DIGITAL PAYMENT AND TAX REVENUE IN NIGERIA

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ABSTRACT

The study examined the relationship between digital payments and tax revenue in Nigeria. Data were obtained from the Federal Inland Revenue Service the questionnaire administered on the management staff at the various corporate offices. Secondary data on tax revenue were also obtained from the Federal Inland Revenue Service website. Analyses of data were performed with Pearson's Product Moment Correlation and Multiply Regression using the Statistical Package for Social Sciences version 21.0 and E-view version 10. Findings indicate that digital payments significantly influence capital gains tax. The finding of the study supports the finding of Oseni (2016), who conducted a study with the objective of assessing the effect of ICT on tax administration in Nigeria. The study concludes that digital payment has a significant impact on tax revenue in Nigeria. Based on the findings, the study concludes as follows: Provision should also be made in the Finance Act in taxing capital gains on online investments, block chain transactions and cryptocurrencies. Staff of the Federal Inland Revenue Service (FIRS) should be trained in big data analytics, data mining, block-chain technologies, automation, robotics. cloud computing and artificial intelligence to be able to interrogate, and access on me capital gains taxes and other digital related taxes. Also, Introduction of social media and mobile application taxes in the Finance Act. Will boost VAT revenues. Significantly, the social media and mobile application taxes are consumption taxes in the nature of excise duty. Excise duties are relatively easy to administer which makes them the preferred tool for countries with low administrative capacity.

Keywords: Digital Payment, Capital Gains Tax, Tax Revenue, Value added Tax.

INTRODUCTION

Digital payment is a form of carrying out transactions devoid of any physical exchange of money. However, the said transaction is mandatorily performed via the internet or applications necessitating its employment. It is the principal branch of digitalization, comprising the transaction of the natives from the physical exchange of money to digital transactions. The parties involved in the said scenario include a payer and a payee. The individual sending the money is the payer, whereas the recipient or the person to whom the money is transferred is the payee. This contemporary form of exchange of money, mandatory the internet for both parties and eliminating hard currency give-and-take in it entirely, is also known as electronic payment. It is, hence, a rapid and highly convenient method of carrying out transactions (Adults, 2020). This modern-day method of money exchange comprises several modalities in its application of the internet. These are debit card, credit card, net banking, unified payments interface (UPI), digital wallets, etc (Mohammed, 2021). It is noteworthy that the intensified use of E-payments in the present time has exacerbated the widespread of cyber-crimes and tax evasions. This age is witnessing extensive use of smart phones and enormous access to products and devices via E-commerce applications; how prepared are the Nigerian Tax Authorities in the use of digital technologies to harvest the increasing tax revenue as a result of these digital payments (Banu, et al, 2019). According to Malan, et al, (2019), in purchasing through E-commerce, websites and opting for internet banking, the portal automatically redirects to the preferred bank's website and the banking details, mentioned above are not required. At present, all the banks in Nigeria rely on internet banking services and all the payment gateways provide the options of virtual banking options. As specified earlier, NEFT, RTGS, and IMPs are the most commonly exercised ways to transact via on-line banking (Malan, et al, 2019). Mobile Banking, though introduced two decades, ago, the application of mobile banking is still scarce, especially when compared with banking cards and internet banking. However, their usefulness is equally substantial. Also, denoted as M-banking, or SMS banking, this is a kind of digital payment service that incorporates almost all Internet banking features (such as issuing a new cheque book or requesting a new debit/credit card, beyond merely paying money) and exercised via an official banking software application that needs to be installed via app store of smartphone or tablet (Malusare, 2019). However, Mujinga (2020) opined that nearly every bank has its own application, which as of late, has been used for more than internet banking, provided similar features for significant ease of accessibility. Many people refer to this branch of digital payment services as the future of banking, considering the lots of features, and it provides in a clean user Interface (Mujinga, 2020). Tax revenue can be seen as a basic source of government revenue. Tax shows the level of activities a government can carry-on without incurring debt (Brautigam, 2018). Naiyeju (2020), states that a critical factor to the collection of tax revenue is the tax system put in place. To further elucidate this, Onyeka and Nwankwo (2016) state that the level of tax collected is a reflection of the quality of the tax management system put in place. According to Omolehinwa and Naiyeju (2015) tax revenue is a fiscal tool in the economy used in achieving certain macroeconomic objectives. They further show that tax revenue is gathered in the federation account and distributed among the federating units (Federal, State and Local government) of Nigeria. Generally, tax is imposed on the income or profits of all companies operating in Nigeria except where the company or the profits made are specifically exempted under the Act. Specifically, Nigerian companies pay tax on their global profits whether such profits were received in or brought into Nigeria while non-Nigeria companies are taxed on that portion of their global profits that is attributable to their operations in Nigeria (Kiabel & Nwikpasi, 2019). Also, Part IV, S. 40(1) of the Companies and Allied Matter Act (CAMA), 2007 stipulates "There shall be levied and paid for each year of assessment in respect of the total profits of every company tax at the rate of thirty percent for every naira". By the implication of this subsection of the law, the companies' income tax rate in Nigeria is 30% of taxable profit of all Nigerian companies.

There is a possibility that Value added Tax (VAT) and Goods and Services

Tax (GST) rates will apply to every business (Ndajiwo, 2020). VAT and GST have been around for decades and include digital businesses. Digital services could be through tangible or intangible goods, physical services (such as connecting service providers to clients) or even streaming platform. Value-Added Tax (VAT) is important for any international entrepreneur to consider when dealing with sales. VAT is a consumption tax that applies to all goods and services, whether physical or digital. That means, every time a customer purchases a good or service in the EU, they pay VAT on the spot. The business of sale collects the VAT from the customer and pays some or all of it to the government. In this way, you can see yourself as a kind of tax middleman between the government and consumer. It's not your money paying for the VAT, you are just collecting and submitting the customer's money to the government. It is important to be charging the VAT to your customers because the government will still be expecting that money whether it comes from your pocket or theirs. Unfortunately, it becomes more complicated since the countries you will be paying the VAT to all have different rates (including the 28 EU member States). The dance around different VAT rates is due to the fact that the consumer is the one paying so it should be at the rate of their country not the country of the seller or of the company incorporation. This also helps even the playing field for local businesses when their consumers are purchasing from cheaper international locations instead (Ndou, 2004). Though VAT has so far sounded like bad news for the international business owner, there is still good news on the way. You only need to charge a business VAT for business to customer (B2C) transactions, not when you are dealing with Business to Business sales (B2B). You also do not need to charge VAT on personal services if you are sitting outside of the EU. This includes popular remote businesses such as consulting companies. This tax is dominantly for the sale of products including those of the digital world. Files, pictures, online resources and other forms of digital products though intangible is still included in a VAT sale product. To fall under the exemptions of VAT, ensure you are carefully considering who your consumer is and whether the sale is a personal service or a physical (tangible or intangible) product. Tax is a compulsory levy imposed by the government on incomes of tax prayer's in order to pay the expenses of governance.

Capital Gains Tax (CGT) is a form of tax chargeable on capital gains arising from the disposal of chargeable assets. Gains here mean increases resulting in the market value of assets to a person who does not regularly offer them for sale and in whose hands they do not constitute stock in trade (inventory) Obaje and Ememaku (2012). Capital gains may arise in two instances, in the first place, where the asset appreciates in value while still in the hands of the owner, or may be the realized gains when the assets are sold or disposed off. Capital gains tax are payable on stocks, shares, securities, land and buildings, plant and machinery, every business assets. The national tax policy (NTP) was first published in 2012, as part of the efforts to entrench a robust and efficient tax system in Nigeria. Four years after, the rapidly changing commercial environment and persistent low tax to gross domestic product (GDP) ratio among other developments, demand new strategies to continue to meet government objectives of creating an enabling environment, simplifying the tax system and ensuring ease of compliance. It is therefore imperative to continually review and update the National Tax Policy (NTP). The national tax policy provides the fundamental guidelines for the orderly development of the Nigeria tax system. The policy is expected to achieve the following objectives: guide the operation and review of the tax system, provide the basis for future tax legislation and administration, serve as a point of reference for all stockholders on taxation, provide benchmark on which stakeholders shall be held accountable and provide clarity on the roles and responsibilities of stakeholders in the tax system. The Nigeria tax policy provides a framework for a sustainable system that would ensure reliable sources of revenue to government and support the economic development of the nation. The new national tax policy 2017 has the following guidelines which all existing and future taxes are expected to align in line with the following fundamental features: Equity and fairness: Nigeria tax system should be fair and equitable and devoid of discrimination. Tax payers should be required to pay according to their ability, simplicity, certainty and clarity. Tax laws and administrative processes should be simple, clean and easy to understand -convenience. The time and manner for the fulfillment of tax obligation shall take into account the convenience of tax payers and avoid undue difficulties. Low compliance cost: The financial and economic cost of compliance to the tax payer should be kept to the barest minimum. Low cost of administration: The administration in Nigeria should be efficient and cost effective in line with international best practices. Flexibility: Taxation should be flexible and dynamic to respond to changing circumstances in the economy in a manner that does not retard economic activities. Sustainability: The tax system should promote sustainable revenue, economic growth and development. There should be a synergy between tax policies and other economic policies of government. Sustainability principle is criticized as having a kind of a lock-in-effect on business in the sense that it inhibits the sale of capital assets which have appreciated in value (Brown, 1955) quoted in Obaje (2012). Capital gains tax is the levy on the profit that an investor makes when an investment is sold. It is owed for the tax year during which the investment is sold. An investor will owe long term capital gains tax on the profits of any investment owned for at least one year. If the investment is for one year or less, short-term capital gains tax applies. The short-term rate is determined by the tax payer's ordinary income bracket. When stock shares or any other taxable investment assets are sold, the capital gains or profits are referred to as having been "realized". The tax doesn't apply to unsold investments or "unrealized capital gains". Stock shares will not incur taxes until they are sold, no matter how long the shares are held or how much the 'increase in value. Capital gains tax was first introduced in Nigeria by the capital Gains Act of 1967. Section 1 (i) of the Act states inter alia: subject to the provisions of this Act there shall be charged a tax to be called capital gains tax for the year of assessment 1967-1968 and for subsequent years of assessment in respect of any capital gains, that is to say, gains accruing to any person on or after April 1967 on a disposal of assets. Subsection 2 states, "every such gain shall, except so far as otherwise expressed provided, be a chargeable gain. Also, section 1(3) of the Acts provided that, "unless the context otherwise requires, any reference to a persons shall include a reference to any person to whom section 2 of the Personal Income Tax Act applies. The rate of capital gains tax shall be ten percent according to the Act. Chargeable assets subject to the exception provisions by the Act shall be all forms of property, shall be assets for the purposes of the Act, whether situated in Nigeria or not, including; options debts and incorporeal property generally. Any currency other than Nigeria currency and any form of property created by the person disposing of it, or otherwise coming to be owned without being acquired, and without, prejudice to the foregoing provisions, this section shall have effect, notwithstanding that the property is an asset in respect of which qualifying expenditure had been incurred under the schedule to the Personal Income Tax Act, the third schedule to the Companies Income Tax Act of the Petroleum Profit Tax Act Assets situated outside Nigeria, without prejudice to the foregoing provisions of the Act, as respect any chargeable gains accruing in the year 1967-1968 or a later year of assessment from disposal of assets situated outside Nigeria-where the disposal of assets is by an individual who is in Nigeria for some temporary purpose only and not with any view or intent to establish his residence in Nigeria and if the period or sum of the periods for which he is present in Nigeria in that year of assessment exceeds 182 days or where the disposal is by any trustees of any trust or settlement and the seat of administration of the trust or settlement is situated outside Nigeria during the whole of that year of assessment, or ‘where the disposal is by a company, which is not a Nigerian company within the meaning of section 105 of the Companies Income Tax Act, that is, to say, a company whose activities are managed and controlled outside Nigeria during the whole of that year of assessment, capital gains tax shall be charged on the amounts (if any) received or brought into Nigeria. This reasonably explores the impact of digital economy on capital gains tax revenue. The borderless nature of business models of digital economy players has challenged the physical establishment (PE) principle in taxation of foreign multinationals’ goods and services and their profit. A digital service provider can earn income from single service beneficiary across several international boundaries. It is therefore difficult, if not impossible to allocate with any degree of certainty income earned from a single service beneficiary across multiple productions without some level of subjectivity, Ogungbero and Olaghere (2021).

LITERATURE REVIEW

Oseni (2016) conducted a study with the objective of assessing the effect of ICT on tax administration in Nigeria. The qualitative research method was used adopting content analysis to process the data gotten. It was shown from the study that ICT will expose the activities of tax evaders. Beeson et al, (2016) assessed the determinants of income tax compliance in Mauritius digital space for individual taxpayers. The study adopted primary survey design to obtain data which was analyzed with the aid of thematic statistical analysis. Their study result suggests that tax knowledge impact significantly on tax compliance and that statutory audit, penalties, personal financial constraints perceptions of government expenditure influences compliance level. The study concluded that reduction of non-compliance should be some collaborative efforts between tax payers and tax administrators. Ifere and Eko (2014) examined the tax innovation, administration and revenue generation in Cross River State. The study employed qualitative research technique using a structured questionnaire to access data from the three senatorial districts in Cross River State. The study using an analytica1 statistics of descriptive and regression analysis found significant degree of inefficiency in the administration of taxes in Cross River State. Otieno, Oginda, Obura, Aila, Ojera and Siringi (2013) conducted a study in Kenya in order to assess the effect of ICT on revenue collection in Kenya by the use of the survey research design. They revealed that there is a positive relationship between ICT and the effectiveness and efficiency of revenue collection. Paul and Mustapha (2011) evaluated the determinants of improving tax revenue through tax compliance in Malaysia digitalized economy. The study used survey method to obtain data for analysis. The result suggested that tax compliance is strongly influenced by tax payer's tax knowledge which varies significantly among respondents. It further revealed the probability of being audited, perception of government spending, penalties, personal financial constraints, and the influence of referent groups as determinants of improving tax revenue through tax compliance in Malaysia's digitalized economy. Dowe (2018) observed that the tax authorities around the world are using electronic tax administration systems (like E-government led solutions like electronic tax filing to interact with taxpaying public in tax collection, administration and compliance settings, so as to improve effectiveness and efficiency in tax administration. Given that the bureaucratic structure is very expensive for public, the use of automated systems has proven to be capable of introducing massive efficiencies for the business to process the information and file the taxes at minimal cost. Although it is recognised that the use of IT technologies is expected to yield greater tax productivity, however, it is not without its pitfalls in harnessing its benefits. It depends on quality of internet facility, availability of electricity to power the host server, cost of maintenance of ICT facilities, technical know-how by tax administering agencies and literacy among tax-paying populations (especially the lower income tax payers) and incidence of internet hackings. Schaefer and Spengel (2015) carried out a study adopting a qualitative research design in order to examine the effect of ICT on international corporate taxation. They found out that ICT facilitates tax shift from host countries of subsidiaries to the host country of the parent country.

METHODOLOGY

For the purpose of this study, the survey research design and ex-post facto research design were adopted. The justifications for this choice is based on the fact that data collected on the variables of the study are in form of opinions and perception and again data on tax revenue were sourced from Federal Inland Revenue Service official website for the period.

RESULTS

Test of Hypothesis One

Ho1: There is no significant relationship between digital payment and value added tax revenue.

Regression Result for Digital Payments and Value Added Tax revenue

Model Summary

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate	Durbin-Watson
1	.735a	.540	.527	2.30804	1.847

a. Predictors: (Constant), Value Added Tax Revenue

b. Dependent Variable: Digital Payments

Source: Researcher's Desk

Coefficients

Model	Unstandardized Coefficients		Standardized Coefficients	t	Sig	Collinearity Statistics	
	B	Std. Error	Beta			Tolerance	VIF

	Constant	5.413	1.286		4.209	.000		
1	Value added Tax	2.860	.446	.735	6.416	.000	1.000	1.000
a. Dependent Variable: Digital payments								

Source: Researcher's Desk

The table above suggests that Digital payments do not significantly influence Value Added Tax revenue. The R of 0.735, while the R2 is 0.540 which reveals that Digital payment explains 54.0% of the observed variation can be explained by the model's inputs. The adjusted R2 is high because digital payment increases the model more than expected value, the t-test which is 7.233 with 58 degree of freedom, the test is significant, the relationship is high. The linear regression analysis estimates the linear function to be .446. Moreso, the intercept of the regression model is positive which implies that as digital payment increases, Value Added Tax revenue also decreases. The Durbin Watson Statistic indicates a positive autocorrelation and values of 1.847. The significant test shows that Digital payment has a significant influence on Value Added Tax revenue. Thus, we conclude that Digital payment significantly impacts on Value Added Tax revenue. Since an r value that is less than 0.20 (r < 0.20) is the benchmark for accepting the null hypotheses and an r value that is greater than or equal to 0.20 (r 0.20) is the benchmark for rejecting the null hypotheses, based on this, guidelines for accepting or rejecting the null hypothesis formulated for the study according to Irving (2005) cited in Ahiazu & Asawo (2016), the researcher rejects the null hypothesis and accept the alternate hypothesis. This was because, the r value obtained from our SPSS computed output is greater than 0.20 i.e. r 0.735 is greater than 0.20.

Test of Research Hypothesis Two

H02: There is no significant relationship between digital payment and capital gains tax revenue

Regression Result for digital payments and Capital Gains Tax Revenue

Model Summary

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate	Durbin-Watson
1	.491a	.241	.219	.58712	2.145
a. Predictors: (Constant), Digital payments					
b. Dependent Variable: Capital Gains Tax Revenue					

Source: Researcher's Desk

Coefficients

Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig	Collinearity	Statistics
		B	Std. Error	Beta			Tolerance	VIF
	Constant	.763	.399		1,909	.064		

1	Digital Technology	.097	0.29	.491	3.332	.002	1.000	1.000

a. Dependent Variable: Capital Gains Tax Revenue

Source: Researcher's Desk

The table above suggests that Digital payments do very moderately influence Capital Gains Tax. The R of 0.491, while the R2 is 0.241 which reveals that Digital payment explains 24.1% of the observed variation, and can be explained by the model's inputs. The adjusted R2 is high because Digital payments increase the model more than expected value the t-test which is 3.332 with 58 degree of freedom, the lest is significant, the relationship is moderate. The linear regression analysis estimates the linear function to be .029. Moreso, the intercept of the regression model is positive which implies that as Digital payment increases; Capital Gains Tax revenue also moderately decreases. The Durbin Watson Statistic indicates a positive autocorrelation and values of 2.145. The significant test shows that Digital payment has a moderate influence on Capital Gains Tax. Thus, we conclude that Digital payment moderately impact on Capital Gains Tax revenue.

Since an r value that is less than 0.20 ($r < 0.20$) is the benchmark for accepting the null hypotheses and an r value that is greater than or equal to 0.20 (r 0.20) is the benchmark for rejecting the null hypotheses, based on this, guidelines for accepting or rejecting the null hypothesis formulated for the study according to Irving (2005) cited in Ahiazu & Asawo (2016), the researcher rejects the null hypothesis and accept the alternate hypothesis. This was because, the r value obtained from our SPSS computed output is greater than 0.20 i.e. r 0.491 is greater than 0.20.

DISCUSSION OF FINDINGS

Digital payments significantly influence capital gains tax. The finding of the study supports the finding of Oseni (2016), who conducted a study with the objective of assessing the effect of ICT on tax administration in Nigeria. The qualitative research method was used adopting content analysis to process the data gotten. It was shown from the study that ICT will expose the activities of tax evaders and this agrees with findings of Beeson, et al, (2016). They assessed the determinants of income tax compliance in Mauritius digital space for individual tax payers. The study adopted primary survey design to obtain data which was analyzed with the aid of thematic statistical analysis. The study result suggests that tax knowledge impact significantly on tax compliance and that statutory audit, penalties, personal financial constraints, perceptions of government expenditure influence compliance level. The study included that reduction of non-compliance should be some collaborative efforts between tax payers and tax administrators.

Digital payment significantly influences VAT revenue. The findings are in the same direction with the findings of Olatunji and Ayodele (2017), who examined the effect of ICT on tax productivity in Southwest Nigeria using the survey research design. The data gathered were analyzed using the regression and Pearson correlation. They revealed that ICT affect tax productivity in South Western Nigeria. Considering 149 panel of VAT implemented countries both from developed and developing economies or alternatively Sub-Saharan Africa (SSA) and non-Sub-Saharan African (Non-SSA) countries over 1970-2013. The finding however differs from the finding of Said (2014), who examined tax knowledge, complexity and compliance based on taxpayers' view so as to uncover the reasons for non-compliance. A survey research design was used to obtain data for analysis with the aid of thematic statistical techniques. The result revealed that tax payers have inadequate technical knowledge and perceive tax system as complex and therefore contributing to non-compliance behaviour of tax payers. The finding of the above is in agreement with the theory in use, the economic efficiency theory and the source theory of taxation. With digital technology the problem of double taxation is reduced by eliminating clash in taxing jurisdictions.

CONCLUSION AND RECOMMENDATIONS

The concept of digital payments and tax revenue has been delineated. This was done through the demonstration of the indications of the proxies. The study concludes that digital payment has a significant influence on tax revenue in Nigeria. The provision of technological infrastructure will increase the tax revenue accruing to the government, and the tax payers will enjoy doing business with ease. The univariate and bivariate analyses agree with the revenue trends for the years under study except in the case of Capital Gains Tax revenue, also VAT revenue shows consistent increase per time within the period under consideration. From these results, it is concluded that digital payments positively impact tax revenues in Nigeria. The increases noticed in VAT revenue may be due to increase in trade volume since VAT is a consumption tax. Also, digital payment portals must have encouraged voluntary and more convenient payment of tax. Based on the findings of this study, the following recommendations were made:

Provision should be made in the Finance Act in taxing capital gains on online investments, block chain transactions and crypto-currencies.

Staff of the Federal Inland Revenue Service (FIRS) should be trained in big data analytics, data mining, block-chain technologies, automation, robotics, cloud computing and artificial intelligence to be able to interrogate, and access online capital gains taxes and other digital related taxes.

Introduction of social media and mobile application taxes in the Finance Act will boost VAT revenues. Significantly, the social media and mobile application taxes are consumption taxes in the nature of excise duty. Excise duties are relatively easy to administer which makes them the preferred tool for countries with low administrative capacity.

A comprehensive reform of international corporate taxation with a shift to full formula of apportionment at its core is likely to be the only solution to really address the issue in the long-term, and greater measure of tax transparency is also required for better debate, as well as quantitative analysis of how the proposals are likely to affect individual tax jurisdictions and the extent to which it may shift the tax base of multinational corporations away from the tax havens.

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