

# The Role of Police in Maintaining Public Order in Nigeria: Challenges and Way Forward

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## Abstract

*The paper addresses the role of police in maintaining public order in Nigeria and its effect on the rights of citizens to peaceful protest. Police is the department of government charged with the responsibility of maintaining public safety and public order. In the discharge of their duties, the police are duty bound to respect the provisions of the Constitution, particularly Chapter 4 dealing with the Fundamental Human Rights of the Nigerian citizen. The paper argues that Public Order Act is one of the laws of Nigeria enacted for the purposes of maintaining proper and peaceful conduct of public assemblies, meetings and processions which is in direct conflict with the Constitution. The paper further argues that the actions of the police authorities of forcefully*

*disrupting rallies, meetings, assemblies and processions, on the grounds that police permit was not sought and obtained, raises a lot controversies as to the constitutionality of the Public Order Act. The paper adopts descriptive approach. The paper recommends that the Police must be properly educated to accept the supremacy of the law and its due process; including Human Rights training in basic curriculum for the police officers and staff at all levels of hierarchy. This is to enable every Police Officer to be familiar with the provision of Chapter 4 of the Constitution, which deals with Human Rights and the police must be trained in peaceful crowd control, and must be deployed to protect the people's right to peaceful protest.*

**Key words.** Police; Public Order Act; Constitution; Human Rights; Nigeria

## 1. Introduction

The Police play important roles without which the sustenance of law, order, legality, development and democracy may be difficult. The primary role of the police is policing – securing compliance with existing laws and conformity with precepts of social order. But the police are not the only agency involved in policing in the broad sense of the term. Other security agencies are equally involved in policing and law enforcement as regard to their statutorily goals and objective. “The security and welfare of the people shall be the primary purpose of Government,”<sup>1</sup> and the Police is the department of government charged with the responsibility of maintaining public safety and public order.

Section 214 (1) of the constitution<sup>2</sup> provides the constitutional basis for the establishment of the Nigerian Police Force. Section 214 (2) of the same constitution clearly stipulates that the Nigerian police shall have such powers and duties as may be conferred upon it

by the law, and by virtue of section 4 of the Police Act<sup>3</sup>, the police are employed for the preservation and detection of crime, apprehension of offenders, preservation of law and order, protection of life and property, and the enforcement of all laws and regulations with which they are directly charged. The Criminal Procedure Act (CPA) and the Criminal Procedure Code (CPC) also grants the police wide powers which includes measures to prevent crime, investigate and prosecute suspects, detect or investigate crime, apprehend and arraign offenders in court, regulate procession and assemblies, and to disperse ‘illegal’ or ‘unlawful’ procession and assembly.

In the discharge of their duties, the police are duty bound to respect the provisions of the Constitution particularly Chapter 4 dealing with the Fundamental Human Rights of the Nigerian citizen. The police uniform does not make a police man a special being or creation who may trample on the rights of others. Given the nature and role of police in man’s life and environment, this paper is set to examine

<sup>1</sup> See Section 14 (2) (b) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended).

<sup>2</sup> Constitution of the Federal Republic of Nigeria, 1999 (as amended).

<sup>3</sup> Cap. P.19 Laws of the Federation of Nigeria, 2004.

the role of the police in maintaining public order in Nigeria vis-à-vis the constitutional guaranteed freedom of peaceful assembly and association. The paper begins with the origin of police in Nigeria; it then examines the effect of Public Order Act on peaceful protests in Nigeria; it further examines the prospects and challenges of the Nigerian Police Force, and finally the way forward will be discussed.

## **2. Methodology**

The paper adopts doctrinal methodology where the bulk of relevant primary and secondary data were utilized. The primary data includes the Constitution of the Federal Republic of Nigeria, 1999, Police Act, Public Order Act and relevant cases. The secondary data involves the literature utilized. The paper also adopts descriptive analyses where the both primary and secondary data were utilized.

## **3. Discussion**

### **3.1 Brief History of the Nigerian Police**

The first police force was established in 1861 during colonial era, when the consul of Lagos colony established a consular guard of thirty members to watch over the colonial properties. This guard grew in size and was later known as the Hausa constabulary. This was because it was dominated by Northerners. In 1896 the Lagos police was established. A similar force was already formed in Calabar in 1894 known as the Niger Coast Constabulary. And in the North too, the Royal Niger Company set up Royal Niger Company Constabulary in 1888. In the early 1900's when the protectorates of Northern and Southern Nigeria were proclaimed, part of the Royal Niger Company constabulary became the Northern Nigeria Police and part of Nigeria Coast Constabulary became the Southern Nigeria Police. Although the South and North were amalgamated in 1914, their police forces were not merged until in 1930, with headquarters in Lagos. It is important to also note that during colonial period, most police were associated with local government (Native authorities). But by 1960's under the first Republic, these forces were regionalized and then nationalized. By

this Nationalization of the Nigeria Police Force, the Inspector General of Police was in control of the general operation and administrative duties. He was supported at the headquarters by a deputy Inspector General and in each state by Police Commissioners. The 1999 constitution also provided for a Police Service Commission that is today responsible for Policy, organization, administration and finance of the Nigerian police force.

From the discussion above we can therefore capture the essence of the British imperialist effort to establish police forces in Nigeria mainly for easy colonial administration and in serving the colonial government economic and political interests. The kind of police the colonial masters bequeathed to Nigeria was aptly described as; “Nigeria Police of the 21st century is still a relic of the 1879 Colony of Lagos Constabulary in spirit and soul...the force has remained trapped in the vision its creator (the British colonial government) crafted for it: an instrument of coercion and oppression.”<sup>4</sup> It is important to also note

that successive Nigerian Military governments after independence considered the police as a threat. This is because the police are larger in number than the military at that time. As a result, the Nigeria Police Force became under funded and marginalized by the military governments during that period<sup>5</sup>. These are some of the challenges facing the Nigeria Police Force up till today.

### **3.2 The Effect of Public Order Act on Peaceful Protest in Nigeria**

The Public Order Act<sup>6</sup> is one of the laws of Nigeria enacted for the purposes of maintaining proper and peaceful conduct of public assemblies, meetings and processions. The government of each state was empowered by the Act to direct the conduct of all assemblies, meetings and processions on the public roads or places of public resort in the state and prescribe the route by which and the times at which the procession may pass.<sup>7</sup> The Act states that any person desirous

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the Nigeria Police Public Relations Department’, *Kuwait Chapter of Arabian Journal of Business and Management Review* (2013) 2 (11), 54.

<sup>5</sup> [www.nigeriapolicewatch.com/resources/about-the-nigeria-police/](http://www.nigeriapolicewatch.com/resources/about-the-nigeria-police/) accessed on 30<sup>th</sup> October, 2014.

<sup>6</sup> Cap. P42, Laws of the Federation of Nigeria, 2004.

<sup>7</sup> See S. 1 (1) of the Public Order Act.

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<sup>4</sup> W. A. Johnson, J. Johnson and T. E Ifeday,  
 ‘Evaluation of the Structures and Operations of

of convening any public gathering or conducting any procession shall apply to obtain a license<sup>8</sup>.

Globally, public rallies and processions are part and parcel of democracy. Human beings, as political animals are bound to resent and exhibit dissenting reactions to any perceived inhuman and controversial policies by the government. Such reactions may take the form of criticisms, strikes, picketing, and recourse to litigations, outright indifference or protest through public assemblies, meetings and processions<sup>9</sup>.

The holding of mass rallies as expression of support to government policies will always go smooth. Think of the million-man-matches conducted for our politicians by the police in our history, and the rally conducted by the Save Nigeria Group in Lagos and Abuja in 2010 to protest the action of the cabal of the Late President Umaru Yaradua. They

were all not attacked by the police. But the holding of mass rallies as expression of opposition to government policies, on the other hand, is always disrupted by the police. For instance, the Conference of Nigerian Political Parties (CNPP) and Citizens Forum led by Professor Wole Soyinka staged mass rallies on the 3rd and 15th May 2004 respectively in protest against an alleged anti people policy by the Obasanjo administration and the unacceptable level of security of life and property in the land, but the rallies were disrupted by the Police with tear gas and arrest of some of the participants<sup>10</sup> on the ground that the organizers were not given Police permit under the Public Order Act, to organize the rally.

Similar actions in the past by the Nigerian Labour Congress (NLC) to protest alleged government insensitivity to the plight of the workers and masses of Nigeria through incessant hike in prices of petroleum products have also attracted government's violent clampdown. Another procession convened in Lagos by a group of

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<sup>8</sup> C. N. Oguonu , 'Public Order Act and Peaceful Protest in Nigeria',  
[www.istr.org/resource/resmgr/./Oguonu\\_Chika\\_Njideka.pdf](http://www.istr.org/resource/resmgr/./Oguonu_Chika_Njideka.pdf)

<sup>9</sup> K.O. Amusa, 'Mass Rally and Public Order Act: The Right of Association and Expression under Assault in Nigeria', Being an unpublished seminar paper presented to the Faculty of Law, University of Lagos.

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<sup>10</sup> See the *Guardian* of 5<sup>th</sup> May, 2004, p.1, and the *Guardian* of 6<sup>th</sup> May, 2004, p.1.

concerned mothers to mourn the tragic loss of over sixty students of the Jesuit College in air crash at Abuja, to draw attention to the deplorable state of aviation sector was violently disrupted by the Police. In the same vein, similar meetings of a number of political leaders who were opposed to the tenure elongation of administration scheduled to hold in Sheraton Hotel Abuja was forcefully dispersed by the Police and the State Security Service.<sup>11</sup>

However, on the 5<sup>th</sup> of April, 2006, police authorities forcefully disrupted the anti-third term meeting of eminent Nigerians at Abuja in the guise that police permit was not sought and obtained before the meeting was convened<sup>12</sup>. While in January 2012, the mass protests against removal of fuel subsidy were violently disrupted by the police and the army personnel. And then the industrial action by the Academic Staff Union of Universities had cause to direct its members to embark on protests

to draw public attention to the underfunding of public universities in Nigeria. The police dispersed the protesting academics with tear gas. Also the recent protest and campaign for the release of 234 Chibok girls abducted by Boko Haram members was banned by the police on the ground that it was posing a serious security threat to the FCT.

It is pertinent to note at this juncture that the actions of the police authorities of forcefully disrupting rallies, meetings, assemblies and processions, on the grounds that police permit was not sought and obtained, raises a lot controversies as to the constitutionality of the Public Order Act. Therefore, it is necessary to look at this Act vis-à-vis the Constitution to determine its validity, it being settled law that all laws or legislations inconsistent with the provisions of the constitution are to the extent of their inconsistency void.<sup>13</sup>

The courts have attempted to interpret the constitutionality or otherwise of the Public Order Act thus, in *Inspector*

<sup>11</sup> See the Punch Newspaper of April 18, 2006, p.1.

<sup>12</sup> Chinelo Chinweze, The Constitutionality of the Public Order Act in a Democracy: 'A Square Peg in a Round Hole' accessed from [www.gamji.com/article5000/NEWS5960.htm](http://www.gamji.com/article5000/NEWS5960.htm) on 30th October, 2014, 1.

<sup>13</sup> See Section 1 of the Constitution of the Federal Republic of Nigeria 1999 (as amended).



*General of Police v. All Nigeria Peoples Party & Ors*,<sup>14</sup> the Court of Appeal in Abuja upheld the judgment of the Federal High Court Abuja that no police permit or any authority is required for holding a rally or procession in any part of the Federal Republic of Nigeria, and that the Public Order Act, Cap. 382, Laws of the Federation of Nigeria, 1990, which prohibit the holding of rallies or proceedings without police permit are unconstitutional having regard to section 40 of the 1999 constitution and Article 11 of the African Charter on Human and People's Right (Ratification and Enforcement) Act, Cap.10, Laws of the Federation of Nigeria, 1990. The learned trial judge relied on two cases considered in other jurisdictions-the Supreme Court of Ghana in the case of *New Patriotic Party v. Inspector General of Police*,<sup>15</sup> where the learned trial judge held that: "Police permit has outlived its usefulness, statutes requiring such permits for peaceful demonstrations, processions, and rallies are things of the past. Police permit is the brain child of the colonial era and ought not to remain in our statute

books". The case of *A-G Botswana v. Dow*<sup>16</sup> was aptly considered where the Court of Appeal of Botswana declared the Citizenship Act of Botswana 1984 unconstitutional.

Irrespective of this applauded decision, one cannot overlook the conflicting legal decision of the Court of Appeal sitting in Ilorin in the case of *Chukwuma & Ors V. Commissioner of Police*.<sup>17</sup> In that case, their Lordships held that police permit is a requirement for the holding of a public meetings or assembly in private or public places. The facts of Chukwuma's case are peculiar in that it involved a potential conflict between two warring factions of a social cultural association known as Igbo Community Association. While one faction of the Association wanted to host a meeting of all Igbo delegates assembly comprising of all Igbo Community Associations in Northern States of Nigeria in Ilorin, Kwara State, the other faction petitioned the commissioner of police alerting his office that the meeting was going to constitute a security risk. This petition

<sup>14</sup> (2007) 18 NWLR (Pt. 1066) 457 C.A.

<sup>15</sup> 1992-93 GLR 585 – (2000) 2 HRLRA 1.

<sup>16</sup> (1998) 1 HRLRA 1.

<sup>17</sup> (2005) 8 NWLR Pt. 278.

informed the decision of the police to disperse the meeting.

You will observe here that there are two conflicting Court of Appeal judgments on the constitutionality or otherwise of the provision of the Public Order Act with respect to police permit. Even though the judgment in the former is preferred to the latter<sup>18</sup>, it is my humble view that where there is receipt of information that a rally or procession will lead to break-down of law and order, it become necessary for the police to intervene so as to protect lives and properties.

It must be noted that Section 39 (1)<sup>19</sup> which provides for freedom of expression thus, “Every person shall be entitled to freedom of expression, including freedom to hold opinions and to receive and impart ideas and information without interference,” is an adjunct of democratic system of government which requires openness,

free debate of ideas and interaction among diverse interests. The expression involves communication in whatever form it may be understood by those who receive the expression.

On the other hand, Section 40<sup>20</sup> which provides for freedom of assembly and association thus, “Every person shall be entitled to assemble freely and associate with other persons, and in particular he may form or belong to any political party, trade union or any other association for the protection of his interests”, is a vehicle of advancing common cause, ideas, values or objectives by congregation of particular groups or generality of the people.

However, it is conceded that these rights are not absolute. They are restricted by any law that is reasonably justifiable in a democratic society in the interest of defense, public safety, public order, public morality, health or for the purpose of protecting the right of others.<sup>21</sup>

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<sup>18</sup> O. Akingbehin, ‘Combating Election Malpractices and Promoting Democratization in Nigeria: The Role of the Police’. (2012) 6 (2) *British Journal of Humanities and Social Sciences*, 31.

<sup>19</sup> Constitution of the Federal Republic of Nigeria 1999 (as amended).

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<sup>20</sup> *Ibid*

<sup>21</sup> See Section 45 (1) (a) (b) Constitution of the Federal Republic of Nigeria 1999 (as amended).



To determine the constitutionality or otherwise of the Public Order Act, one needs to have a cursory look at section 1 (2) of the Public Order Act which provides that any person desirous of convening or collecting any assembly or meeting or of forming any procession in any public road or place of public resort shall first make application for a license to the Governor...and if such Governor is satisfied that the assembly, meeting or procession is not likely to cause a breach of peace, he shall direct any superior police officer to issue a license, not less than 24 hours thereto, specifying the name of the licensee and defining the condition on which the assembly, meeting or procession is permitted to take place; and if he is not satisfied, he shall convey his refusal in like manner to the applicant within the time stipulated.<sup>22</sup>

The other paragraphs of section 1 of the Act are to the effect that the Governor can delegate his powers to the Commissioner of Police of the State or other police officers, and that persons aggrieved by any decision of the Commissioner of Police may appeal to

the Governor and the decision of the Governor shall be final and no further appeal shall lie there from. The effect of these provisions would be that the exercise of the rights in section 40 of the constitution rests substantially on the subjective judgment of the State Governor or his police delegate.

In other words the Act places upon the Governor the absolute power of determining whether or not an assembly, meeting or procession will cause a breach of peace or public order. This scenario is clearly not envisaged by the constitution, that an individual be placed as the sole and unquestionable determinant of what is reasonably justifiable for the entire citizenry of Nigeria. The constitution does not in anyway intend that the enjoyment of a right or freedom enshrined by it be conditioned or contingent on the opinion of an official of the executive arm of government, especially when such exercise of power appears not to be subject to judicial review<sup>23</sup>. It is a rule of administrative law that no ministerial

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<sup>22</sup> Cap. P.42 Laws of the Federation of Nigeria, 2004.

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<sup>23</sup> Chinelo Chinweze, (n. 12) 2.

discretion is unquestionable by the court<sup>24</sup>.

The Public Order Act attempts under section 1, particularly paragraphs 5 and 6, to authorize an administrative authority to interrupt the exercise of guaranteed rights (under section 40) with finality and conclusiveness, and without the necessity of judicial review. This provision of the Act is contrary to the explicit provision of section 36 (2) of the 1999 Constitution which provides that no act of a functionary of executive arm of government shall, with regards to matters implicating the exercise of fundamental right be final and conclusive.<sup>25</sup>

### **3.3 Challenges of the Nigerian Police**

Considering the limited resources at its disposal, the purported inability of the Nigeria Police Force to perform to full capacity should be seen as a function of the institutional structures it has been forced to subsist in. Despite these inhibitions, the Nigeria Police Force has churned out series of outstanding

achievements over the years, ranging from: Control of the Tiv Unrest in the early 1960s; control of the Bakolori riots of 1982; control of several communal clashes in the country, such as Bauchi (1985, Zango-Kataf (1992), Ogoni (1994-96), Warri (19997-1999), etc; control of several religious riots in the country, like the Maitatsine uprising in Kano (1980), Bulunkutu and Maiduguri (1982), Yola (1983), etc; corperation with International Police (INTERPOL) on crime control; several peace keeping missions; training of police forces of sister countries, etc. These successes were recorded under very risky circumstances as the force lacked the required equipment and other significant resources to intervene in such high intensity conflicts.<sup>26</sup>

On the other hand, the police has also recorded some failures ranging from: its inability to unravel the culprits behind several assassinations and bombings of prominent Nigerian citizens over the years, starting with the parcel bombing of Mr. Dele Giwa, the late Chief Editor

<sup>24</sup> See *Stitch v. A-G Federation* (1986) 12 SC P.245.

<sup>25</sup> Chinelo Chinweze, (n. 12 and 23) 3.

<sup>26</sup> Obuseh Jude, 'The Nigeria Police and National Security', The Nigerian Observer Digital Edition, accessed from <[www.nigerianobservernews.com/03102013/features/features4.html](http://www.nigerianobservernews.com/03102013/features/features4.html)> on 31/10 2014.

of News Watch Magazine; inability of the police to properly manage some student riots and demonstrations by other unarmed protesters without resorting to the use of naked force; inability of the force to transform itself into a people-friendly organization; inability of the force to transform itself into a service-oriented organization in practice, rather than the forceful face it still bears; inability of the force to stay politically neutral, etc. But like I mentioned earlier, these shortcomings should be assessed from the perspective of the operationally encumbrances that have traditionally bedeviled the ability of the force to perform to full capacity.<sup>27</sup>

However, some of the challenges that have militated against the ability of the Nigeria Police Force to satisfactorily perform its functions to the core includes: Police corruption which is a major hindrance to positive contribution. Corruption and extortion are widespread among the members of the Nigerian Police Force and have soiled their image. While corruption is endemic in all segments of the Nigerian society, it is particularly objectionable among the

police because it is their occupational responsibility to prevent and work at its elimination. Closely related to the problem of corruption and extortion is the incidence of collusion of some police officers with criminals, resulting in increased insecurity and police inefficiency in tackling crime. The twin phenomenon of police brutality and corruption constitute the main barrier between the police and public in Nigeria.

Inadequate manpower, both in terms of quantity, but more especially of quality has made it practically impossible to adequately police a country as highly populated expansive as Nigeria; inadequate and obsolete equipment – especially communication gadgets, arms, and ammunitions – which reduces the speed of responding to distress calls and getting information across to other units; poor remuneration, which has tends to deflate the morale of officers, and confronts those with weak willpower with extortionist temptations; inadequate public cooperation, which has restricts access to crucial intelligence; poor and inadequate accommodation facilities for both office and residential use; mobility challenges, which makes it difficult to

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<sup>27</sup> *Ibid.*

respond to distress calls and carry out patrols; activities of bad eggs, which has tended to give the force a negative public image; inadequate training, etc<sup>28</sup>

Many of these problems in the Nigeria Police Force are self-evident and have been sources of serious concern to the public, governments, police authorities and officials, the mass media and human rights organization in the country. What is required is a determination to address the problems.

#### **4. Conclusion and Recommendations**

It is the humble submission of the writers that government must scrupulously respect the people's right to peaceful association. It must desist from using the police to disrupt peaceful protests, particularly where these have not resulted in breakdown of law and order. However, where there is a complain or information of possible break-down of law and order, violence or imminent danger to lives and properties, then the police force should intervene to maintain peace and security within the area or locality where the protest is to hold. The Nigerian

constitution did not provide for protest as a means of change of government, therefore the government will not allow that. As provided in the Constitution, change is done through the people exercising their franchise in a general election, in that case the police will likely intervene to prevent imminent clash. The Public Order Act should therefore explicitly provide for this point in its provisions in order to avoid unnecessary police and public clash.

Professionalism of the Police is essential in a democratic society. The Police are most viable elements of the security sector. The lack of professionalism among the police operatives is responsible for the public perception of the police operatives as largely illiterates. Therefore, as a matter of urgency, government must address the following:

- 1) Need by Federal Government to give quality support in provision of proper equipment and funding instead of unnecessary proliferation of law enforcement agency for instance EFCC, ICPC, NAFDAC, FRSC and host of others to handle matter that fall within

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<sup>28</sup> *Ibid.*

the purview of the criminal law for which the Police is statutorily suppose to be responsible. Generally, the success of these agencies is not due to any form of magic training or professional superiority since their personnel are indeed drawn from the Police Force rather due to proper equipment, high level of operational autonomy and adequate funding<sup>29</sup>.

2) The Police must be properly educated to accept the supremacy of the law and its due process; including Human Right training in basic curriculum for the police officers and staff at all levels of hierarchy. This is to enable every Police Officer to be familiar with the provision of Chapter 4 of the Constitution, which deals with Human Right.

3) The police must be trained in peaceful crowd control, and must be deployed to protect the people's right to peaceful protest.

4) The police should be given public relations training in order to be better equipped to communicate and relate with members of the public in ways that uphold human dignity while preserving police authority. There is need to show respect and decorum in exercising of their statutory duties, this will promoted and enhance good governance.

5) Need to review the provisions of the Police Act and Public Order Act to ensure that the right to freedom of assembly is fully respected and that undue or unreasonable limits are not placed on collective and public action for the promotion or protecting human rights. With a view also to ensure that the provisions in the Act are not in conflict with the Nigeria Constitution.

6) Recruitment of police personnel should be on merit. Only those that are worthy of character should be in the force as this will help checkmate issues of human right abuse.

7) Need to educate members of the public about their human right and the need to cooperate with Law Enforcement Agencies in the lawful discharge of their

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<sup>29</sup> 'The Role of Law Enforcement Agencies in the Promotion and Sustainability of Participatory Democracy and Rule of Law', a speech delivered by Mr. Sunday Ehindaro (IGP). Ably represented by C.P Bukar Maina, Commissioner of Police, Kwara State Command on 13<sup>th</sup> December, 2006 [http://mafng.org/symposium1/role\\_law\\_enforcement\\_agenciespdf](http://mafng.org/symposium1/role_law_enforcement_agenciespdf) accessed on 31/10/2014.

duties in Nigeria and to refrain from resenting the police when they are exercising their lawful power in the course of legally permissible law enforcement activities.

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