CORPORAL PUNISHMENT IN NIGERIA: AN OVERVIEW

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ABSTRACT

Corporal Punishment as an integral part of penology aims at reducing crime by ensuring that rules and regulations are obeyed. Apart from inflicting physical pains on the offender, he is disgraced as well when he is publicly caned. This paper examined the theories of retribution and deterrence as a penological basis of corporal punishment as well as guidelines employed by courts in its award. The paper further examined the enforcement techniques, case law development and its efficacy of reducing crimes. Notwithstanding the arguments against corporal punishment as a disposition method, the paper recommended its application for young offenders in Magistrates', customary and juvenile courts.

INTRODUCTION:

Corporal punishment is one of the oldest forms of sanctions invented by man and practiced in so many societies as a method of expressing resentment to deviant behaviour and also redressing certain private wrongs.[1] In *Clearly v Booth*,[2] Collins J. noted that corporal punishment "…is in accordance with very ancient practice… and it has always commended itself to the common sense of mankind". Corporal punishment is the intentional infliction of physical punishment upon the body of another person for his or her wrongful act.[3]

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[1] Jakande, L.K. (1977) "Consequences of Remand and Conviction" in Adeyemi, A.A. (ed.) *Nigerian Criminal Process*, University of Lagos Press, p.222.

[2] (1893) 1 Q.B, p 465 at 468. This statement was made in relation to a right of a parent, teacher or a master to discipline his child, pupil or servant.

[3] Garner, B.A. (ed.) (2009) *Black's Law Dictionary*, 9th Edition, (St. Paul Minnesota: West Publishing Company) p. 1353.

Alan Milner reported that in the early days of British Rule in Nigeria, sentences passed by customary courts showed that the beating of both men and women often in the public, was traditionally felt to be a suitable criminal sanction for a wide range of offences.[4] In the olden days, corporal punishment was executed in a most crude form through burning of fingers or toes, dismembering of the human body, laceration of the body through severe chastisement with rod or punishment in the stocks trial by ordeal, amputation, stoning, which most invariably resulted in grievous bodily injury or even death of the victim.[5]

However, judicial corporal punishment, as we know it today, has a much recent history and is a product of successive reforms of the old, crude and barbaric methods. According to Jakande:[6]

> *The world has since grown less wicked and moral conscience, more sensitive. Under the Nigerian Penal System, capital punishment is reserved for only a few categories of crime: Treason, Murder and Armed Robbery. Next in order of severity of punishment are treasonable felony, manslaughter and attempted murder, which attract a maximum sentence of life imprisonment. All other felonies, misdemeanours and non-indictable offences are punishable with fines or imprisonment, or both."*

With the emergence of "Nation States", all criminal wrongs became enforceable and redressible through the States and corporal punishment became a formalised disposition method employed by the State in penalising breached of certain specified offences.

PENOLOGICAL BASIS OF CORPORAL PUNISHMENT

Apart from general statements as to the traditional evidence of long use and practice of corporal punishment in many societies,[7] research materials are very scarce as to the actual policies that informed the use of corporal punishment as a disposition method. Alan Milner argued that "the principles on which corporal punishment is ordered

[4] Alan Milner (1972), *The Nigerian Penal System*. London: Sweet and Maxwell, p. 297.
[5] Gordon Hawkins (1983) "Corporal Punishment" in Kidish, S.H. (ed.) *Encyclopedia of Crime and Justice,* p. 251. See also, Oke, G.D. (2000) "Traditional System of Conflict Resolution" in Yakubu J.A. (ed.) *Conflict Management Techniques and Alternative Strategies to Conflict Resolution.* Demyasxs Nigeria Limited, p.14
[6] Jakande, L.K. (1977) *Op.cit* at p.224.
[7] Edwards, L.P (1996) "Corporal Punishment and the Legal System" *Stantta Clara law Review,* Vol. 36, No. 4, p.986.

have never been explored in West African Case law".[8] However, it is obvious that as with all other penal sanctions, the object of corporal punishment is, according to Beccaria, to protect the society from criminal activities by preventing the criminal from injuring his fellow citizens, and at the same time to deter others from committing similar injuries.[9]

In *State v Okechukwu,* Nkemena, J. while convicting and sentencing a quack doctor to a 9 year jail term stated:[10]

> *This type of offence is very common nowadays and a deterrent sentence is called for in this case. Ignorant persons should not be allowed to experiment with lives of people*.

It was thought that the infliction of some measure of pain on the body of a criminal would be an efficient device to keep him away from injuring the society in any way. Adeyemi asserted that corporal punishment is designed, either to inflict physical pain on the offender or to disgrace him.[11] He went further to state that, in inflicting physical pain on the offender, the main objective is deterrence, the primary objective is to invoke the traditional machinery of public ridicule against him.[12]

McEwen noted that the reasons for the use of corporal punishment as a penal measure are firstly, to instill fear and to act as a deterrence, and secondly, to inflict pain and bring home to the offender the results of his own action on the other people.[13] It can be distilled from the foregoing therefore, that the penological principle that informed the use of corporal punishment as a disposition method is deterrence.[14] Beneath this policy of deterrence lies a vengeful and retaliatory policy of "retribution" which is

[8] Alan Milber, *Op.cit,* p.310.

[9] Radzinowics, L. (1948) *History of English Criminal Law.* London: Stevens and Sons Limited, vol. 1, p. 281. See also, Ayua, I.A. (1983) "Towards a More Appropriate Sentencing Policy in Nigeria" *Ahmadu Bello University Law Journal,* p. 1.

[10] (1965) 9 E.N.L.R, p.91. See also, Dambazau, A.B. (2007) *Criminology and Criminal Justice.* Ibadan: Spectrum Books Limited, p. 305.

[11] Adeyemi, A.A. (1990) "Administration of Justice in Nigeria: Sentencing" in Osinbajo, Y and Kalu, A. (eds*) Law Development and Administration in Nigeria,* Federal Ministry of Justice, p. 117.

[12] *Ibid.*

[13] Mc Ewen, W.A. (1972) "Non Institutional Treatment of Offenders" in Elias, T.O (ed.) *The Nigerian Magistrate and the Offender,* Benin: Ethiope Publishing Corporation, p. 99.

[14] The term "deterrence" as used here refers to both general and individual deterrence. General deterrence is to the effect that other members of the society are expected to benefit from the punishment which is deterrent in nature. The benefit comes in form of learning a lesson from the fate of the criminal who suffers penal consequence for his acts. On the other hand, individual deterrence is applicable to the criminal himself. The deterrent punishment is expected to deter the criminal from engaging in the crime for which he was punished.

intended to make the criminal feel the impact of the pain and injury he has caused his fellow citizen.[15]

GUIDELINES FOR THE AWARD OF CORPORAL PUNISHMENT

The question is: What are the principles that will usually guide the court in awarding the sentence of corporal punishment against a convicted offender? To this, section 387 of the Criminal Procedure Act provides a statutory guide as follows:[16]

> *When any person is convicted of any offence for which he is liable to imprisonment for a period of six months or more, the court may, if it thinks fit, having regard to the prevalence of crime within its jurisdiction or to antecedents of the offender, sentence such offender to caning either in addition to or in lieu of any other punishment to which the offender is liable.*

It can be seen from this section that the award of corporal punishment is at the discretion of the court, and the court can couple this punishment with any additional punishment. Secondly, in exercising this discretion, the court is enjoined to take into consideration:

(a) the prevalence of the crime, and

(b) the antecedents of the offender.

These statutory guidelines are evidently in terms with the sentencing guidelines laid down by the Supreme Court in *Adeyeye & Anor v The State.*[17] Adeyemi states that the language of section 404 of the Penal Code of Northern Nigeria shows that *haddi lashing* is even designed for a recidivist offender.[18] The inevitable conclusion to be drawn from these statutory provisions is that corporal punishment is regarded as an appropriate and severe penalty with the potency of curbing habitual offenders and

[15] The term "retribution" is also known as the revenge policy. It is based on the view that it is right for the offender to be punished. The policy is dated back to the Mosaic theory of *lex Tailions* i.e. eye for eye, tooth for tooth, hand for hand, foot for foot. See *The Bible* Deuteronomy, Chapter 19 verse 21 (i.e. New International version) Great Britain, Colorado Springs Co. p. 140. See also, Leviticus, chapter 24, verses 17-24 states that "when one man strikes another and kills him, he shall be put to death, whoever strikes a heart and kills it shall make restitution, life for life. When one man injures and disfigures his fellow country-men, it shall be done to him as he has done, fracture for fracture, eye for eye, tooth for tooth: the injury and disfigurement that he has inflicted upon another shall in turn be inflicted upon him"

[16] Cap 41, Laws of the Federation, 2004

[17] (1968) N.M.L.R. 287 at 289.

[18] Adeyemi, A.A. *Op.cit* at p. 117.

also curtailing wide-spread crimes. In the Northern Rhodesian case of *R v Chong,*[19] the court regarded corporal punishment as a highly exceptional sentence which should be used for offences showing great aggravation.

ENFORCEMENT OF CORPORAL PUNISHMENT

The use, application and administration of judicial corporal punishment in Nigeria have been modified from time to time ever since the colonial era. The modifications relate both to the type and dimensions of instruments to be used in administering the punishment, the mode of its execution and the age, health and gender of the recipient/offender. These changes even affected the jurisdiction of courts to award the sentence, the nature of offence, the numbers of strokes to be administered and the venue for its administration.[20]

At one point, flogging was outlawed and in its place, whipping with a light rod or cane or birch was substituted in respect of some offences under the Criminal Code.[21] Subsequently, *bulala* (a single-thonged hide whip) was added to the armoury in line with the moslem traditional practice, while the mode of execution variously alternated between caning and whipping.[22] There was also discrimination on the basis of gender and age as women and only adult males over forty-five years of age were exempted from receiving corporal punishment.[23] Unstable offenders, depending on their health conditions, were partially exempted.[24] Elaborate provisions were also made with reference to the administration of the penalty on juvenile offenders against whom the penalty appeared to be more focused.[25]

The Criminal Code applicable in Southern States of Nigeria specifically enumerated a number of offences which the penalty of corporal punishment would be made available.[26] Similar provisions are also made under section 68 of the Penal Code

[19] (1940) 2 N.M.L.R, p.93.

[20] See section 68(1) of the Penal Code of Northern Nigeria, sections 308-310 of the Criminal Procedure Code of Northern Nigeria and section 386(1) of the Criminal Procedure Act of Southern Nigeria. See also Bamgbose, O. and Akinbiyi, S (2015) *Criminal Law in Nigeria.* Ibadan; Evans Brothers (Nigeria Publishers) Limited, p. 396.

[21] Section 386 (1) of the Criminal procedure Act.

[22] *Ibid.*

[23] Section 68(1) of the Penal Code, sections 308-310 of the Criminal Procedure Code and Section 386 of the Criminal procedure Act.

[24] *Ibid.* section 386 of the Criminal Procedure Act.

[25] Section 14 of the Children and Young Persons Act.

[26] Section 218 of the Criminal Code states that a person who has unlawful carnal knowledge of a girl under the age of eleven years is guilty of a felony, and is liable to imprisonment for life, with or without caning. Section 219 states that a householder who permits defilement of young girls on his premises is liable to imprisonment for two years, with or without caning. Section 221 states that defilement of girls under sixteen and above thirteen or idiots attracts two years imprisonment, with or without caning. Under section 222, any person who unlawfully and indecently deals with

applicable in Northern States of Nigeria. Sections 308 -310 of the Criminal procedure Code spelt out the procedure to be followed in carrying out a sentence of caning. Section 68(2) of the Penal Code provides for the administration of the Moslem Corporal Punishment of *haddi lashing* applicable only to Moslim offenders. *Haddi lashing* is available for specified offences like adultery, defamation and injurious falsehood and drinking of alcohol.[27]

According to Richardson, the punishment is intended to be purely symbolic and is carried out in a public place.[28] The *haddi lashing* is to be administered with a soft leather whip on the back and shoulders and the person to be beaten should be in a squatting position with his back and shoulders bared.[29] The person administering it must be of moderate physique and should never raise his striking arm above the shoulder so as to avoid hitting the offender hard. To ensure strict compliance with these rules as prescribed by the Maliki Jurists, the striker is required to hold a heavy object under his arm above his shoulders, to emphasise the symbolic nature of this punishment, the punishment must not be heavy and serious physical injury, to the extent of lacerations or wounds, must be avoided. *Haddi lashing* is intended to inflict disgrace but not pain.[30] In determining the number of strokes to be ordered, the court is duty-bound to consider the following factors:

i. the season of the year; and
ii. the health of the person to be punished.[31]

Caning is administered to the buttocks of the offender, bending forward. Unlike *haddi lashing*, caning is administered with the objective of inflicting serious pains.[32] The number of strokes of the cane to be administered is controlled by statute prescribing the punishment and it is usually administered in prisons, mostly for adult offenders.[33] Juvenile offenders are normally caned in a police station.

Prior to its formal abolition in England in 1948, Judicial Corporal Punishment was employed in England to punish those convicted of physical aggressive crimes as well

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a girl under the age of thirteen years is guilty of a misdemeanor, and is liable to imprisonment for two years with or without caning.

[27] Sections 387, 388, 392, 393, 402, 403 and 404 of the Penal Code. Any person who consumed alcohol for medical purposes is protected.

[28] Richardson, S.S. (1987) *Notes on Penal Code Law.* Zaria, A.B.U. Press, p. 38.

[29] *Ibid.*

[30] Osamor, B, (2012) *Criminal Procedure Laws and Litigation Practices.* 2nd Edition, United Kingdom: Dee Sage (Books + prints) p. 495

[31] Section 5, Criminal Procedure (*Haddi Lashing)* Order in Council, 1960.

[32] Milner, A. *Op.cit.* p.311

[33] Section 386 of the Criminal Procedure Act and section 77 of the Penal Code. No specific number of strokes was prescribed for *haddi lashing* thereby importing the Islamic Maliki School prescription of 100 lashes.

as for those violently resisting lawful arrest.[34] In the place of judicial corporal punishment, detention centers, mostly for juvenile offenders were established in great Britain and corporal punishment was restricted mainly to enforcement of discipline in prisons and other custodial institutions. In Tanzania, Benhringer reported that judicial corporal punishment was made to be an alternative to imprisonment but it has not been so much used in that way; with the result that a high proportion of criminal offenders are normally given strokes in addition to prison terms.[35]

CASE LAW DEVELOPMENT

There is evident dearth of case law materials with regard to this disposition procedure. In Nigeria, few cases dealing with the sentence of corporal punishment hardly get reported in the various law reports. Alan Milner reported as at 1972 that the principles on which corporal punishment is ordered had never been explored in West African Case Law.[36] The reason for this state of affairs may be two-fold. First, nearly all the corporal punishment offences are usually tried and sanctioned. Magistrates' Courts, Juvenile Courts and Area Courts whose decisions are not usually reported in Law Reports and few recipients of the penalty do not often appeal against their sentences. Secondly, the penalty is rarely invoked these days by judicial officers but is usually invoked mostly for juveniles in circumstances where there are no better alternative sentences for the offender. Prest J in *Republic v Dediare*, while sentencing a twenty-three year old offender to twelve strokes of the cane for manslaughter, was reported to have apologised to the mother of the deceased in the following words:

> *I am really sorry for the unfortunate incident. If I send the accused to jail, I will mar his career as a young man just beginning life. If in the alternative, he is fined not even a penny of the fine will go to your pocket.*[37]

However, judicial corporal punishment has a much developed law history in East and South African countries of Tanzania, Uganda, Zimbabwe and Malawi.[38]

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[34] Kaplan, J. (1978) Criminal Justice: Introductory Cases and Material. 2nd edition, New York, The Foundation Press Incorporation, p. 467.
[35] Bechringer, G.H (1970) "Alternatives to Prison in East Africa" in the *International Annals of Criminology Proceedings,* p. 91 at 120.
[36] Milner, A. *Op.cit*, p.30.
[37] Proceedings of Warri Special Assiszed reported in *the Daily Times* of December 28, 1964 and cited by Alan Milner. *Ibid.*
[38] *R v Subuluwa* (1946) 4 N.R.L.R, 61; *R v Dhlamini* (1963) ReN (S.Rhod) p. 863; *Republic v Witness* (1966-680 ALR, p. 579.

THE EFFICACY OF CORPORAL PUNISHMENT

Deterrence and retribution are the penological policies that informed the adoption of corporal punishment as an appropriate disposition method; and that it has its major targets, recidivist and habitual juvenile and adult male offenders below forty-five years of age. In other words, is caning or *haddi lashing* an effective way to end crimes? For this, we shall be guided by the available statistical reports, opinions of criminologists, academic writers and other commentators.

On statistical reports, we rely on the pioneer research efforts of Alan Milner[39] and Adeyemi[40] 1958 and 1975. The summary of these reports shows that from 1958 to 1975, corporal punishment was lowly and rarely used by the courts as a penal measure in comparison with other disposition methods. Adeyemi reported that the used of corporal punishment oscillated between 0.61% and 0.53% of the total sentences imposed by the courts during these periods, whereas imprisonment and fines oscillated between 34.21% and 32.63% and 58.79 and 50.90% respectively.

With reference to property offences and personal offences between 1958 and 1963, the reports indicate that corporal punishment averaged about 1.5% (property offences) and 9% (personal offences) as against 73% fines (property offences) and 45% for imprisonment (personal offences) and 49% for fines (personal offences).

Even prior to those reports, Milner reported that:

> *The stricter control of the penalty saw an immediate reduction in its use. By 1933, the number of native court sentences of whipping had grown to 7,347. In 1934 and 1935, it fell to 1,637 and 944 respectively.*

It could be seen, therefore, that both the colonial and post-colonial statistical records show evidence of a fluctuating low level of utilisation of judicial corporal punishment as a disposition method. Adeyemi welcomed this low level utilisation, noting that nothing will be lost if it is done away with. He relied on the British Cadogan Committee Reports which recommended abolition of judicial corporal punishment in England and the subsequent report of the Advisory Council on the Treatment of Offenders which affirmed the Cardogan Committee Report.[41]

These abolitionists' views must be contrasted with the views expressed by some proponents of corporal punishment. A number of people have maintained that judicial corporal punishment is an effective penal sanction which ought to be retained under

[39] Milner, A. *Op.cit*, pp. 95-97 and 297-315.
[40] Adeyemi, A.A. *Op.cit*, *pp. 117-120.*
[41] Hall Williams, J.E (1970) *The English Penal System in Transition,* London; Butterworths, pp. 332 -337.

the criminal justice system. For instance, Jakande, while noting that corporal punishment in the form of caning is unpopular with modernists, opines;

> *In our view, caning is morally and socially acceptable and is certainly relevant. Other forms of corporal punishment such as the dismembering of the human body are barbaric and revolting. But in our view, caning is to be preferred to a short term sentence. The accused directly receives the physical pain. He does not lose his job, he remains with his family, the stigma of an ex-convict is avoided and he simply cannot forget the punishment easily enough for him to return to the crime committed. One suspects that this is why most recidivists prefer a month's imprisonment to one stroke of the cane.*[42]

This is a familiar traditional view, supported by the then Lord Chief Justice of England, Lord Parker, when there was a renewed agitation for a re-introduction of corporal punishment in England Lord Parker, calling himself a "reluctant advocate of corporal punishment" has hoped that "the Advisory Council on the Treatment of Offenders would find that the balance of advantage now lay in favour of reintroducing corporal punishment in a limited form".[43]

Milner noted that a similar debate took place in the Federal House of Representatives, Lagos in 1960 during the passing of the Criminal Procedure Act. During the debate, opposition members of the House took the opportunity to urge for total abolition of corporal punishment. The opponents relied on the abolition of judicial corporal punishment by the Eastern Region of Nigeria in 1955. The then Minister of transportation and Aviation who introduced the Bill for amendment retorted as follows:

> *…when people come out here and talk about caning as a very barbarous thing… let us face facts. It is still the custom in this country…*[44]

The opponents of judicial corporal punishment argued that the argument in support of corporal punishment is more easily stated than defended. It is not just enough to say that a punishment is right or customary, or even acceptable in order to justify its

[42] Jakande, L.K. *(Op.cit)* at p.235.
[43] Quoted in Criminal Law Review (1960) pp.382-383.
[44] *Milner, A. Op.cit.* pp. 304 – 305.

imposition and use. According to Milner, justification must first be sought to prove that corporal punishment achieves its set objective of reducing crime.[45]

In the absence of any such justification and proof, it is not open to the proponents of corporal punishment to say that corporal punishments is relevant simply because of an unproven assertion that "recidivists prefer a month's imprisonment to one stroke of the cane".[46] After all, there is abundant evidence that many recipients/offenders derided the application of corporal punishment through the use of canes on them because it provided no lasting resentment.[47]

On the contrary, the partial abolition of corporal punishment in the Easter part of Nigeria since 1955 has not shown any abnormal increase in crime rate in that part of the country, just in the same way as its retention in the other parts of the country has not shown any decrease in crime rate attributable to the use of the cane. Even when the number of strokes was increased from twelve to forty-one strokes under General Gowon's Indian hemp Decree and under the Robbery and Firearms Decree which permitted twenty-four strokes of the cane, there was no evidence of decrease with regard to the offences.[48]

The opponents of corporal punishment for juvenile justice administration argue that the use of corporal punishment for juvenile has not proven to be as effective as is generally believed in some quarters.

Cross states with some skepticism that:[49]

> *In the case of a boy between the ages of fourteen and seventeen, corporal punishment might occasionally be a suitable punishment to a detention centre, but there is well-nigh insuperable problem of choosing the right boy… in the case of offenders over seventeen, corporal punishment only seems to be appropriate, if appropriate at all, for offences which are so serious that it would only be possible for it to be the sole punishment in the most exceptional circumstances.*

This view must have been inspired by the common and ancient practice of domestic corporal punishment, usually called lawful correction employed by parents and

[45] *Milner, A. Op.cit.* p 34.
[46] Jakande, L.K. *Op.cit.* p.235.
[47] *Milner, A. Op.cit.* p. 34.
[48] General Yakubu Gowon was the Military Head of State of Nigeria between 1966 and 1975.
[49] Cross, R. (1971), *Punishment, Prison and the Public,* London; Steven and Sons, pp. 60-61.

teachers in enforcing discipline at home and school. Adeyemi and Milner argued that this view cannot be over-stretched since there is no parallel to be drawn between judicial corporal punishment and domestic corporal punishment. To them, domestic corporal punishment is swiftly administered making it easier for the juvenile to connect the punishment to the offence; whereas, judicial corporal punishment involves delay as it is usually administered long after trial, conviction and sentence.[50] Secondly, domestic corporal punishment involves a continuing relationship of love and affection between the parents or the teacher which is lacking in judicial corporal punishment. Thus, a stroke from a parent will evoke greater feelings of remorse in a child than a stroke from a police or a prison officer, who being a total stranger, is more likely to alienate the child.

CONCLUSION

Modern penal principles and conceptions of justice deny the utility and efficacy of corporal punishment both as a statutory sanction and as a disciplinary measure.[51] The reason for this is simply because the efficacy of corporal punishment as a disposition method remains unproven on all fronts. There is no concrete evidence of both individual and general deterrence in relations to specific crime(s) attributable to the fear of the stroke. By extolling physical violence,[52] corporal punishment may have fulfilled its ancillary penological policy of retribution, as Becarria stated, the object of punishment is neither to torment nor to undo a crime already committed.[53] Even, if the true intent of penal sanctions is to protect society from criminal behaviour, reformation and not deterrence or retribution should be the good of the penal laws. Nigel Walker stated in his underterribility theory thus:

> *Different kinds of offense are committed in very different states of mind, with or without planning, impulsively or compulsively from a wide variety of motives.*[54]

Some people are "undeterrible" so far as some kinds of offence are concerned. It is for this reason that Adeyemi suggested that recourse should be had to the

[50] Adeyemi, A.A. (1972) "Scientific Approach to Sentencing" in Elias, T.O. (ed.) *The Nigerian Magistrate and the Offender,* Benin; Ethiope Publishing Corporation, pp. 64-65.
[51] Kaplan, J. *Op.cit.* p. 315.
[52] Radizionowics, L. *Op.cit.* pp. 281-282.
[53] *Ibid.*
[54] Walker, N. (1985) *Sentencing: Theory, Law and Practice.* London; Butterworths, p.97.

aetiologiocal factors which enable proper typological matching between the offender and the treatment.[55]

It is suggested that corporal punishment in form of caning should be encouraged by Magistrates' Customary and Juvenile Courts. Culturally and religiously, caning of children is allowed in order to enforce discipline. Criminal activities will reduce drastically if the decline in Nigeria's social values is addressed urgently. Social values must be taught in schools. The truth of the matter is that youths of nowadays have no home training. In the past, parents used to tell their children that they should remember the children of whom they were. The moonlight tales showing that laziness and stealing should not be practiced have been jettisoned by parents of nowadays. The Bible says: "train a child in the way he should go, and when he is old he will not turn from it".[56] Youths of nowadays want to get rich at all cost without working. They want their first car to be the latest car in town. Unfortunately parents are not asking questions on how their jobless children came about items they did not buy for them. According to Agbese:[57]

> *So long as society measures man's worth by the degree of his material possessions, so long will men and women strive to get there by whatever means they can.*

[55] Adeyemi, A.A. *Op.cit. p.65.*

[56] *The Bible, P*roverbs, Chapter 22, verse 6 (i.e. King James Version) Red Letter Edition, Dallas, Jet Move Publishing Inc. p. 686.

[57] Agbese, D. (1972) "Decline in Ethics and Values" *Newswatch, November 9, p. 8.*