

The Legal Status of Foreign Nationals in Nigeria: Regulation of Entry, Residency, and Employment under Nigerian Immigration Law

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Abstract

The regulation of foreign nationals in Nigeria is central to immigration governance, balancing economic development with national security. The Constitution of the Federal Republic of Nigeria, 1999 (as amended) and the Immigration Act 2015 form the legal basis for entry, residency, and employment of non-citizens. This Article examines the scope, limitations, and enforcement of these provisions, highlighting their practical implications. Adopting a doctrinal legal research approach the paper finds that while Nigerian law establishes a structured framework for regulating entry, stay, and employment, implementation is undermined by administrative bottlenecks, inconsistent policy application, and weak institutional capacity. Broad discretionary powers granted to immigration officers often result in arbitrary decisions and rights violations, hence the paper recommends streamlining administrative processes, narrowing discretionary powers, enhancing judicial oversight, and integrating technology-driven systems to promote transparency and accountability.

Keywords: Foreign Nationals, Immigration and Residency

1. Introduction

The regulation of foreign nationals is an essential aspect of Nigeria's immigration policy, shaping the country's socio-economic development, security framework, and compliance with international

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obligations. As Africa's most populous nation and a regional economic hub, Nigeria attracts a significant number of migrants seeking opportunities for trade, investment, education, and employment. At the same time, the country faces challenges arising from irregular migration, human trafficking, cross-border crimes, and national security concerns. These realities have necessitated the development of a legal and institutional framework to manage the entry, residency, and employment of non-citizens.

The 1999 Constitution of the Federal Republic of Nigeria provides the overarching legal context, guaranteeing certain rights to all persons within Nigeria's territory while empowering the state to regulate migration in the public interest. The Immigration Act 2015, together with its subsidiary legislation, operational guidelines, and related labour and investment laws, outlines the conditions under which foreign nationals may enter, reside, and work in Nigeria.

This Article critically examines the legal status of foreign nationals within this framework, highlighting the interplay between constitutional safeguards, statutory provisions, and administrative discretion. It also analyses enforcement practices, identifies systemic gaps, and considers comparative perspectives from other jurisdictions. The aim is to propose reforms that promote transparent, efficient, and rights-compliant immigration governance in Nigeria.

2. Legal Framework Governing Entry into Nigeria

2.1 Statutory and Regulatory Instruments

The legal foundation for the regulation of entry into Nigeria is primarily contained in the Immigration Act, 2015. This statute empowers the Nigerian Immigration Service to control the movement of persons across Nigerian borders and establishes categories of visas and permits applicable to foreign nationals.¹ The Immigration Regulations 2017, made pursuant to the Act, provide detailed procedures for entry, visa issuance, and documentation.²

¹ Immigration Act 2015,Cap.11,LFN 2015,ss 2,5, and 36.

² Immigration Regulations 2017,Federal Republic of Nigeria Official Gazette No.47,Vol.104,29 May 2017.

Complementary instruments include the Passport (Miscellaneous Provisions) Act, ECOWAS Protocol on Free Movement of Persons, Residence and Establishment (1979), and relevant bilateral agreements governing reciprocal visa arrangements or diplomatic exemptions. Collectively, these instruments form the legal matrix for assessing and regulating the entry of non-citizens into the Nigerian territory.

2.2 Entry Requirements and Visa Regime

Entry into Nigeria is regulated through a structured visa regime, which includes multiple visa classes such as:

- i. Short Visit Visas(Tourist, Business, Transit)
- ii. Temporary Residence Visas(Temporary Work Permit (TWP),Subject to Regularization(STR)).
- iii. Permanent Residence Visas
- iv. ECOWAS Travel Certificate (for citizens of member states).

Each visa category has specific documentation, duration, and eligibility requirements.³ Foreign nationals are expected to obtain visas prior to arrival, except where visa-on-arrival (VOA)privileges apply.⁴ The VOA policy, introduced in 2020, is intended to facilitate ease of doing business but also requires online pre-approval before arrival at a port of entry.⁵

The discretion to grant or refuse a visa lies with the Comptroller-General of Immigration or officers acting on their behalf.⁶ The courts

³ Nigerian Immigration Service, *Guidelines on Entry Visas*, available at <https://immigration.gov.ng>.accessed 20th July 2025.

⁴ Immigration Act 2015, s.9; Immigration Regulations 2017, reg 12.

⁵ Federal Ministry of Interior, *Policy on Visa on Arrival (VoA)*,2020

⁶ Immigration Act 2015, s.8(1).

have affirmed that such discretion must be exercised in accordance with constitutional principles of fairness and non-arbitrariness.⁷

2.3 Exceptions and Regional Integration (ECOWAS).

A significant departure from strict entry controls is the ECOWAS Protocol on Free Movement, which guarantees the right to entry, residence, and establishment to citizens of member states.⁸ However, this right is not absolute and may be limited on grounds of public order, security, or health. For examples, Nigerian authorities may lawfully expel an ECOWAS national who poses a threat to national security, provided due process is followed.⁹

Despite the protocol, there have been documented cases of arbitrary detention, extortion, or deportation of ECOWAS citizens, revealing enforcement gaps and institutional limitations.¹⁰

3. Case Law on Entry and Immigration Control

In *Oyebanji v FRN*,¹¹ the Court of Appeal emphasized that the discretion of immigration authorities must be subject to judicial review particularly where the liberty of the individual is at stake. The case involved the arbitrary denial of re-entry to a dual-national without an opportunity to be heard, which the court held was a violation of Section 36 of the Constitution.

Similarly, in *Minister of Internal Affairs v. Alhaji Shugaba Abdulrahman Darman*,¹² the Nigerian Court of Appeal ruled that deportation of a Nigerian-born legislator (wrongly claimed to be a foreign national) was illegal, unconstitutional, and null and void,

⁷ Constitution of the Federal Republic of Nigeria 1999(as amended), s.36(1); see also *Oyebanji v. FRN* (2018) 15 NWLR(Pt.1642) 501.

⁸ ECOWAS Protocol A/P.1/5/79, *Relating to Free Movement of Persons, Residence and Establishment*, adopted 29 May 1979.

⁹ ECOWAS Revised Treaty 1993, art 59.

¹⁰ CDD West Africa, *The Implementation of ECOWAS Protocol on Free Movement in Nigeria: Realities and Prospects*, (Abuja,2021)7-11.

¹¹ (2018) 15 NWLR (Pt.1642) 501.

¹² (1982) 3 NCLR 915.

affirming that immigration powers must conform to constitutional protections.¹³

4. Residency Rights and Permits under Nigerian Immigration Law

4.1 Legal Basis for Residency Rights

Residency rights for foreign nationals in Nigeria are primarily governed by the Immigration Act 2015, the Immigration Regulations 2017, and related administrative guidelines issued by the Nigeria Immigration Service (NIS). These laws define the conditions under which a non-citizen may reside temporarily or permanently in the country, whether for employment, business, education, family reunification, or other legitimate purposes.¹⁴

The Immigration Act 2015 vests the power to issue, renew, or revoke residence permits in Comptroller-General of Immigration, subject to ministerial oversight.¹⁵ The Combined Expatriate Residence Permit and Aliens Card (CERPAC) is the principal legal document that confers residency status on foreign nationals residing in Nigeria for over 90 days.¹⁶

4.2 Types of Residency Permits in Nigeria.

4.2.i Temporary Residency

Temporary residence is granted to foreign nationals entering Nigeria for limited durations. Under the CERPAC framework, this permit allows residence for employment, diplomatic, educational, or family-related purposes and must be renewed annually.¹⁷ A CERPAC Green Card is typically issued for employment, while a CERPAC Brown Card is given for diplomatic or other exempt categories.¹⁸

¹³ Minister of Internal Affairs v. Shugaba (1982) 3NCLR 915.

¹⁴ Immigration Act 2015, s 18; Immigration Regulations 2017, reg 27.

¹⁵ Immigration Act 2015, s 3(2); s 20

¹⁶ Nigeria Immigration Service (NIS), Guidelines on CERPAC (2022) <<https://immigration.gov.ng>> accessed 19 July 2024

¹⁷ Immigration Regulations 2017, reg. 30.

¹⁸ CERPAC Handbook (2022) 5.

Importantly, Section 18 of the Immigration Act 2015 requires all non-citizens residing in Nigeria to register and carry their residence permits at all times.¹⁹ Failure to comply may attract fines, deportation, or prosecution.²⁰

4.2.ii Permanent Residency

Permanent residency status is more restricted. It may be granted to foreign spouses of Nigerian citizens, individuals of exceptional economic or professional importance, or those who have resided continuously in Nigeria for at least 15 years.²¹ The relevant legal basis is found under Section 20 of the Immigration Act, as well as the Immigration Regulations 2017, which empower the Minister to issue guidelines on eligibility and application procedures.²² The NIS Guidelines on Permanent Residency (2021) also outline categories such as:

- i. Spousal residency (based on marriage to a Nigerian)
- ii. Residency by naturalization (complemented by the Nigerian Citizenship Act)
- iii. Economic residency for investors or high-net-worth individuals.²³

4.3 Administrative Process and Conditions

Applications for residency permits must be submitted to the NIS headquarters or appropriate zonal offices. Required documentation includes:

- i. Passport and visa
- ii. CERPAC application forms

¹⁹ Immigration Act 2015, s. 18(1).

²⁰ Ibid, s. 19.

²¹ Immigration Regulations 2017, reg 33; see also Citizenship Act Cap C30 LFN 2004.

²² Immigration Act 2015, s 20; Immigration Regulations 2017. regs 34-36

²³ NIS Permanent Residency Guidelines (2021), paras 4-6.

- iii. Employer's expatriate quota approval (for work-based residency)
- iv. Evidence of marriage (in spousal cases)
- v. Police clearance and medical certificates.²⁴

Approval is discretionary and subject to security clearance. Furthermore, the issuance of a residence permit does not confer rights to employment or naturalization unless expressly stated.²⁵

5. Constitutional and Judicial Perspectives

Although the Nigerian Constitution does not expressly guarantee residency rights to foreigners, such rights derive from statutory and administrative discretion. However, courts have affirmed that once granted, these rights must be respected and can only be revoked in accordance with due process.

In *Eyo v A-G Federation*, the Court emphasized that even non-citizens are entitled to procedural fairness when immigration decisions affect their liberty or status.²⁶ Similarly, in *Afolayan v Nigeria Immigration Service*, the court condemned arbitrary refusal to renew a foreign national's residency status without giving reasons or hearing.²⁷

Moreover, the Supreme Court in *Director, SSS v Agbakoba* held that where the state interferes with an individual's movement or state within the country, it must justify such actions based on clear legal provisions.²⁸ This extends to immigration-related decisions.

6. Rights and Obligations of Foreign Nationals under Nigerian Immigration Law

²⁴ NIS Residency Application Requirements (2022) <<https://immigration.gov.ng>> accessed 14 July 2024

²⁵ Immigration Regulations 2017, reg 36(3).

²⁶ *Eyo v Attorney-General of the Federation* (2010) 3 NWLR (Pt 1181) 246 at 260.

²⁷ *Afolayan v Nigeria Immigration Service* (2017) 5 NWLR (Pt 1556) 438 at 454.

²⁸ *Director, State Security Services v Agbakoba* (1999) 3 NWLR (Pt 595) 314 at 331

The Nigerian legal framework governing the rights and obligations of foreign nationals is anchored primarily in the Constitution of the Federal Republic of Nigeria 1999(as amended), the Immigration Act 2015, the Immigration Regulations 2017, and relevant international instruments to which Nigeria is a party. While the Constitution guarantees fundamental rights to “every person” within Nigeria, certain rights are subject to lawful restrictions based on immigration status. The Immigration Act and subsidiary legislation also impose obligations on foreign nationals to ensure compliance with Nigeria’s immigration control regime.

6.1 Rights of Foreign Nationals in Nigeria

6.1.i Right to Entry and Residence upon Compliance with Legal Requirements

Foreign nationals are entitled to enter and reside in Nigeria if they comply with the conditions prescribed under the Immigration Act 2015 and the Immigration Regulations 2017. These include possession of valid entry visas or residence permits and adherence to the terms of stay. In *Osawa v. Registrar of Trade Unions*,²⁹ the Supreme Court recognized that non-citizens lawfully present in Nigeria may enjoy rights accorded under Nigerian law, subject to statutory restrictions.

6.1.ii Right to Fundamental Human Rights.

Section 42 of the Constitution prohibits discrimination based on circumstances of birth or membership of a community, but more importantly, Chapter IV rights (such as the right to life, dignity, fair hearing, and personal liberty) extend to “every person” in Nigeria, not just citizens.³⁰ S.42 of the African Charter on Human and Peoples’ Rights (Ratification and Enforcement) Act also reinforces these protections.³¹ In *Chinonso Obioha v. Federal Republic of Nigeria*³² the

²⁹ (1985) 1 NWLR(Pt.4) 755(SC)

³⁰ Constitution of the Federal Republic of Nigeria, 1999 (as amended).

³¹ African Charter on Human and Peoples’ Rights (Ratification and Enforcement) Act, Cap. A9, Laws of the Federation of Nigeria, (LFN) 2004.

ECOWAS Court affirmed that foreign nationals are entitled to protection from unlawful detention and deportation without due process.

6.1.iii Right to Work and Engage in Business (Subject to Permits)

Foreign nationals with valid work permit or expatriate quotas may engage in employment or business activities in Nigeria under sections 36-39 of the Immigration Regulations 2017. In *Minister of Internal Affairs v Shugaba Abdulrahman Darman*,³³ although the case primarily concerned deportation, the court emphasized that lawful residents enjoy the right to carry out lawful economic activities without arbitrary interference.

6.1.iiv Right to Due Process in Deportation

Foreign nationals are entitled to procedural safeguards before deportation, including notice of allegations, opportunity to respond, and judicial review, as recognized in Section 36 of the Constitution and applied in *Garba v. University of Maiduguri*,³⁴ though not an immigration case, it reinforced the principle of fair hearing.

6.2 Obligations of Foreign Nationals in Nigeria

6.2.i Compliance with Immigration Conditions

Foreign nationals must comply strictly with visa and residence permit conditions, including duration of stay, prohibition of unauthorized employment, and notification of address changes.³⁵ Overstaying or breaching permit conditions can result in fines, detention, or deportation under section 57 of the Immigration Act 2015.

³² ECW/CCJ/JUD/03/11(ECOWAS Court,2011).

³³ (1982) 3 NCLR 915.

³⁴ (1986) 1 NWLR (Pt.18) 550.

³⁵ Immigration Regulations 2017, regs.8-10.

6.2.ii Respect for Nigerian Laws and Public Order

Under section 45 of the Constitution, certain rights may be restricted in the interest of public safety, order, and morality. Foreign nationals are under a duty to respect Nigerian criminal, civil, and administrative laws. In *R v. Omoni*³⁶ the court underscored that foreigners are subject to the same criminal laws as citizens while in Nigeria.

6.2.iii Tax Compliance

Foreign nationals earning income in Nigeria are obligated to pay applicable taxes under the Personal Income Tax Act and other fiscal statutes, regardless of nationality or residence status.³⁷

6.2.iv Registration and Reporting Duties

The Immigration Regulations 2017 require foreign nationals to register with the Nigeria Immigration Service (NIS) upon entry, maintain valid documentation, and report any change in employment or residence. Breach of these obligations constitutes an offence.³⁸

7. Balancing Rights and Obligations.

Nigeria's immigration policy seeks to balance the protection of foreign nationals' rights with the sovereign prerogative to regulate entry, stay, and removal. While international instruments such as the International Covenant on Civil and Political Rights (ICCPR) and the African Charter impose human rights obligations, the domestic legal framework ensures that the enjoyment of rights is conditioned upon lawful presence and compliance with immigration requirements.

8. Institutional Oversight and Enforcement

Nigeria's immigration and enforcement ecosystem is distributed across multiple institutions with overlapping mandates. The principal actors are:

³⁶ (1949) 12 WACA 511.

³⁷ Personal Income Tax Act, Cap.P8, LFN 2004, s.3.

³⁸ Immigration Regulations 2017, regs.12-15.

8.1 Nigeria Immigration Service (NIS)-

The frontline agency for border control, visa issuance, registration of foreign nationals, enforcement (apprehension, detention, deportation) and maintenance of immigration records. The NIS enforces the Immigration Act and Regulations and runs ports of entry, checkpoints and detention facilities.³⁹

8.2 Ministry of Interior-

Formulates national immigration policy and supervises the NIS and related agencies; responsible for high-level policy, international cooperation and administrative oversight.⁴⁰

8.3 National Commission for Refugees, Migrants and Internally Displaced Persons (NCFRMI)

Mandated to implement refugee policy, conduct refugee status determination (RSD) frameworks, coordinate protection and durable solutions for refugees and IDPs.⁴¹

8.4 National Agency for the Prohibition of Trafficking in Persons (NAPTIP)-

Identifies, prosecutes and provides support to trafficking victims, works at intersections with immigration enforcement where victims are encountered.⁴²

³⁹ Immigration Act (consolidated 2015)-powers and functions of the Nigeria Immigration Service

⁴⁰ Ministry of Interior mandate-supervisory responsibility for NIS (Ministry administrative circulars and policy instruments).

⁴¹ National Commission for Refugees, Migrants and Internally Displaced Persons (NCFRMI Act)-mandate for refugee protection and coordination (2022 re-enactment/earlier NCFR structures).

⁴² National Agency for the Prohibition of Trafficking in Persons (NAPTIP) Act-mandates for trafficking identification and victim support

8.5 Nigeria Police Force (NPF) and Other Security Agencies.

Assist in enforcement operations, criminal investigations, and detection where offences overlap with criminal law.⁴³

8.6 Attorney-General/Ministry of Justice-

Prosecutes criminal immigration offences, advises on removals involving legal complexity (e.g., nationality disputes, extradition overlaps), and appears in judicial review proceedings.⁴⁴

8.7 Judiciary and Administrative Tribunals. -

Courts (High Courts, Court of Appeal, Supreme Court) exercise judicial review of executive immigration actions, determine legality of detention and removals, and protect constitutional rights of “every person.”⁴⁵

8.8 International and Civil-Society Actors-

The United Nations High Commissioner for Refugees (UNHCR), International Organization for Migration (IOM), NGOs and Legal aid clinics play roles in identification, legal assistance, monitoring detention conditions and advocacy.⁴⁶

Enforcement is therefore operational (Nigeria Immigration Service(NIS)-led) but dependent on multi-agency coordination for protection such as National Counter-Fraud and Risk Management Initiative(NCFRMI), The United Nations High Commissioner for Refugees(UNHC) and National Agency for the Prohibition of Trafficking in Persons(NAPTIP) and constrained in law by constitutional guarantees and judicial review. Where coordination is weak, enforcement predominates; where oversight mechanisms

⁴³ Nigeria Police Force-role in enforcement and criminal investigations.

⁴⁴ Attorney-General of the Federation/Ministry of Justice-prosecution and legal advice functions.

⁴⁵ Constitution of the Federal Republic of Nigeria 1999(Chapter IV: Fundamental Rights-application to “every person” in the Federation.

⁴⁶ UNHCR/IOM operational roles and partnership models in Nigeria

(judicial review, parliamentary scrutiny, civil-society monitoring) are active, protection outcomes improve.

9. Challenges and Gaps in Residency Administration.

Nigeria's residency permits system faces several practical and legal challenges:

1. Bureaucratic delays and corruption hinder timely processing of permits.⁴⁷
2. The exorbitant cost of obtaining and renewing CERPAC discourages compliance.⁴⁸
3. Inadequate protection against arbitrary deportation or permit revocation, especially for foreign spouses of Nigeria.
4. Lack of judicial review mechanisms specific to immigration decisions, which limits accountability.⁴⁹

There is an urgent need for reforms to create a more transparent and rights-based residency framework that balances national security with Nigeria's obligations under regional and international human rights instruments such as the ECOWAS Protocol on Free Movement and the International Covenant on Civil and Political Rights (ICCPR).⁵⁰

10. Comparative Perspectives from Other Jurisdictions

The regulation of foreign nationals varies significantly across jurisdictions, reflecting differences in constitutional structures, labour policies, and national security priorities. A comparative analysis offers

⁴⁷ A. Ogundipe, “*Challenges of CERPAC Implementation in Nigeria*” (2021) 8 *Journal of African Migration Studies* 97, 101.

⁴⁸ J. Akindele, “*Administrative Hurdles in Nigerian Immigration Law*” (2023) 12 *Nigerian Public Law Review* 145,148.

⁴⁹ B. Aluko , “The Need for Immigration Courts in Nigeria” (2020) 15 *Nigerian Judicial Review* 79, 82

⁵⁰ ECOWAS Protocol *Relating to Free Movement of Persons, Residence and Establishment* (1979); ICCPR (1966), art 13.

valuable lessons for Nigeria in balancing sovereign control with the protection of rights.

In Canada, the Immigration and Refugee Protection Act governs entry, residency, and employment, with the Canadian Charter of Rights and Freedoms guaranteeing certain rights to “everyone” irrespective of citizenship.⁵¹ In *Singh v. Minister of Employment and Immigration*,⁵² the Supreme Court held that refugee claimants are entitled to full Charter protections, including the right to a fair hearing before deportation.

South Africa regulates foreign nationals under the Immigration Act 2002, guided by the 1996 Constitution which guarantees rights such as dignity, equality, and fair labour practices to all persons.⁵³ The Constitutional Court in *Union of Refugee Women v. Director, Private Security Industry Regulatory Authority*,⁵⁴ struck down regulations excluding refugees from certain employment sectors, holding them inconsistent with the right to equality.

In the United Kingdom, the Immigration Act 1971 and subsequent amendments govern entry and stay, while the Human Rights Act 1998 incorporates the European Convention on Human Rights (ECHR) into domestic law. In *R (Kiarie) v. Secretary of state for the Home Department*,⁵⁵ the UK Supreme court held that foreign nationals facing deportation on criminal grounds must be given a meaningful opportunity to appeal, reinforcing procedural fairness.

These jurisdictions demonstrate that effective immigration governance requires clear statutory provisions, independent adjudication mechanisms, and adherence to constitutional or human rights standards to prevent discrimination abuse.

⁵¹ Canadian Charter of Rights and Freedoms, Part 1 of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11

⁵² [1985] 1 SCR 177 (SCC)

⁵³ Constitution of the Republic of South Africa, 1996, ss 9.10 & 23

⁵⁴ *Union of Refugee Women v. Director: Private Security Industry Regulatory Authority* 2007 (4) SA 395 (CC)

⁵⁵ *R (Kiarie) v. Secretary of State for the Home Department* [2017] UKSC 42, [2017] 1 WLR 2380.

11. Recommendations

Predicated upon the findings of this paper, it is recommended that the Immigration Act 2015⁵⁶ is amended to define the scope of discretion granted to immigration officers, ensuring that decisions on entry, residency, and employment are transparent, predictable, and consistent with constitutional safeguards. It is also suggested that simplified visa and work permit procedures, supported by digital platforms be introduced to reduce bureaucratic delays and enhance compliance monitoring. Prompt judicial review of administrative decisions affecting the status of foreign nationals, in line with the principles in *Odafe v Attorney of the Federation*⁵⁷ should be adopted to enhance liberty through due process. Immigration policies should also be aligned with labour laws to prevent exploitation and discrimination of migrant workers, following the South African precedent in *Union of Refugee Women v Director: Private Security Industry Regulatory Authority*.⁵⁸ Finally, it is recommended that an independent immigration ombudsman to investigate complaints, monitor compliance, and recommend reforms.

12. Conclusion

The regulation of foreign nationals in Nigeria remains a critical governance issue, situated at the intersection of sovereignty, economic development, and human rights. While the 1999 Constitution and Immigration Act 2015 provide a structured legal framework, enforcement challenges, ranging from administrative inefficiencies to rights violations, undermine its effectiveness. Comparative jurisprudence demonstrates that rights-based immigration governance can coexist with robust national control when supported by clear statutory limits, procedural fairness, and institutional accountability.

⁵⁶ Immigration Act, No.8 of 2015, Laws of the Federation of Nigeria (LFN) 2015, ss 17-23.

⁵⁷ *Odafe & Ors v. Attorney –General of the Federation & Ors* (2004) LPELR-22208 (CA).

⁵⁸ *Union of Refugee Women v. Director: Private Security Industry Regulatory Authority* 2007(4) SA 395(CC).

For Nigeria, the path forward lies in legislative reform, institutional strengthening, and adherence to constitutionalism. As reaffirmed in *Mohammed v. Commissioner of Police*,⁵⁹ the rights guaranteed under the Constitution extend to “all persons” within Nigeria’s jurisdiction. Effective immigration control must therefore be exercised within the rule of law, ensuring that entry, residency, and employment policies promote both national interests and respect for human dignity.

⁵⁹ *Mohammed v Commissioner of Police* (2014) LPELR -23614(CA).