Challenges Of Victims Of Crime In Administration Of Criminal Justice In Nigeria

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ABSTRACT
In administration of criminal justice system in Nigeria, victims of crime are faced with the problem of inadequate compensation. No doubt, In Nigeria anybody could be a victim of crime, and the society is exposed to a high level of criminality which calls for effort to tackle the trend and alleviate the plights of the victim of such violent crime. The underlying principle in the promotion of crime victims right is to ensure that they are assisted in recovering from the trauma of criminal violations. Therefore this paper intend to examine the administration of criminal justice system in Nigeria whether the existing provisions on compensation and restitution orders are satisfactory or adequate in our present day society. Is there any legal framework for procedure in existence that ensure that a victim of crime obtain adequate compensation where such victims suffer harm, injury or damages as a result of commission of crime by another. Again, what are the plight of victims in relation to these offences as the victims suffer loss of life, loss of dignity, loss of means of livelihood and impairment to health. Are there other options for these victims to alleviate their problems as monetary compensation may not be the only solution? On a daily basis, different crimes are committed and at times the offenders are neither found nor arrested. The salient question is, what happened to a victim of crime who is a party in the Nigerian criminal justice system.

Keywords: Criminal justice system, compensation, administration

INTRODUCTION
No doubt, every now and then, crimes are being committed. The rising trend of violent crimes have reached alarming proportion that the society is rudely exposed to high level of criminality and advancement of new and dangerous criminal activities that defy scientific advancement and threaten both survival and security of man, hence effort must be made to tackle this trend. The criminal justice system in modern times appears to be more concerned with the criminal offender. A close look at the statutory provisions, through procedural laws, to penal sanctions appears to emphasize the safeguarding of rights and interest of offenders while that of the victim of crime has little or utterly neglected under the Nigeria criminal justice system. Today in Nigeria, events have shown that no matter one’s position or no matter how well placed you are, one could be victim of crime. Therefore something should be done to alleviate the plights of victims of crime in our criminal justice system.

The Administration of Criminal Justice Act 2015 recently passed into law in Nigeria, intended to revolutionize our criminal justice system with a view of checkmating the mischief inherent in the old justice system appeared to have a great attention to the welfare of the offender or the accused person and scant regard to the victim of crime. This has placed the victim of crime in disadvantageous party that has been forgotten in our criminal justice system. It is a trite law in Nigeria that justice is three way traffic; justice for the accused person, justice for the victim of crime and justice for the society. The pertinent
question is, to what extent justice for the victim of crime has actually touched the life of the victim to reposition him into his previous state?

It is against this background, the underlying principle in the promotion of crime victims’ Right is to ensure that they are assisted in recovering from the trauma of criminal violations. The salient question to be answered is whether there is a legal framework for a procedure in existence that ensure that a victim of crime in Nigeria obtains adequate compensation where he suffers harm, injured, destroyed as a result of the criminal behaviour of another person, as obtainable in America, Britain or in line with international best practices.

The Criminal Justice Act 2015 as well as other criminal legislation provide for cost, compensation and restitution to be made to the victim of crime as a way of solving problems created by criminal activities. These provisions make mockery of the whole system as a value contained in them remains totally unrealistic in our present day society. Moreover, these provisions are merely discretionary and subject to order of court. In the absence of these orders, a victim cannot avail himself of these provisions.

It is the victim that feels outraged, humiliated, oppressed and deprived. Hence, this paper intends to examine the current administration of criminal justice in Nigeria, whether the plight of victim of crime is adequately compensated or the restitution order satisfactory. Are there other options for these victims to alleviate their problems as monetary compensation may not be the only solution? The paper further examine the international standard regarding the victim of crime such as United Kingdom whose criminal justice has been a model for Nigeria, with a view to arriving at possible suggestion that will help Nigeria situation.

Who is a victim of crime?

The Black Law Dictionary define victim of crime as a person harmed by crime, tort or other wrong it connotes someone who has been harmed through the kind of activity prohibited by the criminal law. Justice Karibi Whyte also defined victim of crime as any person, dependant or institution who has suffered injury from the criminal act of the offender who has been found guilty in such acts.

These definitions see the victim from the natural legal angles. A ‘person’ whether human or inanimate object, is one that is recognized by law to have rights and duties. In addition, such a person must be someone who can sue and be sued. In other word a juristic personality.

It therefore follows that even a human being may not be ‘person’ under the law, if that human being is not also recognized by the law as one that can sue and be sued. This depends on the conditions and circumstances and according to the dictates of the law. Thus, a human being may not be a victim if the law does not ascribe the status to him, and similarly an inanimate can be victim if the law so wishes. The legal definition of the victim could depend on the legislative policy framework.

For instance, the British compensation Act has defined the victim from a conservative angle bearing in mind the common law attitude to compensation of victims of crime without a criminal trial. The victim is therefore defined as one who has ‘undeservedly suffered’ by the criminal conduct of others. This is the working and legal definition applied by the Compensation Board in Britain in awarding compensation to victims of violent crimes. This definition appears restrictive as it was intended to curtail multiplicity of claims by undeserving victims and for the Compensation Board to be able to cope with its new responsibility. The fact that Compensation Board has qualified a victim to be one who has ‘undeservedly suffered’ does not disqualify the said victim from becoming one from the natural perspective.

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5. Ibid.
The definition of a victim may also vary from another angle depending upon the connotation given to the term ‘victim’ by the law. For instance some have argued that instead or regarding the victim as one who has undeservedly suffered he should rather be seen and defined as one who is innocent of the misconduct of the offender. This is because the consideration is consistent with the doer-sufferer models of criminal interactions. In other words, in a model criminal justice interaction you find an innocent victim and a blameworthy offender. Thus, it is contended that the definition should be reflective of that model. This definition is slightly different from the compensation scheme of Britain. The definition is wider than the latter, as it is not restrictive to the class of persons as having undeservedly suffered from the conduct of others, but extends to all categories of victims either general or otherwise, who are said to be of the misconduct of others.

An extreme approach has been adopted in the United States to the effect that a person only becomes a victim when a verdict of guilt is returned against an alleged offender. Consequently, in a criminal trial, where the prosecution fails to be diligent in handling its matters and does not secure a conviction against the offender, the law will not recognize the existence of a victim. In other words, if there was any victimizing event, it is taken that such an event failed to produce a victim. Thus, any injury or losses sustained as a result of the offender is not sustainable and cannot be a ground for an award. Where however, the alleged offender is only discharged and not acquitted, and it is a case where the prosecution is allowed by the law to have a second bite at a further prosecution, then it is only saving grace for the victim and the prosecution to prove their case, otherwise an award of compensation eludes the alleged victim.

The victim in such a case cannot be considered as one unless the prosecution proves that he is. One of the proponents of these views is Lamborn and he argues unequivocally when defining the effects of victimization thus:

“ The mental state in the case of insanity and infancy approximates criminality; mental state in the case of self defence, necessary official action, consent and mistake differs markedly from criminal mens rea. When the later defences are successful there is no crime, no right to civil interaction, even a lack of moral wrong. Therefore, it appears that persons injured through conduct made non-criminal by these doctrines should be treated as victim”

Strictly examining the position of the law, Lamborn made a valid proposition by drawing inferences from his analysis which if accepted will necessitate hardship by virtue of its rigidity. He stated that the mentally defective children are absolved by the law from criminal liability proceeding from their conduct by reason of their mental capacity at the time of the commission of the crime. Similarly, any crime that is committed out of self defence, necessity authority action, consent and mistake are not only absolved from criminal liability, but excused from civil wrong. The argument appears legally appealing and morally right. He inferred that if that is the case any person that is said to have been wronged either physically or socially by the conduct of the persons mentioned above cannot be a victim of crime as no crime has been committed.

Although Lamborn’s argument is constructive, yet it is rigid. The analysis is faultless to be sincere. However, such an expository is damaging and dangerous to potential victims of crime. Thus cases involving the misconduct of the insane and children will not be compensated.

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6 Ibid p 6
For the purpose of this paper, it is necessary to distinguish the real victim. Our main concern here is the victim upon whom a crime has been committed. This class of victim include those against heinous offences have been committed. These offences range from murder, arson, assault, rape and other organized crimes. The victims have neither constitutional safeguards\(^8\) nor adequate machinery for receiving any compensation for the harm suffered by them. The bona-fide victim is any person who individually or collectively with another person or other persons has injury, loss, damage in consequence of a criminal offence, regardless of his relationship with the offender and including filial, parental, spousal or other relationship.

From the above the bona-fide victim or an injured person will depend on the construction of the court based on the evidence adduced. Mustapha Ogiri and anor. v The State\(^9\) where the Court of Appeal reasoned thus;

“the question now is, who is the person injured by these offences for which the appellant where convicted? In respect of the first appellant who stole a cheque leaf valued at 2 kobo in possession of Audu Adamu, the person injured is Audu Adama and not the bank of the North. The cheque leaf is the property of the customer and not that of a bank………”

The Nigerian Approach towards Victim of Crime

There is no doubt that the Nigeria criminal justice system recognizes the salient third party, the victim in line with the preliminary provisions of the administration of criminal justice Act recently passed into law in 2015 thus;

“The purpose of this Act is to ensure that the system of administration of criminal justice in Nigeria promotes efficient management of criminal justice institutions, speedy dispensation of justice, protection of the society from crime and protection of the rights and interest of the suspects, the defendant and the victim”\(^10\)

In spite of this provision of the law, the interest of the victim is still always submerged in the interest of the society whose norms and values are affronted by the commission of a crime.

It is my humble submission that there is a paucity of provisions in Nigeria criminal statues\(^11\) dwelling on the interests of victim of crime. The statutes are defective, inadequately addressing the financial, emotional and psychological problems of the victim in Nigeria, and therefore could not provide the victim with necessary and adequate remedies as obtainable in other foreign jurisdictions. This situation of victim of crime in Nigeria has long been recognized by Prince Bola Ajibola when he said;

“there has always been a serious dearth of provision within our legal system to guarantee the rights of the victims and to design procedures and institutional framework needed to ensure that a victim can obtain compensation where he suffers harm, injury or damages as a result of commission of crime”\(^12\)

It is really sad that even the recent ACJA 2015 could not make adequate or provide institutional framework needed to ensure that the victim of crime can obtain adequate compensation in line with international standard and best practices.

As a matter of fact, this is particularly true because in inter-personal relationship such as indecent assault and rape offences where the provisions of the law does not make room for the victim to be psychologically redressed.

\(^8\) As provided for the offender in Ss 34,35,36,of the 1999 Constitution of the Federal Republic of Nigeria


\(^10\) Section 1 (1) of the Administration of Criminal Justice Act 2015

\(^11\) See Section 78 and 365 of the Criminal Procedure Code (CPC)

The writer submits that in rare cases where there is compensation which amount to nothing or as is the case in penal code, the amount is not spelt out. The psychological traumas that victim usually undergoes and how that can be redress are not provided for in these provisions.

Again, the courts have the discretion to award compensation or not. This discretion is left to the presiding judicial officer. The provision does not take cognizance of the jurisdictional limits in terms of the amount that the various courts may award. While some courts have limited jurisdiction, others have unlimited jurisdiction in terms of sentence they can impose.

The writer humbly submits that this has resulted in arbitrary use of discretion to the detriment of the victim. Martins v C.O.P. 13

The provisions in section 78 of penal code which is to the effect that any person who is convicted of an offence under this code may be adjudged to make compensation to any person injured by his offence and such compensation may be either in addition to or substitution of any other punishment are not only inadequate but also defeat the purpose they are meant to serve.

Again, the provisions of the criminal procedure Act (CPA) make room for compensation 14 but the compensation is intended to serve the interest of an accused person who has been discharged and acquitted on charges of crime.

However, section 435 (2) provides compensation for the victim up to the sum of Twenty Naira, while this may have been adequate earlier on or as at when this law was made, obviously, it is unrealistic considering the present situation of inflation in Nigeria today. Therefore, it leaves the victim with no option other than to resort to his civil remedies which are fought with difficulty for an indigent victim who may not have the wherewithal to pursue his claims.

Worse still, the recent Administration of criminal Justice Act 2015 provide for compensation of victim of crime, 15 but did little or nothing to assist the victim. Although in criminal matters, compensation may be awarded to the victim of crime by court. Where the victim accepts the compensation, it is a bar to any civil claim for compensation because of the crime. However, the victim is not obligated to collect the compensation, in which case his right in an action for a civil claim will depend on the ability of the convict to pay the compensation. It is provided that where the convict, having been ordered to pay compensation, suffers imprisonment for non-payment, the undergoing of the imprisonment, shall act as a bar to any further action for the same injury.

The writer humbly submits that this provision appeared to have compromised the right of a victim to adequate compensation, where the defendant decides to serve a jail term rather than pay compensation.

Furthermore, there are various crimes that engenders penalty against the offender. In these crimes the criminal justice system would certainly be more humane if it considers not only the offender by punishing him but also by focusing on the victim of crime occasioned by the offence and by ensuring that, in appropriate cases, the victims get compensation. However there are problems which includes:

1. What becomes of a victim of crime who is impecunious and cannot pursue his civil remedies?
2. What becomes of a victim of crime where the offender cannot be identified such as cases of riots and unlawful assembly where it is particularly difficult to trace the offender, and where will the victim turn to for redress?
3. What becomes of a victim, where the offender is indigent and unable to pay any form of compensation?

The first problem raised is the rationale for exploring the possibility of redressing or compensating a victim in a singular civil proceeding. This is because one is not unaware of the financial incapability of some victims and the cumbersome nature of civil proceeding. In such circumstances, it is better the state is called upon to assist the victim financially in other to ameliorate his sufferings. The argument for this is based on the fact that the offender has been convicted and the state is responsible for his upkeep and

13 (2012) LPELR 9821
14 Section 255, 259 260 and 435 (2) Cap 41 LFN 2004
15 S. 319 Administration of Criminal Justice Act 2015
rehabilitation. The state should be seen to be fair to all parties by extending the same gesture to the victim who is a third party in the administration of criminal justice in Nigeria.

In matter of riots and breach of peace, some people take the law into their hands, and some innocent persons suffer undue hardship. What then is the fate of the victims where the offenders cannot be traced? The State assumes a responsibility to protect its citizens and consequently proceeds with prosecuting those responsible for breach of the peace but without compensating the victims who sustain injury as a result of the criminal behaviour of the offenders. Where the state fails or neglects its responsibility by ensuring adequate security, then it should not relent to compensate the victims of such crime because they are also parties to the criminal justice system.

In the words of Scarman L.J. in R.v Wood (RI)\(^\text{16}\);

“Compensation orders were not introduced into our laws to enable the convicted buy themselves out of the penalties of crime. They were introduced as a convenient and rapid means of avoiding the expense of resorting to civil litigation when the criminal clearly has the means which would enable the compensation to be paid.”

The above statement does not consider the peculiar nature of our society where in most cases offenders are incapable of paying. There is the need to compensate such victims. The offender may not want to pay even though the compensation is awarded in addition to the sentence because he believes the victim led him into the crime. For instance, a man who tries to defend himself in the process of an attack by armed robbers may be adjudged to pay compensation to the victim even though the law is not likely to come to the aid of the armed robber.

It is my humble submission that the victim of crime should be assisted by the state where the offender cannot be found or the offender chooses to serve jail term or is impecunious. The justifications for state intervention include\(^\text{17}\):

1. That the state is responsible for preventing crime and therefore should be made responsible for compensating the victims of the crimes it fails to prevent.
2. The second is an extension of welfare doctrine that rest on the belief that people in need, especially those in needs because they have been victimized by event they could not avoid, are entitled to public aid.
3. That State intervention is based upon the notion of an attenuated contract between the state and its citizen, that in consideration for the citizens accepting laws regulating the possessions of firearms and other weapons, restricting the victim use of force in self defence, the State agrees to compensate him in the event of his sustaining injury as a result of criminal behaviour.
4. Their civil remedies are not likely to be successful because of the poor financial conditions and prospects of most offenders and the Criminal Law generally, makes no effort to use it sanctions to ensure restitution to the victim. Indeed it often aggravates the victim’s problems by incapacitating the offender, thus preventing him from earning money to make restitution.
5. Crime prevention theory, which holds that compensation programme will encourage more citizens to report crime, thereby resulting in more effective law enforcement programmes.
6. Equal protection theory, which says that compensation should serve to ameliorate imbalances in society, including the huge variation in crime risk that citizens living in different parts of the Nigeria faces.

\(^{16}\) (1995) CR APP. R 70

\(^{17}\) Fedelis Nwadiolo, “Compensation Victims of Arson and other Offences to Property” in compensation and remedies for Victims of Crime in Nigeria Edited by Ajibola (Federal Ministry of Justice 1990) p 209
These are sufficient reasons why the State must come to the aid of victim of crime in Nigeria and work out a legal framework to guide the award of compensation to victims of crime as obtainable in Britain, America and other Western nations of the world in line with international best practices.

Other Jurisdictions

Criminal justice systems all over the world have continued to fret over the well known demerits of imprisonment and other forms of punishment. Whether the reason for imprisonment is punishment, retribution or rehabilitation or whatever the rationalism has been in favour of a more human approach to convict’s welfare. This underscores the point that the criminal justice system pays great attention to the welfare of the offender and scant regard to the victim of crime.

Victims of crime experience many hardships extending beyond their original victimization, including the trauma of having to testify, uncertainty about their role in the justice process and loss of time at work caused by trial delays, fear of retaliation by the defendant and a general lack of knowledge about what is expected of them as the wheels of justice grind forward. In recent years, these problems are addressed in most jurisdiction of the west, including England whose criminal justice system has been a model for Nigeria. Popular sentiments about the victims of crime soon translated to international standards due to a flurry laws, designed to provide compensation to victims of crime.

The first modern victim compensation statue was adopted by New Zealand in 1963 known as the Criminal Injuries Compensation Act\(^\text{18}\) under the royal prerogative to provide an avenue for claims to be filled by victims of certain violent crimes.

It was intended to fulfill a need voiced both inside and outside parliament to alleviate the hardship which many offenders were inflicting upon innocent people. The Board is charged by the Crown with the duty of distributing the bounty of the crown to those who sustain injury directly attributable to a crime of violence or to assisting in apprehending an offender or preventing an offence. The Board has discretion in making or refusing to make an award, when a victim applies for such an award. But its decision is subject to judicial review by the courts. In 1978, the working party appointed to review the operation of Criminal Injuries compensation schemes reiterated the view of the working party of 1964 that the public feels a sense of responsibility for sympathy for the innocent victim, and it is right that these feelings should find practical expression in the provision of compensation by the community. They also accepted that compensation for criminal justice was morally justified as a measure to tell the nations inability to preserve law and order, and insisted that there should be reasonable provisions for the victims of crime.

In 1964, Margaret Fry\(^\text{19}\) a social reformer brought into focus the disadvantaged position of the crime victims with the system and their need to be recognized and treated with respect to compensation. This led to a criminal injuries compensation scheme for Britain. Since the introduction of this scheme the notion of state compensation for victim’s offences against the person has been accepted as right and proper.

In English and Scottish law\(^\text{20}\), the payments made under the scheme are still ex-gratia. Indeed the Government’s statement when introducing the scheme expressly denied an obligation or responsibility towards victims, basing it upon ‘the more practical ground that although the welfare state helps victims of many kinds of misfortune, it does nothing for the victims of crimes of violence as such\(^\text{21}\).

One must state at this stage that it is not intended to assert or deny that the primary duty to pay compensation lies with the offender; it is simply emphasizes three practical points i.e.

1. the serious effect of some crimes,
2. the limited financial resources of many offenders and
3. the fact that some offenders are not caught coupled with compensation for criminal harms as a largely unsolved social problem unless the state takes action.

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18 Compensation for Criminal Injuries, Criminal Law Review 1969. p 18
20 The English and Scottish Schemes includes personal injury and shock directly attributable to crime of violence (including arson)
In Northern Ireland, the criminal injuries to persons compensation Act of 1968 also contains express statement for the role of the State in compensating those who have been injured as a result of a criminal offence under six headings namely:

1. Expenses actually and reasonably incurred as a result of the victim’s injury or death.
2. Pecuniary loss to the victim as a result of total or partial incapacity for work.
3. Pecuniary loss to dependants as a result of the victim’s death.
4. Pains and sufferings and loss of amenities.
5. Other pecuniary losses resulting from the victim injury.
6. Any other cost as the court may deem fit and reasonable or proper to make in the circumstances.

At the international and regional levels, recognition has been given to the crime victims and the need for an improved status within the justice system. There has been the United Nation Declaration of Basic principles of Justice for Victims of Crime and Abuse of Power\(^\text{22}\), the European Convention on the Compensation of Victims of violent Crime, 1983 and The council of Europe, Assistance to victims and prevention of Victimisation, 1988. All these are declarations and conventions meant to advance the course of victims of crime by member states. These advocate and solicit for better assistance to crime victims, and the recognition to their rights within the criminal justice system of member states.

The United Nations General Assembly Declaration of the of Basic principles of Justice for victims of crime and abuse of power, member States are enjoined specifically to review their practices, regulations and laws to consider restitution as an available sentencing option in criminal cases, in addition to other criminal sanctions. The declaration also provides that;

“Where compensation is not fully available from the offender, States should endeavour to provide financial compensation to;

a. Victims who have sustained significant bodily injury or impairment or physical or mental health as a result of serious crime,

b. The family, particularly dependants of persons who have died or become physically or mentally incapacitated as a result of such victimization."\(^\text{23}\)

Furthermore, the United Nations Declaration\(^\text{24}\) also encourages the establishment of, strengthening and expansion of national funds for compensation to victims of crime. Particular groups of victims who are considered especially vulnerable are also protected by justice systems in the western world. These are mainly child victims and rape victims. For instance, rape victims are to be interviewed in a less threatening environment outside the traditional interrogation rooms with a woman police officer present.

Also child victims are allowed to give evidence from another room (outside the court room but within the court premises) by means video facilities. Identities of rape victims are also not disclosed at the trial. All these make the criminal justice system less remote and more accommodating to the needs of victims.

Again, in Britain and America, voluntary groups such as “Victims Support in Britain” and the “Victim of Crime Act” (VOCA) in America provide immediate and long term assistance to victims. In fact, in Britain, Victim support is hugely funded by the government\(^\text{25}\). Their services ranges from emergency care, crisis intervention, counseling, assistance through the court system, help with applying for and obtaining compensation, setting up the refuges for battered women (victims of domestic violence) and rape crisis centres. They also sometimes setup mediation programmes between offenders and victims thus, diverting them from the formal justice system\(^\text{26}\). This saves time and helps foster reconciliation between parties.

**Conclusion**

heaven for vengeance and finally justice for the society at large- the society whose social norms and values had been desecrated and broken by the criminal act complained….."

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\(^{22}\) G.R. Res 40/43 UN G.A or Supp. (No 53)

\(^{23}\) See Art 13

\(^{24}\) Ibid

\(^{25}\) Magurire, M., and Shapland, J., “the victim movement in Europe”, in victims of crime; Problems Policies and Program, 1990. (Quoted by Koroye) E. p136
In recent times, the problems of victim of crime have been addressed in most foreign jurisdiction, such as New Zealand, England, America and the United Unions. However, Nigeria whose criminal justice system has been model in line with British criminal Justice system has been very slow on the uptake. No doubt the Nigeria criminal justice system recognizes the salient third party, the victim\(^{33}\) Oputa J.S.C in Josiah v the State\(^{27}\) emphasized and stated clearly that;

“Justice is not one way traffic. It is not justice for the appellant only. Justice is not even a two way traffic. It is really a three way traffic- justice for the appellant accused for the heinous crime of murder; justice for the victim, the murdered man, the deceased, whose blood is crying to The point here is that the victim of crime is a party in our criminal justice system whose interest is still submerged in the interest of the society. The statutes are defective in adequately addressing the financial, emotional and psychological problems of the victim and provide him with necessary remedies.

The courts have the discretion to award compensation or not. This discretion is left to the presiding judicial officer. The provision does not take cognizance of the jurisdictional limit in terms of the amount that the various courts may award. This is a shortcoming because some courts in Nigeria have limited jurisdiction while others have unlimited jurisdiction in terms of sentence they can impose. This has resulted in arbitrary use of the discretion to the detriment of the victim.

The need for a legal framework for the victims of crime’s Right and adequate compensation cannot be over emphasized for this is the only way victims can be assured and secured in the Nigeria Criminal justice system. Remember, anybody in Nigeria could be a victim of crime.

RECOMMENDATION

1. A legislation directing the State to pay compensation to victim of crime where the offender cannot be found or found but impecunious. This will be in like manner with Compulsory Treatment and Care for Victims of Gunshot Act 2017 which was recently signed into law by the president Muhammadu Buhari.

2. Establishment of Federal and State Compensation Board for victims of crime. As a matter of fact, Nigeria is long overdue for the compensation board at federal and state level as obtainable in the America and U.K. This will serve as government focal point for all issues affecting crime victims across Nigeria.

3. The private individual or NGO should also create a platform for victim of crime and work out modality on how victims of crime could be compensated or assisted. The Christians and the Muslims may embark on this in line with their religious doctrines to assist victims of crime in Nigeria.

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