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The International Comparative Legal Guide to:

Corporate Immigration 2018

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Nigeria

Jackson, Etti & Edu

Afolasade Olowe



1 Introduction

1.1 What are the main sources of immigration law in your jurisdiction?

The main sources are the Immigration Act, 2015 (the Act) and Immigration Regulations, 2017 (the Regulations). Other sources include the Nigerian Oil and Gas Industry Content Development Act, 2010 (the NOGIC Act).

1.2 What authorities administer the corporate immigration system in your jurisdiction?

These are the Federal Ministry of Interior (FMI), Nigeria Immigration Service (NIS), Federal Ministry of Foreign Affairs and Nigerian Content Development and Monitoring Board (NCDMB).

1.3 Is your jurisdiction part of a multilateral agreement between countries (EU/NAFTA/MERCOSUR) which facilitates the movement of people between countries for employment purposes?

Nigeria is a party to the ECOWAS (Economic Community of West Africa States) Protocol on the Free Movement of Persons within the ECOWAS community. The Protocol allows citizens of member countries to move freely and establish business within the community for up to 90 (ninety) days without visa.

2 Business Visitors

2.1 Can business visitors enter your jurisdiction under a relevant visa waiver programme?

There is no visa waiver programme for business visitors in Nigeria with the exception of ECOWAS nationals who do not require visas to visit Nigeria. Business visitors who have obtained the Comptroller General of Immigration's (CGI) pre-entry approval can, however, obtain a visa on arrival in Nigeria.

2.2 What is the maximum period for which business visitors can enter your jurisdiction?

The maximum period is 90 (ninety) days in the first instance, but can be extendable once in the country.

2.3 What activities are business visitors able to undertake?

Permissible activities include meetings, conferences, seminars, contract negotiation, marketing, sales, trade fairs, job interviews, training of Nigerians (humanitarian), emergency/relief work and attending musical concerts, etc.

2.4 Are there any special visitor categories which will enable business visitors to undertake work or provide services for a temporary period?

There is no special visitor category that allows business visitors to undertake work or provide services for a temporary period. To undertake work or provide service for a temporary period, a Temporary Work Permit (TWP) is required.

2.5 Can business visitors receive short-term training?

A business visitor may receive short-term training by way of attendances of seminars, conferences, etc.

3 Immigration Compliance and Illegal Working

3.1 Do the national authorities in your jurisdiction operate a system of compliance inspections of employers who regularly employ foreign nationals?

Yes, the national authorities (immigration, tax authorities, etc.), by law, undertake periodic compliance inspections of employers who regularly employ foreign nationals. Compliance inspections may also be conducted further to a third-party petition/request.

3.2 What are the rules on the prevention of illegal working?

The general rule is that employers of foreign nationals must ensure to obtain authorisation/approval from the appropriate national authorities before employing foreign nationals in Nigeria.

3.3 What are the penalties for organisations found to be employing foreign nationals without permission to work?

A defaulting organisation shall be liable on conviction to imprisonment for up to 5 (five) years or a fine of one million Naira (approximately \$2,774) or both. Furthermore, such an organisation may be wound up and made to bear the cost of deportation of affected foreign nationals.

The authorities may also withdraw any immigration facilities/approvals previously granted to such organisation.

4 Corporate Immigration – General

4.1 Is there a system for registration of employers who wish to hire foreign nationals?

Yes, employers who wish to hire foreign nationals must apply for expatriate quota positions from the FMI. Additionally, employers in the Oil and Gas sector are required to register with and obtain pre-approval from the NCDMB before applying to the FMI for expatriate quota positions.

4.2 Do employers who hire foreign nationals have ongoing duties to ensure immigration compliance?

Employers have Immigration Responsibility (IR) to their foreign employees and must ensure compliance with the provision of Immigration laws at all times. Particularly, employers are required to file appropriate monthly returns stating information about the location, movement and status of foreign employees in their employment with the immigration authorities.

4.3 Are employers who hire foreign nationals required to show a commitment to train or up-skill local workers?

Yes. This is a prerequisite to the renewal of expatriate quota positions. For every foreign employee, an employer must hire at least 2 (two) Nigerians to understudy the foreign employee. Commitment/training/plans for local employees are mandatory requirements in support of applications for employers in the Oil and Gas sector.

4.4 Are employers who hire foreign nationals required to pay government charges and fees which contribute towards the training or up-skilling of local workers?

There is no such requirement but all companies registered in Nigeria and having at least 5 (five) or more employees or an annual turnover of 50 million Naira (approximately \$139,000.00) and above must contribute a percent of their total annual payroll to the Industrial Training Fund.

4.5 Do the immigration authorities undertake routine inspections of employers who sponsor foreign nationals, to verify immigration compliance?

Yes. The immigration authorities undertake routine compliance inspections to verify compliance of employers of foreign nationals.

4.6 Do the immigration authorities maintain a list of skilled occupations which may be filled by foreign nationals?

Yes, the FMI and the NIS periodically designate skills or capacities which are not locally available. The NCDMB does the same in relation to skills and capacities in the Oil and Gas sector.

4.7 Is there a recognition that some occupations may be in short supply and do special exemptions apply to certain sectors and occupations?

To some extent, there is such a recognition of skill shortages in the oil and gas, and power sectors, etc. Notwithstanding, expatriate quota positions will be granted in respect of skills that are not readily available in Nigeria.

4.8 Are there annual quotas for different types of employment-related work permits or visas?

There is no specific provision in the laws regarding annual quotas for an employment-related work permit. For long-term work permits, an employer is only limited to the number of expatriate quota positions issued to it. In the case of a short-term work permit (TWP), these are also granted outside expatriate quota provision on the authorisation of the CGI.

4.9 Are there restrictions on the number of foreign workers an employer may sponsor, in relation to a maximum percentage of foreign workers in the employer's workforce?

There are no restrictions on the number of foreign workers an employer may sponsor as long as the employer legally fulfils the conditions of sponsoring foreign workers.

4.10 Are employees who are sponsored to work in your jurisdiction required to demonstrate language proficiency?

Foreign employees are not required to demonstrate English language proficiency in Nigeria.

4.11 Are employees who are sponsored to work in your jurisdiction required to undergo medical examinations before being admitted?

This is not mandatory, but it is the practice for employees in the Oil and Gas industry to demonstrate fitness and competence to work offshore by presenting a certificate of medical fitness. The Minister of Interior, may, however, by order, either exempt or restrict persons from the requirements of medical examination with the concurrence of the Minister of Health where medical examination of persons landing in Nigeria is required.

4.12 Are employees who are sponsored to work in your jurisdiction required to have medical insurance or are they entitled to any free public medical services?

Foreign employees are not entitled to free public medical services. Employers of foreign nationals may provide such nationals with private health insurance as part of their annual remuneration.

4.13 Does the work permit system allow employees who hold work permits to be seconded to a client site?

A foreign employee may be seconded to a client's site, if required.

5 Highly Skilled Visas

5.1 Is there an immigration category which covers highly skilled individuals?

There is currently no immigration category in this regard.

6 Investment or Establishment Work Permits

6.1 Is there an immigration category which permits employees to be authorised to work based on investment into your jurisdiction?

Yes. This is referred to as Permanent Until Review (PUR) which is granted to enable foreign investors to adequately protect their interest/s in Nigeria. The PUR is granted as an expatriate quota slot, i.e. Managing Director position, for which a Certificate will be issued.

7 Temporary Work Permits

7.1 Is there an immigration category permitting the hiring of temporary workers for exchanges, career development, internships or other non-economic purposes?

TWP is the permissible permit for the hiring of foreign workers for exchanges, career development and internships. For other non-economic purposes e.g. training of Nigerians, conferences, seminars etc., a business visa (or visa on arrival) will suffice.

7.2 Are there sector-specific temporary work permit categories which enable foreign workers to perform temporary work?

There are no sector-specific temporary work permit categories. The same TWP category is applicable to all foreign nationals in all sectors to work temporarily in Nigeria.

8 Group or Intra-Company Transfer Work Permits

8.1 Does a specific immigration category exist for inter-company transfers within international groups of companies?

For inter-company transfers (from one separate legal entity to the other), an in-country change of employment application is required.

8.2 What conditions must an employing company or organisation fulfil in order to qualify as part of a group of companies?

To qualify as part of a group of companies, a company must fulfil the conditions provided in the Companies and Allied Matters Act (Cap C20, LFN 2004), which is the law regulating the registration of companies and incidental matters, etc. in Nigeria. One of such conditions is that an application is made to the company registrar for consent to form a group company; which must comprise of no fewer than 3 (three) associate companies, who must form the group company. Other conditions include evidence relating to membership, share capital, annual returns and other specific filings required of the associate companies.

8.3 What conditions must the employer fulfil in order to obtain a work permit for an intra-company group employee?

To obtain a work permit for an intra-company group employee (transfer from one country to another), an employer in Nigeria must fulfil the same conditions for the employment of a new hire.

8.4 What is the process for obtaining a work permit for an intra-company group employee?

To obtain a work permit for an intra-company group employee, it is expected that an employer in Nigeria must have a vacant expatriate quota position for the employee to fill. The employee then applies for a Subject to Regularisation (STR) visa in the country where he/she is resident. Requisite documents must be provided in support of the application.

The STR visa enables the employee to work and reside in Nigeria for an initial period of 90 (ninety) days. Once in Nigeria, the employer must, within 90 (ninety) days, regularise the immigration status of the employee by applying for a Combined Expatriate Residence Permit and Alien Card ('CERPAC', 'Residence Permit' or 'Green Card') on behalf of the employee.

8.5 What is the process for the employee to obtain a visa under the intra-company group transfer category?

Under an intra-company group transfer, the employee must apply for an STR visa just like a new hire. The visa application is filed at the Nigerian mission in his/her country of residence. Copies of educational qualification/s and a CV of the employee, expatriate quota position of the employer, letters of offer and acceptance of employment as well as required corporate documents of the employer in Nigeria, etc., are to be provided as supporting documents.

8.6 How long does the process of obtaining the work permit and initial visa take?

For the initial visa STR, it may take up to 15 (fifteen) working days. This may be shorter depending on the processing times of the various Nigerian missions abroad. The in-country work permit application (regularisation) also takes up to 10 (ten) working days to conclude.

8.7 How long are visas under the “initial” category valid for, and can they be extended?

Visas under the initial category (i.e. STR) are issued for an initial period of 90 (ninety) days and cannot be extended.

8.8 Can employees coming under the intra-company transfer route apply for permanent residence?

Employees coming under an intra-company transfer route cannot apply for permanent residence unless they fulfil the conditions for the grant of permanent residency.

8.9 What are the main government fees associated with this type of visa?

This is not applicable.

9 New Hire Work Permits

9.1 What is the main immigration category used for employers who wish to obtain work permits for new hires?

Employers who wish to obtain work permits for new hires must obtain expatriate quota positions to enable them to obtain work permits for new hires. New hires must also obtain STR visas to visit and work in Nigeria.

9.2 Is there a requirement for labour market testing, to demonstrate that there are no suitable resident workers, before a work permit can be issued to new hires?

Yes, there is a requirement for labour testing and this is a stricter requirement for employers in the oil and gas sector.

9.3 Are there any exemptions to carrying out a resident labour market test?

Generally, there are no exemptions in the law, but in practice, renewal applications are exempted from the need to carry out a resident labour market test.

9.4 What is the process for obtaining a work permit for a new hire?

On the basis that an employer has obtained requisite expatriate quota position/s, the first step would be to make an employment offer to the new hire. If the new hire accepts the offer, the next step is to apply for an STR visa in the country where the new hire is resident.

The STR visa enables the new hire to work and reside in Nigeria for an initial period of 90 (ninety) days. Thereafter, the employer must within 90 (ninety) days of entrance to Nigeria, regularise the immigration status of the new hire by applying for a CERPAC on his/

her behalf. The CERPAC is valid for a period up to 2 (two) years and subject to annual renewal.

9.5 What is the process for the employee to obtain a visa as a new hire?

The employee, as a new hire applies for a STR visa at the Nigerian mission in the country of his/her residence. Copies of educational qualification/s and a CV of the new hire, expatriate quota position issued to the employer, employment contract as well as required corporate documents of the employer are to be attached as supporting documents.

9.6 How long does the process of obtaining the work permit and initial visa for a new hire take?

For the initial visa (STR) for a new hire, it may take up to 15 (fifteen) working days. This may be shorter depending on the processing times of the various Nigerian missions abroad. The in-country work permit application (regularisation) also takes up to 10 (ten) working days to conclude.

9.7 How long are initial visas for new hires granted for and can they be extended?

They are granted for an initial period of 90 (ninety) days and cannot be extended.

9.8 Is labour market testing required when the employee extends their residence?

No, this is not required.

9.9 Can employees coming as new hires apply for permanent residence?

No, employees coming as new hires cannot apply for permanent residence unless they fulfil the conditions for the grant of permanent residency.

9.10 What are the main government fees associated with this type of visa?

This is not applicable.

10 Conditions of Stay for Work Permit Holders

10.1 What are the conditions of stay of those who obtain work permits and are resident on this basis?

Both employer and employee must ensure compliance with immigration laws by ensuring that work permits are renewed when due. Failure to renew an expired work permit is a punishable offence.

10.2 Are work permit holders required to register with municipal authorities or the police after their arrival?

All foreign nationals including work permit holders entering into Nigeria who intend to stay for a period exceeding 90 (ninety) days are required to register at the Immigrants' Registry where he/she resides within 21 days of arrival in Nigeria.

11 Dependants

11.1 Who qualifies as a dependant of a person coming to work on a sponsored basis?

Spouse, child/children, parents, domestic staff, etc. qualify as dependants.

11.2 Do civil/unmarried or same-sex partners qualify as family members?

Civil/unmarried or same-sex marriage do not qualify as family members.

11.3 Do spouses and partners have access to the labour market when they are admitted as dependants?

Yes, spouses have access to the labour market and may take up employment when they are admitted as dependants.

11.4 Do children have access to the labour market?

Children younger than 18 (eighteen) years do not have access to the labour market.

12 Permanent Residence

12.1 What are the conditions for obtaining permanent residence?

To obtain permanent residence status, foreign nationals must import an annual minimum threshold of capital over a period of time.

The minimum threshold capital is determined from time to time in the national visa policy. The procedure for obtaining permanent residence based on investment is still in progress but it should be borne in mind that residency would be forfeited if investment is withdrawn from Nigeria. Other categories of persons that may qualify to acquire permanent residence include foreign nationals married to Nigerians, persons of dual nationality who qualify to be Nigerian citizens by birth but do not possess Nigerian passports as well as those who lost their citizenship (for non-criminal reasons) but wish to retain family ties to Nigeria.

12.2 Is it possible to switch from a temporary work visa to a work visa which leads to permanent residence?

It is not possible to switch from a temporary work visa to a work visa that would lead to permanent residence. The CGI may, however, under special circumstances permit a switch from one visa category to the other.

13 Bars to Admission

13.1 What are the main bars to admission for work?

Persons that fall within the category of prohibited immigrant in the Act will not be admitted to work in Nigeria. Persons in this category include those without visible means of support or likely to become a public charge, insane persons or persons suffering from any mental disorder, persons convicted in any country of any crime, persons whose admission would be in the opinion of the Minister of Interior contrary to the interest of national security, any person against whom an order of deportation from Nigeria is in force, a person who has no valid passport, prostitutes, sexual offenders or under the age of 16 (sixteen) years.

13.2 Are criminal convictions a bar to obtaining work permission or a visa?

Yes, they are. The Act states that any person convicted in any country of any crime wherever committed, which is an extradition crime within the provisions of the Extradition Act, is barred from admission into Nigeria.



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Sade brings to bear a practical knowledge of Nigerian Immigration Law, Regulations, Policies and Procedures. Sade's competences in this domain of practice, derives from years of technical experience which she combines effectively with insights gained from regular interactions with immigration authorities. No doubt, Sade draws on this wealth of experience, to offer dynamic and innovative advisory services to her Clients.



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