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The Legal Appraisal and Implications of Cross - Border Marriages between Citizen and Refugee: A Comparative Study of Nigeria and the United Kingdom

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Abstract

This study conducts a comprehensive legal appraisal of cross-border marriages between citizens and refugees in Nigeria and the United Kingdom, employing a comparative analysis to elucidate the complexities and implications of such unions. The research explores the various types of marriages recognized in each jurisdiction, examining the essential validity of marriage and the legal effects of cross-border marriages. The study reveals significant differences in marriage laws between Nigeria and the UK, particularly regarding same-sex marriage, which is prohibited in Nigeria but recognized in the UK. This study contributes to the ongoing debate on cross-border marriages, refugee rights, and citizenship, providing valuable insights for policymakers, legal practitioners, and scholars seeking to navigate the complexities of international family law. Notably, marriage emerges as a viable pathway for refugees to acquire citizenship in both countries. This research underscores the importance of protecting refugee rights in cross-border marriages and advocates for harmonized policies to ensure the security and dignity of all individuals involved. Utilizing a doctrinal approach, this study draws on textbooks, constitutions, and judicial precedents to provide an in-depth analysis of cross - border marriage in Nigeria and the United Kingdom. The Nigeria and United Kingdom relevant matrimonial cause acts and marriage laws were examined. The Primary data used included the Constitution of the Federal Republic of Nigeria, The Matrimonial Causes Act, The Marriage Act, The Gender Recognition Act, The British Nationality Act etc. Secondary data were gathered from textbooks and online articles. It was finally concluded that marriage is one of the means where a refugee can acquire the status of a citizen in any of these jurisdictions. The study recommends enhanced legal frameworks to safeguard refugee rights, increased awareness and education on the implications of cross-border marriage and streamlined processes for refugee - citizenship acquisition through marriage.

Keywords: Marriage, cross-border, citizen, refugee, legal implication

1. Introduction

Marriage is an institution recognized across the globe.[1] It is a social institution founded and governed by social, religious, cultural, and societal values and norms. [2] The issue of same sex marriage has faced various criticism in Nigeria, since both Christian and Islamic religions frowned at it. It is also a taboo in the various customs and traditions across the country for same sex to get married. In the case of *Meribe v Egwu,*[3] the Supreme Court held that a culture that allows a woman to marry a woman is repugnant to natural justice, equity, and good conscience.

However, the concept of same sex marriage is lawful in the United Kingdom.[4] The law that regulates the issue of cross -border marriage between a refugee and citizen is the law applicable and legalized in the country where the marriage was conducted and where parties are domiciled.

Marriage-based citizenship offers various benefits and poses challenges, including: residency and work permits, access to social services and healthcare, voting rights, travel freedom, family reunification, fraudulent marriages, integration difficulties, language barriers, cultural differences, and potential for exploitation. To be eligible, individuals typically require a valid marriage certificate, joint residency, language proficiency, background checks, good character certification, and financial stability.

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[1] For the purpose of this article, this paper focus on England and Wales.

[2] E I Nwogogu, *Family law in Nigeria*.(HEBN Publishers Plc ,2014).

[3] (1976)I N. M.L.R233

[4] Gender Recognition Act. 2004.

2. Types of Marriage in Nigeria

2.1 Monogamous or Statutory Marriage: Monogamous marriage is defined as the voluntary union for life of man and one woman to the exclusion of all others, until death or divorce[5]. A statutory marriage is a monogamous one, this means that a man can only be married to one woman at a time and vice versa, without a third party. From the above description, it can be derived that the base of a monogamous marriage is substantially on free concurrence of both parties, and it must involve two persons of separate sex. Same sex marriage is banned in Nigeria.[6] Any person who enters a same sex marriage contract in Nigeria is liable on conviction to a term of 14 years imprisonment.[7] This type of marriage is also known as marriage under the Act because it is governed by the provision of the Marriage Act. It comes with enormous benefits and rights for the couple and their children, with respects to inheritance, Will and other family matters. In Nigeria, statutory marriage usually commences from the Marriage registry, a licensed place of worship or at any other licensed public place. Statutory marriage in Nigeria is regulated by the provisions of the Marriage Act.[8]

The Matrimonial Causes Act regulates and determines matters arising from statutory marriages in Nigeria, including divorce, separation, and of the guardianship.[9] The Constitution of the Federal Republic of Nigeria established the High Courts in countries across Nigeria, including the Federal Capital Territory, Abuja. Among other effects, divorce and other affiliated issues arising from statutory marriages can only be determined in the High Court of a State.[10] It can be appealed to either the Court of Appeal or Supreme Court if a matter is settled in a way that is not acceptable to either of the parties.

2.1.1 Validity of Monogamous or Statutory Marriage in Nigeria

A statutory marriage must pass through certain specific ways, for it to be valid in Nigeria. It generally commences from the marriage registry and can be completed at the said registry, sometimes couples may go to a licensed place of worship or in any other public place. Before the conduct of statutory marriage in Nigeria, the following requirements must be met: The parties must get a "Notice of Marriage" from the Marriage registry to be filled, signed, and returned to the Registrar of Marriages[11] The Registrar shall enter the notice of marriage into the Marriage Notice Book" and attach a duplicate of the notice on the external door of his office for all to see until the license is granted, or expiration of 3 months.[12] This is when marriage license has been granted or 3 months has passed, [13] if there are no expostulations to the permission of a Marriage Certificate by members of the public and the prescribed fees have been paid to the Registry and appropriate affidavit has been made, the Registrar shall issue a " Registrar's Certificate " to the couple. This should be done within 21 days.[14]

The marriage can also be celebrated within three months from the date of notice in any of the approved places (Marriage Registry, a licensed place of worship or at any other licensed public place). If the marriage does not take place within three months, the notice and other proceedings will be invalid. In similar circumstances, for a valid marriage to be contracted, the entire process must be repeated, unless a disclaimer is gotten through a special license from the Minister of Interior.[15]

2.2 Customary/Islamic Marriage

Customary and Islamic law marriages are predominantly polygamous marriage. It is the act of marrying more than one spouse. It can be either polygyny or polyandry, although Nigeria customary law does not recognize polyandry, a situation where a woman has more than one husband. In the case of *Kplanya v*

[5] *Hyde v Hyde* (1860) L.R.I PD. 130, 133.
[6] Section 3 of Same sex marriage (Prohibition) Act, 2013.
[7] Section 5(1) Same sex Prohibition Act.
[8] Marriage Act, Cap M6, Laws of the Federation of Nigeria, 2004
[9] Cap M7, Laws of the Federation of Nigeria, 2004
[10] Section 272 of 1999 Constitution
[11] Section 7 of the Marriage Act.
[12] Section 9&10, ibid.
[13] Section 13, ibid.
[14] Section 11, ibid.
[15] Section 12, ibid.

Tsoka & anor[16] The Court held under the Tiv customary law that a woman cannot lawfully be married to two men at the same time. Therefore, for any customary law to be valid in Nigeria, it must not be in contradiction to natural justice, equity, and good conscience. Polygyny allows a man to marry multiple wives, but under the Islamic law, it is limited to just four wives.[17]

3. Marriage in the United Kingdom

In the United Kingdom, both the opposite sex and same sex couples can marry in a civil or religious ceremony, though the Church of England will not join same sex couples[18] but the Church in Wales can do so, with the permission of the chancellor and request for special liturgy to be made for the couples.[19] Same sex couples who marry under foreign law in the United Kingdom are recognized as being married in England and Wales. The marriageable age for both couples is 18 years and above, and each party are free to marry, if they are both single, widowed and divorced, or if they were once in a civil partnership which has been dissolved.[20]

3.1 Transgender Person

A transgender person who has applied, gotten and granted a full gender recognition certificate by the Gender Recognition Panel can get a new birth certificate which reflects their acquired gender, both in England and Wale.[21] This will avail them the opportunity to marry someone of the opposite or same gender to their acquired gender. However, if a transgender person does not have a gender recognition certificate, they are legally considered to be the gender that is on their original birth certificate.[22]

3.2 Validity of Marriage in the United Kingdom

Couples can get married at a civil ceremony or a religious ceremony. There are some legal requirements to be met, before getting married in the United Kingdom.

3.2.1 Civil Marriage

The following are the prerequisites to get married under a civil marriage.
Firstly, notice must be given of the intention of the couples to get married, depending on the type of wedding to be conducted.[23] In England and Wales, the law requires that a twenty eight days (28) notice be given to the Register Office before the marriage can take place. Thereafter, the couples must get married within twelve (12) months of giving notice. The partners must be resident for seven days in England or Wales before notice is given. A notice must state where the marriage is to be conducted, and the prescribed fees must be paid for the notice.

The Register will thereafter issue a marriage schedule, which will be brought to the marriage ceremony. If one of the partners has been issued with a gender recognition certificate and was previously the civil partner of the person who they wish to marry, there is no requirement for the 28-day notice period. In this case, notice of the marriage and the marriage itself can happen on the same day.

The essence of the notice is for an objection or caveat to be raised by any individual who wishes to do so, within the period between the notice of intention to marry and the ceremony. Falsification of records or statements are grievous criminal offence in the United Kingdom. A valid wedding ceremony can be conducted at an approved building. The ceremony must be attended by the intended couples, two witnesses, the person who will join the couples and in case such person is not authorized to register

[16] (1971) NNLR 66.
[17] Quran 4:3 And if you fear that you cannot act equitably towards orphans, then marry such women as seem good to you, two and three and four; but if you fear that you will not do justice (between them), then (marry) only one or ...
[18] <https://www.achurchnearyou.com/>; <https://www.citizensadvice.org.uk/family/living-together-marriage-and-civil-partnership/getting-marriedon> accessed 26 May 2024.
[19] < https://www.churchinwales.org.uk/en/faith/same-sex-marriage /> accessed 25 May 2024.
[20] <https://en.m.wikipedia.org/wiki/Marriage_in_England_and_Wales> accessed 25 May 2024.
[21] Section 3A of Gender Recognition Act 2004
[22] Corbett v Corbett 1970 2 WLR 1306
[23] <https://en.m.wikipedia.org/wiki/Marriage_in_England_and_Wales> 25 May 2024.

marriages, then the person who is registering the marriage.[24]The law also requires that the marriage schedule is returned to the Register Office and added to the electronic register.

3.2.2 Religious Marriage Ceremony

The Priest is responsible for performing marriage ceremony in religious places. Before marriage can be conducted in the Church of England and Church of Wales, partners must notify the Priest and the Priest must inform the registrar and give notice to the Register Office, especially if one of the parties is not from the UK.[25] Other religious marriages require the need to give twenty eight (28) days' notice of the marriage to the Register Office. Ministers and priests of all other religions can be authorized to register marriages and must have a certificate or licensee to do so from the local Superintendent Registrar. For Jewish and Quaker marriages, the authorization is automatic. For all other religions, if the official performing the ceremony is not authorized, either a Registrar must attend the religious ceremony, or the partners will need to have separate religious and civil ceremonies.

If the ceremony needs to be conducted in either the Church of England or Church of Wales building, the vicar prepares the schedule and brings same to the ceremony. In case the ceremony is in any other religious building, the Superintendent Registrar issues the schedule, which must be taken to the place of the ceremony. The notice of the proposed marriage is usually be read in the parish church of each of the partners and in the church where the marriage will be celebrated. Bans must be read on three Sundays before the ceremony, and this is done, in case anyone has an objection for the reason why the marriage would not be celebrated.

The vicar will prepare the marriage schedule. After the ceremony, the marriage schedule must be signed by both partners, two (2) witnesses and the vicar. The vicar will take the schedule to the Register Office, and it will be put on the electronic register, after which the prescribed fees have been paid. The copy of the marriage certificate, will therefore be issued[26] There are situations where couples have been married in a Register Office, thereafter partners can have a religious marriage ceremony, this is depending on the couples choice and agreement. In the above case, the partners will be asked to produce their marriage certificate.[27]

4. Comparative analysis of the essential validity of marriage In Nigeria and the United Kingdom

Age is an essential validity for parties to get married both in Nigeria and the United Kingdom. Parties must have reached the majority age, which is eighteen (18) years in both jurisdictions.[28] Parties to a marriage in Nigeria and United Kingdom must not be related by blood. Relatives are not allowed to marry, because marriage to a family member would render the union void. A person cannot marry any of the following relatives: child, including an adopted child, parent, including an adoptive parent, brother, or sister, including a half-brother or half-sister, parent brother or sister, including half-brother, half-sister's, ancestress, descendants etc.[29] People who are step relations or in-laws may marry only in certain circumstances, both in Nigeria and the United Kingdom.[30]

Where either party to a marriage in these jurisdictions are at the time of the marriage lawfully married to another person, such marriage will be void. Therefore, where any lawful marriage precedes the subsequent marriage, the subsequent one is void ab initio. This is further supported by section 33(1) of the Act[31] which states that "No marriage in Nigeria shall be valid where either of the parties thereto at the time of the celebration of such marriage is married by native law or custom to any person other than the person with whom such marriage is had." Section 35 of the Marriage Act further prohibits such and

[24] <https://en.m.wikipedia.org/wiki/Marriage_in_England_and_Wales> accessed 25 May 2024.
[25] <.https://www.achurchnearyou.com/> accessed 26 May 2024.
[26] <.https://www.achurchnearyou.com/> 26 May 2024.
[27] <https://en.m.wikipedia.org/wiki/Marriage_in_England_and_Wales> 25 May 2024.
[28] Section 21 of the child right act. Cap M7, Laws of the federation of Nigeria, 2004; Marriage and civil partnership (minimum age) act, (2022).
[29] First schedule of Matrimonial Causes Act LFN (2004); Marriage Act 1949". Legislation.gov.uk. section 1, retrieved on 25th May, 2024
[30] Section 4 of the Marriage Act 2004
[31] Marriage Act.

Section 39 states that any person who contracts such a marriage to another whom he/she knows to be married to another is liable to imprisonment for 5 (five) years.

5. Cross Border Marriage

Marriage is an institution recognized globally. A cross- border marriage is when marriage occurs between partners of different nationalities. Cross-border marriage refers to marriage between individuals from different countries, cultures, or nationalities, including transnational (between citizens of two countries), binational (between citizens of two countries residing in one), and international (involving citizens of multiple countries).[32]

The implication of cross – border marriage include cultural exchange and diversity, international understanding and cooperation, economic social integration, legal complexities (conflicting laws, divorce), economic disparities, opportunities, personal growth, and global citizenship among others. Challenges include immigration and visa issues, cultural and linguistic differences, family and social integration, complexity and conflicts of laws on divorce among others[33].

Cross-border marriage has increased dramatically recently, due to globalization. This growth in marriages between partners of different nationalities frequently referred to as cross-border marriage has generated public interest. These cross-border marriages are observed to be by a pattern in which men from wealthier countries, after a relatively brief courtship, marry women from less developed countries, and vice-versa.

Increasingly, these marriages occur with the assistance or backing of transnational marriage brokers or through social media networks.[34] A lot of young people are using the various social media platforms to socialize, network and in so doing, business transactions including marriages have been perfected through the various social media platforms.

Cross -border marriage has become a trend recently, especially when it involves migrants or refugees from non-European countries, who want to become a citizen or obtain the British passport.[35] The use of forced marriages, sham marriages or cross-border marriages are practices done globally for immigration purposes, especially, for immigrants who want to migrate to developed countries, thus the trans nationalization of migration practices and the politicization of these practices are ways to understand cross-border marriages from the perspective of each partner.

6. Citizenship in Nigeria and the United Kingdom

The word" Citizenship" is defined as pertaining to a person who by the virtue of the Constitution and the law of a particular State is a member of the community, state or nation owing and being entitled to the benefits of the state and also has enjoyed Human Rights, as stipulated in the constitution. Citizenship can be acquired in various ways in both jurisdictions, which include citizenship by birth, citizenship by naturalization and citizenship by registration.[36]

6.1Ways of Acquiring Citizenship in Nigeria

6.1.1 Citizenship by Birth

The 1999 Constitution of the Federal Republic of Nigerian[37] 1999 Constitution as amended, citizenship can be acquired in three ways by birth, by naturalization and by enrollment. [38] Constitution provides that the citizenship of Nigeria can be acquired by birth in the following ways through descent from a person or persons who are themselves Nigerians. The following persons are citizens of Nigeria by birth: Every

[32] A M Manzano, 'A Study of Transnational Marriages in the European Union, 2017'
[33]S F Martin, 'Cross- Border Marriage and Immigration', (2020) *Journal of Comparative Analysis.*
[34] Ibid.
[35]<https://www.scomo.com/services-for-you/human-rights-public-law/immigration-law/can-i-live-in-the-uk-if-i-marry-a-british-citizen.html> accessed 25 May 2024.
[36] Learned oxford Dictionary
[37]The Constitution of the Federal Republic of Nigeria 1999 as amended
[38]Section 25 of the 1999; <https://nigerian-constitution.com/chapter-3-section-25-citizenship-by-birth>

person born in Nigeria before the date of independence, either of whose parents or any of whose grandparents belongs or belonged to a community indigenous to Nigeria; handed that a person shall not come a citizen of Nigeria by virtue of this section if neither of his parents nor any of his grandparents was born in Nigeria. Every person born in Nigeria after the date of independence either of whose parents or any of whose grandparents is a citizen of Nigeria; and every person born outside Nigeria either of whose parents is a citizen of Nigeria? In the case of *Shugaba v Minister of Internal Affairs*[39], the court held that the aspirant could claim citizenship through his mother. A Citizen by birth under section 30 cannot be deprived of his citizenship.

6.1.2 Citizenship by Registration

The Constitution provides for the two classes of people that can become Citizens of Nigeria by registration and they are:[40]

i. any woman who's or has been married to a citizen of Nigeria; or
ii. every person of full age and capacity born outside Nigeria any of whose grandparents is a citizen of Nigeria.

The content of rights would also include the enjoyment of some fundamental human rights, as entrenched in the Constitution. Citizenship by registration through either of his or her grandparents under the section, must be of full age and capacity which under the Nigerian Constitution, would be the age of 18 years up till the age of capacity, the parents presumably make the choice of citizenship. For someone to be good for registration under this section and must satisfy the President that such individual is of good character, has shown a clear intention of his desire to be in Nigeria.

6.1.3 Citizenship by Naturalization[41]

The 1999 Constitution provides for citizenship by naturalization. The Constitution states that any person who is eligible and qualified may apply to the President for naturalization. The Constitution also provides that no citizen shall be eligible to apply for naturalization, unless he satisfies the President that-

(a) he's a person of full age and capacity;
(b) he's a person of good character;
(c) he has shown a clear intention of his desire to live in Nigeria;
(d) he is, in the opinion of the Governor of the State where he's or he proposes to be resident, respectable to the original community in which he's to live permanently, and has been assimilated into the way of life of Nigerians in that part of the Federation.

7. Ways of Acquiring Citizenship in the United Kingdom

British citizen can be achieved through several pathways which include: Birth, descent and naturalization.[42]

7.1.1 Birth: A person born to a British or settled parent is automatically a British citizen by birth, this is well spelt out under section 1 of the British Nationality Act 1983.

7.1.2 Descent: Citizenship for those born outside the UK to a British parent[43]

7.1.3 Naturalization: Eligible individuals who have lived in the UK lawfully for five (5) years or three (3) years if married to a British citizen can apply for citizenship[44]

Such individual must be or over 18 years and must have lived in the UK for five (5) years three (3) years if married to a British citizen. Also, must have the Indefinite Leave to Remain (ILR) or EU Settled

[39] (1982) 3 NCLR 915
[40] Section 26
[41] Section 27
[42]<https://iasservices.org.uk/britishcitizenship/#:~:text=British%20Citizenship%20Guidelines&text=To%20be%20eligible%20to%20become,UK%20law%2C%20including%20immigration%20breaches>
25 May 2024
[43] British Nationality Act 1981, Section 14; Immigration Act 2014.
[44] Section 6, British Nationality Act 1981.

Status, fulfill English language and Life in the UK Test requirements, and demonstrate good character. Such individuals must not have broken UK immigration laws.

Additionally, various documents, including proof of identity, residence, and English language proficiency would be required. The key differences between British citizenship and ILR are: British citizenship has full rights and responsibilities, including voting and a British passport. ILR allows individuals to live and work in the UK without immigration controls but can lose this status if such an individual stays outside the UK for too long.Any individual who has the indefinite Leave to remain (ILR), can apply for British citizenship after twelve (12) months or immediately if married to a British citizen. However, if such individuals stay away from the UK for more than 2 years, the ILR status would be lost and the person may need to reapply.

8. Refugee

Who is a Refugee?

A refugee is someone who has been forced not to stay in his or her country because of persecution, war, or violence. A refugee has a well- innovated fear of persecution for reasons of race, religion, political opinion, or class in a particular social group. Most probably, they cannot return home, due to war or religious violence. This is more of the leading causes of deportees fleeing their countries.[45]

A refugee is a person who has fled their own country because they are at threat of serious violation of rights and persecution in their various countries. The pitfalls to their safety and life were so great that they felt they had no choice but to leave and seek safety outside their country because their own government cannot or would not protect them.

Refugees have a right to transnational protection. They are outside their country of origin for reasons of stressed persecution, conflict, generalized violence, or other circumstances that have seriously disturbed public order and, as a result, bear transnational protection.[46] Migrants on the other hand is someone who changes his or her country of irrespective of the reason for migration or legal status.[47] They are person who has left their home country for one reason or another, though not because of a direct trouble, persecution, or death, but through work, education, family reunification or other reasons. However, they will continue to enjoy the protection of their government if they choose to return home.

For individuals, this distinction is important. Settlers aren't defended under transnational law. Each country accepts settlers under their own immigration laws and processes. There are numerous reasons why people around the globe seek to rebuild their lives in a different country. Some people leave home to get a job or an education. Others are forced to flee due to persecution or fundamental rights violations similar as torture.

Millions flee due to conflicts or other forms or violence. Some no longer feel safe and might have been targeted just because of who they're or what they do, probably their ideology, or political affiliations. These usually start with the aim for a better future, or safety from peril and fear. Some people risk falling prey to mortal trafficking and other forms of exploitation. Some are detained by the authorities as soon as they arrive in a new country, especially if done through an illegal entry.

9. The Legal Implication of Cross-border Marriage between a Citizen and Refugee

Cross - border marriage creates status, a situation where each partner will be addressed as a married people and in such the law assigns certain peculiar capacities and liabilities. Also, each mate enjoys certain rights and owes each other several duties called consortiums. In the United Kingdom, Non-British spouses of British citizens may obtain residence permits if the British partner meets a minimal income demand of £18,600 per time. This rises to £22,400 for families with a child, and a further £2,400

[45] Refugee Convention Protocol, 1967
[46] The 1951 Convention and indigenous Refugees instruments, as well as UNHCR's Statute.
[47] United Nations Department of Economic and Social Affairs; <https://www.unrefugees.org/refugee-facts/what-is-a-refugee>

for each farther child. Spouses are considered to have a duty of care towards each other, and certain social security benefits are calculated differently from those for single people.[48]

A refugee who married a citizen will automatically become the citizen of his/ her partner country both in Nigeria and United Kingdom. Marriages that involve the migration of at least one of the spouses challenge two intersecting angles of the politics of belonging the making of the 'good and legitimate citizens' and the 'respectable family'.

Cross border marriage can reduce racism and discrimination to some extent, thereby guarding the fundamental rights of the refugee. A refugee who becomes a citizen by virtue of marriage will be seen as one of the family of the partner country. Couples may have children of mixed-race backgrounds, and therefore limiting the issues of racial and ethnic discrimination. Cross-border marriage can promote various cultural and moral values. People living in a close- inclined society frequently have narrower worldviews. Being exposed to different societies can broaden one's worldviews and values. Couples who come from various cultural backgrounds can introduce each other to new foods, languages, etc[49]. Cross-border marriage can create the status of citizenship and nationality. Each partner can claim citizenship of the other spouse country. Also parties may have right to the property and inheritance of one another in cross - border marriage.

10. Summary of Findings and Conclusions

This paper explained the legal appraisal and implications of cross-border marriage between a citizen and refugee, using a comparative analysis of Nigeria and the United Kingdom. The paper also highlighted the various types of marriage in Nigeria and the United Kingdom and make a comparative analysis of essential validity of marriage in Nigeria and United Kingdom respectively. This paper critically highlighted the ways of acquiring citizenship in both Nigeria and the United Kingdom, and the meaning of refugee was discussed.

This paper found out the various reasons why people leave their country and the implications and effects of cross-border marriage between a citizen and refugee in Nigeria and United Kingdom were analyzed in this paper It was also found out that marriage is a principle recognized by law in these jurisdictions, however the type of lawful marriage differs from one another both in Nigeria and the United Kingdom. The Nigerian law forbids same sex marriage, but same sex marriage is recognized in the United Kingdom. Moreso, it was observed in this paper that marriage is one of the means where a refugee can acquire the status of a citizen in any both in Nigeria and the United Kingdom.

11. Recommendations

Based on the following findings in this research work, the following are recommended to protect both the citizens and refugees of cross -border marriage. Marriage is a universal institution recognized globally. In view of the above, every society should regulate and promote the institution of marriage, especially on internet spaces.

The issue of cross-Cultural Dating is a common trend recently. The internet and other various media platforms have created a gateway for cross-cultural relationships to flourish. Social media and technology connect people with each other across the world. Strangers use social media platforms to get to know one another and build a connection and a relationship. Healthy relationships may sometimes be formed, which can lead to unions between a man and a woman. However, there are hundreds of people who have been scammed in this process of dating online. Therefore, Government should create laws that regulate dating and online relationship, to avoid fraudulent activities.

Government should also make laws that will protect the rights of a refugee and make provisions for how to survive in the various jurisdictions, because this is more of the reason why some indigent persons are being forced to marriage, which eventually leads to divorce after a short time.

[48]<https://www.scomo.com/services-for-you/human-rights-public-law/immigration-law/can-i-live-in-the-uk-if-i-marry-a-british-citizen.html> 26 May 2024

[49] T O Oyedele, *Transnational Families: Nigerian-UK Experiences* (Bloomsbury Academic, 2020).