



An appraisal of the Administration of Criminal Justice Act 2015 in enhancing justice delivery in Nigeria

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Abstract

The passage of the Administration of Criminal Justice Act 2015 (ACJA) 2015) is considered a quantum leap in the Administration of Criminal Justice in Nigeria. Prior to the promulgation of ACJA 2015, the criminal justice system in Nigerian was governed by two principal legislations traceable to the British Colonial administration, namely the criminal Procedure Act, (CPA) which is applicable in the South and the Criminal Procedure Code (CPC) which is applicable in the Northern part of Nigeria. The Administration of Criminal Justice Act 2015, merges the main provision of CPA and CPC into one Principal Federal Enactment. The purpose of the ACJA 2015 is to ensure that the system of administration of criminal justice in Nigeria is efficient in the management of criminal justice institutions, speedy dispensation of justice, protection of the society from crime and protection of the rights and interest of the suspect, the defendant and the victim. The law provides a deliberate effort to transmute the criminal justice system from a state of retributive justice into a restorative justice system. The aim of this research is to critically examine the new innovations introduced into the Administration of criminal Justice Act, 2015 by the National Assembly and its effect on the criminal justice system in Nigeria, its features and the perceived pitfall or lacuna of the Act. In this essay the doctrinal research method was adopted. Primary and secondary source materials were made reference to such as books, law reports and statute. The researcher discovered that most of the staff that are engaged in justice delivery lack modern knowledge on how to handle issue before the. The study recommends that there is need to strengthen the capacity of the justice delivery system by training and retraining of staff. This study contributes to existing knowledge in the area of analyzing the Administration of Criminal Justice Act, 2015, and finally proffer recommendations.

Keywords: Eventuation criminal justice, retributive justice, restorative justice

Introduction

The administration of criminal justice in Nigeria before the introduction of the Administration of Criminal Justice Act 2015 has historically been dominated by the retributive justice system which emphasizes punishment through imprisonment, fine or other state imposed sanctions. This model is premised on the view that crime is primarily an offence against the state with the victim relegated to a secondary role. ^[1]

Despite its long-standing application, the retributive justice system has not achieved its central objective of reducing crime or deterring offenders. In Nigeria, crime rate remains high and the emphasis on punishment has contributed to prison congestion, recidivism and diminished public confidence in the justice system ^[2] Restorative justice system has emerged globally as viable alternative shifting the focus from punishment only to repairing harm, fostering reconciliation and reintegrating offenders into the society again. Restorative justice system recognizes that crime is first and foremost a violation of individual and communities right, therefore seeks to involve the victims, offenders and stakeholders in finding mutually satisfactory resolution. The Administration of Criminal Justice act 2015 (hereinafter referred to as ACJA) represent an important legislative attempt to incorporate restorative practices within the country's criminal justice framework.

The Administration of Criminal Justice Act 2015, repealed the Criminal Procedure Act that was applicable to the Southern Nigeria and Criminal Procedure Code which was applicable in the Northern States. The ACJA by merging the major provisions of the two principal criminal Justice

legislation in Nigeria, the CPA ^[3] and CPC, ^[4] maintains the existing Criminal procedures while introducing new provisions that will enhance the efficiency of the justice system and help fill the lacunas observed in these laws over the course of several decades.

Section 1 of the ACJA is overtly apt in explaining the purpose of the Act thus:

The purpose of this Act is to ensure that the system of administration of criminal justice in Nigeria promotes efficient management of criminal justice institutions, speedy dispensation of justice, protection of the society from crime and protection of the rights and interest of suspect, the defendant, and the victim.

One essential feature of the ACJA is its complete shift from punishment as the main goal of the criminal justice to restorative justice which pays serious attention to the needs of the society, the victims, vulnerable persons and human dignity in general. The general tone of the Act puts human dignity in the fore, from the adoption of the word "Defendants" instead of accused, to its provision for humane treatment during arrest ^[5] to the numerous provisions for speedy trial, to suspended sentencing, ^[6] community service, ^[7] parole, ^[8] compensation to victims of crime ^[9] and so on.

Statement of the Problem

Prior to the introduction of the Administration of Criminal Justice Act (ACJA) the interest of accused persons not yet convicted was poorly regarded while the previous laws had significant provisions that discriminated against the rights of

women, among other defects in the nations criminal justice system.

Following the introduction of the ACJA, however, a number of innovations emerged which not only improved the human rights in Nigeria, by virtue of its laws, but also served as major breakthrough to the problems of prolonged trials in federal courts. Furthermore, the emergency of the ACJA marked the eradication of unlawful arrest especially where security operatives arrest a suspect without providing an arrest warrant. The law also terminated the arrest of suspects relatives or friends, where the said suspect is said to be at large. Specifically, Section 7 of the act provides that ‘a person shall not be arrested in place of a suspect’. The ACJA also prohibits the arrest of persons for contract-related offences. Section 8^[2] of the Act provides that “a person shall not be arrested merely on a civil wrong of breach of contract.”

Section 8 of the ACJA also prohibits any form of torture or inhumane treatment of suspect. Statement made by suspects are also to be recorded, as provided by section 17 of the ACJA. However, as good and forward looking as the law is, police officers in our various state headquarters and police station are still operating at variance with the provisions of the law in dealing with suspects as part of their duties. For instance, they beat up suspects in order to force out confessional statements from them which is in sharp contrast with the provisions of the Administration of Criminal Justice Act, 2015.

Another problem that also resulted in the introduction of the Administration of Criminal Justice (ACJA) was the protracted nature of many cases in court. As the core objective of the ACJA, therefore, Section 306 of the Act was introduced to curtail the rate at which interlocutory applications led to the suspension of a substantive matters still pending in court. The section provides that “an application for stay of proceedings in respect of a criminal matter before the court shall not be entertained.” The above stated are the problems that gave impetus to this researches.

Aim and Objective of the Study

The general aim of this study is to examine the impact of the Administration of Criminal Justice Act 2015 in enhancing justice delivery in Nigeria with a view to ascertain if ACJA 2015 is a viable alternative to CPA and CPC that were in existence.

Specific Objectives of the Study

The specific objectives of the Study are to:

1. provide historical background of the Administration of Criminal Justice Act 2015.
2. examine the applicability of the Act throughout Nigeria.
3. analyze the innovative provisions introduced into the ACJA 2015
4. highlight the impact of the innovative provisions of ACJA 2015 on the Nigeria judicial system
5. appraise the adequacy or otherwise of the legal and institutional framework for the enforcement of the Act.

Purpose for the Enactment of the Administration of Criminal Justice Act, 2015

The purpose of the enactment of the Administration of Criminal Justice Act, 2015 is captured in the first section of the Act itself which read thus:

“The purpose of this Act is to ensure that the system of administration of criminal justice in Nigeria promotes

efficient management of criminal justice institutions, speedy dispensation of justice, protection of the society from crime and protection of the rights and interests of the suspect, the defendant, and the victim”.^[10]

The purpose of the Act as captured above is a deliberate shift from punishment as the main goal of our criminal justice to restorative justice. Which pays attention to the needs of the society, the victims, dignity of human persons and vulnerable persons.

The provisions of the Administration of Criminal Justice Act in general apply to criminal trials in courts except where express provisions are made in the Act or in any other law in respect of any particular courts or form of trial.

The Act^[11] also specifically excludes the court martial in the applications of its provisions. Also, the establishment of the Administration of Criminal Justice Act brought about speedy administration of criminal justice. According to Justice Walter Onnoghen,^[12] delay in the administration of justice is a major challenge facing the Nigerian Judiciary. Delay has over the years no doubt been a major impediment to effective and speedy dispensation of criminal justice in Nigeria.

Furthermore, the Administration of Criminal Justice Act, 2015 establishes the Administration of Criminal Justice Monitoring Committee (the Committee).^[13] The Committee comprises nine members with the Chief Judge of the FCT as the Chairman. By virtue of Section 470 of the ACJA, the Committee has the responsibility of ensuring effective and efficient application of the Act by the relevant agencies. In doing this, the Committee shall among other things ensure that criminal matters are speedily dealt with; congestion of criminal cases in courts is drastically reduced; congestion in prisons is reduced to the barest minimum; and persons awaiting trial are, as far as possible, not detained in prison custody. Section 471 of the ACJA establishes a secretariat for the Committee, Section 472 of the ACJA establishes a fund for the Committee, and Section 476 of the ACJA provides for proceedings and quorum of the Committee.

By this establishment, the ACJA becomes the first legislation in the Nigerian administration of criminal justice framework to establish a body charged with the responsibility of ensuring effective application of the Act. The extent to which it empowers the Committee to discharge its responsibilities, however, is an issue that will be addressed in later sections of this work. As shall be shown, the role of the Committee in criminal justice administration is implicated in the various innovation introduced by the ACJA. The Act has 495 Section with detailed provisions on arrest, warrants, investigation, trial, conviction, imprisonment, plea bargain, community service, parole, suspended sentence, etc.

Reforms in the Administration of Criminal Justice Act 2015

Before the introduction of the Administration of Criminal Justice Act (ACJA), Nigeria’s formal compliance to human rights issues was low. The interests of accused persons not yet convicted was also poorly regarded while the previous laws had significant provisions that discriminated against the rights of women, among other defects in the nation’s criminal justice system.

Following the introduction of the law, however, a number of innovations emerged which not only improved the human rights in Nigeria, by virtue of its laws, but also served as

major breakthroughs to the problem of prolonged trials in federal courts.

It would be pertinent to discuss these new innovative provisions introduced into the new law.

Humane Treatment of an Arrested Persons and Prohibition of Arrest on Civil Case

The Administration of Criminal Justice Act 2015 ^[14] provides that a person shall;

- a. Be accorded humane treatment, having regard to his right to dignity of his person
- b. not be subjected to any form of torture, cruel, inhuman or degrading treatment.

Section 8 ^[2] of the Act states that. “A suspect shall not be arrested merely for a civil wrong or breach of contract”.

This provision is a commendable one in the sense that it deals with the long-standing problem whereby people employ machinery of criminal justice wrongly for civil matters. It is not uncommon for people to maliciously instigate the arrest and detention of others for breach of contract, failure to pay debt owed or for other civil wrongs. It is hereby believed that his innovative section would check arbitrary arrest of persons and torture by the law enforcement and security agents.

Establishment of Police Central Criminal Registry

Section 16 ^[1] of the Act makes provision for the establishment within Nigeria Police force, a Central Criminal Record Registry.

Following the provisions of section 16 ^[2], there shall be established at every state police command, a criminal record registry which shall keep and submit all such record to the central criminal record registry. The Act ^[15] also mandate the chief registrar of the courts to transmit the decisions of the court in all criminal trails to the Central Criminal Record Registry within 30 days after delivery of judgement. Where there is default by the chief registrar to transmit records within 30 days after judgement, he shall be liable to disciplinary measures by the Federal Judicial Service Commission for misconduct.

The establishment of a central Criminal Record Registry will ensure that all arrest and judgement are well documented. This is intended to avoid the repeat of what happened in the case of Agbi v James Ibori. ^[16] In this case, the then Governor of Delta State Chief James Onanefe Ibori at the time of commencement of this action at the High Court of the Federal Capital Territory, Abuja, was a candidate for the 2003 general elections. In an action before the said High Court, two persons suing as Plaintiffs began a joint action to challenge Ibori’s qualifications to stand as gubernatorial candidate for the 2003 elections since they alleged that he was an ex-convict. The main issue in this case was whether the records of proceedings of Bwari Upper Area Court ^[17] which was Exhibit ‘A’, wherein one James Onanefe Ibori was convicted, was sufficient to act against the 5 ^[th] Defendant/Appellant (James Onanefe Ibori) as an ex-convict.

James Onanefe Ibori on the other hand, contended that exhibit A did not specifically and cogently identify him as the James Onanefe Ibori who was convicted as shown on the record of proceedings. In other words, that the person convicted by the Bwari Upper Area Court was another person and not him. The court gave judgement in favour of

James Onanefe Ibori and the matter was dismissed. However, with the introduction of a central police central criminal registry, cases like this will no longer pose a major problem as there will be sufficient information on all convicted persons which will make it easy to identify them in subsequent proceedings.

Electronic Recording of Confessional Statements

A number of criminal cases are bedeviled with denial of confessional statements. It is either the defendant is denying ever making the statement or alleging that the statement was made under duress or other such vitiating factors. This often leads the court to suspend trial of the substantive matter to conduct what is called trial within trial. This takes an awful length of time and even at times leads to the confessional statement being set aside. This is largely due to the fact that the confessional statements are merely in writing. The ACJA, in conformity with the provision of the Evidence Act 2011, now provides that a Confessional Statement may be made by means of an electronic recording in a retrievable video compact disc or such other audio-visual means.

Section 15 ^[4] of the Act provides that where a person arrested with or without a warrant of arrest volunteers to make a confessional statement, the police officer shall record the statement in writing or may record the making of the confessional statement electronically on a retrievable video compact disc or such other audio-visual means. The Act ^[18] further provides that notwithstanding the provision of subsection ^[4], an oral confession of arrested suspect shall be admissible in evidence. The electronic recording of confessional statement was aimed at ensuring that the police do not use torture and other involuntary means to extract confessional statements from suspects. However, it was observed that most police station in the country do not have electronic recording machines. Even if such machines were provide, a suspect could be taken into a room where there are no recording equipment and tortured there. He could thereafter be taken to another room with recording equipment to make a confessional statement as if he has not been tortured. It was further observed that practical problems of implementation as these are already being experienced in Lagos State where electronic recording of the making of confessional statement is already provided for. The final provisions of section 15 ^[4] and ^[5] of the ACJA took cognizance of the observed practical problems.

Recording of Statement of Suspect

This is also another innovative provision introduced into the Administration of Criminal Justice Act, 2015. This provision ^[19] is to the effect that where a person is arrested on allegation of having committed an offence, his statement shall be taken in the presence of a legal practitioner of his choice, in the presence of an officer of the legal Aid Council, official of a Civil Society of Organization, a justice of the peace, or any other credible person of his choice. The legal Practitioner or any other person mentioned in this provision shall not interface while the suspect is making his statement.

Where a suspect does not understand or speak or write in the English language, an interpreter, shall record and read over the statement to the suspect to his understanding and the suspect shall then endorse the statement as having been made by him, and the interpreter shall attest to the making of the statement. The interpreter shall endorse his name,

address, occupation, designation or other particulars on the statement. The suspect shall also endorse the statement with his full particulars.

The role of the legal practitioner at the police station at this point are to help give the suspect legal advice, advise the suspect on his rights and ensuring fair play at the police station. The above provision of the Administration of criminal justice Act, 2015 is in line with the provision of the constitution of The Federal Republic of Nigeria which provides that:

Any person who is arrested or detained shall have the right to remain silent or avoid answering any question until after consultation with a legal practitioner of his choice. ^[20]

It is therefore our opinion that at the point where the accused is arrested and taken to the police station, it is incumbent on the police to inform the suspect that he has such a right. In other words, the right to the legal practitioner being present carries concomitant duty on the police to inform the suspect that such right exists. This is because the suspect may be an illiterate or may not have knowledge of the existence of this right. Having a solicitor around during police interview or while the suspect is to make a statement to the police is vital due to the fact that a suspect held in police custody may be frightened, disoriented, and therefore suspicious of any one who comes to see him/her. Therefore, seeing the solicitor around bring down his nerves and gives him/her the assurance that he/she is safe. In most case, by blunt abdication of constitutional or statutory responsibility, sheer incompetence or corruption, the police may want to force out a confession from a no-crime circumstance. In cases where the police suspects that a crime has been committed for instance, where the police could have used interview skills coupled with expert evidence to unravel the truth as to whether actually it was the suspect arrested that committed the offence or someone else, they rather resort to bullying a suspect into admitting what he probably did not do, so as to keep his life. With basic investigation and interviewing skills couple with basic scientific tools, the police can unravel any difficult case without resorting to violence on the suspects.

Agaba ^[21] narrated the reported investigation of the complex case of the murder of Robert Curley as follows:

Robert Curley was admitted in the hospital for an Unidentified ailment. But his condition later improves and he was discharged only to return to the hospital nine days later when his condition worsened and the wife agreed to the withdrawal of his life support. By then, doctors had discovered high level of thallium in his system. Curley had been working in a building that contains jars of thallium salt and at first, it was though that he had been accidentally exposed to the poison but test showed that the level of thallium in his system could only have been ingested through drinking or eating. Investigators considered the possibility of his fellow worker putting the substance in his tea and so his colleague was interviewed to no avail.

In 1994, a forensic toxicologist offered to produce a time-line indicating the peak of thallium ingestion which could give a clue to how he had been exposed to the poison. Robert Curley's body was exhumed and sample was taken of hair, nails skin and other tissues where thallium could be deposited. The analysis showed that the thallium level began to rise in late 1990 and then dropped, rose again until a final massive increase In 1991 killed him. It was amazing the increase continued even while he was in the hospital. It

became clear that he must have taken the final dose on September, 22, when his family visited him and his wife was suspected to have done it. The wife (unknown to everybody else) had collected \$295,000 from an insurance company policy while he was still on sick bed and she alone had free access to her husband at all times. On interrogation, she admitted to have killed her husband with rat poison. ^[22]

It is not in doubt that if this incident had taken place in Nigeria, the police would have simply employed forced confession technique. This is because over the years, it appears that this is about the only technique the police are comfortable with in Nigeria. That is to say, the investigation may have ended with the arrest of Robert Curley's colleague at the building site, after which he would be interrogated and if he refuses to make any statement favourable to the police, they will torture him until he either confesses or die in police detention. According to Agaba ^[23]

...the main shortcoming of the forced confession technique is that it picks on the suspect and blinds the eyes of the investigator to any other angle of the crime. That explains why when criminals commit a crime in Nigeria, they walk with bold foot prints up to a man's door steps, pull their shoes there and walk away leaving no further footprints. The reason is obvious. They know that as soon as the police get to the doorsteps of the innocent man, they would stop there, pick the man and his family members and force an admission or confession out of them.

The section goes further to state that where a suspect does not understand, or speak or write in English language, an interpreter shall record and read over the statement of the suspect to his understanding and the suspect shall then endorse the statement as having been made by him, and the interpreter shall attest to the making of the statement. The interpreter shall also allow his name, address, occupation, designation or other particulars to be written on the statement. The suspect shall also endorse the statement with his own full particulars.

This provision is aimed at putting a stop to cases where suspects are being tortured before making statement which ordinarily they would not have made in the circumstances.

Non-Custodial Sentence

In Nigeria, prison congestion has always been one of the challenges faced by our criminal justice administration. These include the introduction of suspended sentences, community services, parole, and probation. Section 453, 460 and 468 attempted to address the problem of excessive use of imprisonment as a disposal method by introducing some alternatives to imprisonment. These include the introduction of suspended sentence, community service, parole and probation. It also provides that the court, in exercising its power shall have regard to the need to:

- a. reduce congestion in prisons
- b. Rehabilitate prisoners by making them to undertake productive work; and
- c. Prevent convict who commit simple offences from mixing with hardened criminals

The Act ^[24] also provide that courts may sentence and order a convict to serve that sentence at a rehabilitation and Correctional Centre established by the Federal Government is lieu of imprisonment. The court in making an order of confinement as a Rehabilitation and Correctional Centre shall have regard to the age of the convict, and other

relevant circumstances necessitating an order of confinement at Rehabilitation and Correctional Centre.

Establishment of Monitoring Committee

In order to ensure strict adherence and compliance to the provisions of the Administration of Criminal Justice Act, 2015, the Act has introduced a very fundamental provision^[25] which establishes a body to be known as the Administration of Criminal Justice Monitoring Committee. Its membership is made up of major stakeholders of the criminal justice system. The Act^[26] further provides that the committee is to ensure that:

- a. Criminal matters are speedily dealt with;
- b. Congestion of criminal cases in court is drastically reduced;
- c. Congestion in prisons is reduced to the barest minimum;
- d. Person awaiting trial are, as far as possible, not detained in prison custody;
- e. The relationship between the organs charged with the responsibility for all aspects of the administration of justice is cordial and there exists maximum co-operation amongst the organs in the administration of justice in Nigeria.
- f. Submit report quarterly to the Chief Justice of Nigeria to keep the Chief Justice abreast of developments toward improved criminal justice delivery and necessary action;
- g. Carry out such other activities as are necessary for the effective and efficient administration of criminal justice in Nigeria.

It is hoped that with the establishment of this committee under the Act, the provisions of the Act will be readily implemented without fear or favour, no matter who is hurt in the process.

Prohibition of stay of Proceedings in Criminal Matters

The Administration of Criminal Justice Act, 2015^[27] provides that:

An application for stay of proceedings in respect of a criminal matter before the court shall not be entertained.

The above section of the Administration of Criminal Justice Act, 2015 is to the effect that application for stay of proceedings shall no longer be heard until judgement and cannot operate to stall continuation of trial. This section is behind a provision in the fourth Amendment to the constitution^[28] (currently awaiting presidential assent or parliamentary override of the president's veto) to the effect that no interlocutory appeal shall operate as a stay of proceeding in the lower court.

Prohibition of Unlawful Arrest

One of the major problems associated with our criminal process in Nigeria, is the act of unlawful arrest by the police. This has resulted in the congestion of police stations and prison.

By the provisions of the Criminal Procedure Code,^[29] the police could arrest without warrant, any person who has no ostensible means of sustenance and cannot give a satisfactory account of himself. This particular provision has been greatly abused by the police who use it as a ground to arrest people indiscriminately. The Administration of Criminal Justice Act, 2015 has expunged this provision.

Furthermore, the Act^[30] provides that a suspect shall not be arrested merely on a civil wrong or breach of contract. It is not uncommon for people to maliciously instigate the arrest and detention of others for a breach of contract, failure to pay debt or for any other civil wrong.

However, the Administration of Criminal Justice Act, 2015 has abrogated arrest merely on a civil wrong. J.A. Agaba^[31] has stated that:

As wide as the power of the police are under section 4 of the police Act, it is important to know that certain things are clearly outside the statutory powers of the police.

An example of such areas where the police has no power to effect arrest is debt collection which is purely civil in nature. In the case of *Mclaren v Jennings*^[32] the defendant/appellants caused some police officers to go to Kano from Abuja to arrest the Plaintiff/Respondent which they did and detained him at Abuja. It was with a view to recovering the advance payment of some money made to the Plaintiff/Respondent by NICON-NOGA Hilton Hotel. The Plaintiff/Respondent challenges his arrest and detention and filed a suit at the Kano High Court claiming the sum of Five Million Naira as damages. The appellants brought an application challenging the jurisdiction of the Kano High Court to entertain the matter. The application was dismissed. An appeal to the Court of Appeal was also dismissed. In dismissing the appeal, the Court of Appeal per Salami JCA as he then was held inter alia:

I have scrutinized the provisions of the section and am unable to see a provision providing for or empowering police to enforce contract or to collect debts. The appellants and the policemen they pressed into duty were not in Kano to prevent a crime nor was the respondent, an offender. It was equally not the case of the appellants that there was a breakdown of law and order, the preservation of which took them to Kano. The court has also not been told the laws and regulations the group went to enforce in Kano. In short, the appellants and the policemen they took to Kano were there to collect debt which is not one of the several duties of the police... it follows that the policemen who accompanied the appellants to Kano and assisted them in the arrest of the respondent were on the frolics of their own. The arrest was not authorized by the Act and was consequently unlawful, wrongful and illegal and cannot afford the appellant a shield.^[33]

The Administration of Criminal Justice Act, 2015,^[34] also prohibits specifically arrest in lieu. There have been several instances in Nigeria where the police arrested relations of friends and close associates of a crime suspect in order to compel the suspect to give himself up even though that person is not linked in any way to the crime the suspect is alleged to have committed. Other agencies vested with the power of arrest such as National Drug Law Enforcement Agency (NDLEA), Economic and Financial Crimes Commission (EFCC), National Agency for Food and Drug Administration and Control (NAFDAC) had also abused this power of arrest and detain.

Conclusion

Efforts have been made to appraise the Administration of Criminal Justice Act 2015, it can be safely said that the framers of the Administration of Criminal Justice Act, 2015 meant well for Nigeria, despite its few lapses, as no law can be totally perfect. Almost all the provisions of the Act are geared towards ensuring that the system of administration of

criminal justice in Nigeria promotes efficient management of all criminal institutions, speedy dispensation of justice, and protection of the rights and interest of the suspects and the victims of crime. Obviously, the new law has addressed the issue of delays which is a major setback in the administration of criminal justice in Nigeria. All stakeholders in the justice system also have a role to play as it imposes responsibility on all, to do something before the system collapses, which may lead to anarchy and lawlessness. All stakeholders and Nigerians in general must do everything possible to ensure that the innovative provisions in the Administration of Criminal Justice Act, 2015 is strictly implemented. The study observed that Judges and other staffers of the court work under harsh conditions. Lighting system is poor, judges still write in long hand with very poor remunerations. The study recommended that there is need to strengthen the capacity of our justice delivery system including addressing issues of welfare packages and working conditions under which justice is delivered in our country.

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