



GUIDANCE NOTICE

IN RESPECT OF SCHEDULE 3 - DATA PROTECTION OFFICER'S ASSESSMENT

(GENERAL APPLICATION AND IMPLEMENTATION DIRECTIVE (GAID) 2025)

NDPC/HQ/GN/VOL.05/ 26

Preamble

WHEREAS Continuous Professional Development (CPD) is a necessary organisational measure which ensures that individuals who are entrusted with safeguarding the rights and interests of data subjects are abreast of development in a rapidly evolving data protection ecosystem;

MINDFUL of the requirement of the S.32 of the Nigeria Data Protection Act, 2023 (NDP Act) to the effect that: A data controller of major importance shall designate a Data Protection Officer with expert knowledge of data protection law and practices, and the ability to carry out the tasks prescribed under the Act and subsidiary legislation made under;

COGNIZANT of the need to, inter alia, to put in place a transparent standard in verifying data protection officers with the requisite expert knowledge of data protection law and practices

NIGERIA DATA PROTECTION COMMISSION (hereafter referred to as the Commission) hereby provides guidance on Data Protection Officers assessment as follows:

1. Objectives

This Guidance Notice aims to:

- a) Ensure transparency in the process of allocation of credit scores to professional development initiatives.

- b) Promote active participation by Data Protection Officers in topical issues relating to the advancement of data privacy and protection.
- c) Foster the development of globally competitive pool of data protection ecosystem in Nigeria.
- d) Encourage professional development service providers, data controllers and data processors to prioritise CPD.

In view of the above, DPOs who wish to be verified in line with Article 14 of the NDP Act GAID are expected to provide verifiable evidence relating to their Continuous Professional Development (CDP) as outlined in this Guidance Notice.

2. Implementation Outline

(1). Annual Requirement

- a) Certified DPOs shall obtain a minimum of twenty (20) CPD points out of the allocated forty (40) CPD annually to maintain active verification status.
- b) To ensure substantive professional growth, at least ten (10) points must be derived from structured training activities.

(2) CDP Categories and Point Allocation

Assessment areas are divided into three categories as follows:

- a) **Category A: Formal Training & Certification (Minimum 10 Points Required Annually).**

Evaluation under Category A involves:

- 1. Verifiable participation in: -
 - i. NDPC-accredited training programme (4 Hours)– 5 points
 - ii. NDPC-accredited training (2 hours)– 2 points
 - iii. NDPC-recognised workshop/webinar (IMPACT Series, etc) – 2 points

2. Completion of a reputable e-learning programme (such as NDPC's Virtual Privacy Academy, etc.) – 4 points
3. Completion of advanced NDPC-approved course – 5 points
4. Acquisition of recognised international privacy certification – 5 points
5. Renewal of recognised international certification – 3 points

b) Category B: Knowledge Contribution (Maximum 10 Points Annually)

A DPO may obtain CPD points in the following circumstances:

1. Publication of a peer-reviewed article in a recognised journal – 5 points
2. Publication of industry article or policy brief – 3 points
3. Speaking engagement at recognised data protection conference – 3 points
4. Panel participation at a recognised event – 2 points
5. Facilitation of NDPC-accredited training – 4 points
6. Development of approved privacy training materials – 3 points

c) Category C: Professional Engagement & Ecosystem Participation (Maximum 8 Points Annually)

Engagement in professional initiatives may be graded as follows:

1. Participation in a recognised privacy conference – 3 points
2. Participation in NDPC technical working group – 4 points
3. Active membership in a recognised privacy professional body – 2 points
4. Mentorship of emerging DPO (minimum 3-month engagement) – 3 points
5. Contribution to regulatory consultation or public comment process – 2 points

3. Evidence and Verification

A DPO who is desirous of being verified shall submit verifiable documentation as may be required by the Commission. The Evidence may include:

- a) Certificates of attendance,
- b) Confirmation emails,
- c) Copies or links of publications, or
- d) Formal letters of participation, and
- e) Professional Education and Engagement Review Forms (PEER Forms)

4. Implementation Considerations

1. CPD compliance shall be reviewed annually during certification re-validation.
2. Non-compliance may result in a temporary inactive status for the non-compliant DPO pending remediation.
3. The Commission shall put in place a digital system for the purpose of receiving and monitoring CPD of DPOs.

Dated this 26th Day of June 2026



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Head of Legal Enforcement and Regulations



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S/N	METRIC	MARKS
1	Confirmation that the issuing body is an educational body approved or accredited by a competent regulator of educational services.	15
2	Confirmation that the training leading to the award of the certificate is up to 40 hours.	15
3	Confirmation that an examination was conducted as a condition precedent to the award of the certificate.	20
4	Confirmation that the DPO is enrolled on the database of the Commission.	10
5	Cumulative Score for Continuous Professional Development (CPD) Yearly (At least active participation in 4 different programmes recognised by the Commission).	40
TOTAL		100