

## CHILD MOLESTATION IN NIGERIA: THE WAY FORWARD FOR THE VICTIM\*

**Abstract**

*The society has begun to acknowledge the harm done to those abused as a child. This paper is therefore geared towards exploring various media through which children who are victims of child molestation can be compensated and the importance of such compensation, if any.*

**Keywords:** Child Molestation, Victim, Nigeria, Way Forward

**1. Introduction**

Dave Pelzer<sup>1</sup> noted that *childhood should be carefree, playing in the sun; not living a nightmare in the darkness of the soul*. Sadly, the rate at which the world is becoming generally unsafe for children to be left carefree is at its peak, and many children have become living shadows of themselves. The reason for this drastic turn of event is not far-fetched; simply put, ‘child molesters’ have been let on the loose, and are roaming countries of the world seeking children to devour (abuse). This ‘fiend’ which goes by the unpopular designation child molestation is very rampant across the globe and occurs in a variety of settings including home, school, work, hospitals, etc. Child sexual abuse is the most common form of child molestation, however it is not limited to sexual abuse only as other forms which includes: inappropriate touching, including non-sexual penetrating contact, exposure of a minor to pornography, or convincing a minor to view sexual acts would suffice as child molestation.<sup>2</sup> Child marriage (prevalent especially in the northern states of Nigeria) is one of the main forms of child sexual abuse; and UNICEF has stated that child marriage ‘represents perhaps the most prevalent form of sexual abuse and exploitation of girls.’<sup>3</sup> Due to the fact that most sexual abusers are very much acquainted with their victims; approximately 30% are relatives of the child, most often brothers, fathers, uncles or cousins;<sup>4</sup> around 60% are other acquaintances such as ‘friends of the family,’ babysitters, or neighbours, strangers are offenders in approximately 10% of sexual abuse cases,<sup>5</sup> this makes reporting the offenders an increasingly herculean task for child victims.

The numerous consequences that flow from child molestation are grievous, and unfortunately, this harm done to children, and extending into their adult lives have been afforded less attention.<sup>6</sup> Some children, even after they have fully grown into adults still live with this trauma; and the society is oblivious of this fact. Bessel has rightly stated that ‘in the culture people talk about trauma as an event that happened a long time ago. But what trauma is, is the imprints that event has left on your mind and in your sensations... the discomfort you feel and the rage and helplessness you feel right now.’<sup>7</sup> In recent times however, the society has begun to acknowledge the harm done to those abused as a child. This paper is therefore geared towards exploring various media through which children who are victims of child molestation can be compensated and the importance of such compensation, if any.

**2. Child Molestation**

Child molestation is a generic term used to describe all types of sexual acts perpetrated by an adult on a child regardless of the gender of the child or the relationship between victim and the offender.<sup>8</sup> It includes a wide variety of activities perpetrated against children by adults that have sexual undertones. Also, it has been

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<sup>1</sup> Dave Pelzer, *A child Called 'it'*

<sup>2</sup> <https://www.justia.com/criminal/offenses/sex-crimes/child-molestation/>

<sup>3</sup> Unicef.org (PDF)

<sup>4</sup> ‘Raising Awareness About Sexual Abuse: Facts and Statistics’ NSOPW

<sup>5</sup> ‘Child Sexual Abuse,’ National Center for Post-Traumatic Stress Disorder, US Department of Veteran Affairs

<sup>6</sup> Malcolm Underhill, *A Guide to Seeking Justice and Compensation: For Victims of Child Abuse*

<sup>7</sup> Bessel A. van der kolk, ‘The Body Keeps the Score: Brain, Mind, and Body in the Healing of Trauma

<sup>8</sup> Comprehensive Clinical Psychology, 1998

referred to any sexual relation or contact with any prepubescent child.<sup>9</sup> The majority of child molesters are male, but in the past decade there have been increasing reports of female child molester.<sup>10</sup> Nevertheless, male offenders considerably outnumber females. Below are some of the statistics compiled by KIDS LIVE SAFE.com<sup>11</sup> on sexual assaults against children and adolescents:

- Every 2 minutes someone in the US is sexually assaulted.
- Three out of four adolescents who have been sexually assaulted were victimized by someone they knew well.
- Girls are more vulnerable to sexual assault with ‘1 in 5 girls’ reported as being victims of child sexual abuse in comparison to ‘1 in 20 boys.’
- Although children and teenagers of all ages are all susceptible to child sexual assault and/or abuse, children between the ages of 7 – 13 years are statistically shown to be most vulnerable.
- More specifically, the year in a male’s life when he is most likely to be a victim of sexual assault (rape) is age 4.
- Vulnerability of rape at such a young age is most often the result of the offender having previous relationship with the child i.e., a family friend, family member, babysitter, step-parent, etc.
- While older victims are more likely to be victimized in places other than homes and private spaces, younger children most often reported rape in a familiar home or even their own home, supporting the likelihood of a prior relationship with the offender.

Nigeria has not been left out in this epidemic that has its tentacles stretched across all continents of the world. Child molestation has become a trend in the country; while it has become a norm for a plethora of child sexual assault to be reported on daily basis, thousands of other cases yet remain or are left unreported, leaving the perpetrators to go scot free and continue in their vicious line of molestations therefore posing greater danger to the nation. Various newspapers are flooded frequently with child molestation cases in their different numbers and forms. For instance, on the 2nd day of February, 2018, the Punch Newspaper reported the case of sexual assault of one eight-year-old girl by one chemist in Otuocha, Anambra State, simply identified as Onwuegbuka.<sup>12</sup> The same newspaper reported a 30-year-old man, Lamidi Alabi, who allegedly touched and rubbed the private part of a seven-year-old girl. UNICEF reported in 2015 that one in four girls and one in ten boys in Nigeria had experienced sexual violence before the age of 18 years.<sup>13</sup> Also, the Centre for Environment, Human Rights and Development reported that 1,200 girls had been raped in 2012 in Rivers, a coastal state in southeastern Nigeria.<sup>14</sup> In Nigeria, defilement of underage boys and girls is provided for in sections 216 and 218 of the Nigerian Criminal Code,<sup>15</sup> in which anyone found guilty of indecent treatment of boys and unlawful carnal knowledge of an underage girl is liable to imprisonment for 7 years and imprisonment for life respectively. The case of *Boniface Adonike v The State*<sup>16</sup> also shows *prima facie* in the application of the law that society abhors cases of defilement of young girls. In that case, the appellant invited and requested a child of 5 years of age to buy sachet water for him. On her return, he lured her into his room,

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<sup>9</sup><https://www.hg.org/legal-articles/differences-in-statutory-rape-and-child-molestation-29517> assessed 1st November, 2018

<sup>10</sup> Allen, 1991; Elliot, 1993

<sup>11</sup> <https://web.kidslivesafe.com/child-safety/sexual-assault-statistics-facts>

<sup>12</sup> <https://www.nigerianbulletin.com/threads/chemist-accused-of-molesting-eight-year-old-pays-n150-000-to-settle-case-punch-newspaper.295901> assessed 1st November, 2018

<sup>13</sup> ‘Release of the Findings of the Nigeria Violence Against Children Survey,’ UNICEF Nigeria 10th September, 2015

<sup>14</sup> ‘Hoodlums rape 1,200 girls in Rivers’ Vanguard Newspaper, 27th February, 2013.

<sup>15</sup> Cap C38 Laws of the Federation of Nigeria 2004; see also section 218 of the Criminal Code Law, Cap. 37, Volume II, Laws of Rivers State of Nigeria 1999

<sup>16</sup> (2015) 7 NWLR (pt. 1458) 237 at 266;

pulled her pant and had carnal knowledge of her. The learned trial judge, Philome Obanor, J. convicted the appellant and sentenced him to 6 years imprisonment and 6 strokes of the cane. His appeal was dismissed; and on further appeal to the Supreme Court, Muntaka-Coomassie, JSC dismissing the appeal said:

The appellant, a pedophile deserved no less than to be kept out of circulation for a while, so that his pedophile instinct may cool off. He is of dangerous specie and of low moral pedigree.

The conduct of the appellant herein is as bad as that of the appellant in *AKINDIPE v THE STATE* (2012) 16 NWLR (pt 1326) 318, so I need re-echo what his Lordship, Muhammad JSC said at page 331, paras. E-H of the report to wit:

The facts revealed in this appeal are sordid and can lead to a conclusion that a man can turn into a barbaric animal. When the appellant was alleged to have committed the offence of rape, he was 32years. His two young victims: Ogechi Kelechi, 8years old and Chioma Kelechi, 6years old, were by all standards, under-aged. What did the appellant want to get out of these under-aged girls? Perhaps the appellant forgot that by nature, children, generally are like animals. They follow anyone who offers them food. That was why the appellant tactfully induced the young girls with ice cream and zobo drinks in order to translate his hidden criminal intention to reality, damning the consequences. Honestly for an adult man like the appellant to have carnal knowledge of an under-aged girl such as appellant's victim is very callous and animalistic. It is against the law of all human beings and it is against God and the state. Such small (under-aged) girls and indeed all females of whatever age need to be protected against callous acts of criminal minded people of the appellant's class. I wish the punishment was heavier so as to serve as deterrent.

There are various types of sexual assault and sexual disorders but they can be classified under four major subheads; they include Pedophilia, Exhibitionism, Voyeurism, and Rape.

### **Pedophilia**

In the 2016 United Nations Annual Review, the UN secretary General Antonio Gutierrez said that there were 145 cases of sexual exploitation and abuse involving troops and civilians across all UN peace missions in 2016 alone. These 145 cases involved 311 victims and many of these victims by UN's own admission are *children*. The United Nations' peacekeepers and staff raping children is no fake news, it is admitted by UN itself.<sup>17</sup> Pedophilia, defined as an adult participating in sexual activity with a child, is endemic in South Africa and around the world.<sup>18</sup> It is reported that sex with minors has become a proliferating business. In South Africa alone, there were 45,000 child prostitutes in 2013. Children are being sold to brothels, clubs and other illegal venues where they are exploited as modern day slaves. Statistics shows that 64,514 cases of rape were reported in 2011/2012 financial year and approximately 45 percent of the victims were children. Also, research has shown that 50 percent of South Africa's children will be abused before the age of 18. On the case of which a Nigerian governor got married to a 13 year old girl from Egypt making the senate to amend the provisions as to the age requirement in which a girl child can get married. It was amended thus: provided they are deemed as being 'physically developed enough.' Femi Fani-Kayode<sup>19</sup> in his article has this to say:

Every Nigerian should bow his or her head in shame because instead of crushing the head of the lustful beast that seeks to fornicate with our children, to steal their virtues and to destroy their future; what senate did the other day was to compromise with and cater for the filthy appetites and godless fantasies of a bunch of child molesters and sexual predators. It

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<sup>17</sup>Extracted from <https://www.google.com.ng/amp/s/www.independent.co.uk/voices/united-nations-soldiers-paedophilia-un-child-rape-ngo-staff-a7648791.html%3famp>

<sup>18</sup> <https://www.doctorsforlife.co.za/paedophilia/>

<sup>19</sup> Femi Fani-kayode, 'A Nation of Perverts and Pedophiles'

is sordid. It is ungodly. It is evil. And it is unforgivable. Surely we ought to be seeking to protect our children and not seeking to bed them.

According to the Diagnostic and Statistical Manual of Mental Disorders, pedophilia can only be classed as a disorder or impairment to the individual, or if acted on would cause harm or risk of harm to others, mainly children. Pedophilia is simply defined as an abnormal or unnatural attraction of sexual activity with prepubescent children.<sup>20</sup> Pedophiles are most often, but not always men, and can be attracted to both sexes. Pedophilic acts include looking at the child in an inappropriate way or for a significant amount of time, undressing and touching the child. Although not common, such acts may also include oral sex or touching the genitals of the child or of the pedophile. The perpetrators do convince themselves and their victims that they are contributing to the child's development; they most time make sure to tell their victims not to tell their parents. Theresa Taylor<sup>21</sup> outlined five types of pedophiles namely:

- 1). The Fixed Immature Pedophile: they love children and feel they understand children. They are uncomfortable in adult relationships. Even though this type does not want to hurt or harm children, they are extremely difficult to rehabilitate as they usually don't see anything wrong in what they are doing.
- 2). The Regressed Pedophile: could be or has been in adult sexual relationship; however a 'trigger' threatens their masculinity. Such trigger could be negative comments from their partner. Christian Bezuidenhout, a professor of criminology at The University of Pretoria, South Africa says '*they know that as adults they are more intelligent and children will not reject them.*' In order to regain control in their lives, they start relationships with children. They may feel guilty and stand a better chance of rehabilitation.
- 3). The Exploitative Pedophile: they may engage in making or viewing pornography and have little regard for the physical or emotional wellbeing of the child. This class is extremely difficult to rehabilitate as they actively seek sexual conduct with children and see them as sexual objects.
- 4). Aggressive or Sadistic Pedophile: they seek children for both sexual and aggressive reasons. Such persons have long history of anti-social behaviours, and seek to inflict pain because that gives them sexual excitement. However, they are very rare and very difficult to rehabilitate.
- 5). Hebephile: these are attracted to children who are just reaching puberty and are between the ages of 14 and 16years.

### **Exhibitionism**

Exhibitionistic disorder is a condition marked by the urge, fantasy or behavior of exposing one's genitals to non-consenting people, particularly strangers. There are several types of exhibitionistic disorder, and these depend on the age of the non-consenting person to whom someone with exhibitionistic disorder prefers to show their genitals. For instance, the preference could be to show genitals to prepubescent children, adults or both. Although the prevalence of this disorder is unknown, it is thought to be approximately two to four percent in the male population; and while the prevalence estimates are unknown for females, it is less common in females.<sup>22</sup> Most often, the exhibitionist might masturbate or fantasize about masturbating while exposing himself to a child, but make no further sexual attempt with the hopes of arousing the said child. This is a serious threat to children as such child may become frightened or traumatized by any stranger approaching them as a result, causing serious emotional complications.

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<sup>20</sup> *ibid*

<sup>21</sup> Theresa Taylor, *No Place to Hide for Paedophiles*

<sup>22</sup> <https://www.psychologytoday.com/us/conditions/exhibitionism>

### **Voyeurism**

This is a psychosexual disorder in which a person derives sexual pleasure and gratification from looking at the naked bodies and genital organs or observing sexual acts of others. The object of voyeurism is to observe unsuspecting individuals who are naked, in the process of undressing or engaging in sexual acts. The person being observed is usually a stranger, and the observer does not generally seek sexual contact or activity with the person. Also, if orgasm is sought, it is achieved through masturbation. However, a voyeur may frequently have a fantasy of engaging in sexual activity with the person being observed, but in reality this fantasy is rarely consummated.<sup>23</sup> It is important to emphasize that these voyeurs are usually hidden from the sight of others, and in popular culture they are called ‘Peeping Tom.’ Often times, children are victimized by voyeurs without their knowledge in playgrounds, schools, home or during extracurricular activities.

### **Rape**

Like wild fire, the case of late Miss Elizabeth Ochanya Ogbaje, a 13 year old minor, who was a victim of serial rape, and died in the month of October as a result of Vesico-Vaginal Fistula, has invaded the headlines of every newspaper in the country. The Punch Editorial Board reported: That the abuse started when Ochanya was just 8 years old in 2013, by Victor, son of Ogbuja – the chief suspect, who is a senior lecturer in Benue State Polytechnic, in the Department of Catering and Hotel Management. Victor’s sexual escapade was exposed by his sister, who once told their father after she caught him in the act. But it was not long before Ogbuja joined his son in the unholy assault that eventually reduced the minor to their sex slave.<sup>24</sup> While Ogbuja has since been arraigned before a Makurdi Upper Area Court, and is being remanded at Makurdi Federal Prisons, his son – a final year undergraduate is on the run. In Nigeria, and other countries of the world, this rape saga is at an alarming threshold, evident in daily newspaper reports. The most callous and inhuman is one involving fathers and their biological daughters – underage or adults. The Lagos State Police Command (reported in the same editorial *supra*) said that 678 rape cases occurred in one year – 2012 march to 2013 March. Also according to the Commissioner for Women Affairs, Glory Edet, seven rapists have been jailed since 2017 in Akwa Ibom State and 30 cases are still pending in court. The BBC’s Geeta Pandey in Delhi says India the home to the largest number of sexually abused children in the world (*a child is sexually abused every 15 minutes*), but there is a general reluctance to talk about the topic so the real number of cases could be much higher. In addition, according to the report released by Indian Home Minister, Rajnath Singh in Delhi, 106,958 cases of crimes against children were recorded in 2016.<sup>25</sup> Rape is a form of child sexual abuse; and The Department for Schools and Families 2010 has defined child sexual abuse to include forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.<sup>26</sup> Generally, rape is a type of sexual assault initiated by one or more persons against another that usually involves intercourse against the victim’s consent. It is quite unfortunate that rape is the most underreported violent crime, as reported by the American Medical Association. The U.S. Bureau of Justice Statistics (1999) estimates that 91% of rape victims are female, and 9% male, with 99% of the offenders being male, 44% of children under the age of 18 are victims of rape, and girls age 16-19 years are four times more likely to be victims of rape, attempted rape or sexual assault.

### **3. Why do Men Rape?**

It is quite disheartening that tales of sexual assault and harassment recounted by women across the world has become fairly regular. Over the years, scientists and psychologists have been gradually filling out a

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<sup>23</sup> [www.minddisorders.com/Py-Z/Voyeurism.html](http://www.minddisorders.com/Py-Z/Voyeurism.html)

<sup>24</sup> EDITORIAL, Rape Case: Justice for the late Ochanya, published November 12, 2018

<sup>25</sup> BBC NEWS, Indian Sexual Abuse: ‘Four Child Victims Every Hour,’ 01 December, 2017

<sup>26</sup> <https://www.google.com.ng/amp/s/www.parentsprotect.co.uk/what-is-child-sexual-abuse.amp.htm>

picture of men who commit sexual assaults. Dr. Smithyman, a Clinical Psychologist in South Carolina, U.S. in 1976, then a Ph.D. candidate at Claremont Graduate University placed a rather unusual personal ad in newspapers throughout Los Angeles:<sup>27</sup>

Are You A Rapist?

Researcher Interviewing Anonymously By Phone To Protect Your Identity. Call 213 \_\_\_\_\_ ' 9-9pm

He sat by his phone, skeptical about any call coming through; however it did ring, according to him '...*nearly 200 times.*' By summer end, Dr. Smithyman had completed 50 interviews, which became the foundation for his dissertation: 'The Undetected Rapist.' He found that these men (rapist) begin early. They may associate with others who also commit sexual violence and even though they admit to nonconsensual sex, they usually deny that they have raped women. Also, more recent studies have shown that men who rape tend to start young, in high school or the first couple of years of college, like crossing the line with someone they know, research suggests. Furthermore, some of these men commit one or two sexual assaults and then stop; while others maintain this behavior or even pick up the pace.<sup>28</sup> Another studies by Noam Shpancer Ph.D.,<sup>29</sup> shows the following that:First, by their genetic makeup, men are on average stronger than women and can overpower them physically. Sigmund Freud, a psychoanalyst said that anatomy is destiny; and so it is the destiny of women that if men wish to impose their will, physical force is one available tool. He says further that the same is not true in reverse. This biological difference is unfair – but there is no fairness in nature; there is only nature in nature. This difference is not likely to disappear any time soon. Another reason for sexual violence is that sex and violence are closely linked in our internal architecture. Sex has inherently violent undertones (in the same way that violence has sexual undertones). The therapist (Noam) said that sex-violence link has traditionally been discussed in the context of over stimulated male sexuality. For instance, in the late Victorian times, the male sex drive was considered so explosive and animalistic as to render men unable to control themselves. He is of a different opinion however where he indicates that 'sexual violence is not the providence of over-aroused men, but rather an inherent feature of the male-female mating dynamic. Although, this is an uncomfortable realization, evidence appears in support of it – to begin with, the sex drive and propensity to violence in men and women are linked to the same hormone, testosterone. Also male aggressiveness is often rewarded by greater access to, attention from, and success with women. The most ridiculous of reasons was the statistics reported by Saartjie Baartman Centre, Cape Town,<sup>30</sup> that men sexually assault children as a result of boredom, opportunity and revenge. The statistics revealed that one in three men said they raped out of boredom, especially in child rape cases. 'Most men start to rape in their teenage years between 15 and 19. More than half of the men that have raped a girl younger than 15 say they did it to 'have fun' or 'as part of a game.' Half of the men said they raped children out of opportunity, as they believed the child would not tell. For example Deborah Ho-Chung was sexually abused by her aunt's husband from when she was nine years old, until she turned 16.<sup>31</sup>

#### **4. Compensation for Victims**

Victims of child molestation can be compensated; and this compensation may vary from financial (monetary) compensation to litigation (i.e. suing the abuser). A person who has been abused may be entitled to compensation, and it is applicable if;

- You are now an adult and you were abused as a child
- You are still a child<sup>32</sup>

The compensation could be extended to cover loss or extra costs like: loss or earnings resulting from psychological illness due to the abuse making the victim unable to work, payment for therapy or private

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<sup>27</sup> 'What Experts Know About Men Who Rape,' by Heather Murphy, October 30, 2017 reported in New York Times

<sup>28</sup> Id.

<sup>29</sup> Noam Shpancer Ph.D., Insight Therapy, *Why Do Men Sexually Assault Women?* (2014)

<sup>30</sup> 'Men Rape Children because They are Bored says Study', reported by Yolisa Tswanya, 27th December, 2017. Assessed from <https://www.iol.co.za/capeargus/news/men-rape-children-because-theyre-bored-says-study-12545342>

<sup>31</sup> Id.

<sup>32</sup><https://www.citizenadvice.org.uk/family/children-and-young-people/child-abuse/financial-compensation-for-child-abuse/>

counseling, costs of medical treatment or clean up and so on. Another form of compensation for child sexual abuse is by suing the person that abused the victim. It is possible to sue for sexual assault or putting you in fear of violence. A further application can also be made to prevent the abuser from engaging in molestation or interfering with you in the future. However for a child or young person under the age of 18 years, an action has to be commenced by an adult know as a next friend on behalf of the child. It is important to state that there are difficulties associated with suing an abuser; one of which may be inability of the victim to pay legal fees. Also a notable challenge facing the courts is the slow dispensation of justice. Such matters when brought to court may therefore take a very long time before coming to an end, of which it may impossible to predict the outcome of the matter; as the maxim states: 'justice delayed is justice denied.' As if to crown it all up, the child victim is put under so much stress and pressure of seeing the perpetrator, is cross examined in court sometimes without regard to the psychological effects such appearances and examinations have on an already traumatized child. Noted psychologist David Libai coined the phrase 'legal process trauma' to represent the negative impact of criminal prosecutions against sex offenders on the child victims.<sup>33</sup> He says that often times, the 'legal process trauma' itself can be more devastating than the actual abuse. Also, except in jurisdictions that operate juvenile courts, such cases are usually tried in open courts exposing the victim to societal stigma.

As regards financial compensation given by government, lawyers and child protection advocates have warned that survivors of child abuse will face an 'especially unrealistic' deadline to decide whether to accept offers of compensation under the government's redress scheme. The redress scheme legislation before parliament gives survivors 90 days to decide on a compensation offer once it is made by a church or institution. Taking an offer of redress discharges the institution responsible for the abuse forever, meaning they cannot be sued. In order to make a decision requires expert legal advice on complex issues, such as the prospects of success in court, limitation periods, the survivor's capacity to afford a civil case, and an institution's ability to pay;<sup>34</sup> indeed the 90days deadline is thus largely an unpalatable one.

Furthermore, some victims are not even given the option of these forms of compensation as majority of these child molestation cases are largely unreported. The findings are that 88 percent of sexual abuse is never reported.<sup>35</sup> The authorities cannot notify you about most people who sexually abuse others because they have never been identified.

In contemporary times, seeing that the harm which flows from sexual abuse may take variety of forms, which may be immediate or at a later time, or in different ways and different times – sometimes an adolescent or adult may have a recognizable psychiatric disorder, such as eating disorder, and a clinician may attribute causation in some measure to a previous experience of sexual victimization; it is therefore mandatory (and of necessity) that such victims are adequately catered for. The state is to take into consideration a new approach in compensating victims of child molestation by first taking into consideration the degree of seriousness involved which should depend on the level of coercion employed in the abuse. In addition, public health should be promoted by government through disbursing of funds for payment of counseling costs for victims of child sexual assault or other more violent crimes, instead of simply paying off the victim thereby neglecting the degree damage done to the victim and the aftermath which may be fatal to the victim's health specially in a country such as Nigeria, where there is scarce public health resources. Both the government and NGOs are to invest more in ensuring that compensation schemes are used generously to provide for clinical psychologists. This is to ensure that victims who are in need of such assistance are able to have access to it; and it should be made available to them until they are fully certified and discharged by the therapist.

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<sup>33</sup> Libai, 'The Prosecution of the Child Victim of a Sexual Offense in the Criminal Justice System', 15 *WAYNE L. REV.* 977, 983 (1969)

<sup>34</sup><https://www.google.com.ng/search?q=compensation+for+victims+of+child+molestation&oq=compensation+for+victims+of+child+molestation+&aqs=chrome..69i57.19768j0j4&client=ms-android-tecno&sourceid=chrome-mobile&ie=UTF-8>

<sup>35</sup> Hanson, Resnick, Saunders, Kilpatrick, 1999