

Short Note: Rape A Consequence of Covid-19 Quarantine on Children and The Elderly: A Call for Action

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ABSTRACT

The novel coronavirus (Covid-19) led to a shift in the social structure of global cities leading to self-isolation and social/physical distancing to curb the spread of the virus. While these two are stand as good policy, they are greeted by domestic violence and rape as the most prevalent consequences. The researchers examined the impact of lockdown on domestic violence in Nigeria based on frequency of news reports using content analysis of two online news reports and discovered a high prevalence of rape on children (0 - 17 years) and elderly (60 years and above). Hence it is suggested that the government should always be prepared for emergencies. Also, future polices should consider the interest of the most vulnerable in the society by providing safety measures.

Keywords: Coronavirus (Covid-19); domestic violence; legal; rape; lockdown

INTRODUCTION

The novel coronavirus 2019 (Covid-19) affected worldwide population, leading to unprecedented shift in the social structure of global cities,¹ wherein self-isolation, social/physical distancing became the norm to safeguard life of people. While these practices reduced spread of the virus,² unfortunately they gave birth to all manner of crimes with an increase in domestic violence³ against women and children as attendant consequences,⁴ Nigeria has also been negatively affected. Statistics showed that the menace of domestic violence had increased by 50%,⁵ with a daily report of 8 to 13 cases of domestic violence as compared to 5 to 8 cases prior to the pandemic. Rape on children and the elderly became more prevalent and the crime was perpetrated by close relatives.

Past studies found a significant association between exposure to natural disaster or pandemic and increase in rate of domestic violence.⁶ It was argued that change in the structure of routine activities such as how offenders, victims and perpetrators converge in time and space, leading to increase in certain types of violent crimes such as domestic violence because of length of time and lack of opportunity for escape. During the Covid-19 lockdown, rape seemed to be on the rise compared to other acts of violence against women and children. Reports from countries such China,⁷ United Kingdom and United States of America,⁸ India with a 100% increase as

at April 2020,⁹ revealed an increase in domestic violence cases since the Covid-19 outbreak began. Other countries like Malaysia have had to use the “Doraemon” cartoon character to avoid domestic violence, Bangladesh in the first weeks of the lockdown recorded 59 reported cases of domestic violence, rape and sexual violence a threefold (300%) increase¹⁰ and South Africa, 87, 000 domestic violence calls were reported to the police.¹¹

The research aimed to examine the impact of the Covid-19 lockdown in Nigeria based on the frequency of reported cases from two online news reports. The study was restricted to reported domestic violence cases as reported by these online news reporters with keen interest on the most prevalent form of domestic violence. The study is important because it considered these reports in line with the Nigerian criminal justice system where it described how the criminal justice system aided high prevalence of domestic violence during the Covid-19. It further suggested ways to prevent future menace. In doing so, literatures were reviewed and the method for the study was explained alongside findings and discussions of results and a conclusion.

LITERATURE REVIEW

DOMESTIC VIOLENCE

Domestic violence is both a local and global phenomenon. Despite existing international and local

legislations against domestic violence, the menace persists with a high prevalence. The prevalence of domestic violence in a society, is dependent on a combined effect of existing legislation, culture, and religion.¹² Other determinants such as patriarchy, gender roles and expectations, age difference, social norm, acceptance and justification, patience and endurance leading to a culture of silence exist due to culture or customary rules and religion.¹³ Domestic violence runs irrespective of age, race, culture, educational status, social status, wealth, or religious belief.¹⁴ It affects women all over the world. Domestic violence does not only destroy family unit through divorce or separation¹⁵ but also affect children's psychology and their mental capacity. Women are mostly the victims of domestic violence,¹⁶ but men also experience domestic violence in a low degree.¹⁷ The cycle continues from childhood to adulthood and then transferred from one generation to another generation.¹⁸ Domestic violence against women manifests in various forms. Such as, rape, marital rape, physical violence, emotional violence, psychological violence, abuse, negligence, wife beating, human trafficking, sexual harassment/assault, and the likes.

Nigeria is a Federal State guided by Federal, state, and local government legislations simultaneously. Nigeria has 36 States and the Federal capital territory is in Abuja. Like every country in the world, Nigeria is also going through domestic violence. Nigeria is a multireligious country that holds Christianity and Islam as two of its major religions.¹⁹ However, both religions and culture have been the reasons for high occurrence of domestic violence in Nigeria. Other factors include assigned inferior roles, wife beating, polygamy, some local legislations and denial of education.²⁰ The Nigerian criminal justice system has also been blamed for incessant domestic violence.²¹ As such, women tend to endure domestic violence and as a result, develop complicated health conditions which eventually lead to their death,²² ideation of suicide²³ and suicide²⁴ without a trace of domestic violence.

RAPE

The legal definition of rape has changed over time and differs substantially across and even within states. Rape means any forceful unwanted penetration by a person using any part of his body into the body of another either mouth, anus or vagina without consent first had and obtained from the

person.²⁵ Rape is generally defined as an unlawful sexual relation with a female against her consent.²⁶

It was argued that despite the disparities in definition, there is a scholarly consensus definition of rape i.e. to mean "an act of penile or vaginal penetration committed by some degree of force or the threat of force." With penetration, use of force and absence of consent as its main elements in early definitions but has recently been broadened to include the issue of power and control perpetrated by acquaintances.²⁷ However, other authors have argued that rape is not just forcible intercourse, it means to inhabit and destroy everything and that the victim did not ask to be raped when she was a victim of circumstance, hence should not be blamed.²⁸ It has been found that rape occurs in every community even though the prevalence is not easily determined due to underreporting. Underreporting is tied up to the victims' fear of public stigmatization, repeated or further crimes by perpetrators, life safeguard and dignity since some communities consider it a taboo. Worst case scenario, in some communities tend to disown, kill or castigate the victims for bringing shame to the family.²⁹ As such, rape stigmatizes the victim rather than the perpetrator.³⁰ In most societies like Nigeria, rape is associated with rape myths which generally deny the magnitude of such sexual assault therefore putting an immense burden on survivors. These factors are contributing to post-rape trauma which impedes survivors' ability to recognize and recover from these traumatic events.³¹ In a broader context, one would say that rape or sexual assault or violence is not just physical assault but a violation and infliction of physical, psychological, social, and spiritual pain on the victim.

THE NIGERIAN CRIMINAL JUSTICE SYSTEM

Nigeria as a federation has both federal and state legislations working concurrently within the jurisdiction of each as stipulated under the 1999 Constitution of the Federal Republic of Nigeria. In its attempt to fight domestic violence, Nigeria has enacted the Violence against Person (Prohibition) Act, 2015 (the VAPP Act, 2015). Nigeria also signed several international treaties on violence against women to further enhance its criminal justice system such as International Covenant On Civil And Political Rights United Nations (ICCPR) and International Covenant on Economic, Social and Cultural Rights (ICESCR), both were ratified in 1993. Nigeria had also signed Convention on Elimination of All Forms of Discrimination against Women (CEDAW) that

it ratified in 1985, Declaration on the Elimination of Discrimination against Women (DEVAW), Convention Against Torture (CAT) and African Charter on Human and People's Rights (ACHPR) and its protocol. However, the criminal justice system is still to be blamed for the incessant violence against women.³² The blame is attributed to the delineation of offences, penalties, and criminal law procedure.³³ For instance, international legislations cannot be implemented in Nigeria because of the caveat in S. 12 of the 1999 Constitution that require such legislations to be ratified to have binding effects. It is sad to observe that some local legislations like S. 55 (d) of the Penal Code legalize wife-beating. As such, victims cannot enforce their rights through these legislations.³⁴ The Nigerian criminal justice system is governed by two main national legislations namely the Criminal Code Act (CC) and Penal Code Act (PC) that are applicable in the South and North respectively. However, the application of these substantive legislations is guided by different procedural legislations such as the Criminal Procedure Act (CPA) which is applicable in the South, the Criminal Procedure Code (CPC) in the North. It is essential to note that the Administration of Criminal Justice Act (ACJA) 2015³⁵ is applicable to federal offences within the jurisdiction of both the Federal and State high courts.³⁶

Rape is a criminal offence under the Nigerian criminal justice system that carries a punishment of life imprisonment with or without canning (S. 358 CC, S. 1 VAPP Act, 2015). Rape is prescribed as an offence under S. 357 of the CC and S.282 of the PC.

S. 357 CC provides the following definition of rape:

“Any person who has unlawful carnal knowledge of a woman or girl, without her consent, or with her consent, if the consent so obtained by force or by means of threat or intimidation of any kind, or by force of arms, or by means of false and fraudulent representation as to the nature of the act, or, in the case of a married woman, by personating her husband, is guilty of an offence which is called rape.”

S. 282 PC reads:

“1. A man is said to commit rape who, except in the case referred to in sub-section (2) of this section, has sexual intercourse with a woman in any of the follow circumstances:

- a. against her will;
- b. without her consent;
- c. with her consent, when her consent has been obtained by putting her in the fear of death or of hurt
- d. with her consent, when the man know that he is not her husband and that her consent was given because she believes that he is another man to whom she is or believes herself to be lawfully married;

f. with or without her consent, when she is under 14years of age or of unsound mind.

2. sexual intercourse between a man with his wife is not rape if she has attained to puberty”

And S. 6 CC, 2004 provides thus:

“When the term ‘carnal knowledge’ or ‘carnal connection’ is used in defining an offence, it is implied that the offence, so far as regards that element of it, is complete upon penetration.”

“Unlawful carnal knowledge means carnal connection which takes place otherwise than between husband and wife.”

However, with the enactment of the VAPP, 2015, the High Court of the federal capital territory now have a new provision for rape under S. 47 of the VAPP Act, 2015.

S. 47 VAPP, Act, 2015 defines rape as:

“1) A person commits the offence of rape if; -

- a. He or she intentionally penetrates the vagina, anus or mouth of another person with any or other part of his or her body or anything else;
- b. The other person does not consent to penetration or
- c. the consent is obtained by force or means of threat or intimidation of any kind or by fear of harm or by means of false and fraudulent representation as to the nature of the act or the use of any substance or additive capable of taking away the will of such person or in the case of a married person by impersonating his or her spouse”

As such, except for the provision of the VAPP Act, 2015, the provision of the CC and PC on rape is restrictive and problematic to sustain conviction for rape. The standard of proof required under S. 135 of the Evidence Act, 2011³⁷ is beyond reasonable doubt. The Supreme Court (SC) in the case of *Posu v. State [2011] SC.134/2010* held that it is the duty of the prosecution to prove mens rea and actus reus of rape beyond reasonable doubt. Consent and penetration have been held to be the basis of proof in rape prosecution in Nigeria as held in a plethora of cases *Okoyomon V. State [1972] 1 NMLR 1 and Sunday Jegede V. State [2001] 14 NWLR (Pt. 733) 264*. However, where it was found that the prosecutrix (victim) gave her consent or believed that her consent was obtained or mistakenly believed she gave her consent, the accused would be discharged and acquitted against the offence of rape. See *DPP vs. Morgan 2 ALL ER 347*.

Also, in the case of *Isa V. Kano State [2016] LPELR-40011(SC)*. The ingredients of the offence of rape were clearly stated in the words of Per Ogunbiyi, J.S.C (p. 11-12, Paras E-C) thus:

“The law is settled and well-grounded that the prosecution has the burden and duty to prove the accused person guilty of the following ingredients to sustain the conviction for rape:

- a. That the accused had sexual intercourse with the prosecutrix;
- b. That the act of sexual intercourse was done without her consent or that the consent was obtained by fraud, force, threat, intimidation, deceit or impersonation;
- c. That the prosecutrix was not the wife of the accused;
- d. That the accused had the mens rea, the intention to have sexual intercourse with the prosecutrix without her consent or that the accused acted recklessly not caring whether the prosecutrix consented or not;
- e. That there was penetration. See also *Ogunbade V. State* (2007) 8 NWLR (Pt. 2035) 157; *Upahar V. State* (2003) 6 NWLR (Pt. 816) 230 and *Iko V. State* (2001) 14 NWLR (Pt. 732) 221.”

In addition, in *Natasha v. State* (2017) LPELR-42587 (SC), the court held that the most important ingredient of the offence of rape is penetration, which is usually based on medical evidence. The combination of all the requirements of consent, corroboration and penetration and the fact that rape is mostly committed in the secret, make it difficult to prove. Hence most rape charges do not see the light of day and perpetrators go unpunished.

METHODS

The researchers in examining rape as consequence of the Covid-19 quarantine used content analysis to analyze two online newspaper houses: Sahara Reporters and PMnews Reports within a period of about 4 months from April 1, 2020, to July 19, 2020, with a focus on Nigeria. This is because during the lockdown, almost all newspaper houses were locked and online reports in Nigeria became the norm.

Sahara reporters.com is chose because it is an outstanding, groundbreaking news website that encourages citizen journalists to report ongoing corruption and government malfeasance in Africa. PMnews reports is favored because it is the latest Nigerian news, breaking news, top Nigeria online news portal that covers politics, business, sports, entertainments, and lifestyles. Though data are scary, it was argued that owing to the urgency of Covid-19, grey literature, government report, media or article and social media postings may be acceptable choices of evidence of potential impacts of the Covid-19 quarantine,³⁸ hence the adoption of this methodology by the researchers to examine the consequences of Covid-19 on children and the elderly (vulnerable group). As a result, rape was discovered to have high occurrence that triggers call for immediate action by social workers to help curtail the surge. After excluding similar reported news on domestic violence, a total of 410 cases were discovered and a total of 183 news reports related to rape in Nigeria and 48 foreign reports.³⁹

ANALYSIS AND FINDINGS

The study discovered that rape is the most reported cases with 183 reports out of a total of 410 news reports on domestic violence as against other form of domestic violence perpetrated during the lockdown. Figure 1 below shows the frequency of news report. Since this study is confined to news report on rape cases, Figure 2 below shows a representation of the news report per month between April and July 2020, during the lockdown order in Nigeria.

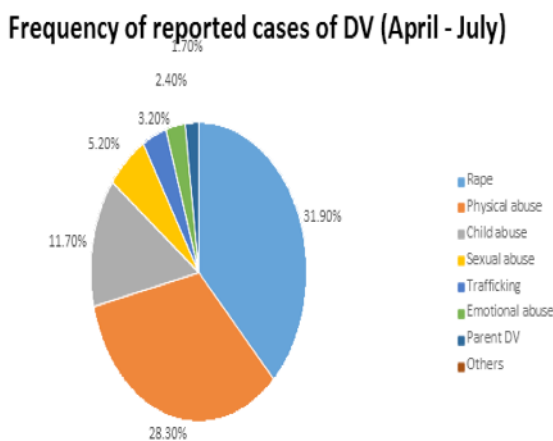


FIGURE 1. Frequency of news report
Source: Primary data, 2020

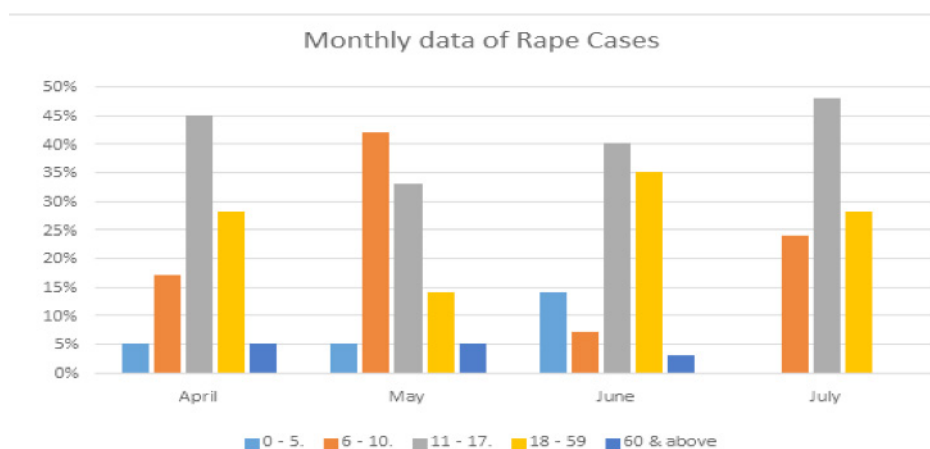


FIGURE 2. News report per month between April and July 2020
Source: Primary data, 2020

From the statistics in Figure 1 above, rape had a high frequency in June and was least reported in April. Children aged 0 - 5, 6 - 10 and 11 - 17 were the most affected and the elderly ages 60 and above had an average of about 3. 5% reported cases per month which is quite high from the population sampled. It was quite a disheartening revelation to see that 10 of the reported cases involved fathers raping the daughters. These groups have been argued to be the most vulnerable groups in the society because they do not have voice and are mostly too weak to defend themselves more so that they suffer the most from physical, mental, emotional, and verbal abuse than any other groups.⁴⁰

From the online newspaper reports, Nigeria was not the only country affected by the rape surge during the quarantine, other countries like Kenya (2 cases; 17 years), Ghana (1 case; 7 years), Congo (14 cases; 11 - 17 years), Serra Leon (2 cases; 5 and 8 years, 1 death), South Africa (2 cases; 5 and 2 years, 1 death), Australia (1 case; 5 years), Malaysia (1 case; adult), Russia (1 case; 8 years) and Babcock 24 cases involving all children.⁴¹

DISCUSSION

The study found that domestic violence increased during the Covid-19 lockdown and rape was perpetrated the most in Nigeria, among other states. It went further to show that the Nigerian government was not prepared to handle emergency. This is because prior to the Covid -19, research found that the government of Nigeria lacks the political will to finance, set up and implement policies to develop 3 fundamental institutions of the criminal justice system namely the police force, the courts and prisons.⁴² Hence the failure of the criminal justice

system in addressing criminal activities in Nigeria.⁴³ Corruption crippled the judicial system due to lack of proper funding and remuneration of these criminal justice institutions, that make it easier for wealthy offenders to get away liability in criminal cases.⁴⁴ As it is widely said in Nigeria “justice is for the highest bidder”.

The study also discovered that most perpetrators were off the hook because they were only arrested and most got police bail while only a few were prosecuted and sentenced.⁴⁵ This could be due to the requirements for consent, penetration and corroboration which are onerous. It is mostly impossible for conviction of the accused to be sustained when these cases were often committed in secret.⁴⁶ Studies have shown that in situations of conflict and disaster, gender inequality, gender-based violence and violations of human rights are likely to increase as the protection and health are disrupted leaving acts of violence unpunished and condoned by the societies,⁴⁷ and this applies to health emergencies as well like the current Covid-19.⁴⁸ With stringent measure of quarantine, victims were trapped with perpetrators without anyway of escape⁴⁹ hence the high rate of father-daughter rape evidenced from the researchers’ investigations.

Rape has its consequences such as depression, unwanted pregnancy, sexually transmitted infections, psychological trauma, mental illness, and suicide.⁵⁰ Although the act of rape is traumatizing and sometimes leading to death, yet under the criminal justice, the issue is treated with levity because of the stringent conditions attached to proving rape cases.⁵¹ Hence the United Nation in mid-November 2020 expressed concerns on the rise of gender-based violence in Nigeria, estimating a total of 3, 600 rape cases recorded nationwide more than a 100 cases

from across the 36 states of the federation during the Covid-19 lockdown.⁵²

Certain reasons have been submitted for prevalence of rape in Nigeria. They include, low prosecution rate, the problem of legislation, impact of police in addressing the issue, low report rate due to stigma, difficulty in proving attributed to stringent requirements of proof of rape,⁵³ The low rate of prosecution of cases in Nigeria are due to culture of silence, fear of bringing disgrace to family,⁵⁴ lack of proper investigation by the police, problem of enforcement of existing legislations, high cost of prosecution and securing witnesses and the requirement of proof which entails corroboration of an eyewitness and medical report of a medical officer evidencing penetration.⁵⁵

Since enforcement is a problem and lawlessness is the order of the day in Nigeria, it is said that a prominent man who commits rape can easily bribe the authorities and get his way to go free.⁵⁶ More so that bail is a constitutional right under S. 36(5) of the 1999 Constitution.⁵⁷ By virtue of S. 4 of the Police Act, CAP P19 LFN, 2004, it is the duty of the police to arrest, investigate and prosecute criminal offences. However they tend to abuse that power thus affecting the citizens⁵⁸ Notwithstanding powers of the Attorney General under S.174 and 211 of the 1999 Constitution of Nigeria, a private person may prosecute in Nigeria. Nonetheless people rather not do so due to cases of malicious prosecution when the action fails in the long run.⁵⁹ There is also presumption of innocence under S. 36 of the 1999 Constitution that protects rape offenders until the contrary is proved. Therefore, this laxity in prosecuting rape offenders encouraged more rapists activities in the country.

It is therefore suggested that, considering the outcome of Covid-19 lockdown order on citizens, government should always be prepared with measures to handle emergencies. In addition, civil society organizations and social workers must device means to help children and the elderly since their voices are seldom heard. Though it is possible for a child of 9 - 17 years to confide in someone, ages 0 - 8 cannot because they do not understand anything and need someone to help them. Thus, mothers should be on alert to observe the behavior of their children and report any changes they discover. Furthermore, children who attend schools should be sensitized and educated to have courage to report to an elderly person they trust and have confidence in whenever they have been molested or

are facing treat of sexual molestation by anyone to help guard future occurrences. While in the case of the elderly, as they listen to the media, they should also be sensitized and given helplines to call or an alert signal for help when in helpless situations.

The government should also be proactive in fighting against rape and be ready to punish perpetrators to serve as deterrence to others who may have the intentions of perpetrating such acts especially on children and the elderly group. As such, policies must be drafted to include the interest of these vulnerable groups in the society to shield them from further violence.

Rape cases should be treated as *sue generis* (time is of essence). Creating awareness on rape and its dangers and raising needs to shun stigmatization are fundamental steps in addition to providing help desks and help lines for rape victims. DNA test kit for blood, saliva, skin, and the likes on the victim should also be made available. The laws on rape should be revisited especially the issue of proof. If those conditions must be maintained, then there should be efficient and effective modern equipment for detecting penetration and the medical team should be fully involved. Judges should be proactive and willing to enforce international legislations at all costs to protect the citizens from discrimination and discriminatory laws existing.

CONCLUSION

Good as the Covid-19 quarantine is in safeguarding the lives of people, yet it brought along negative consequences that would leave life-long consequences on the lives of victims. Therefore, measures should be put in place to avert future consequences of health emergencies.

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NOTES

- ¹ T. Hodgkinson & M.A. Andresen, 'Show me a man or a woman alone and i'll show you a saint: changes in the frequency of criminal incidents during the Covid-19 pandemic', (2020) *J. Crim. Justice*, p 69.
- ² M. Sutherland, M. McKenney & A. Elkbuli, 'Gun Violence during COVID-19 Pandemic: Paradoxical trends in New York City, Chicago, Los Angeles and Baltimore', (2021) 39(xxxx) *Am. J. Emerg. Med.*, p 225-226, 2021.
- ³ R. Tandon, 'The Covid-19 Pandemic, Personal Reflections on Editorial Responsibilities', (2020) 50 *Asian J. Psycotr.*

- ⁴ P. Mlambo-Ngcuka, 'Violence against women and girls: The shadow pandemic', *UN Women*, 6 April, 2020, <https://www.unwomen.org/en/news/stories/2020/4/statement-ed-phumzile-violence-against-women-during-pandemic> [18 July 2021]. See also J. Chandra, 'NCW launches domestic violence helpline', *The Hindu*, 2017, <https://www.thehindu.com/news/national/ncw-launches-domestic-violence-helpline/article31312219.ece> [18 July 2021].
- ⁵ M. Ogunmeru, 'Covid-19 lockdown: Domestic and sexual violence cases rise in Lagos by 50%', *Scooper*, 21 April, 2020, <https://m.scooper.news/nigeria/2020/04/21/covid-19-lockdown-domestic-sexual-violence-cases-rise-in-lagos-by-50/9661845> [18 July 2021].
- ⁶ S. Gearhart, M. Perez-Patron, T.A. Hammond, D.W. Goldberg, A. Klein & J.A. Horney, 'The impact of natural disasters on domestic violence: An analysis of reports of assaults in Florida (1999 - 2007)', (2018) 5(2) *Violence Gend.*
- ⁷ M. Godin, 'As cities around the world go on lockdown, victims of domestic violence look for a way out', *Time.com*, 18 March, 2020, <https://time.com/5803887/coronavirus-domestic-violence-victims/> [18 July 2021].
- ⁸ Anon, 'The impact of Covid 19 on women and children experiencing domestic abuse, and the life saving-services support them', *Women's Aid*, 17 March, 2020, <https://www.womensaid.org.uk/the-impact-of-covid-19-on-women-and-children-experiencing-domestic-abuse-and-the-life-saving-services-that-support-them/> [18 July 2021].
- ⁹ S.S.C. Bose, 'Domestic Violence Against Women in India', (2020) 40(50) *UGC Care J.*, 2020.
- ¹⁰ Maya Dania, 'Pandemic, national disaster and domestic violence', *The Jakarta Post*, 3 May, 2020, <https://www.thejakartapost.com/academia/2020/05/03/pandemic-national-disaster-and-domestic-violence.html> [18 July 2020].
- ¹¹ S. Lambo, 'SAPS received 87 000 gender-based violence calls during first week of lockdown - Cele', *IOL*, 3 April, 2020, <https://www.iol.co.za/news/south-africa/saps-received-87-000-gender-based-violence-calls-during-first-week-of-lockdown-cele-46024648> [15 July 2021].
- ¹² B.A. Raji & G.O. Akolokwu, 'Discriminatory customary practices against womens rights: an account of intervention strategies by Southern African developing states', (2019) 27(1) *IJUM Law J.*, pp. 89-120.
- ¹³ S.B. Fakunmoju, F.O. Bammeke, F.A.D. Oyekanmi, S. Temilola, and B. George, 'Psychometric properties of beliefs about relationship violence against women and gender stereotypes scale', (2016) 26(3) *J. Psychol. Africa*, pp. 246-258. See also B.O. Akor, L.A. Moses, N.D. Baamlong, L.L. Shedul, A.S. Haruna, J.M. Abu, O.U. Chira, N.R. Ripiye & R.A. Abdulkareem, 'Effect of counselling on the family function of intimate partner violence victims attending antenatal clinic in a tertiary hospital in North Central Nigeria', (2019) 61(2) *South African Fam. Pract.*, pp. 69-74 and S. O. Ademiluka, 'Reading 1 corinthians 7:10-11 in the context of intimate partner violence in Nigeria', (2019) 40(1) *Verbum Eccles.*, pp. 10-11.
- ¹⁴ A. Aragbuwa, 'A standard reading of selected online readers comments on domestic violence against men in Nigeria', (2020) *Men Masc.*
- ¹⁵ B.O. Akor *et al.*, 'Effect of Counselling on the Family Function of Intimate Partner Violence Victims Attending Antenatal Clinic in a Tertiary Hospital in North Central Nigeria', pp. 69-74.
- ¹⁶ A. Aragbuwa, 'A standard reading of selected online readers comments on domestic violence against men in Nigeria'. See also P. O. Dienye and P. K. Gbeneol, 'Domestic violence against men in primary care in Nigeria', (2009) 3(4) *Am. J. Mens. Health*, pp. 333-339.
- ¹⁷ A. Aragbuwa, A Standard Reading of Selected Online Readers Comments on Domestic Violence against Men in Nigeria.
- ⁸ N.A Adeleke, W.O Adebimpe, E.O Farinloye, E. O. & A.S. Olowookere, 'Rural and urban prevalence of sexual assault against women in an African population', (2019) 18(3) *Bangladesh J. Med. Sci.*, pp. 628-635, 2019. See also L.K. Gilbert, F.B. Annor & H. Kress, 'Associations between endorsement of inequitable gender norms and intimate partner violence and sexual risk behaviors among youth in Nigeria: Violence against children survey, 2014', *J. Interpers. Violence*, 2020.
- ¹⁹ S.B. Fakunmoju *et al.*, 'Psychometric properties of beliefs about relationship violence against women and gender stereotypes scale', pp. 246-258. See also B. O. Akor *et al.*, 'Effect of counselling on the family function of intimate partner violence victims attending antenatal clinic in a tertiary hospital in North Central Nigeria', pp. 69-74.
- ²⁰ F.D. Oluremi, 'Domestic violence against women In Nigeria', (2015) 2(1) *Eur. J. Psychol. Res.*, pp. 24-33. See also M.O.N. Kunnuji, 'Experience of domestic violence and acceptance of intimate partner violence among out-of-school adolescent girls in Iwaya community, Lagos state', (2014) 30(4) *J. Interpers. Violence* 30(4), pp. 543-564, and O. Arisukwu, C. Igbolekwu, T. Adebisi, and F. Akindele, 'Perception of domestic violence among rural women in Kuje', (2021) 7(2) *Heliyon*.
- ²¹ N.A. Adeleke *et al.*, 'Rural and urban prevalence of sexual assault against women in an African population', pp. 628-635. See also I. P. Enemo, 'Effectiveness of nigerian international obligations in curbing domestic violence', (2018) 6(1) *Nnamdi Azikiwe University Journal of International Law and Jurisprudence*, pp. 1-13.
- ²² O. Arisukwu, C. Igbolekwu, T. Adebisi & F. Akindele, 'Perception of domestic violence among rural women in Kuje', *Heliyon* 7(2), 2021.
- ²³ C.U. Chimah, P.O.U. Adogun, K. Odeyemi & A. L. Ilika, 'Comparative analysis of prevalence of intimate partner violence against women in military and civilian communities in Abuja, Nigeria', (2015) 7 *Int. J. Womens. Health*, pp. 287-295.
- ²⁴ M.O.N. Kunnuji, 'Experience of domestic violence and acceptance of intimate partner violence among out-of-school adolescent girls in Iwaya community, Lagos state', (2015) 30(4) *J. Interpers. Violence*, pp. 543-564.
- ²⁵ O.O. Lilian & P.I. Martins, 'Enforcement of the violence against persons prohibition (vapp) act 2015 in fighting domestic violence against women in Rivers State: Challenges and remedies', (2018) 6(11) *Int. J. Sci. Res. Manag.*, pp. 345-352.
- ²⁶ Anon, 'Rape in Nigeria: Punishment, prove, elements & effects of rape in Nigeria', *Bscholarly*, 2021. <https://bscholarly.com/offence-of-rape-in-nigeria/> [15 July 2021].
- ²⁷ L. R. David & J. Haglund, *Violence against Women and the Law*, Routledge, New York, 2016.
- ²⁸ Sahid Ahmed, Shanthi Nadarajan & Ahmed Shamsul Bahari, 'Silencing of rape: Treatment of rape events and rape victims by media and fiction', (2020) 36(1) *Malaysian J. Commun.*

- ²⁹ WHO, *Global and Regional Estimates of Violence against Women: Prevalence and Health Effects of Intimate Partner Violence and Non-Partner Sexual Violence*, World Health Organization, Italy, 2014.
- ³⁰ J. Chandra, 'NCW launches domestic violence helpline'.
- ³¹ L. C. Wilson & K. E. Miller, 'Meta-Analysis of the prevalence of unacknowledged rape', (2016) 17(2) *Trauma Violence Abus*.
- ³² Anon, *Handbook for Legislation on Violence against Women*, UN Women, New York, 2012.
- ³³ C. Onyemelukwe, 'Legislating on violence against women: a critical analysis of Nigeria's recent Violence Against Persons (Prohibition) Act, 2015', (2016) 5(2) *De Paul J. Women, Gen. Law*, p. 3.
- ³⁴ I.P. Enemo, 'Effectiveness of Nigeria's international obligations in curbing domestic violence', pp. 1-13.
- ³⁵ R.E. Abajuo, 'An appraisal of the administration of Criminal Justice Act', (2015) *SSRN Electron. J.*, pp. 0-38.
- ³⁶ T.T. Olonisakin, A.J. Ogunleye & S.O. Adebayo, 'The Nigeria criminal justice system and its effectiveness in criminal behaviour control: A social-psychological analysis', (2017) 22(2) *IOSR J. Humanit. Soc. Sci.*, pp. 33-48.
- ³⁷ Evidence Act 2011 (Nigeria).
- ³⁸ J.A. Knottnerus & P. Tugwell, 'Methodological challenges in studying the Covid-19 pandemic crises', (2020) *J. Clin. Epidemiol.*, p 121.
- ³⁹ M. Ogunmeru, 'Covid-19 lockdown: Domestic and sexual violence cases rise in Lagos by 50%'. See also Anon, 'Group tells Nigerian to report domestic violence while observing stay at home', *Sahara Reporters*, 28 March, 2020, <http://saharareporters.com/2020/03/28/group-tells-nigerians-report-cases-domestic-violence-while-observing-stay-home-order> [18 July 2021], Anon, 'VP Osibanjo speaks on gender-based violence in Nigeria', *PM News*, 20 June, 2020, <https://pmnewsnigeria.com/2020/06/20/vp-osibanjo-speaks-on-gender-based-violence-rape-in-nigeria/> [18 July 2021] and Anon, 'Child to Parent Abuse (CPA) in UK', *Selig Reporters*, 26 June, 2020.
- ⁴⁰ Noor 'Aza Ahmad, 'Older persons: The development of legal protection on emotional abuse in domestic violence', (2018) 3(13) *Int. J. Law, Gov. Commun.* See also Ying Ying Chan, Azriman Rosman, Noor Ani Ahmad, Noraida Mohamad Kasim, Mohamad Aznuddin Abd Razak, Maisarah Omar, Fazly Azry Abdul Aziz, S. Maria Awaluddin, Muslimah Yusof, Rasidah Jamaluddin, Nor'Ain Ab Wahab & Najwa Hanim Rosli, 'Prevalence and factors associated with intimate partner violence among postpartum women attending government primary health care clinics in Malaysia', (2019) 34(2) *J. Fam. Violence*, pp. 81-92.
- ⁴¹ M. Ogunmeru, 'Covid-19 lockdown: Domestic and sexual violence cases rise in Lagos by 50%'. See also Anon, 'Child to Parent Abuse (CPA) in UK'.
- ⁴² M. Aminu, 'Police corruption and administration of criminal justice system in Nigeria', (2018) 9(1) *Nnamdi Azikiwe Univ. J. Int. Law Jurisprud.*, pp. 198-207.
- ⁴³ M. Aminu, 'Police corruption and administration of criminal justice system in Nigeria'.
- ⁴⁴ M. Aminu, 'Police corruption and administration of criminal justice system in Nigeria'.
- ⁴⁵ Anon, 'VP Osibanjo speaks on gender-based violence in Nigeria'.
- ⁴⁶ U. Eshemokha, 'Rape laws in Nigeria: Addressing the issue of rape and killings of the girl child in Nigeria', *Nimed Health*, 2020, <https://nimedhealth.com.ng/2020/06/16/rape-laws-in-nigeria-addressing-the-issue-of-rape-and-killings-of-the-girl-child-in-nigeria/> [15 July 2021]
- ⁴⁷ P. Gearhart et al, 'The impact of natural disasters on domestic violence: An analysis of reports of assaults in Florida (1999 - 2007)'. See also S. Bellizzi, A. Nivoli, L. Loretto & A.R. Ronzoni, 'Human rights during the COVID-19 pandemic: the issue of female genital mutilations', (2020) 185 *Public Health*, pp. 53-54.
- ⁴⁸ E. Komba, 'The dilemma: Female Genital Mutilation in the midst of Covid-19 pandemic', *End FGM European Network*, 20 April, 2020, <https://www.endfgm.eu/news-en-events/news/covid-19-pandemic-putting-girls-at-high-risk-of-fgm-in-kenya/> [18 July 2021].
- ⁴⁹ G. Lessard, S. Lévesque, C. Lavergne, A. Dumont, P. Alvarez-Lizotte, V. Meunier & S.M. Bisson, 'How adolescents, mothers and fathers qualitatively describe their experiences of co-concurrent problem: Intimate partner violence mental health and substance use', (2020) *J. Inter Pers. Violence*.
- ⁵⁰ I. Ibanga, 'Rape in Nigeria; Notable cases, causes, effects, possible solutions', *Infoguide Nigeria*, 2017, <https://infoguidenigeria.com/rape-in-nigeria/> [15 July 2021].
- ⁵¹ Anon, 'Rape in Nigeria: Punishment, prove, elements & effects of rape in Nigeria.'
- ⁵² F. Olorok, 'Nigeria recorded 3,600 rape cases during lockdown - UN', *Punch Newspapers*, 2020, <https://punchng.com/nigeria-recorded-3600-rape-cases-during-lockdown-un/> [15 July 2021].
- ⁵³ L.K. Gilbert et al, 'Associations between endorsement of inequitable gender norms and intimate partner violence and sexual risk behaviors among youth in Nigeria: Violence against children survey, 2014'. See also I. P. Enemo, 'Effectiveness of Nigeria's international obligations in curbing domestic violence', pp. 1-13, C. Onyemelukwe, 'Legislating on Violence Against Women: A Critical Analysis of Nigerias Recent Violence Against Persons (Prohibition) Act', p. 3, and C. Onyemelukwe, 'How well does the law protect women at home? An analysis of Nigeria's domestic violence legislation', (2018) 60(2) *Int. J. Law Manag.* Pp. 186-209.
- ⁵⁴ I. Ibanga, 'Rape in Nigeria; Notable cases, causes, effects, possible solutions.'
- ⁵⁵ U. Eshemokha, 'Rape laws in Nigeria: Addressing the issue of rape and killings of the girl child in Nigeria'.
- ⁵⁶ I. Ibanga, 'Rape in Nigeria; Notable cases, causes, effects, possible solutions.'
- ⁵⁷ M. Aminu, 'Police corruption and administration of criminal justice system in Nigeria'.
- ⁵⁸ M. Aminu, 'Police corruption and administration of criminal justice system in Nigeria'.
- ⁵⁹ C.O. Olawoye, 'The role of the police and the courts in the administration of criminal justice in Nigeria', (1971) 10(1) *Int. Ann. Criminol.*, p 229.

REFERENCES

Abajuo, R.E. 2015. An appraisal of the administration of Criminal Justice Act. *SSRN Electron. J.*: 0-38.

- Adeleke, N.A., Adebimpe, W.O., Farinloye, E.O. & Olowookere A.S. 2019. Rural and urban prevalence of sexual assault against women in an African population. *Bangladesh J. Med. Sci.* 18(3): 628-635.
- Ademiluka, S.O. 2019. Reading 1 Corinthians 7:10-11 in the context of intimate partner violence in Nigeria. *Verbum Eccles.* 40(1): 10-11.
- Akor, B.O., Moses, L.A., Baamong, N.D., Shedul, L.L., Haruna, A.S., Abu, J.M., Chira, O.U. Rapiye, N.R. & Abdulkareem, R.A. 2019. Effect of counselling on the family function of intimate partner violence victims attending antenatal clinic in a tertiary hospital in North Central Nigeria. *South African Fam. Pract.* 61(2): 69-74.
- Aminu, M. 2018. Police corruption and administration of criminal justice system in Nigeria. *Nnamdi Azikiwe Univ. J. Int. Law Jurisprud.* 9(1): 198-207.
- Annex 1 103 <http://www.ohchr.org> [18 July 2021].
- Anon. 2012. *Handbook for Legislation on Violence against Women*. New York: UN Women.
- Anon. 2020. Group tells Nigerian to report domestic violence while observing stay at home. *Sahara Reporters*. 28 March. <http://saharareporters.com/2020/03/28/group-tells-nigerians-report-cases-domestic-violence-while-observing-stay-home-order> [18 July 2021].
- Anon. 2020. The impact of Covid 19 on women and children experiencing domestic abuse, and the life saving-services support them. *Women's Aid*. 17 March. <https://www.womensaid.org.uk/the-impact-of-covid-19-on-women-and-children-experiencing-domestic-abuse-and-the-life-saving-services-that-support-them/> [18 July 2021].
- Anon. 2020. VP Osibanjo speaks on gender-based violence in Nigeria. *PM News*. 20 June. <https://pmnewsnigeria.com/2020/06/20/vp-osinbajo-speaks-on-gender-based-violence-rape-in-nigeria/> [18 July 2021].
- Anon. 2021. Rape in Nigeria: Punishment, prove, elements & effects of rape in Nigeria. *Bscholarly*. <https://bscholarly.com/offence-of-rape-in-nigeria/> [15 July 2021]
- Antai, D. 2011. Traumatic physical health consequences of intimate partner violence against women: What is the role of community-level factors? *BMC Womens Health*.
- Aragbuwa, A. 2020. A standard reading of selected online readers' comments on domestic violence against men in Nigeria. *Men Masc*.
- Arisukwu, O., Igbolekwu, C., Adebisi, T. & Akindele, F. 2021. Perception of domestic violence among rural women in Kuje. *Heliyon* 7(2).
- Bellizzi, S. Nivoli, A., Loretto, L. & Ronzoni, A.R. 2020. Human Rights During the COVID-19 Pandemic: The Issue of Female Genital Mutilations. *Public Health* 185: 53-54.
- Bose, S.S.C. 2020. Domestic violence against women in India. *UGC Care J.* 40(50).
- Chandra, J. 2017. NCW launches domestic violence helpline. *The Hindu*. <https://www.thehindu.com/news/national/ncw-launches-domestic-violence-helpline/article31312219.ece> [18 July 2021].
- Chimah, C.U., Adogu, P.O.U., Odeyemi, K. & Ilika, A.L. 2015. comparative analysis of prevalence of intimate partner violence against women in military and civilian communities in Abuja, Nigeria. *Int. J. Womens. Health* 7: 287-295.
- Constitution of the Federal Republic of Nigeria 1999. Criminal Code Act 2004 (Nigeria).
- David, L.R. & Haglund, J. 2016. *Violence against Women and the Law*. New York: Routledge.
- Dienye, P.O. & Gbeneol, P. K. 2009. Domestic violence against men in primary care in Nigeria. *Am. J. Mens. Health* 3(4): 333-339.
- Enemo, I.P. 2018. Effectiveness Of Nigeria's International Obligations In Curbing Domestic Violence. *Nnamdi Azikiwe University Journal of International Law and Jurisprudence* 6(1): 1-13.
- Eshemokha, U. 2020. Rape laws in Nigeria: Addressing the issue of rape and killings of the girl child in Nigeria. *Nimed Health*. <https://nimedhealth.com.ng/2020/06/16/rape-laws-in-nigeria-addressing-the-issue-of-rape-and-killings-of-the-girl-child-in-nigeria/> [15 July 2021]
- Evidence Act 2011 (Nigeria).
- Fakunmoju, S.B., Bammeke, F. O., Oyekanmi, F. A. D., Temilola, S. & George, B. 2016. Psychometric properties of beliefs about relationship violence against women and gender stereotypes scale. *J. Psychol. Africa* 26(3): 246-258.
- Gearhart, S., Patron, M.P., Hammond, T.A., Golberg, D.W., Klein, A. & Hopney, J.A. 2018. The impact of natural disasters on domestic violence: An analysis of reports of assaults in Florida (1999 - 2007). *Violence Gend* 5(2).
- Gilbert, L.K., Annor, F.B. & Kress, H. 2014. Associations between endorsement of inequitable gender norms and intimate partner violence and sexual risk behaviors among youth in Nigeria: Violence against children survey. *J. Interpers. Violence*.
- Godin, M. 2020. As cities around the world go on lockdown, victims of domestic violence look for a way out. *Time.com*. 18 March. <https://time.com/5803887/coronavirus-domestic-violence-victims/> [18 July 2021].
- Hodgkinson, T. & Andresen, M.A. 2020. Show me a man or a woman alone and I'll show you a saint: Changes in the frequency of criminal incidents during the Covid-19 pandemic, *Journal of Criminal Justice* 69.
- Ibanga, I. 2017. Rape in Nigeria; Notable cases, causes, effects, possible solutions. *Infoguide Nigeria*. <https://infoguidenigeria.com/rape-in-nigeria/> [15 July 2021].
- Ibekwe, P.C. 2007. Preventing violence against women: Time to uphold an important aspect of the reproductive health needs of women in Nigeria. *BMJ Sexual & Reproductive Health* 33(4).
- Knottnerus, J.A. & Tugwell, P. 2020. Methodological challenges in studying the Covid-19 pandemic crises. *J. Clin Epidemiol*: 121.
- Komba, E. 2020. The dilemma: Female genital mutilation in the midst of Covid-19 pandemic. *End FGM European Network*. 20 April. <https://www.endfgm.eu/news-events/news/covid-19-pandemic-putting-girls-at-high-risk-of-fgm-in-kenya/> [18 July 2021].
- Kunnuji, M.O.N. 2015. Experience of domestic violence and acceptance of intimate partner violence among out-of-school adolescent girls in Iwaya community, Lagos state. *J. Interpers. Violence* 30(4): 543-564.
- Lambo, S. 2020. SAPS received 87 000 gender-based violence calls during first week of lockdown - Cele. 2020. *IOL*. 3 April. <https://www.iol.co.za/news/south-africa/saps-received-87-000-gender-based-violence-calls-during-first-week-of-lockdown-cele-46024648> [15 July 2021].

- Lessard, G., Lévesque, S., Laverigne, C., Dumont, A., Lizotte, P. A, Meunier, V. & Bisson, S.M. 2020. How adolescents, mothers and fathers qualitatively describe their experiences of co-concurrent problem: Intimate partner violence mental health and substance use. *J. Inter Pers. Violence*.
- Lilian, O.O. & Martins, P.I. 2018. Enforcement of the Violence Against Persons Prohibition (VAPP) Act 2015 in fighting domestic violence against women in Rivers state: Challenges and remedies. *Int. J. Sci. Res. Manag.* 6(11): 345-352.
- Maya Dania. 2020. Pandemic, national disaster and domestic violence. *The Jakarta Post*. 3 May. <https://www.thejakartapost.com/academia/2020/05/03/pandemic-national-disaster-and-domestic-violence.html> [18 July 2020].
- Maya Dania. 2020. Pandemic, national disaster and domestic violence. *The Jakarta Post*. 3 May. <https://www.thejakartapost.com/academia/2020/05/03/pandemic-national-disaster-and-domestic-violence.html> [18 July 2020].
- Mlambo-Ngcuka, P. 2020. Violence against women and girls: The shadow pandemic. *UN Women*. 6 April. <https://www.unwomen.org/en/news/stories/2020/4/statement-ed-phumzile-violence-against-women-during-pandemic> [18 July 2021].
- Ngcuka, P.M. 2020. Violence against women and girls: The shadow pandemic. *UN Women*. 6 April. <https://www.unwomen.org/en/news/stories/2020/4/statement-ed-phumzile-violence-against-women-during-pandemic> [18 July 2021].
- Noor 'Aza Ahmad. 2018. Older persons: The development of legal protection on emotional abuse in domestic violence. *Intl. J. Law, Gov. Commun.* 3(13): 342-349.
- Ogunmeru, M. 2020. Covid-19 lockdown: Domestic and sexual violence cases rise in Lagos by 50%. *Scoop*. 21 April. <https://m.scoop.news/nigeria/2020/04/21/covid-19-lockdown-domestic-sexual-violence-cases-rise-in-lagos-by-50/9661845> [18 July 2021].
- OHCHR. 1966. *International Covenant on Civil and Political Rights United Nations*, Geneva: Office of the United Nations High Commissioner for Human Rights.
- OHCHR. 1984. *Convention against Torture and Other Cruel Inhuman or Degrading Treatment or Punishment and its Optional Protocol*. Geneva: Office of the United Nations High Commissioner for Human Rights.
- OHCHR. 2005. *Protocol to the African Charter on Human and People's Rights on the Rights of Women in Africa*. Geneva: Office of the United Nations High Commissioner for Human Rights.
- Olawoye, C.O. 1971. The role of the police and the courts in the administration of criminal justice in Nigeria. *Int. Ann. Criminol* 10(1): 229.
- Olorok, F. 2020. Nigeria recorded 3,600 rape cases during lockdown – UN. *Punch Newspapers*. <https://punchng.com/nigeria-recorded-3600-rape-cases-during-lockdown-un/> [15 July 2021].
- Olonisakin, T.T., Ogunleye, A.J. & Adebayo, S.O. 2017. The Nigeria criminal justice system and its effectiveness in criminal behaviour control: A social-psychological analysis. *IOSR J. Humanit. Soc. Sci.* 22(2): 33-48.
- Oluremi, F.D. 2015. Domestic violence against women In Nigeria. *Eur. J. Psychol. Res.* 2(1): 24-33.
- Onyemelukwe, C. 2016. Intersections of violence against women and health: Implications for health law and policy in Nigeria. *William & Mary Journal of Race, Gender, and Social Justice* 22(3).
- Onyemelukwe, C. 2016. Legislating on violence against women: a critical analysis of Nigeria's recent Violence Against Persons (Prohibition) Act. *DePaul J. Women, Gen. Law* 5(2): 3.
- Onyemelukwe, C. 2018. How well does the law protect women at home?: An analysis of Nigeria's domestic violence legislation. *Int. J. Law Manag.* 60(2): 186-209.
- Penal Code (Northern States) Federal Provisions Act 2004 (Nigeria).
- Raji, B.A. & Akolokwu, G.O. 2019. Discriminatory customary practices against women's rights: An account of intervention strategies by Southern African developing states. *IJUM Law J.* 27(1): 89-120.
- Sahara Reporters. 2020. Child to Parent Abuse (CPA) in UK. *Selig Reporters*. 26 June.
- Sahid Ahmed, Shanthi Nadarajan & Ahmed Shamsul Bahari. 2020. Silencing of rape: Treatment of rape events and rape victims by media and fiction. *Malaysian Journal of Communication* 36(1).
- Šimonović, D. 2007. Convention on the Elimination of All Forms of Discrimination Against Women. *United Nations Audiovisual Library of International Law*. <https://legal.un.org/avl/ha/cedaw/cedaw.html> [18 July 2021].
- Sutherland, M., McKenney, M. & Elkbuli, A. 2021. Gun violence during COVID-19 pandemic: Paradoxical trends in New York City, Chicago, Los Angeles and Baltimore. *Am. J. Emerg. Med.* 39(xxxx): 225-226.
- T. I. for E. Rights. 2019. 2019 report on human rights violations. *An Introd. to Polit. Crime*: 115-136.
- Tandon, R. 2020. The Covid-19 pandemic, personal reflections on editorial responsibilities. *Asian J. Psychol.* 50.
- Violence against Person Prohibition Act 2015 (Nigeria).
- WHO. 2014. *Global and Regional Estimates of Violence against Women: Prevalence and Health Effects of Intimate Partner Violence and Non-Partner Sexual Violence*. Italy: World Health Organization.
- Wilson, L.C. and Miller, K.E. 2016. Meta-analysis of the prevalence of unacknowledged rape. *Trauma Violence Abuse* 17(2).
- Ying Ying Chan, Azriman Rosman, Noor Ani Ahmad, Noraida Mohamad Kasim, Mohamad Aznuddin Abd Razak, Maisarah Omar, Fazly Azry Abdul Aziz, S. Maria Awaluddin, Muslimah Yusof, Rasidah Jamaluddin, Nor'Ain Ab Wahab & Najwa Hanim Rosli. 2019. Prevalence and factors associated with intimate partner violence among postpartum women attending government primary health care clinics in Malaysia. *J. Fam. Violence* 34(2): 81-92.

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