

**NATIONAL JUDICIAL INSTITUTE
ABUJA**

**THE LEGAL RIGHTS OF THE VULNERABLE GROUPS
VIS-À-VIS CUSTOMARY PRACTICES**

BY

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EDO STATE*

AT

**THE REFRESHER COURSE FOR JUDGES AND KADIS
FROM 23 – 27 MARCH, 2009**

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INTRODUCTION:

Let me commence this piece of work by thanking the National Judicial Institute for finding me worthy of preparing this paper. The society, by nature, is complex and the way it is structured, in some cases, creates inequalities which may evolve unwittingly. These inequalities can metamorphose into a threat to the legal rights of others who may be our parents, siblings, children, relations, friends and members of our communities.

The Black's Law Dictionary, Eighth Edition defines right as

“something that is due to a person by just claim, legal guarantee or moral principles; a power, privilege, or immunity secured to a person by law; a legally enforceable claim that another will do or will not do a given act; a recognized and protected interest the violation of which is a wrong.”

Every human being from the moment of conception in his/her mother's womb, is entitled to some rights. This is why deliberate

termination of the foetus i.e. deliberate abortion, is a crime in many countries including Nigeria. In other words, the unborn child in his mother's womb has a right to life. The Child's Rights Act 2003¹ provides as follows:

- 17(1). "A child may bring in action for damages against a person for harm or injury caused to the child willfully, recklessly, negligently or through neglect before, during or after the birth of that child.
- (2) Where the father of an unborn child dies intestate, the unborn child is entitled, if he was conceived during the lifetime of his father, to be considered in the distribution of the estate of the deceased father.
- (3) Where the mother of an unborn child dies intestate before the child is delivered, the unborn child is entitled, if he survives his mother, to be considered in the distribution of the estate of the deceased mother".

At birth and thereafter, the legal rights of the person is guaranteed by the Constitution of the Federal Republic of Nigeria 1999 (hereinafter after called the Constitution), and other numerous laws in the land.

Chapter IV of the Constitution for example, governs the fundamental rights of every Nigerian. The chapter, *inter alia*, provides for right to life, dignity of human person, right to personal liberty, right to fair hearing, right to private and

¹ Section 17 of Child's Rights Act, 2003.

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 anywhere in Nigeria.

Having said these about rights, I will proceed to define the word “vulnerable” as contained in the Oxford Advanced Learner’s Dictionary of Current English by A. S. Hornby Revised and Updated Edition as

“that is liable to be damaged; not protected against attack”.

Vulnerable groups in my view, therefore consist of people like children, women, disabled, elders, and minorities.

I shall now attempt to highlight the legal rights of these groups vis-à-vis customary practices.

A. CHILDREN

The child is defined as follows:

“a person under the age of fourteen years”²

However, the Child’s Rights Act, 2003³ defines the child as follows:

“child” means, a person under the age of eighteen years”.

² Section 2(1) of the Children and Young Persons Law Cap. 38 Laws of Bendel State 1976.

³ Section 277 of the Child’s Rights Act, 2003.

With this definition, we therefore have two conflicting definitions of the child - one saying that the child is a person under the age of fourteen years and the other saying that the child is a person under the age of eighteen years. It should be noted that one definition is by a state law while the other is by a federal law. In our system of government, the federal law which has a national application is superior to a state law that is applicable only in the state concerned.

For this work therefore, I shall lean to the definition of the Child's Rights Act which says that a child means a person under the age of eighteen years.

The rights of the child dates back to 1924 with the Geneva Declaration on the rights of the child culminated in the United Nations Convention of the Rights of the Child (CRC) which was adopted in 1990. Later that same year, the Organisation of African Unity (OAU) adopted its Charter on the rights and welfare of the child.

Nigeria is a signatory to both the Convention of the United Nations and the OAU Charter. Nigeria is therefore in the forefront in the battle for the protection of the welfare of the child. Most of the issues canvassed in the United Nations Convention and the OAU Charter regarding the rights of the child were effectively covered by the provisions of the Child Rights Act 2003.

In a commentary to a paper titled "Women, Children and Nigerian Law" presented during the All Nigeria Judges Conference

2003 held here at Abuja, Olubor (PCCA) stated at page 14 as follows:

“I regard the Act as a revolutionary piece of legislation aimed at protecting the child. The Act is so deeply rooted in achieving that aim that it even protects the unborn child”.

Because of the tender ages of children, they are unable to protect themselves and therefore face the danger of abuses. It was therefore thought that their vulnerability could be devastating if nothing positive was done to protect them. The promulgation of the Child’s Right Act 2003 by the Federal Government, which was subsequently domesticated by some States, was therefore seen as a soothing balm that could mitigate or reduce their vulnerability.

Section 1 of the Act provides as follows:

S.1 “In every action concerning the child, whether undertaken by an individual, public or private body, institutions or service, court of law, or administrative or legislative authority, the best interest of the child shall be the primary consideration”.

Section 2 states that a child should be given protection and care necessary for his well-being.

Section 3(1) provides that the provisions of Chapter IV of the Constitution which provides for the fundamental rights of a person shall apply to a child. This sub-section, in my considered view, is desirable even if it can be regarded as superfluous. It is a surplusage in the sense that the child ordinarily benefits from the

provisions of Chapter IV of the Constitution because the provisions therein are applicable to every person; the child is a person. The Constitution being the grundnorm in Nigeria, it is superior to all laws and all laws derive their legitimacy from the Constitution.

Consequently, the Nigerian child has right to life, right to dignity of human person, right to personal liberty, right to fair hearing, 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 anywhere in Nigeria.

Section 15 of the Child's Right Act provides *inter alia* that a child has right to free, compulsory and universal primary education.

However a random sampling of our major cities will reveal that many Nigerian children are in the streets engaging themselves in street trade by hawking sundry wares for their parents or guardians. Some are used to solicit alms for parents or guardians. Some are sent to farms and markets when they are supposed to be in schools.

Violence against children is quite common. They are still easily beaten by adults under the guise of chastisement. Corporal punishment in schools is still widespread. In the process, injuries are easily inflicted on them. Illegal trafficking of children for

sundry inhuman purposes appears to be on the increase because of the economic downturn in our country.

In our rural environments, children are generally regarded as assets and helpmates to parents. They are therefore used by parents as extra labour for their domestic chores and farmhands. Any suggestion that such children should be sent to school is generally seen as an attempt to rob their parents of the needed assistance the children usually provide.

The Act as well provides:

“no parent, guardian or any other person shall betroth a child to any person”.⁴

Continuing, the Act provides that any person who marries a child or to whom a child is betrothed or who promotes the marriage of a child or who betroths a child commits an offence and is liable on conviction to a fine of =N=500,000 or imprisonment for a term of five years or to both such fine and imprisonment.⁵

In spite of these provisions, it is observed that betrothal and child marriage are still practised freely in our communities and rural settings primarily because of traditional practices. It is still common for the parents of a girl child to announce that they were giving out a daughter to a man in whom they are well pleased. The family of such a “husband” usually assumes the guardianship of

⁴ Section 22(1) of Child’s Rights Act 2003

⁵ Section 23 of Child’s Rights Act 2003

such a child until she is big enough for the husband to physically take possession of.

In a national daily newspaper (Sunday Punch) of March 1, 2009 it was published on page 3 as follows:

“In these days when parents are not sparing any cost to send their children to good schools within and outside the country in order to make them self-reliant, a father, Mohamodu Umoru, who hails from the Republic of Niger, prefers to send his two under-aged daughters into forced marriages.

The two girls, dubbed ‘baby wives,’ by neighbours are Rashida, who is 12 years old and her elder sister, Haramu who claims to be 18.

Dark-skinned Rashida, who tells SUNDAY PUNCH her own story first, says her father had given her and her sister to two different men, who are Nigeriens like her parents, but that “it is rather absurd and callous for our father to abort our destiny abruptly without our consent.”

“My father did not even tell us that he had collected our bride prices from the suitors we never knew,” she says. “We were surprised to see some guests in our residence, who came and took us away to different locations, which they say were our husbands’ houses.”

She stresses that she was surprised to see her parents erecting canopies and hiring chairs on that fateful day.

“My father rented canopies and rented chairs, and before we knew what was happening, family friends

and his supposed in-laws were seated and they started eating rice and doing all sorts of things,” she states. Rashida adds that the ironic thing about the whole charade was that neither her sister nor herself was invited to the brief ceremony.

Another curious twist to the story was that none of the suitors were present at the ceremony. “The whole thing seems funny to me, because my sister and I did not partake in the ceremony. We were inside the room, neither did any of our supposed suitors show up,” Rashida recalls.

Like sheep being led to the slaughter, which would not utter a word but bleat, Rashida and Haramu amid suppressed sobs, were finally sent forth to their husbands’ houses on February 15, 2009, as soon as the ceremony was concluded.

The two ‘newly-wedded brides’ were piloted into two different cars, brought by their in-laws. While Rashida was driven to Agboju, along the Lagos-Badagry Expressway, Haramu was taken to somewhere in Ajah, another part of Lagos.

A spectacle awaited Rashida when she finally arrived in her husband’s residence. The man, alleged to be 56 years stays in a one-room apartment.”

In addition to the penalty against betrothal specified in section 23 above, Section 31 makes it a criminal offence to have sexual intercourse with a child. Section 31(3) of the section went further to state that it is immaterial that the offender believes the person to be of or above the age of eighteen years or that the sexual

intercourse was with the consent of the child. Such an offender is said to have committed rape and is liable on conviction to imprisonment for life.⁶

Section 24 of the Act provides that no person shall tattoo or make a skin mark or cause any tattoo or skin mark to be made on a child.

It was the customary practice in the past for skin marks to be made on people, including children, in order to identify people of same tribe. Although this practice is now on the decrease, it has not gone into extinction. It is still being practised in some of our communities and children are the worst victims.

Although it can be argued that skin marks or tattoo are cosmetic, the process of putting the marks or tattoo can lead to some health hazards. It can lead to acute loss of blood. It can also lead to different types of infection. The child can be disfigured in the process. The physical pain involved in the course of the introduction of the mark cannot be quantified. Above all, the child can grow up and dislike the marks. The effect of the marks on the child may be irreversible.

This is why it is better to leave the child's body in its natural form and let the child decide what to do with his body when he or she attains majority.

Section 27(1) states that no person shall remove or take a child out of the custody or protection of his father or mother,

⁶ Section 32(2) of Child's Rights Act, 2003.

guardian or such other person having lawful care or charge of the child against the will of the father, mother, guardian or other person.

This provision brings to mind the psychological trauma some children of broken homes suffer. There are reports where contests as to guardianship of children result in kidnapping or abduction of children by parents or their agents who want to take custody of the children without exploring the legal means of obtaining such custody. Such an action can be regarded as a breach of this provision.

From the foregoing, it is clear that the vulnerability of the child virtually knows no bounds. It is also observed that rather than ameliorate such vulnerability, customary practices, in some cases, tend to aggravate it.

After the consideration of children, the next set or groups to be considered are *women, the disabled and the aged*. I will prefer to refer to them as vulnerable adults.

I will define a “vulnerable adult” as any person, 18 years of age or older, who is a resident or patient of a facility such as a hospital, group nursing home, day service facility, day activity center and adult foster care home.

A vulnerable adult also includes a person who possesses a physical or mental infirmity or other physical or emotional dysfunction that impairs the individual’s ability to provide adequately for his/her own care without assistance and because of

the dysfunction or infirmity and the need for assistance, the individual has an impaired ability to protect himself from maltreatment.

B. WOMEN

Women form a very substantial number of our population in Nigeria. The last population census in Nigeria showed that men and women are almost equal in number.

It is common knowledge that women are virtually responsible for rural households. In spite of this, our customary practices subject them to conditions of inequality with their male folks. Most rural women do not have equal rights as men to resources. Most of them must rely on men for their physical well-being, economic security as well as social status.

A close study will reveal that at various stages in their lives, women's rights to land depend on their fathers, husbands, sons and brothers.

If a woman's relationship with the man in her family is terminated by death, divorce, abandonment, or other circumstances, the woman may also be left without a house or an accepted place in the community with no independent means to secure her survival.

Providing vulnerable groups (like the women in this case) with the right to use, own and transfer moveable and immovable property is thus important to promote entrepreneurial activity and

also provide them with a platform for building strong families and strong businesses.

In a paper titled “Property Rights In Zambia” an issue paper presented for the Commission on Legal Empowerment For The Poor, it was stated on page 8 as follows:

“With reference to access to formal legal institutions, it is important to underline that before a property rights case is brought to court there are several obstacles to the implementation of the statutory law. This often happens because poor and vulnerable people do not have enough knowledge or awareness about entitlement to their rights. *The result is that many women are, for instance, not aware of the possibility to bring to court their late husband’s relatives accused of property grabbing. Women who indeed manage to go to the court must also face relevant hurdles ranging from fear of witchcraft to the possibility of losing their social safety networks. Without a proper moral support they can easily give up and suffer in silence.*” (Emphasis supplied).

They are therefore tied to the apronstrings of these people to the extent that any break in the relationship between the women and the people mentioned results in the women being left without a home and with no independent means to ensure survival.

Landlessness results in acute poverty and an impediment to rural development.

The land tenure systems in Nigeria are mostly characterized by cumbersome administrative requirements. These make the vulnerable groups including women often unable to acquire land.

Customary laws of several communities impose conditions that make women access to land only through male relations. More often, women are regarded as property and therefore cannot own property themselves. In **Suberu v. Sunmonu**⁷, Jibowu, F.J. held thus:

“It is a well settled rule of native law and custom of the Yoruba people that a wife could not inherit her husband’s property since she herself is like a chattel to be inherited by a relation of her late husband.”

The bulk of the ethnic groups in Nigeria are patriarchal. On being married, the women leave their natal homes to settle in their husbands’ villages where they might have lands allocated to them.

Marriages are usually contracted under the Marriage Act, Islamic law or customary law. Consequently, women’s marital property rights are regulated by the regime governing their marriage.

Women married under the Act have their property rights protected by the Act thereby making them entitled to a share in the matrimonial property, including the husbands property, and the jointly owned and acquired property.

Under customary law, women do not have corresponding protection. Their property rights therefore stem from traditional norms which do not entertain the share of marital property. They

⁷ (1957) SCNLR 45.

are more often entitled to kitchen utensils and whatever their husbands may give to them as gifts made *inter vivos*.

This insecurity, stemming from customary practices and laws, place vulnerable groups (women in this case) in a condition of forcible eviction from their homes and land by family members, traditional authorities and neighbours.

This phenomenon (property grabbing) is a widespread problem which occurs after the demise of a person. Since most people die without wills, the distribution of the deceased's estate is left to the whims of relatives. Where a man dies, the widow is left without access to the man's estate as the estate is regarded as belonging to the deceased's family.

This is why it becomes necessary for there to be awareness as to the vulnerability of women with regard to property grabbing. This is more so against the background of the fact that more than 80% of land in Nigeria is held under customary tenure.

It is hereby recalled that section 43 of the Constitution earlier referred to under chapter IV provides:

S.43. "Subject to the provisions of this Constitution, every citizen of Nigeria shall have the right to acquire and own immovable property anywhere in Nigeria".

Considering the above provision, it thus appear that the practice which tends to deprive a woman from access to the late husband's land, which acquisition she invariably contributed to, is contrary to the provision of Section 43 of the Constitution reproduced above.

Our courts should not therefore gloss over such breaches and when the opportunity presents itself, it should make the necessary pronouncements that are capable of whittling down women's vulnerability in that sector.

In most surveys, women clearly appear as the most vulnerable members of the society. In a paper titled

“Effects of the Interplay of Formal and
Customary Laws on Women in Tribal Cultures”

presented at the 7th Interdisciplinary Congress on Women on June 24th, 1999, Simi Kamal, a lady Founder and Chief Executive of Raasta Development Consultants and a Pakistani prominent researcher on women's rights, said at page 2 as follows:

“The estimates of maternal mortality in Balochistan (Pakistan), for example, range from 500 to 1000 per 100,000 live births. Women's health is characterized by high levels of anemia, poor nutrition and maternal weakness arising from frequent child-bearing. Parental deaths are mainly due to complications arising during delivery and poor maternal health. The prenatal and antenatal care of mothers is largely inadequate. Morbidity rates for women were higher than that of men”.

In some cultures, women are not allowed to be Obas, Chiefs and Emirs. This, in my view, is an infringement of the provision of Section 42(2) of the Constitution which provides as follows:

42(2) “No citizen of Nigeria shall be subjected to any

disability or deprivation merely by reason of the circumstances of his birth”.

The disability or deprivation of women from occupying such positions as that of Oba, Emir or Chief is a customary practice. Although the Constitution tries to protect them, it is doubtful whether the Constitution can for now match the muscle of the customary practice. This is because, in communities that practise it, that type of customary practice is regarded as immutable. I know that any suggestion that the practice be reversed may not only be regarded as sacrilegious but could be violently resisted. A reversal of the practice can therefore be regarded as unthinkable for now.

The result of all the above is that customary practices of our local communities make the rights of our women not sufficiently protected and therefore vulnerable.

C. DISABLED

Another group of vulnerable adults are the disabled. Among these are the blind, the lame, people with hunchbacks, dwarfs, deaf, dumb etc. etc.

Their disabilities might be congenital while others might be the result of afflictions or accidents after birth.

Their disabilities more often expose them to physical danger. In case of fire outbreak, for example, the lame and the blind may find it difficult escaping to safety. The blind is sometimes

compelled to move around without any assistance in spite of the monumental danger associated with such movement.

In case of congenital disabilities, some traditions attribute them to evil forces probably consequent upon curses on their parents by their ancestors. It is difficult to convince some of such believers that some natural forces could cause malformation and distortion of human formation during the period of gestation.

These groups of people are discriminated against in their local communities. Help is hardly rendered to most of them. Their rights are always trampled upon and in extreme cases people want to criminally terminate their lives. Examples abound with reports of sudden disappearance of dwarfs and people with hunchbacks. It is generally suspected that ritualists kidnap them for ritual purposes. These misplaced beliefs, which may be traced to some crude customary beliefs that parts of their body could be efficacious when used for ritual purposes, put these people in immense danger.

In big cities, it can be observed that adequate provisions are not made to enable this group of people function side by side with able-bodied people.

Our public highways and buildings are not usually designed to make it easier for people who are lame or blind to function properly. They are left to struggle like every other person in the society.

Some of these disabled people contend with the challenges of life by acquiring sound education. In the course of their training, they are made to struggle with able-bodied students to gain access to limited training facilities like poorly equipped laboratories, congested classrooms, poorly equipped libraries and congested hostels.

After acquiring this hard earned education, they are faced with the problems of securing employments. In spite of the fact that there is acute problem of employment in the country, the problem of this group is that of double tragedy in the sense that even when they excel in other requirements for employment, employers more often refuse to employ them because of their physical challenge or disability.

Most employers, especially those of the private sector, like to parade very presentable workers in order to attract higher patronage.

The vulnerability of the disabled is therefore pathetic and unfortunate especially when viewed against the background of some customary practices that regard their plight as the handiwork of evil cause(s) consequent upon unknown curses by their ancestors.

D. THE AGED

Another vulnerable group that readily comes to mind here is the aged. Age naturally weakens the entire system and organs of the body. It slows down the entire body system and reduces

human reflexes. Old age, in most cases, reduces one's ability to care for himself and *a fortiori* protect himself.

In some cases, age prevents people from appreciating the level of danger that they face. It can also lead to inability to assert one's rights.

In some traditional settings, it is believed that the aged can see vision and dream dreams better than the young. However, these attributes can sometimes lead to accusations of witchcraft. Aged, ugly and frail-looking people are usually dreaded by the young ones and at every opportunity, the aged are accused for being spiritually responsible for calamities that may befall the community. These customary practices are detrimental to the welfare of the aged.

Some aged people who have no responsible children are therefore neglected and left to scavenge for daily bread and when they become ill they are usually left to groan until they pass away.

It is also observed that this group can easily be disenfranchised by lack of access to facilities that can enfranchise them. Because of their physical weakness, they may be unable to easily acquire property and when they are able to acquire property and their rights to the property are invaded or threatened, they may be too weak to assert or defend those rights.

It can therefore be observed that the legal rights of the aged can easily be invaded even by customary practices except deliberate efforts are made to protect these rights.

E. MINORITIES

I believe that it may not be possible to do a fairly good discourse of vulnerable groups without reference to minority groups. This group is quite unique because within them are children, women, disabled, aged and able bodied adults who are not aged.

In most parts of the world, minority groups continue to be among the poorest and most marginalized. In fact they are peculiar as earlier stated among the vulnerable groups.

In a paper titled “Minority Rights and Development: Overcoming exclusion, discrimination and poverty” submitted to the United Nations Working Group on Minorities on 29th May, 2002, it was stated at page 1 as follows:

“Minorities are more likely to be harmed by or left out of the development process. They are particularly susceptible to the causes of poverty, such as lack of assets, restricted access to markets and public institutions, voicelessness and vulnerability, because of violations of their rights to, inter alia, fair distribution of resources, participation in the public sphere, non-discrimination, and education in their language and culture. Ignoring the rights of minorities has weakened poverty reduction strategies and could prevent the achievement of the Millennium Development Goals. The exclusion of minorities from the benefits of development also has direct implications for security and stability. When political exclusion of minorities is compounded by economic exclusion, the propensity for impoverishment to lead to extreme or desperate reactions from minority groups is heightened. At the

root of the problem is the continuing refusal of many governments to recognize the minorities that exist within their territory.”

Examples of minority groups abound in Nigeria.

Poor people are more vulnerable to economic shocks and natural disasters because they already live on the edge of their own means, with little security to absorb the impact of adverse events. Poor minorities are similarly vulnerable to adversity, but they are also vulnerable to discrimination in the provision of remedies to cope with adversity or to policies in response to adversity.

When disaster hits, minorities may find themselves in the back of the queue for assistance. In times of economic crisis, limited resources may be diverted to placate the more vocal, visible and politically powerful majority communities.

On page 4 of the paper referred to above, it was stated among others that:

“when companies are forced to lay off workers, minorities are likely to be the first to be dismissed and the last to be called back to work”.

The paper went further on same page:

“The human security of minorities is also very tenuous. Minorities are often the scapegoats of regimes in crises. They are displaced across borders only to find themselves further impoverished and excluded as refugees; this displacement can lead to further conflict. They may also be more susceptible to violent attacks by private citizens or police and have less chances of securing justice or financial compensation from courts.

In sum, all of the aspects of poverty, that is, low income, lack of assets, voicelessness and vulnerability, are felt more acutely and systematically by minorities than by other poor people. All of these are a direct result of the violations of the rights of persons belonging to the minorities.”

The problems of the minorities are more pronounced in countries where indigenous people have been displaced by immigrants who have taken absolute control of the machinery of government in the affected countries.

In most of these countries, the aborigines were overwhelmed by invasion, wars and other negative means and displaced. Some have been confined to remote parts of the country. Their languages, traditions and customs are being relegated and are going into extinction. Their customary laws are not recognized and practised in any court.

The United Nations appears to be discussing the fate of these oppressed indigenous people. At the sixty-first General Assembly, Third Committee- Informal Report on Plenary Discussion of 16th October 2006, the Under-Secretary-General for Economic and Social Affairs report on the situation of human rights and fundamental freedoms of indigenous people stated thus:

“At the end of the First International Decade of the World’s Indigenous People, the High Commissioner for Human Rights had found that indigenous people in many countries remained among the poorest and most marginalized. The second Decade had been launched on 1 January 2005 with the goal to “further strengthen international cooperation for

the solution of problems faced by indigenous people in such areas as culture, education, health, human rights, the environment, and social and economic development”.

RECOMMENDATIONS

1. Vulnerability of children is quite high in spite of the legal checks put in place to protect children. It is recommended that states that have not enacted the law regarding the rights of the child should do so without further delay. In addition, the provision of the Act should always be given the widest publicity. Non-governmental organizations and religious organizations should be encouraged to assist in the dissemination of the evil of the violation of the rights of the child whether as a result of customary practices or otherwise.
2. The legal rights of our women as contained in our constitution and relevant laws should be protected. The courts especially the customary courts and the Customary Courts of Appeal should not shy away from taking closer look at these rights vis-à-vis the customary practices in order to make the appropriate pronouncements whenever the opportunity presents itself in order to protect the legal rights of our women.
3. The disabled should be regarded as part of the able bodied. Therefore, necessary steps should be taken to ameliorate their hardship by taking them into consideration in

planning our cities and public buildings. Enlightenment campaign should be encouraged in order to erase all types of bias against them.

4. Just as special Ministries have been established for the women and minorities of Niger Delta, a special Ministry should be established for the disabled in Nigeria.
5. There is a general belief that old age brings a person almost back to his childhood days. It is therefore recommended that all relevant organs including the United Nations and the Organisation of African Unity should take serious steps as was done to the child by promulgating Aged's Rights Act to protect the rights of the aged.
6. All information outlets should be explored to highlight the problems of the minorities in order to attract assistance to them in order to avert the self-help approach which most minority groups always adopt by taking up arms against their fellow citizens in an attempt to ventilate their grievances.

I wish all participants very useful and refreshing deliberations.

***HON. JUSTICE JOSEPH OTABOR OLUBOR
PRESIDENT.***

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