

Woman and Human Rights in Nigeria: A Study of Delta State

Purity UDJOH*¹

¹Department of Political Science, Faculty of Management and Social Sciences, Michael and Cecilia Ibru University Agbara-Otor, Delta state Nigeria, email: purityudjoh@gmail.com

*Corresponding Author: Email: purityudjoh@gmail.com

Abstract

The Constitution of the Federal Republic of Nigeria 1999 chose certain rights to protect under chapter IV and termed them as Fundamental Rights. These rights protected not only by the Constitution, but also by the African Charter on Human and Peoples Right. Whenever there are breaches of these fundamental rights, the law provides a procedure for their enforcement, which is the Fundamental Rights (Enforcement Procedure) Rules 2009. The basic objective of the 2009 Rules is to facilitate enforcement procedure by removing some of the impediments in 1979 rule. Unfortunately, it is clear that the procedure for enforcement of Fundamental Rights is still bedeviled by delay. Many applications alleging serious human rights violations are routinely struck out or dismissed. However, the pertinent question is: to what extent are the human rights provision in these legal instruments realized or enforced as it relates to the women folk? It is worthy of note that there are equally other important impediments in the realization of the objective of Fundamental Rights (Enforcement Procedure) Rules 2009, such as the distinction between main claim and ancillary claim in the Nigerian fundamental rights, because litigants are cautious of whether or not their will succeed because of this distinction. This research examines Women and Human Rights in Nigeria. This research made an in depth analysis of the rules and considered to what extent it achieved its objective in order to enhance a robust human right regime as it relates to the women folk. To achieve a close -to- accurate" if not accurate result, the research embarked on a field work. To this end, empirical method of research is used. This research found out that the Fundamental Rights (Enforcement Procedure) Rules 2009, though has brought tremendous changes in the field of human rights protection (e.g the abolishment of locus standi and leave, is still faced with some major setback like the issue of principal and ancillary claim in the enforcement of fundamental rights and the jurisdiction of the National Industrial Court which is not clear in the rule. The work recommend that Courts should do away with the dichotomy between principal and ancillary and the definition of courts in the Rule should include the National Industrial Court.

Introduction

Fundamental Rights are rights derived from natural or fundamental or constitutional law. They are rights which remain in the realm of domestic law, which are recognized, entrenched and guaranteed in the constitution of a country or any other legal instrument such as the African Charter on Human and People's Rights. Fundamental Human Rights are also described as rights which are inalienable and guaranteed to every person. The Constitution of the Federal Republic of Nigeria and the African Charter on Human and Peoples' Right guarantee fundamental human rights. These Fundamental Human Rights are not privileges in the sense that they could be withdrawn at the whims and caprices of the government of the day. They are rights which the executive and legislature are enjoined to respect and the judiciary to protect. However, there are instances where these guaranteed rights are violated either by the law enforcement agents or in quasi-judicial proceedings (Orhero, 2021).

Furthermore, where there are breaches of these rights, the appropriate means to secure the enforcement of the victims' fundamental right is paramount. It is against this background that the Fundamental Rights (Enforcement Procedure) Rules were enacted. On 29th May, 1999, a new constitution came into being. (Evans, 2015) Some judicial opinions were of the view that the Fundamental Rights (Enforcement Procedure) Rules 1979 was dead pursuant to section 42(3) which provides who to make rules for the practice and procedure for the High court towards the enforcement of the provision of Chapter IV. For effective enforcement of the rights guaranteed under the 1999 Constitution, the 2009 Fundamental Rights (Enforcement Procedure) Rules was enacted, It was signed In November 11,2009 by the then Chief Justice Idris Legbo Kutigi and came into force with immediate effect replacing the Fundamental Rights (Enforcement Procedure) Rules 1979 (Orhero, Okereka & Ogbe, 2021).

The purpose of the Fundamental Rights (Enforcement Procedure) Rules is to facilitate the enforcement of fundamental rights (Orhero, 2019). The Rules provide for redress where there is a violation or even apprehension of likely violation of these rights. The fundamental rights are provided in Chapter IV of the 1999 Constitution and Chapter 1 of the African Charter on Human and Peoples' Rights. Where the violation has occasioned injury which could be compensated in financial terms, courts are duty bound to make orders of reparation in monetary terms if applied for and proved.

Literature Review

Human Rights are the basic guarantees which individuals enjoy simply because they are human beings. The rights are enshrined in Chapter IV and Chapter II of the constitution (1999 constitution) as fundamental Rights and fundamental objectives and directives principles of state policy. Human Rights today have not only become a global concern but remarkable interest aimed at protecting and promoting universal respect for and observance of human rights has eventually been shown at the international, regional and national levels. There have been contending explanations as to their scope and nature, regards being had to the contextual realities of the society in which they are sought to be enjoyed (Okereka & Okolie, 2022).

The present codification of human rights in the national constitution flows from the Universal Declaration of Human Rights (UDHR) 1948 which provides a firm foundation for the historical development and globalization of human Rights. The UDHR represents a bold attempt by the UN to elaborate on and give concrete and authoritative expression to the imprecise and ambivalent definition of human rights contained in the UN Charter. Since the promulgation and adoption of the UDHR the United Nations has made its commitments to the promotion and protection of human rights around the globe. This justifies the numerous resolutions, declarations and conventions 19which have been passed in the area of human rights. Human rights have become indispensable that virtually all constitutions the world over, make provisions for them in the preamble or substantive provisions. For example, the French constitution of 1958 refers in its preamble, to the 1789 Declaration of the Rights of Man and of the Citizen. The Nigerian and Indian constitutions incorporated virtually all the rights contained in UDHR. In the Nigerian Constitution, beginning from the post - independent, attention has always been given to the issue of human rights. Human Rights cannot be over emphasized because; it is the State, with its various institutions which is primarily responsible for guaranteeing the implementation and enforcement of these rights. While the need for the guarantee and protection of human rights in national constitutions cannot be doubted, it is important to do a critical content-analysis of these constitutional provisions with a view to seeing their real value and what gave rise to the quest for these Rights (Orhero, 2020).

Very few scholars have written books that touched on the subject matter of the research. This is because the Fundamental Rights Enforcement (Procedure Rules) 2009 is a recent regime. After careful perusal of the available books it was discovered that though the authors discussed a vast area of the subject matter, they have not written on the new Fundamental Rights (Enforcement Procedure) Rules 2009, which is the subject of this research. Jamo 2000 made a critical analysis of fundamental rights. He gave philosophical dimensions of human rights, including United Kingdom's Bill of Rights, perspective of human rights, and definition of human rights and conceptualization of human rights. Most importantly is his discussion on human rights under the 1999 Nigerian Constitution, which this work also looked into. However, it is observed that the procedure of enforcement of this right is not mentioned. This research seek to elaborate on this procedure i.e the Fundamental Rights (Enforcement Procedure) (Orhero, Okereka & Okolie, 2023).

Orhero and Okolie (2023), made a brief explanation on the concept of human rights and theories. To him, to understand human rights, there is need to go back to history of notable antecedents e.g the Great Britain, the Romans and the American experience. He also looked at the theories on the origin of human rights from the perspective of religion, morality, and divinity in brief. His analysis is limited, without mentioning the group of people who first developed the idea of human rights. This work elaborates on the development of human rights with critical analysis of philosophers. They further discussed fundamental rights, problems of limitation on fundamental rights, distinction between human rights and fundamental rights. In his analysis of fundamental right, the author did not contemplate the provision of Chapter II of the Constitution which is the fundamental objectives and directive principles of State policy as a fundamental right and unjustifiable. The author only gave priority to Chapter IV of the Constitution. Orhero and Okolie (2023) discussion on fundamental objectives and directive principles of state policy, emphasized fundamental obligation of the government. However, her limitation is based on provision of the section without looking at the practical applicability of its provision, which will reveal that the provision is just in paper and unattainable. The research considers the current situation in Nigeria which is the practical violation of the provision of the sections, due to lack of enforcement of the provision which makes it unjustifiable. More so this research considers the provision of the 1999 Constitution as against the 1979 which was the focus of the author.

Sokoh and Okolie (2023) made elaborate analysis of the constitutional provisions of fundamental rights with limitations encountered under the military and civilian regime of the first, second, and third republic. This research goes further and discussed the limitations on Enforcement of these rights in recent time. Campbell and Goldberg (2014) discussed the realization of human rights and constitutional protection of human rights. However, their work being foreign made reference to the American and the British Constitutions. This research appraises the Fundamental Rights (Enforcement Procedure) Rules 2009 and the Rights under Chapter IV of the Constitution of the Federal Republic of Nigeria 1999 and the African Charter on Human and Peoples' Right.

Orhero and Okolie (2023) discussed the domestic enforcement of Human Rights, including the African Charter on Human and Peoples' Rights but did not expatiate on the procedure of enforcement of such rights. This is another area this research explores. Sokoh and Okolie (2023) made an appraisal of the new Fundamental Rights (Enforcement Procedure) Rules 2009 pointing out the issue of principal and ancillary claim as a major problem faced by applicants. However, the injury this principle has caused in the area of human rights and practicability of its application with regards to the test on the determination of what are principal and ancillary claims is one area this research dwelled upon.

Okereka and Okolie (2023) made an overview of the new Fundamental Rights (Enforcement Procedure) Rules 2009, giving the positive side and tremendous changes brought by the Rules in comparison with the old Rules of 1979. However this work tend to point out the limitation or setbacks in the 2009 Rules and the need for improvement in order to create a society devoid of constant human rights abuse.

Orhero and Okolie (2023) made an in-depth analysis of enforcement procedure of the old Rules applicable at that time. With the coming of the new Rules, this research made an in-depth analysis of the new Rules i.e The Fundamental Rights (Enforcement Procedure) Rules, 2009, which is the current law applicable, replacing that of 1979.

Meaning of Human Rights

The word "right" is derived from the Latin word *rectus* which means that to which a person has just, valid claim. This right may be classified into legal right, which is the liberty of acting or abstaining from acting on a specific manner, or the power of compelling a specific person to do or abstain from doing a particular thing. The Black's Law Dictionary defines right as that which is proper under the law, morality or ethics, something that is due to a person by just claim, legal guarantees or legal principle. "Human Rights" have been defined by the United Nations "Human rights could generally be defined as those rights which are inherent in our nature and without which we cannot function as human beings

Human rights is a process that has taken years in the history of mankind, it has been a process which has gone through many stages. It is not certain as to how such liberties can be described as 'Human rights' in the modern sense. The concept of human rights is one of the most profound questions that have ever tasked scholars. Discourse on the precise meaning and content of human rights has taxed the ingenuity of eminent scholars as the issue raises, more questions than answers on issues such as the Universality - relatively palaver, as well as the ethical, moral, cultural, philosophical, legal and ideological underpinning of the subject matter. For this reason it is a prerequisite to examine the major stands in the various approaches to human rights. Natural law Approach and the Sociological Approach to Human Right The natural law approach: philosophers and jurists in their search for a law that was higher than positive law developed the theory of natural law. It was first elaborated by the stoics of the Greek Hellenistic period, and later by those of the Roman period. Natural law, they believed, embodied those elementary principles of justice which were right reason i.e. in accordance with nature unalterable and natural. Medieval Christian philosophers, such as Thomas Aquinas, put a great stress on natural law as conferring certain immutable rights upon individuals as part of the law of God (Orhero & Okolie, 2020).

Natural law theory led to natural rights theory, the theory most closely associated with modern human rights. The chief exponent of this theory was John Locke, who developed his philosophy within the framework of seventeenth century humans and political activity known as the age of enlightenment. Another exponent of this view is Thomas Hobbes, an English philosopher who suggested the existence of a social contract by which men and women mutually agreed to form a community and setup a body politics. Individuals agree for the sake of the common good to form institution to govern them (Orhero & Okolie, 2024). Thomas Hobbes and John Locke construct a general scheme of rights which are common to mankind irrespective of nationality, creed or sex in line with Anold lien conception of human rights as: "Universal rights or enabling qualities of human beings attaching to the human beings wherever he appears, without regard to time, colour, sex, parentage or environment In setting up that political authority, individuals retained the natural rights of life, liberty, and property. The socialist approach, on the other hand, is predicated on the dialectical thesis that the economic infrastructure is determinant of the superstructure. Consequently, it has been noted that.

... It is the concrete material conditions of the society which gives rise to the sort of rights that can be enjoyed; therefore, there can never be rights with divine content derived from natural law synthesis from this point given. What are considered human rights in a bourgeois society is the liberty allowed to either the exploitation as alienation of the working class and pleasantly by the Dominant class...

Thus, the socialist synthesis questions the validity of the naturalist and maintains human rights as a more legal potentiality which depends on material conditions for its concretization as a social reality. The sociological school is seen to have contributed its emphasis on obtaining a just equilibrium of interest among prevailing moral sentiments and the social and economic conditions of time and place.

The Concept of Fundamental Rights, Human Rights and Constitutional Rights Distinguished

There is a clear distinction between fundamental rights, human rights and constitutional rights. Human rights are rights which were derived from the wider concept of natural rights, they are rights which every civilized society must accept as belonging to each person as a human being irrespective of citizenship, race, religion, and so on. Therefore, human rights can be seen as legal rights conferred on individuals and group of individuals by law and such rights are regarded as inalienable, interdependent, inherent and indivisible because they are based on the principles of law, namely equality and non discrimination. When these human rights are guaranteed by a law other than the constitution they are fundamental rights e.g. Freedom of Information Act 2011 gave freedom to seek for information and also access the information. It is a fundamental right guaranteed under a law different from the Constitution. However, another view is that determining the fundamental nature of a human right is whether or not it can be derogated from only during public emergency. If a right cannot be derogated from even during public emergency, then it ranks as a fundamental right. Similarly, the African Charter on Human and Peoples' Rights makes provisions for rights from which no derogation is allowed even in time of public emergency e.g. right to life, and right to dignity of human person. When fundamental rights are guaranteed in a Constitution they become Constitutional Rights. They are carefully selected by national constitutional law for guarantee and protection in favour of individuals and groups in particular politically organized society. It follows that while all rights enjoyed and asserted by human person may be described generally as human rights not all human rights can be termed fundamental rights or fundamental human rights under the constitution

unless they are entrenched in the Constitution. The purpose of this classification is to show that some human rights are ranked higher and more important than the others. However, the recognized human rights were never in any way arranged in a hierarchical order. Therefore only a careful perusal of the human rights instrument will indicate which of the rights is considered weightier and therefore fundamental (Orhero & Okolie, 2023).

History of Fundamental Human Rights in Nigeria

The development of human right began in Greece, around the year of 300BC. Philosophers then, began to take an interest in the relationship that existed between the society, the state, religion and the individuals that makeup the city state. A group of people called the *stoics* were the first people to discuss their perception of the world and the role or place of Man. They claimed that human beings were masters of their own destiny. To them, a person's destiny did not depend on gods. Ancient philosophers, such as Aristotle and Plato, wrote extensively on rights e.g. the contribution of Plato laid the foundation for the concept of a universal and external set of laws derived from and based on the dignity of the individual human beings. It was the Greek and Roman philosophers that first formulated natural law that it was a universal law because it applies to everybody in the state irrespective of whether you are a citizen or not. It was superior to every positive law and embodied those principles of justice, which were apparent to the "eye of reason". According to Cicero, it is for universal application, unchangeable and everlasting... it is a sin to try and alter this law, nor is it allowable to try to repeal any part of it, and it is impossible to abolish it entirely. We cannot be free from its obligation by senate or people...And there will not be different laws at Rome or at Athens or different laws now and in the future, but one eternal and unchangeable law will be valid for all nations and for all times (Orhero & Okolie, 2023).

The concept of natural law suffered some set-back in the 16th century due to the abolition of the new and emerging national states during that period. It was however revitalized in the 16th and 17th centuries by two factors. The first was the reformation which paved the way for religious struggle in Europe. This resulted in the demand for the natural rights of freedom of conscience and religious belief. Secondly was the doctrine of social contract. This was resorted to in order to strike a balance in the relationship between the individual and the community. In the work of John Locke, before country or state existed, Man was free to do whatever he sought irrespective of others. An individual relinquished some of his rights to the community or country established and in return the individual's rights are protected by the government However, the individual can rebel against the government (Orhero & Okolie, 2023).

In the 19th century, human rights became a central concern over the issue of slavery. A number of reformers such as Williams Wilberforce in Britain worked towards the abolition of slavery. This was achieved in the British Empire by the Slavery Abolition Act 1833. The huge losses of life and gross abuses of human rights that took place during the First and Second World wars were a driving force behind the development of modern human rights instruments. Modern international conception of human rights as earlier stated can be traced to the aftermath of World War II and the foundation of the United Nations. Article 1(3) of the United Nations Charter set out one of the purposes of the United Nations thus "Achieve international cooperation in solving international problems of an economic, social, cultural or humanitarian character and in promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction as to race, sex, language, or The development of fundamental human rights in Nigeria can be appreciated at three historical epochs - pre-colonial, colonial and post colonial. Pre-colonial era was one neither culturally nor politically homogeneous, yet it had its own notion of human rights, informed largely by the material condition of the time (Orhero & Okolie, 2023).

Unfortunately, the colonial era was one of the diminished, if not extinguished, human rights promotion and protection. This is because colonial domination inheres with gross injustice and inhumanity and is therefore the very antithesis of human rights. This is partly attributed to the social, political, economic and cultural dislocation occasioned by colonialism. Since the colonized people were excluded from history, forgotten in geography (and) only existed in relation to colonial point of reference. Many of the rights that existed during this period were seen and termed as barbaric by the colonial masters, since they did anchor with the law of the White Man. eg. In *Edet v. Essien*, the Plaintiff was the original husband of a woman. The defendant had an affair with the woman which yielded a baby. Although the woman had packed out of the house of the plaintiff before the affair but the marriage was still subsisting as divorced rights were not performed. In a claim under the prevalent communal law, the plaintiff had the right to lay claim over the baby as his own. The trial judge held that the customary law which gave a child to a person other than the natural father is repugnant to natural justice equity and good conscience. One may be tempted to agree that the judgment was right. However, the interest at stake when properly articulated in the light of the interest of the people will be appreciated. It is the failure to obtain divorce that is being punished by taking away the fruit of the illicit association. After all, a legal maxim stipulates, *exturpicausa no oritur action* (out of an illegal transaction no cause of action can rise) (Okolie & Emoghene, 2020; Orhero & Okolie, 2023).

The penalty was a means of preventing promiscuity and protecting the sanctity of the home. In the post-colonial era, Nigerians witnessed party to so many international human rights treaties and conventions including, International Convention on Civil and Political Rights (ICCPR), Convention on the Rights of the child (CRC), International Convention on the Suppression and Punishment of the Crime of Apartheid, Slavery Convention of 1926 (as amended), the African Charter on Human and Peoples Rights 1981 which became part of Nigerian Law on the 17th March, 1983 by virtue of African Charter on Human and People's Rights (Application and Enforcement) Act Cap 10 Laws of the Federation 1990. Nigeria has also ratified the UNESCO Convention against Discrimination Education, among others (Orhero & Okolie, 2023).

The government human rights record was mixed and generally worse under the military rule. There were many Decrees by the previous military administrations which ousted the court's Jurisdiction. For example, the Military Empowerment (Supremacy and Enforcement of Powers) decree No. 13 of 1984 though not well known to non-lawyers has been described as a Frankenstein Monster in its not adherence to the Rule of Law. It contains the following provisions No civil proceedings shall be or be instituted in any Court for or on account of or in respect of any act, matter

or thing done or purported to be done under or pursuant to any Decree or Edict and if such proceedings are instituted before or on or after the commencement of this Decree the proceedings shall abate or be discharged and made void. The irony of this is that the Military were found making promises to respect Human Rights provisions in the previous constitutions. For example, former military head of state, Yakubu Gowon declared: (Orhero & Okolie, 2023)

The Human Rights and Fundamental Freedom we have mentioned constitute the cornerstone of the constitutions of the Federal Republic of Nigeria we therefore remain irrevocably committed in many aspect of our national life to the principle of upholding individual rights and personal freedom of our citizens within the framework of the existing laws. At the inception of General Babangida's administration he once said while commenting on the issue of numerous Nigerians being detained under various Decrees that: "... we must never allow ourselves to lose our sense of natural justice. The innocent cannot suffer the crimes of the guilty. The guilty should be punished only as a lesson for future..."

One nagging question that must be addressed is the compatibility of military administration with the rule of law. Rotimi Williams (SAN) in a paper said that military government in Nigeria as we have come to know it since the coup of January, 1996 is not a system of government in which a despot or military oligarchy operating above the law exercises absolute power. It is rather a system of government, which after coming into existence by overthrowing the existing legal order replacing it with a new legal order, maintains that Ojo J.D,(1985),*Development of the executive under the Nigerian Constitution 1960-1981*,University Press ,p.27L Ibid.P.22 (Orhero & Edo, 2020)

... there could be a world of difference between government under law and government under the rule of Law, while it must be appreciated that all the military administration in Nigeria have operated under law there is still lacking those elements of constitutionalism which keep them away from being government under the rule of law. Constitutionalism involves not only the proposition that the exercise of governmental powers must be bound by rules but also that the government is genuinely accountable to an entity or organ distinct from itself, where elections are freely held on a wide franchise at frequent intervals, where Political groups are free to organize in opposition to the government in offices and where there are effective legal guarantees of fundamental civil liberties enforced by an independent judiciary. The nature of military administration does not admit all these requirements. They can be government under law but certainly not under the rule of law... Having made the above preliminary remarks, one can now zero his mind that the military is anti human right and the development of fundamental human right during this regime was handicapped (Orhero & Edo, 2020).

In 1976, after the creation of Nigerian Security Organizations (NSO), human rights violation became frequent. During the Second Republic, human rights violation was reduced. However the development of human rights was poor because of the harassing power of the Police Force and the NSO and the constant harassment of political opponents. The government not only gave the NSO greater powers but also promulgated decrees that directly violated human rights, one of which was the State Security (Detention of persons) Decree Number 2 of 1984, which empowered the Chief of Staff at Supreme Headquarters to detain anyone suspected of being a security risk indefinitely without trials. Before the establishment of human rights organization in Nigeria some notable individuals like Gani Fawehinmi, Professor Wole Soyinka, Dr. Bala Usman to mention a few, were most visible criticizing the government on occasions where gross violations of human rights were observed. It was not until 1987 that the first Human Rights Organization, the Civil Liberties Organization came on stream. Since then, there have been considerable numbers of groups like the Constitutional Rights Project (CRP), National Association of Democratic Lawyers (NADL), and Committee for the Defense of Human Right (CDHR) Committee for the Advancements of Rights and Law (CARC), Gani Fawehinmi Solidarity Association (GFSA), and Women Justice Programme (WJP). The growth of these non-governmental Organizations could be traced to consciousness and a concern for the preservation of liberty which they conceived was gradually being Also freedom of expression and the press was greatly curtailed. Several methods, including arrest and detention of media practitioners, their arraignment before the court/tribunal on spurious charges, proscription of news papers, invasion and occupation of press houses, arrest of news paper vendors, etc have been used to achieve the destruction of the independent press in Nigeria. One of the incidences was the arrest and detention by the State Security Services of Christ Mammah and Godwin Agbonko on 6th of September 1995,the Managing Director and Editor respectively of the Week Magazine. They were released days later without being charged to court (Orhero & Edo, 2020).

In the 90's, human rights remained substantially circumscribed. There where radical and outspoken critics of the government like Gani Fawehinme, Balarabe Musa where regular callers of the security cells, in 1988 News Watch was proscribed for six months, and journalists, academics and Civil Rights activists were harassed by state security agents. With return to democratic rule in Nigeria in 1999, it is difficult to assert that there has been a substantial improvement in reduction of human rights abuses in the country by the government, its agents and individuals against the public. There have been social unrest, violent clashes, religious and ethnic riots in different parts of Nigeria. Whilst the estimate of the casualties of these unrest are somewhat difficult to ascertain, from July 26 to 29, violent clashes between police and militant member of Boko Haram from four Northern States resulted in more than 700 deaths. Quick burials in mass graves precluded an accurate account of the dead. Media reports indicate that, Plateau State has recorded the highest number of internally displaced persons (IDPS) in the country since the return of civilian rule. While an estimated one million Nigerians were displaced by internal conflict between 1999 and 2004 fighting in Plateau State, and between February and May, 2004 alone generated some 250,000 IDPS. There has been increase in the assassination of political opponents and people's votes do not count in any election. While only small minorities of the human rights abuses that have been documented were directly carried out by the Federal Government Officials, the Federal Government's failure to combat widespread impunity for abuses orchestrated by government and party officials at the State and local level fostered the unabated continuation of those abuses (Orhero & Edo, 2020).

Nature of Constitutional Provisions

Pre-colonial Nigeria was politically and culturally heterogeneous, yet, notions of human rights were extant, predicated essentially on the communalistic ethos of that era. Consequently, human rights were collectivized.

Colonialism largely abridged rather than enhanced human rights, as Gyewado rightly points out.

...One of the glaring index of colonial period was the denial of the fundamental rights of the colonized peoples. It is in this context that the argument of civilizing mission can be flouted, while the colonizers pretended notions of human rights, as a least natural right they paradoxically never saw the necessity for the enjoyment of these rights by the colonized peoples. Of course the logic of colonialism was incapable of allowing the full effect of the rights; otherwise colonialism would have ceased to be relevant.

Additionally, the derogation from these rights had also affected the development and articulation of Africa, human right dispensation and perspectives... Nigeria, because of her colonial experience has adopted fundamental human rights provisions which are "civil and political" rather than "socioeconomic". Many reasons have now emerged as regards the origin of the inclusion of the fundamental human rights provisions in the 1960 Constitution. The most popular is the recommendation by the Willink Commission on Minorities in 1958 which recommended the inclusion of human rights in the Constitution. Others are the demands by early nationalists. It has been said that the late sir Abubakar Tafawa Balewa was quoted to have said

...Now I remember that during the constitutional discussion which preceded our independence the question came up of enshrining in the constitution those rights which we believe to be fundamental in a civilized society and it was pointed out that most of those rights were already included in the law of Nigeria nevertheless we felt that this was a subject of such tremendous importance that the human rights should not be left hidden here and there in a legal maze and we insisted on having a special chapter of our constitution devoted to the exposition of those fundamental rights...

Late Chief Obafemi Awolowo expressed his own views thus, "Fundamental human rights are ordained not for the protection of ethnic minorities as such but for the citizens at large against exclusive and legislative tyranny exercise". The Willink Minorities" Commission report was accepted and fundamental rights, principally first generation rights, found expression in the constitution that year and were retained in subsequent constitution that followed it in Chapter IV, 1979, 1989 and 1999 Constitution of the Federal Republic of Nigeria.

It can be rightly asserted that one of the greatest objectives of the post independence Nigerian constitution is the protection and promotion of human rights. The preamble to the 1999 constitution unmistakably set the tone by dedicating itself to promote "good government and welfare of all persons on the principles of freedom, equality, and justice". Chapters two and four of the Constitution extensively deal with human rights issues. Second and third generation rights do not find expressions under the three 1979, 1989, and 1999 Constitutions as justifiable rights. Instead, they form the basis of Chapter II titled "Fundamental Objectives and Directive Principles of State Policy", consisting of economic, social, cultural, political, educational and foreign policy objectives and directive principles. These rights are predicated on the necessity for the material wellbeing of the citizenry with the state playing a pivotal role. These rights which are essentially equalitarian and egalitarian in character are rooted on the belief that the attachment of certain level of social and economic standard is a necessary condition for the enjoyment of the civil and political rights. Accordingly, these rights require affirmative governmental action for their enjoyment. Obligation of the state towards the effectuation and realization of the rights is fully captured by section 13 which provides that "*It shall be the duty and responsibility of all organs of government, and of all authorities and persons exercising legislative, executive or judiciary powers, to observe and apply the provisions of (the fundamental objectives and directive principles of state policy)*". In *Attorney-General of Ondo State vs. Attorney General of the Federation and 35*, the Supreme Court held that the foregoing section does not only impose a solemn duty to observe the mandate contained in chapter two on all organs of the government and all authorities and persons exercising legislative or judicial powers, but also private individuals as well. The court rejected the argument that the section applies only to government officials and held that the argument "does not take account of the undeniable fact that those organs do not operate entirely within their official cocoons. They do not, in performance of their duties act in isolation of the public" (Orhero & Edo, 2020).

The first fundamental objective stated in Chapter II is the political objective which state that Nigeria shall be a state based on the principles of democracy and social justice. Section 16, provides for the economic objectives of the nation. It guarantees, among others, the right of any person to participate and engage in any economic activities, subject to necessary restrictions, and obliges the government to protect the right of every citizen to engage in any economic activities outside the major sectors of the economy. By section 17, the state is obliged to "direct its policy towards ensuring that all citizens, without discrimination whatsoever have the opportunity for securing adequate means of livelihood as well as adequate opportunity to secure suitable employment. Further, the state obliged that the conditions of work are just and humane and that there are adequate facilities for leisure and social, religious and cultural life and that the health, safety and welfare of all persons in employment are safeguarded and not endangered or abused. Government policy is also required to ensure that there is equal pay for equal work without discrimination on account of sex, or any other ground whatsoever. By section 18, government is obliged to direct the policy towards ensuring that there are equal and adequate educational opportunities at all levels and government shall and when practicable provide the compulsory and universal primary education, free university education and free adult literacy programme. Section 21 which deals with cultural rights provides that the state shall protect, preserve and promote the Nigerian cultures which enhance human dignity. On the other hand section 6(6)(C) provides that the "judicial powers" vested in the courts enumerated in the constitution; ...shall not except as otherwise provided by this constitution extend any issue or question as to whether any act or omission by any authority or person or as to whether any law or any judicial decision is in conformity with the fundamental objectives and direct principles of state policy set out in chapter II of this constitution...The inclusion of this section is understood to make Chapter II non-justifiable; consequently, no action may

lie to enforce compliance. Unlike chapter II, chapter IV of the 1999 Constitution guarantees a catalogue of enforceable rights. The fundamental rights guaranteed under chapter IV are essentially the civil and political rights which form the bedrock of the first generation rights. The rights seek to protect and safeguard the individuals, whether alone or as a group, against the abuse of power, especially by political authority. It is pertinent to enumerate these rights since what is involved is comparable with the rights guaranteed in the UDHR, African Charter on Human and People's Right (Orhero, 2020).

Rights to life, Right to dignity of human person, Right to personal liberty, Right to fair learning, Right to private and family life, Right to freedom of thought conscience and religion, Right to freedom of expression and the press, Right to peaceful assembly and association, Right to freedom of movement, Right to freedom from discrimination and Right to acquire and own immovable property. The enforcement machinery of chapter IV of the Constitution of the Federal Republic of Nigeria 1999 is as provided for in section 46 of the Constitution. The section which is part of chapter IV provides that: " Any person who alleges that any of the provisions of this chapter has been, is being or is likely to be contravened in any state correlation to him may apply to the court in that state for redress". Section 46(2) empowers the High Court to hear and determine any application made to it in pursuance of section 46(1) and make such orders, issue such writs and give such direction as it may consider appropriate for the purpose of enforcing or securing the enforcement of any rights which are called into question. Section 46(3) similar to section 42(3) of the 1979 Constitution empowers the Chief Justice of Nigeria to make rules with respect to the practice and procedure of the High Court for the section in question. Pursuant to section 46(3) of the Constitution of the Federal Republic of Nigeria, 1999 the Chief Justice of Nigeria made the Fundamental Rights Enforcement Procedure Rules, 2009 for the enforcement of the provisions under Chapter IV of the 1999 Constitution, as well as the African Charter on Human and People's Rights. In the preamble to the Rules, Matters initiated under are to be given priority over all other matters before the court(Orhero, 2020).

The Nature of Fundamental Rights

The development of human rights has gone through three contemporary generations. The first generation deals with the question of civil and political rights. A right is political when it gives an individual the rights to participate in decision making e.g. the age in which to participate in politics. Civil rights are rights given to civilians; the example of civil and political rights is the entire Chapter Four of the Nigeria constitution. This has been the trend of the Nigerian Constitution. Such rights include; rights to life, freedom from torture and inhuman treatments, freedom from slavery and forced labours, freedom of movement, Right to fair hearing, freedom of thoughts, conscience and religion. First generation rights largely represent western liberal democratic ideals which are anchored on a definition of the person as an isolated, autonomous individual and inherent with individual self aggrandizement and the glorification of private property as fundamental inalienable human rights. This is in agreement with Ake's critique of the liberal regime as atomized and individualistic. First generation rights find expression in the constitution of many countries as fundamental rights. Various regional human rights regimes also embody these rights while at the international levels the Universal Declaration of Human Rights 1948 and the International Covenant on Civil and Political Rights 1966 are instructive. The second generation of Human Rights is referred to as the economic, social and cultural rights. These rights are intended to provide for the material well being of individuals. It was realized that while it was possible to enjoy civil and political rights, there was the necessity for the State to put in place the material conditions upon which economic, social and cultural rights can be enjoyed. While the first generation of rights may be said to be libertarian in nature, the second generation of rights is essentially egalitarian. Example of rights under the second generation include right to education, health, social security, adequate standard of living, employment/work, housing, food, equal pay for equal work and to participate in cultural life. The second generation rights unlike the first generation rights need budgetary allocation for their realization. The rights also require affirmative governmental action for their implementation. Consequently, they are positively represented as "rights to" rather than "Freedom from" as its characteristic of first generation rights (Orhero, 2020).

The National constitution of many countries do not embody second generation rights except as fundamental objectives and directives principle of state policy which, as is the case in Nigeria, is non justifiable. The third generation rights deal with solidarity rights. They deal with the organic and corporate existence and working of the society and embrace inter alia, the rights to safe and healthy environment, development and to share in the common heritage of mankind. These rights are concerned with the development of states, noting that the organized world community is a composite whole of the States which should work in solidarity with each other. These rights are still being progressively developed. It is hoped that the cooperative synthesis which forms the core of third generation rights will be concretized and become the shared expectation and responsibility of the entire human race. Additionally, generational conflicts must not be given pride of place over complementary synthesis which runs through the generations of human rights (Okoedion, Okolie & Udom, 2019; Orhero, 2020).

Examination of Fundamental Human Rights Enforcement

Fundamental human rights and freedoms are inherent in all human kind and they find expression in constitutions and legal systems throughout the world and in the international human rights instruments. Fundamental human rights have been described as rights which are inalienable and guaranteed to every person; they stand above the ordinary laws of the land. These fundamental rights are embodied in chapter IV of the Nigerian Constitution 1999 and in the African Charter on Human and Peoples' Right. The Charter became part of Nigerian laws by virtue of the African Charter on Human and Peoples' Rights (application and enforcement) Act Cap A9 Laws of the Federation 2004. In Nigeria, the process of protection and enforcement of the rights may be classified as conventional and unconventional or orthodox and unorthodox ways. The orthodox ways are provided by the law, they are regularly adopted in seeking relief against an alleged infringement of right. These include invocation of judicial powers and the recourse to police enforcement

(Emoghene & Okolie, 2020). Mediation can be classified as an unorthodox procedure, which is a means of alternative dispute resolution, a process whereby parties request a third person to assist them in their attempt to reach an amicable settlement of their dispute arising out of or relating to a contractual or other legal relationship. The resolution of disputes is by consensus and is a decision of the parties and not of the mediator, the mediator is not concerned with the issue of right and wrong, his primary interest is to assist parties in reaching amicable, acceptable settlement. Fundamental rights are personal rights, the person entitled to benefit from such rights may decide to litigate in the event of violation of it, compromise it or abandon it. Where he decides to litigate, the 1999 Constitution, and the African Charter on Human and Peoples Right guarantee to any person the right to seek redress in a High Court. He needs not wait for his right to be violated; likely hood of the violation gives him the right for redress (Orhero & Okolie, 2024). However, some of the fundamental rights guaranteed in the Constitution are not justifiable: consequently no action can be brought thereby.

The Right to Institute Human Rights Cases

With the promulgation of Fundamental Rights (Enforcement Procedure) Rules 2009, efforts to tackle human rights abuses which are prevalent in Nigeria received a boost. By paragraph 3(e) of the preamble to the Rules, the Courts are obliged to encourage and welcome public interest litigation in human right cases. In human rights litigation, the applicant may include any of the following:

- i. Anyone acting in his own interest;
- ii. Anyone acting on behalf of another person;
- iii. Anyone acting as a member of, or in the interest of a group or class of persons;
- iv. Anyone acting in the public interest; or
- v. Association acting in the interest of its members or other individuals or group. Other persons that can institute human right cases are human rights activists, advocates or group as well as any non-governmental organization who may institute human rights application on behalf of any potential applicant.

Instead of leaving the issue of *locus standi* to the ideological inclination of individual judges, the 2009 Rules has abolished the doctrine in order to enhance public interest litigation in the field of human rights in Nigeria. It has been expressly stated in the rules that “no human rights case may be dismissed or struck out for want of *locus standi*”.

Before the enactment of the 2009 Rules, the term “any person” under section 46(1) of the 1999 Constitution was interpreted by the courts to mean the actual person whose fundamental right has been, was being or likely to have been violated. Despite the restrictive approach of Nigerian courts to the doctrine of *locus standi* in the repealed 1979 Fundamental Rights (Enforcements Procedure) Rules, activist and lawyers repeatedly sought to enforce the fundamental rights of the disadvantaged members of the society through public interest litigation. But they were usually met with frustration as the courts struck out cases filed either by individuals or organizations on behalf of other persons. The courts under the old Rules must ascertain whether the party has *locus standi*. To ascertain whether a plaintiff has *locus standi*, the statement of claim must be seen to disclose a cause of action vested in the plaintiff and also establish the rights and obligation or interest of the plaintiff which have been or are about to be violated, and in respect of which he ought to be heard upon the reliefs he seeks. The interest which the plaintiff alleges must be real not superficial or merely imaginary. The new Rules welcomes public interest litigations in the fields of human rights and no human rights case may be struck out or dismissed for want of *locus standi*. Group or class of persons, human rights activists or nongovernmental organization have the right to institute an action on fundamental right enforcement as envisaged in paragraph 3(e) of the preamble to the 2009 Rules (Orhero & Okolie, 2024).

Justifiability or Otherwise of Fundamental Human Rights under the Constitution

Justifiability means proper examination in court of justice and it depends on whether there is a right or obligation known to the law to be protected or enforced. The question of justifiability lies in the enforcement of Chapter II of the Constitution. The rights in Chapter II of the 1999 Constitution of the Federal Republic of Nigeria are second generation rights. First generation human rights often called “blue” rights deal essentially with liberty and participation in political life. They are fundamentally civil and political in nature. They serve negatively to protect the individual from excesses of the state. First generation rights include the right to life, freedom of speech, freedom from torture and inhumane treatment. The second generation does not find expression under the constitution as justifiable rights. Instead, they form the basis of Chapter II fitted “Fundamental Objectives and Directive Principles of State Policy”. The third generation rights remain largely unofficial, it houses an extremely broad spectrum of rights to participate in cultural heritage. The African Charter on Human and Peoples" Rights ensures many of those: rights to self determination, right to satisfactory environment. The second generation rights are political, economic, social, cultural, educational and foreign policy objectives and directive principle. Section 13 of the Constitution is to the effect that: “It shall be the duty and responsibility of all organs of the government and of all authorities and persons exercising legislative, executive or judicial powers to conform to observe and apply the provision of the chapter of the constitution”. Section 6(6) (c) provides that the judicial power vested in accordance with the provision of this section shall not, except as otherwise provided by this constitution, extend to any issue or question as to whether any act or omission by any authority or person or as to whether any law or any judicial decision is in conformity with the fundamental objectives and directive principles of state policy set out in chapter II of this constitution. It may be noted that by the provision of this section the rights stated under the section are not justifiable. Consequently no action may lie to enforce compliance. Fundamental rights contained in the constitution will be meaningless if we cannot enforce their breaches. It is often said that a right which cannot be enforced is no right at all (Orhero & Okolie, 2020). The rights under chapter II which are political, economic, social, cultural, educational and environmental rights encompass the right to work, right to just condition of work, right to fair remuneration, right to organize, form and join trade unions, right to collective bargaining, right to equal pay for equal work, right to security, right to property, right to education, and right to participate in cultural life

and enjoy the benefit of scientific progress. A perusal of section 16 of that chapter reveals an interesting contradiction of what is contained in the provision of the section and practical experience of the Nigerian citizens, which indicates that the policy is observed more in breach than in compliance. According to Section 16 (1) the state shall within the context of the ideals and objectives for which provisions are made in this constitution.

- a. Harness the resources of the nation and promote national prosperity and an efficient, a dynamic and self-reliant, economy every citizen on the basis of social justice and equality of status and opportunity.
 - b. Control the natural economy in such a manner as to secure the maximum welfare, freedom and happiness of every citizen on the basis of social justice and equality of status and opportunity.
2. The state shall direct its policy towards ensuring;
- a) the provisions of a planned and balanced economic development;
 - b) that the material resources of the nation are harnessed and distributed as the best as possible to served the common good;
 - c) that the economic system is not operated in such a manner as to permit the concentration of wealth or the means of production and exchange in the hands of few individuals or groups; and;
 - d) that suitable and adequate food, reasonable national minimum living wage old age care and pensions, and unemployment, sick benefit and welfare of the disabled are provided for all citizens.

The Niger Delta region of Nigeria which harbors a great chunk of the country's oil resources has been agitating for some time now as people protest the injustice from unfair distribution of the country's oil wealth. Warri ex-militant leaders of Urhobo extraction gave the federal government a 14 day ultimatum to release their fair share" of the Niger Delta amnesty programme or face attacks on oil operations in the areal 1 if this is the matter then there is a clear violation of section 16(2)(5) which provides that the material resources of the nation are harnessed and distributed as best as possible to serve the common good.

Section 18 of the Constitution talks of government ensuring educational opportunities at all levels. How tenable is this today? The educational system does not meet with the requirement of the constitution. For example, the Academic Staff Union of Universities (ASSU) entered into an agreement with the Federal Government in October 2009. One of the key areas on which the agreement was signed is the funding requirements for revitalization of the Nigerian universities, and the Federal Government assistance to state universities. As a result of the failure by the federal governments to implement the agreement the union having persevered for nearly four years proceeded to strike on Sunday 30th June, 2013. The government on several occasions disrupted the union's peaceful public demonstration to educate the public. In Akure on 24th of October 2013, the police disrupted a rally organized by the Academic Staff Union of Universities, of the Federal University of Technology Akure, to educate the public on their four-month-old industrial action (Orhero & Okolie, 2023). The Niger Delta Coalition of Universal Periodic Review (UPR) called on the Nigerian government to take necessary steps in bringing the perpetrators of the various acts of extra-judicial killings in the Niger Delta to justice. The coalition in a report to the 17th UPR session of the United Nations Human Rights council in Geneva - Switzerland said

a) During the four year period after the review, rather than Nigeria improving on its record in promoting its citizens right to life, the country, particularly the Niger Delta regions has become a killing field where innocent citizens have been extra -judicially killed in their hundreds by the police and the various security forces established in different states. In contrast to the above, section 14(2)(b) provides that the security and welfare of the people shall be the primary purpose of government and section 17 states that, the state social order is founded on ideals of freedom, equality and justice. Yet, those affected cannot question this act of insecurity in court because these sections are non-justifiable. The essence of relief that these provisions are thought to have provided is obliterated by the constitution itself, which unequivocally provided in section 6 (6) (c) of the 1999 constitution. Until the constitution is amended to make the provisions of chapter II justifiable, the expectation of having a Nigerian society free from human right violation will be a mirage.

Conclusions

Fundamental rights constitute the cornerstone of the Constitution of the Federal Republic of Nigeria. These rights are provided under Chapter IV of the 1999 Constitution and in the African Charter on Fluman and Peoples" Right. The concept of human rights is that aspect that tasks scholars on its precise meaning and content. Different scholars, like those of Natural and sociological schools, see human rights from different point of view. Despite the guaranteed rights under the constitution and African Charter, the legislature contemplated that there could be breach of these rights. This is why the law laid down procedure for the enforcement of these rights when breached.

The Fundamental Rights (Enforcement Procedure) Rules 2009 provides for the mode of enforcement. The fundamental Rights (Enforcement Procedure) Rules 2009 replaced the fundamental Rights (Enforcement Procedure) Rules 1979, bringing new modification to enhance public interest litigations in the field of human rights.. With the Fundamental Rights (Enforcement Procedure) Rules 2009, there is improvement such as in the area of human right in the aspect of

enforcement e.g., the abolishment of *Locus Standi* and leave for enforcement. However, there are still setbacks in the Fundamental Rights (Enforcement Procedure) Rules 2009. e.g. the issue of main claim and ancillary claim. The fundamental rights enshrined in Chapter IV of the Constitution are to protect the rights of individual against arbitrary violation. However, it is without gain saying that the Nigerian courts understanding of principal and ancillary distinction is capable of rendering the fundamental human rights in the Chapter meaningless. To test whether the Rules met its objectives in order to enhance public interest litigation, field research work was taken. Questions were asked with regards to the procedure of enforcement which revealed the extent to which this objective was achieved. From the analysis of the field work, it was discovered that though the 2009 Rules brought tremendous changes e.g. the abolishment of *locus standi*, there is need for improvement e.g. the issue of jurisdiction of the National Industrial court. In the course of this work the researcher made the following findings:

1. The review of cases shows that no consistent test is applied in determining the distinction between principal and ancillary claim. Some of the instances of the distinction cannot be explained on any ground other than that the court laboured under an improper understanding of the scope of the different rights protected by chapter IV of the constitution.
2. The difficulty in correctly determining whether the claim is principal or ancillary lies in the fact that there is no stated procedure in the enforcement procedure rules as to how claims are to be couched. More importantly, there are no reliefs that are confined for fundamental human rights claim. The provision of Order XV Rule 4 "where in the course of any human rights proceedings, any situation arises for which there is or appears to be no adequate provision in these rules, the Civil Procedure Rules of the court for the time being in force shall apply". This has bred inconsistency in the enforcement of fundamental rights in Nigeria. This study has endeavoured to examine women and the Fundamental Human Rights (Enforcement Procedure) towards the enforcement of fundamental rights. However, the pertinent question is: to what extent are the human rights provision in these legal instruments realized or enforced? It is worthy of note that there are equally other important impediments in the realization of the objective of Fundamental Rights (Enforcement Procedure) Rules 2009, such as the distinction between main claim and ancillary claim in the Nigerian fundamental rights, because litigants are cautious of whether or not their claim will succeed because of this distinction. The third problem is with respect to Order IV rule 4 of the Fundamental Rights (Enforcement Procedure) Rules 2009, the section provides. "Where in the course of any human rights proceedings, any situation arises for which there is or appears to be no adequate provision in these rules, the civil procedure rules of the court for the time being in force shall apply". There is no uniform high court civil procedure rule in Nigeria. It is recommended that:
 - i. It is imperative that the Supreme Court formalizes the understanding that the distinction between principal and ancillary claim negates human rights, and hence discard this dichotomy.
 - ii. There should be Uniform High Court Civil Procedure Rules across Nigeria so as to enhance the doctrine of judicial precedent. There is no doubt that the Fundamental Rights provided under Chapter IV of the Constitution and in the African Charter on Human and Peoples' Right will be breached, this is why the fundamental Rights (Enforcement Procedure) Rule 2009 is enacted to provide procedure for the enforcement of these rights when breached. For this reason the Rules being a procedure for remedy must attain the utmost objective to enhance litigation in the field of human right. Therefore, there is need to improve the Rules in the areas it have lapses. Until the constitution is amended to make the provisions of chapter II justiciable, the expectation of having a Nigerian society free from human right violation will be a mirage.

References

- Emoghene, A. K., & Okolie, U. C. (2020). [Ethnicity, religion, politics and the challenges of national development In Nigeria](#). *Journal of Public Administration, Finance & Law*, 18, 26 – 42.
- Okereka, O. P., & Okolie U.C. (2022). [Issues and challenges of public administration education and training in Nigeria](#). *The Indonesian Journal of Social Studies*, 6(2), 21 – 39.
- Okereka, O. P., & Okolie U.C. (2023). *A march to the future: teaching of public administration and public administrators' perception on public administration education and training in Delta State University, Abraka, Nigeria*. Iraq: Proceedings of the Second International Scientific Conference - Al-Mustafa Al-Amin University and Faculty of Fundamentals of Religion. Pp. 355 – 371.
- Okoedion, E. G., Okolie, U. C., & Udom, I. D. (2019). [Perceived factors affecting students'academic performance in Nigerian universities](#). *Educația Plus*, 25(2), 26 – 37.
- Okolie, U. C., & Emoghene, A. K., (2020). [Psychological capital and employee performance in federal neuro-psychiatric hospital, Benn City, Edo State, Nigeria](#), *World Scientific News*, 122-136
- Orhero, A. E. (2019). [Poverty, unemployment and national insecurity in Nigeria's Fourth Republic](#). *International Journal of Legal Studies*, 6(2), 89 – 98.
- Orhero, A. E. (2020). [Human security: the key to enduring national security in Nigeria](#). *Journal of Public Administration, Finance and Law*, 25, 470 – 484
- Orhero, A. E. (2021). Leadership and governance failure in Nigeria's fourth republic. *PalArch's Journal of Archaeology of Egypt/Egyptology*, 18(5), 290 – 303.
- Orhero, A. E., & Edo, Z. O. (2020). [Restructuring towards sustainable development: The role corporate social responsibility should play in the development of the Niger Delta Region](#). *UJAH: Unizik Journal of Arts and Humanities*, 21(4), 65 – 80.
- Orhero, A. E., & Okolie, U. C. (2020). [Performance appraisal and its effect on employee's job performance in Edo state internal revenue service, Benin City, Nigeria](#). *International Journal of New Economics and Social Sciences*, 11, 93 –

- Orhero, A. E., & Okolie, U. C. (2023). [Workplace diversity and the performance of coca-cola company in benin city, edo state, nigeria](#). *PERSPEKTIF*, 12(3), 844 – 859.
- Orhero, A. E., & Okolie, U. C. (2023). [Nigeria's trend of military administration and economic decay: An analytical review](#). *Social Sciences, Humanities and Education Journal*, 4(2), 355 – 381.
- Orhero, A. E., & Okolie, U. C. (2024). [BVAS, IReV and democratic elections in Nigeria](#). *Pinisi Journal of Social Science*, 2(3), 84 – 95.
- Orhero, A. E., Okereka, O. P., & Ogbe, H. E. (2021). [Corruption and threat of state failure in Nigeria](#). *EBSU Journal of Social Sciences and Humanities*, 11(1), 56 – 75.
- Orhero, A. E., Okereka, O. P., & Okolie, U. C. (2023). Role stressor and work adjustment of university lecturers in Delta State. *Ianna Journal of Interdisciplinary Studies*, 5(1), 124 – 135.
- Sokoh, G. C., & Okolie, U. C. (2023). Administrative and financial reforms in Nigeria: The panacea for efficient service delivery. *PERSPEKTIF*, 12(1), 1 – 14.