasize previous attempts by the Commission to expand voter access to Polling Units and why they were not often successful. Specific public reactions to such attempts, especially the unfounded claims, have to be identified and addressed in order to convince stakeholders that the Commission means well and has no underhand



“It is important to note that because of the politics of mistrust among Nigerians and the unnecessary delays it has engendered in the process, establishment of Polling Units tended to come too close to elections to be successfully completed.”



motives in this process. It is important to note that because of the politics of mistrust among Nigerians and the unnecessary delays it has engendered in the process, establishment of Polling Units tended to come too close to elections to be successfully completed. This is why this engagement with stakeholders has to be completed as soon as possible in order to ensure that by the next general election improved access to Polling Units is guaranteed to a vast majority of the Nigerian electorate.

iv. Experiences from other jurisdictions in expanding voter access to Polling Units

Experiences will be shared drawing from other jurisdictions, including countries comparable to Nigeria. These experiences would clearly show that the issue of voter access to Polling Units is one that other countries contend with. One clear indicator of this is the number of voters per Polling Unit. Clearly, the Nigerian situation needs to be addressed urgently by finding ways of establishing a maximum number at which additional Polling Units would have to be established in an area.



India: with a voter population of **910,512,091** has **1,035,000** PUs which is **880** Voters/ PU in the 2019 election (voters/PU pegged at 1000)



Ghana: with a voter population of **17,027,641** has **38,622** PUs which is **441** Voters/PU in the 2020 election.



Niger Republic: with a voter population of **7,446,556** has **25,978** PUs which is **286** voters/PU in the 2020 (voters/PU pegged at 500)



Kenya: with a voter population of **19,611,423** has **40,800** PUs which is **480** voters / PU in the 2017 election (voters/PU egged at 700)



Mozambique: with a voter population of **13,162,321** has **20,162** PUs which is **653** voters/PU in the 2019 election (voters/PU pegged at 800)



Zimbabwe: with a voter population of **5,524,188** has **10,985** PUs which is **503** voters/PU in the 2019 election (voters/PU pegged at 1000)



Another important lesson from other jurisdictions has to do with how Polling Units are established. A common denominator across many countries is the administrative nature of expanding voter access to Polling Units. For instance, in Ghana, Kenya and South Africa, the Electoral Commissions routinely create Polling Units based on increasing size of the voting population, while in the UK, it is the Counties and Burroughs (equivalent of Local Government Councils) that review the state of Polling Units and decide on whether to establish more. In many parts of the United States of America, each State Election Board routinely performs this function. In other words, this is purely administrative and routine function carried out by bodies legally empowered to do so. It is therefore important for stakeholders to work with INEC to depoliticize the expansion of voter access to Polling Units, for instance through the establishment of standardized, agreed, inclusive and verifiable principles or mechanisms for establishing new Polling Units and their proper location. Based on such principles, INEC can issue Guidelines from time to time on expanding voter access to Polling Units, which could include a process of requesting for more Polling Units by communities.

v. The role of stakeholders in expanding access to Polling Units

Discussion in this area will emphasize both the positive and negative roles that stakeholders could play in expanding

voter access to Polling Units. The negatives include acting on suspicion, lack of support for the Commission, sectionalism, sensationalist reporting by the media, mobilization against expanding access to Polling Units, unfounded accusations levelled against the Commission and unwillingness to listen to the Commission on these issues. The positives include regular engagement with the Commission, peaceful demands for more Polling Units, dissemination of information on the work of the Commission in this area and participation in future stakeholder engagements, among others. A positive role that State governments can play is to help maintain Polling Units, for instance, by giving the Commission access to school buildings and maintaining their facilities that are used for electoral purposes.

vi. Developing a framework for expanding voter access to Polling Units in Nigeria

This segment will explore several models for standardizing the expansion of voter to Polling Units. The three aspects of this must be covered by the models namely, establishing adequate numbers of Polling Units, locating Polling Units in suitable places and the optimal physical arrangement or organization of a Polling Unit. A very important aspect of this segment is to explore the possibility of establishing a standardized and routinized system for expanding voter access to Polling Units, especially the basic issue of establishing

“This segment will explore several models for standardizing the expansion of voter to Polling Units. The three aspects of this must be covered by the models namely, establishing adequate numbers of Polling Units, locating Polling Units in suitable places and the optimal physical arrangement or organization of a Polling Unit.”

new Polling Units. Three approaches may be explored:

a) Conversion of Voting Points and Voting Point Settlements to Polling Units

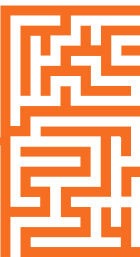
In this model, Voting Points and Voting Point Settlements will be converted to Polling Units. The underlying logic is that once an area is not well-served in the provision of Polling Units, its residents will naturally migrate to the nearest Polling Units. Consequently, Voting Points and Voting Point Settlements arguably represent “unestablished Polling Units”. In this model, Voting Points can then be relocated to areas of need and converted to Polling Units.

b) Application by residents of a new area/settlement for Polling Units

In this approach, residents of a new area or difficult terrain will be required to apply for Polling Units through an established procedure. There will be an application review process, stakeholder consultation and publication of the outcome prior to establishment of the Polling Unit. Application will be received at established time intervals, for instance every four years.

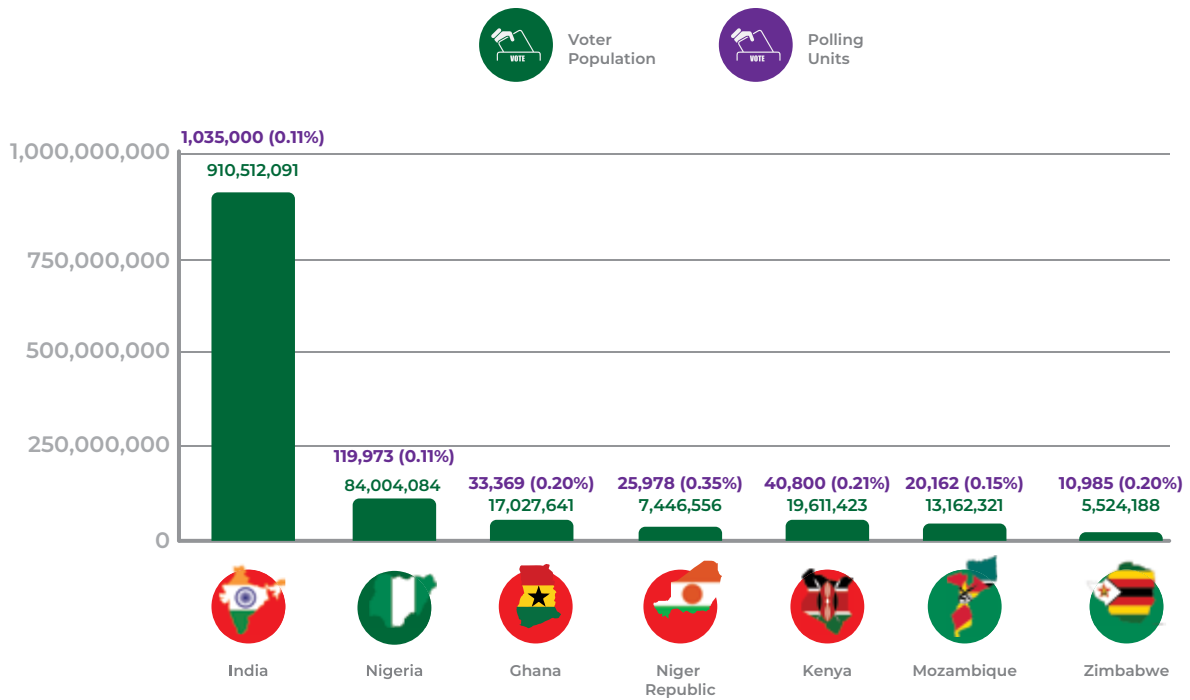
c) Creation of Polling Areas

Section 13 (3) of the Electoral Act 2010 (as amended) introduces the concept of “Polling Area”. The Commission can establish such Polling Areas, each to



be served by a Polling Unit. A Polling Area may be understood as a defined area in a constituency, which is served by one Polling Unit. Polling Areas can then be harmonized with National Population Commission's Enumeration Areas, with a certain number of Enumeration Areas

making up a Polling Area, in order to have a relatively balanced population distribution across Polling Areas. However, this is more feasible when Registration Areas and Constituencies have been reviewed and properly delineated.



Comparison in the percentage of polling units to voting population

Conversion of Voting Points and Voting Point Settlements to Polling Units

Of the three models, the Commission believes that the most feasible in the short to medium terms is the conversion of Voting Points and Voting Point Settlements to Polling Units. This is the Commission's preferred approach, which is further elaborated below.

1 Assumption

The assumption underlying this approach is that when a Polling Unit is crowded and therefore divided into Voting Points, it is precisely the absence of Polling Units in surrounding areas that is driving up the numbers. In other words, the logic is that when

an area is not adequately served with Polling Units, eligible voters will find the nearest Polling Unit to register and vote. Consequently, if the Voting Points in a Polling Unit are moved to surrounding unserved areas, it will reduce the pressure at the Polling Unit.

2 Justification

There are several reasons that justify the adoption of this approach. Firstly, Voting Points have been used in Nigerian elections since 2011. They are well-known and accepted. Therefore, Nigerians are likely to accept them as a basis for creating Polling Units. Secondly, the areas that are not served, which are likely the cause of the overcrowding of the Polling Units can be easily verified

by the means of a map. Thirdly, the conversion of Voting Points to Polling Units can be done quickly and easily. Fourthly, the Commission believes that this approach will also address a good number of the requests received from the public for creation of Polling Units. Finally, it is likely to be the least controversial and time-consuming of the three models identified earlier.



3 Method of conversion

- i. The Commission will identify Polling Units and Voting Point Settlements with Voting Points.
- ii. A detailed map of the adjoining areas to the Polling Unit and Voting Point Settlement will be developed. Such a map will give a sense of areas that the potential Polling Units from the Voting Points may serve when created. The maps should demonstrate three things:
 - a) *Inadequacy of the existing Polling Units*: This will show that the Polling Units are inadequate to serve their vast adjoining areas.
 - b) *Concentration of Polling Units in a limited area*: Shows that the Polling Units are concentrated and clustered only in a few areas.
 - c) *Overcrowding*: Demonstrate that the Polling Units are overburdened due to the large number of voters they serve.
- iii. The Voting Points, the maps and harvested requests of communities for creation of Polling Units are sent to INEC State Offices. It is expected that some of the community demands will be addressed by relocation of the Voting Points.
- iv. The State Offices identify suitable locations for the Polling Units to be established from the Voting Points, taking into consideration unserved areas and requests from communities. This must correspond strictly to the number of Voting Points identified by Commission based on current registered voters. The location of the new Polling Units must be in line with subsisting guidelines of the Commission, including that no Polling Unit will be moved from one Registration Area to another.
- v. National Commissioners lead Electoral Operations Department and State Offices to verify the new locations and organize stakeholder engagements in the States.
- vi. The Commission shall approve the report of the verification exercise and all the Polling Units across the country are recoded.
- vii. The process will be supported by strong media and communication plan to carry stakeholders along.

4

Future application

For the Commission, in future, such conversions should become routinized such that whenever a Polling Unit increases to ten Voting Points, it should become eligible for some of its Voting

Points to be converted to Polling Units, provided that the methodology and any guidelines established by the Commission on this are strictly followed.

Evidence from Across the Country

The problem of declining voter access to Polling Units in Nigeria is a nationwide problem. This is clearly indicated in two ways. First, the Commission since 2011 has created thousands of Voting Points out of Polling Units all over the country. The streams of voters that these Voting Points represent, are emblematic of the overcrowded nature of these Polling Units. In other word, there will be no need for Voting Points in a Polling Unit if the number of voters it serves is optimal. Second, the Commission has received thousands of requests for the establishment of additional Polling Units from all over the country. Again, this is an indication that it is a nationwide problem that is recognized by communities and voters practically everywhere.

To further illustrate the widespread nature of the dwindling voter access to Polling Units in Nigeria, the following

selected maps are instructive. They are drawn from all the geo-political zones of the country. The dots on the maps represent Polling Units, many of them containing several Voting Points. They all tell the same story. First, that Polling Units are concentrated and clustered in certain areas. Second, that these Polling Units are overcrowded as indicated by the streams of voters (Voting Points) they contain. And third, that very huge swathes of land containing new settlements adjoining the locations of these Polling Units are poorly served. This is the impetus for voters to move to far-flung Polling Units in order to exercise their rights to vote. Consequently, a good way of serving these unserved areas is to convert the already existing and known Voting Points in these Polling Units into standalone Polling Units and relocate them to the areas of need.





**Selected Maps
Showing Polling
Units & Adjoining
Areas**



Polling Units in Akko Local Government Area of Gombe State

1:4,000



LEGEND

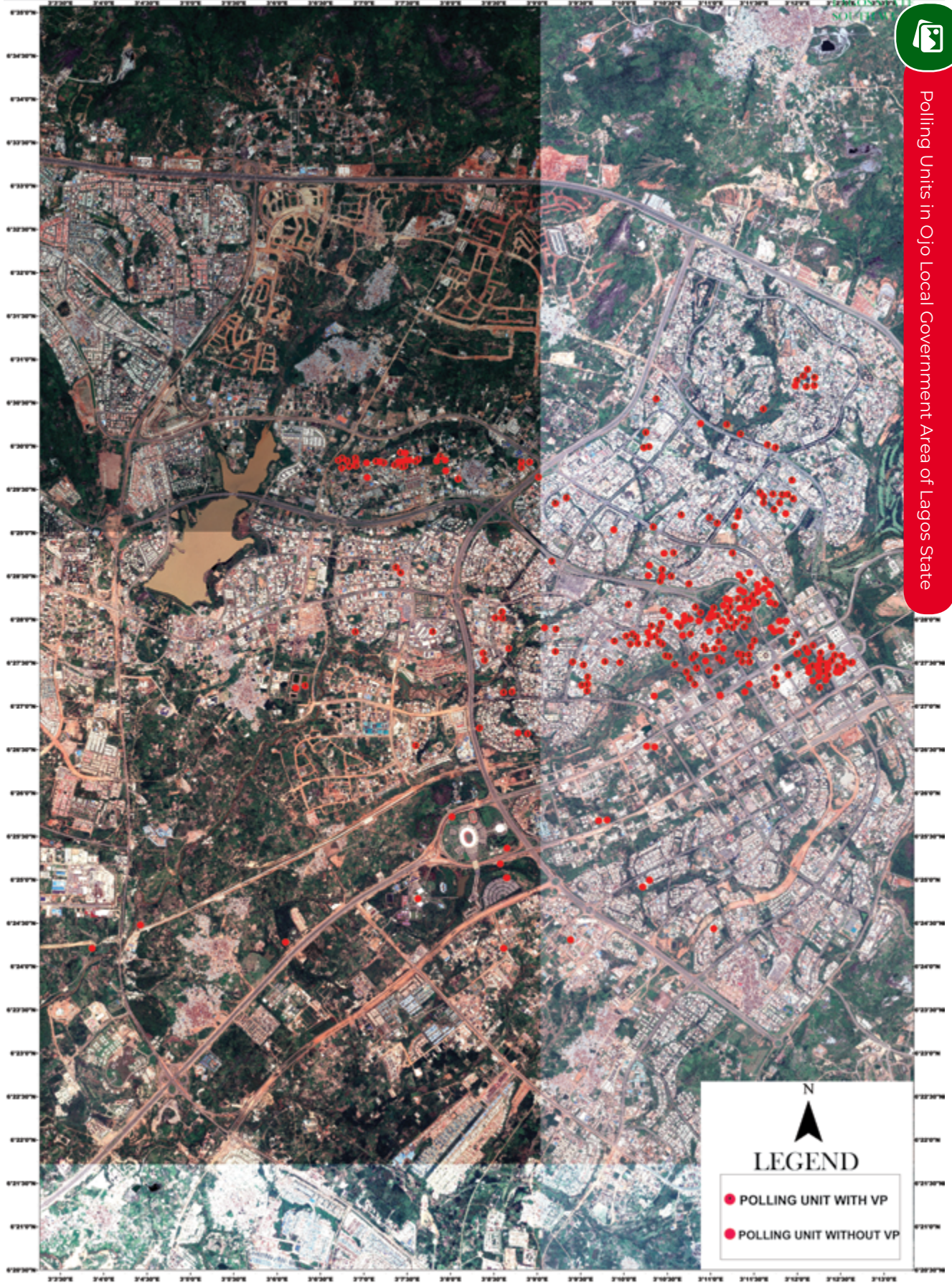
- Polling Unit with VP
- Polling Unit without VP



FIG 1
OJO LGA
LAGOS STATE
SOUTH WEST



Polling Units in Ojo Local Government Area of Lagos State



SCALE: 1:20,000



Polling Units in Nasarawa Local Government Area of Kano State

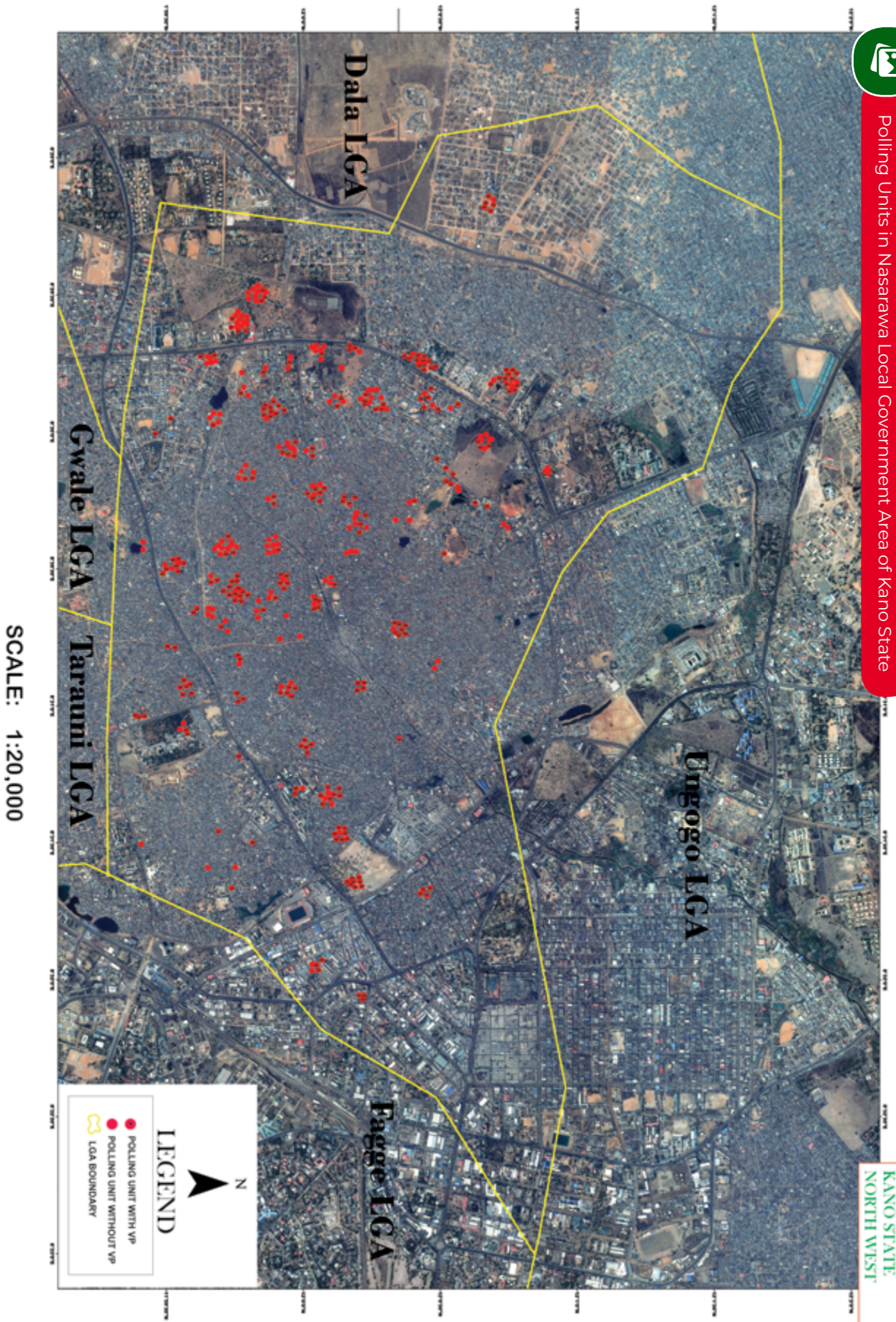


FIG 2
NASARAWA LGA
KANO STATE
NORTH WEST

SCALE: 1:20,000



Polling Units in Karu Local Government Area of Nasarawa State



LEGEND
● Polling Unit with VP
● Polling Unit without VP



1:4,000



Polling Units in Awka South North Local Government Area of Anambra.



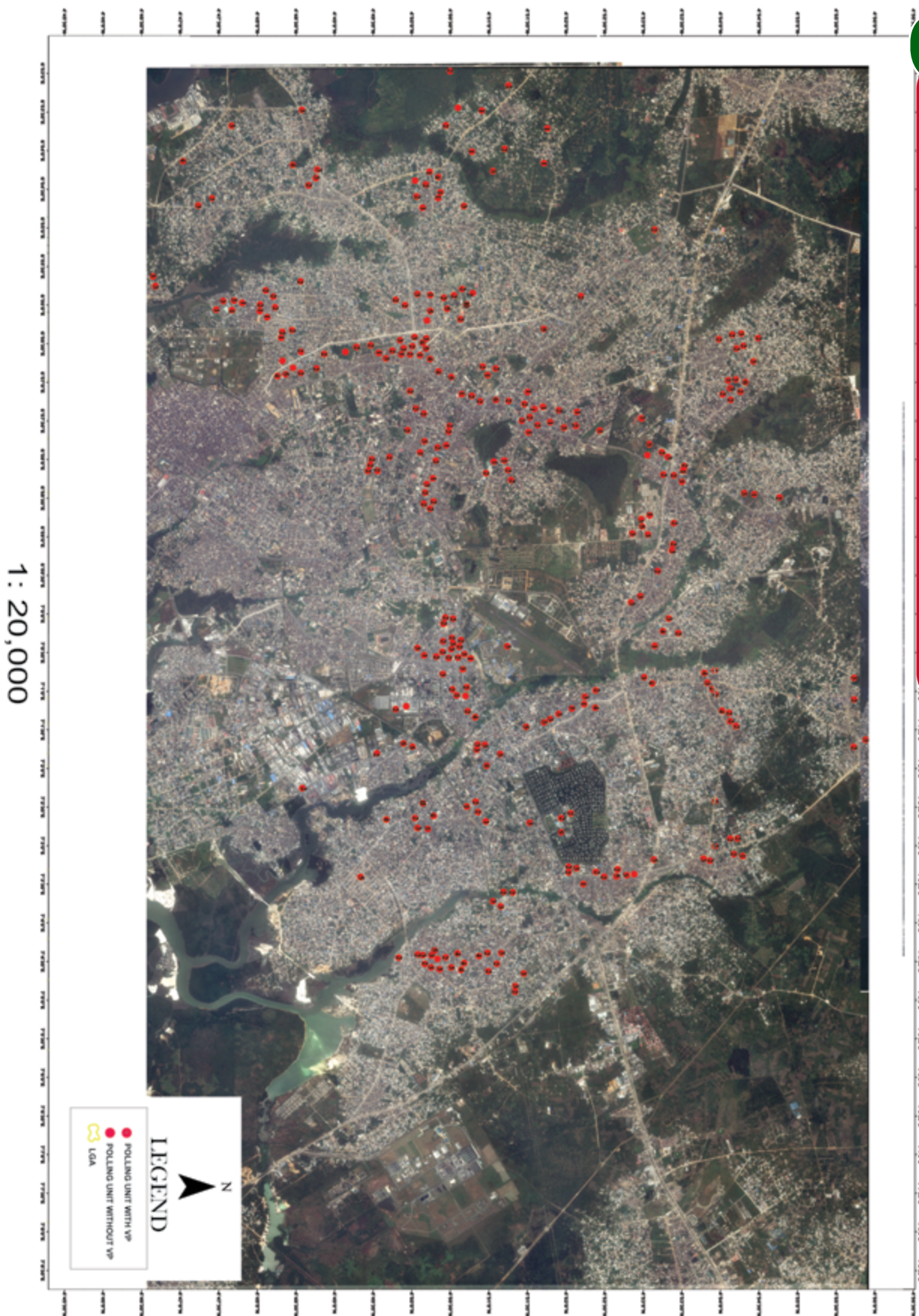
LEGEND

- Polling Units with VP
- Polling Units without VP





Polling Units in Obio/Akpor Local Government Area Rivers State



Some crowded Polling Units



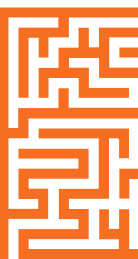
Some crowded Polling Units



Click the links below to see the scenario at some of our Polling Units (PUs) on Election Day and why INEC needs to expand voters' access to Polling Units.

Link 1: <https://www.youtube.com/watch?v=VUel3vgJ3xg&feature=youtu.be>

Link 2: https://www.youtube.com/watch?v=_msHVHSwjIQ&feature=youtu.be



Conclusion

For the Commission, there are ten inferences, lessons and deductions from the foregoing as it prepares for this national engagement with stakeholders towards expanding voter access to Polling Units in Nigeria. They are as follows:

1 Voter access to Polling Units is at the heart of the voting rights of Nigerians and therefore fundamental to democracy and its consolidation.

2 Voter access to Polling Units goes beyond the establishment of Polling Units, but also entails their location in accessible places and ensuring that the environment of each Polling Unit guarantees observance of the Commission's guidelines and safe voter experience on Election-Day, especially in the context of the COVID-19 pandemic.

3 Over politicization underscored by unfounded conspiracy theories has been a major obstacle to expanding voter access to Polling Units. This has caused unnecessary delays in establishing and relocating Polling Units prior to major elections.

4 Declining access to Polling Units for Nigerian voters is potentially disenfranchising millions of Nigerians. It has become so critical that it must be addressed urgently if the credibility of our electoral system is not to be profoundly damaged.

5 The problem affects every part of the country. Therefore, a national consensus built on genuine consultations is required to address it.

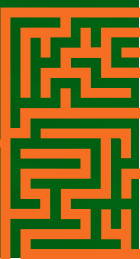
6 Stakeholders have a central role to play in addressing the challenge, especially by committing to supporting the Commission's efforts to find solutions and assisting to depoliticize the issue. Indeed, no lasting solution to the problem is possible without the full understanding and support of the major stakeholders in the country.

7 Experiences from other jurisdictions across the world show that continuously expanding voter access to Polling Units is a good practice. These experiences also show that the problem of declining access to Polling Units is not unique to Nigeria. In most countries, however, expanding voter access to Polling Units is essentially the administrative responsibility of agencies charged with the function by law. There is need for Nigeria to also approach it as such.

8 With over 5,000 specific requests for the establishment of new Polling Units, the Commission will be failing in its responsibility if it does not address the declining voter access to Polling Units across the country prior to upcoming major elections.

9 Section 42 of the Electoral Act 2010 (as amended) empowers the Commission to establish adequate number of Polling Units and to assign voters to them. As the Commission prepares to recommence the Continuous Voter Registration (CVR), as required by the Electoral Act, it is important to conclude the issue of expanding voter access to Polling Units in order to assign voters to new Polling Units during the CVR.

10 The Commission has in the last three electoral cycles made use of Voting Points and Voting Point Settlements as interim solutions for the declining voter access to Polling Units. These are well known by stakeholders and accepted by voters. Consequently, converting them to full-fledged Polling Units is a cost effective and timely way of addressing the problem.





iccc@inec.gov.ng
@inecnigeria
www.inecnigeria.org
inecnews.com



0700-CALL-INEC (0700-2255-4632)
09050858629, 08180958715,
09025038466, 07062896047
Download 'MyInec' Mobile App



INEC. Making your votes count...Consolidating our democracy.