

**ROLE OF THE NATIONAL INDUSTRIAL COURT OF NIGERIA IN THE SETTLEMENT AND ADMINISTRATION OF CRIMINAL DISPUTES\***

**Abstract**

*It is the individual business or trade relationships that make up every modern economy. At the state level, organs and parastatals reach different agreements in carrying out their functions. In these unending activities and processes, friction may ensue. There may be misunderstandings, or outright relegation from responsibilities. It is for this purpose that the National Industrial Court was established; to have jurisdiction to determine issues and matters arising from business relationships. It is necessary for a lawful and friendly business environment. The Third Alteration Amendment Act 2010 did not only restate the civil jurisdiction of the National Industrial Court, but it also went as far as conferring upon it, the power to hear and decide criminal matters. This paper posits that the National Industrial Court has an important role to play in the administration of criminal disputes to facilitate trade relations and economic development. The court, in its role in the administration of criminal disputes, will guarantee liberty in labour, enhance social order in workplaces, and promote trade and industry.*

**Keywords:** Criminal Disputes, Settlement and Administration, National Industrial Court, Labour.

**1. Introduction**

In the affairs of men, especially as it concerns economic interests, the confidence that the actions of others are predictable to a great extent facilitate trade and industry. It is this certainty in transactions that the National Industrial Court (NIC) was established to provide, so that where the expected outcome falls short, the party can seek redress. It is particularly so given the growing complexity of commerce, with attendant crimes emanating from trade relations. Under the Trade Disputes Act 1976, a trade dispute was defined to mean any dispute between employers and workers or workers and workers which was connected with the employment or non-employment and physical conditions or work of any person. A crime is any act or omission which the law has declared to be an offence with penalty attached. In this context, criminal dispute involves those acts committed or omission made in the course of trade or labour and which the law declares to be a crime or an offence and the penalty thereof. Unlike the civil labour disputes, criminal dispute is a public interest issue. The NIC is a specialized superior court of record which entertains matters bordering on employment and industrial relations, to enhance economic growth by ensuring orderliness in the labour market. It was established pursuant to Section 19(1) the Trade Disputes Decree No. 7 of 1976. Under the Trade Dispute Act (TDA).<sup>1</sup> The jurisdiction of the Court included the making of awards for settling trade disputes and determining questions regarding the interpretation of any collective agreement and any award made under an arbitration tribunal.<sup>2</sup>

**2. The Establishment of the National Industrial Court of Nigeria**

Prior to the establishment of the National Industrial Court (NIC), the resolution of trade-related disputes had undergone different stages of evolution. Under the 1941 and 1951 Trade Disputes Ordinances, there was voluntary option opened to disputing parties.<sup>3</sup> The government subsequently made intervention in trade disputes mandatory by enacting laws which prescribed procedures for the resolution of trade and industrial disputes such as the Trade Disputes (Emergency Provisions) Decree No. 21, 1968 and the Trade Disputes Emergency Provisions (Amendment) Decree No. 2 1969.<sup>4</sup> The 1968 Decree for the first time in Nigeria restricted the right of workers to take part in a strike action and the right of employers to lock out their workers. In the event of a trade dispute, either party was compelled to declare it to the commissioner of labour who could appoint a conciliator to assist both sides to reach settlement.<sup>5</sup> On the other hand, the 1969 Decree totally banned strikes and lockouts through Nigeria.<sup>6</sup> These later enactments were retained in the Trade Disputes Act which established two judicial institutions for the settlement of industrial disputes, namely, the Industrial Arbitration Tribunal (IAT) and the National Industrial Court (NIC).<sup>7</sup>

The status of the NIC was, for a long time, a victim of serious practical confusions. The enactment of the National Industrial Court Act 2006 made the NIC a superior court of record and Section 2 by fiat abated the jurisdiction of the Federal High Court, the State High Court and the High Court of the Federal Capital Territory, Abuja to entertain labour or industrial disputes or any matter related thereto except where such matters were part-heard.<sup>8</sup> The issue of being a superior court of record was inconsistent with Section 6(5) of the Constitution whereunder the list of Nigeria's

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<sup>1</sup> Section 19(1) the Trade Disputes Decree No. 7 of 1976

<sup>2</sup> O. O. Oluwandusin, *National Industrial Court: Court with a Difference and the Need to Review Its Legal Status*

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

superior courts of record is enshrined, of which the National Industrial Court was not one of them. This conflict did not help matter either. In *National Union of Electricity Employees v. Bureau of Public Enterprise*<sup>9</sup>, the issue arose for determination as regards the place of the NIC compared with the constitutionally created superior courts of record. The Supreme Court ruled against the NIC to the effect that the NIC did not operate to curtail the jurisdiction of the High Court, the latter being amendable only by the Constitution itself and not by any Act. At present, this issue has long been laid to rest by the Constitution of the Federal Republic of Nigeria (Third Alteration) Amendment Act, 2010, which incorporated the establishment of the National Industrial Court, its composition and powers like other superior courts of record into the provisions of the Constitution. Specifically, Section 254C (1) reaffirmed and reinforced the status and the jurisdiction of the National Industrial Court as contained in the National Industrial Court Act 2006. The NIC is made up of the President of the National Industrial Court and such numbers of judges as may be prescribed by an Act of the National Assembly but must not be less than twelve judges.<sup>10</sup>

### 3. The Civil Jurisdiction of the National Industrial Court

The concept of jurisdiction has been defined as a court's power to decide a case or issue a decree. It is the authority which a court has to decide matters that are litigated before it, or to take cognizance of the matters presented in a formal way for its decision. The provisions of the National Industrial Court Act regarding the jurisdiction of the Court have been reinforced under Section 254C (1), (2) of the 1999 Constitution (Third Alteration) Act 2010. Accordingly, the provision of section 254C (1) of the Constitution (Third Alteration) Amendment Act, 2010 conferred jurisdiction on NIC provides as follows:

- Notwithstanding the provisions of sections 251, 257, 272 and anything contained in this Constitution and in addition to such other jurisdiction as may be conferred upon it by an Act of the National Assembly, the National Industrial Court shall have and exercise jurisdiction to the exclusion of any other court in civil causes and matters-
- A. relating to or connected with any labour, employment, trade unions, industrial relations and matters arising from workplace, the conditions of service, including health, safety, welfare of labour, employee, worker and matters incidental thereto or connected therewith;
  - B. relating to, connected with or arising from Factories Act, Trade Disputes Act, Trade Unions Act, Labour Act, Employees' Compensation Act or any other Act or Law relating to labour, employment, industrial relations, workplace or any other enactment replacing the Acts or Laws;
  - C. relating to or connected with the grant of any order restraining any person or body from taking part in any strike, lock-out or any industrial action, or any conduct in contemplation or in furtherance of a strike, lock-out or any industrial action and matters Connected therewith or related thereto;
  - D. relating to or connected with any dispute over the interpretation and application of the provisions of Chapter IV of this Constitution as it relates to any employment, labour, industrial relations, trade unionism, employer's association or any other matter which the Court has jurisdiction to hear and determine;
  - E. relating to or connected with any dispute arising from national minimum wage for the Federation or any part thereof and matters connected therewith or arising there from;
  - F. relating to or connected with unfair labour practice or international best practices in labour, employment and industrial relation matters;
  - G. relating to or connected with any dispute arising from discrimination or sexual harassment at workplace;
  - H. relating to, connected with or pertaining to the application or interpretation of international labour standards;
  - I. connected with or related to child labour, child abuse, human trafficking or any matter connected therewith or related thereto;
  - J. relating to the determination of any question as to the interpretation and application of any-
    - I. collective agreement;
    - II. award or order made by an arbitral tribunal in respect of a trade dispute or a trade union dispute;
    - III. award or judgment of the Court;
    - IV. term of settlement of any trade dispute;
    - V. trade union dispute or employment dispute as may be recorded in a memorandum of settlement;
    - VI. trade union constitution, the constitution of an association of employers or any association relating to employment, labour, industrial relations or work place;
    - VII. dispute relating to or connected with any personnel matter arising from any free trade zone in the Federation or any part thereof;
  - K. relating to or connected with disputes arising from payment or nonpayment of salaries, wages, pensions, gratuities, allowances, benefits and any other entitlement of any employee, worker, political or public office

<sup>9</sup> (2010) 7 NWLR (Pt. 1194) 538 at 575 paras. C-F, Chukwumah – Eneh, J.S.C

<sup>10</sup> Section 254A(1)2(A)(B) of the CFRN (Third Alteration)

holder, judicial officer or any civil or public servant in any part of the Federation and matters incidental thereto;

L. relating to-

- i. appeals from the decisions of the Registrar of Trade Unions, or matters relating thereto or connected therewith;
- ii. appeals from the decisions or recommendations of any administrative body or commission of enquiry, arising from or connected with employment, labour, trade unions or industrial relations; and
- iii. such other jurisdiction, civil or criminal and whether to the exclusion of any other court or not, as may be conferred upon it by an Act of the National Assembly;

M. relating to or connected with the registration of collective agreements.<sup>11</sup>

The NIC has original and appellate jurisdictions over labour-related matters as listed above. Its appellate jurisdiction is on ‘appeals from the decisions of the Registrar of Trade Unions, or matters relating thereto or connected therewith; appeals from the decisions or recommendations of any administrative body or commission of enquiry, arising from or connected with employment, labour, trade unions or industrial relations.’<sup>12</sup> The court is further conferred with appellate and supervisory jurisdiction in matters listed in section 254C (3) of the CFRN (Third Alteration):

The National Industrial Court may establish an Alternative Dispute Resolutions Centre within the Court premises on matters which jurisdiction is conferred on the court by this Constitution or any Act or Law: provided that nothing in this subsection shall preclude the National Industrial Court from entertaining and exercising appellate and supervisory jurisdiction over an arbitral tribunal or commission, administrative body, or board of inquiry in respect of any matter that the National Industrial Court has jurisdiction to entertain or any other matter as may be prescribed by an Act of the National Assembly or any Law in force in any part of the Federation.<sup>13</sup>

The right of appeal against the decisions of the NIC is limited to fundamental rights and criminal disputes emanating from those civil matters which the NIC has exclusive jurisdiction. In all other instances, an aggrieved litigant can only appeal against the decision of NIC only with the leave of the Court of Appeal where the enabling Act or Law prescribes an appeal.

#### **4. The Administration of Criminal Dispute and the National Industrial Court of Nigeria**

The power of the NIC to sit over criminal disputes is pursuant to the Third Alteration Act. It states that ‘the National Industrial Court shall have and exercise jurisdiction to the exclusion of any other court in civil causes and matter... and such other jurisdiction, civil or criminal and whether to the exclusion of any other court or not, as may be conferred upon it by an Act of the National Assembly.’<sup>14</sup> This implies that the National Assembly may confer on the NIC exclusive criminal jurisdiction if the National Assembly deems it proper. Specifically, subsection 5 of section 254C of the 1999 Constitution provides that, ‘The National Industrial Court shall have and exercise jurisdiction and powers in criminal causes and matters arising from any cause or matter of which civil jurisdiction is conferred on the National Industrial Court by this section or any other Act of the National Assembly or by any other law.’<sup>15</sup>

This provision entails that the criminal jurisdiction conferred on the NIC is only in respect of the criminal matters that may arise from any of the items or matters over which civil jurisdiction has been conferred on the NIC by the Constitution and not general criminal jurisdiction created by the Criminal Code or Penal Code. Consequently, the NIC has jurisdiction to hear matters relating to child labour, child abuse and human trafficking given that section 254C (1) (i) of the 1999 Constitution confers on the NIC exclusive civil jurisdiction over issues of child labour, child abuse and human trafficking. This role to adjudicate on criminal issues in this respect is concurrent with the powers of the High Courts to hear and determine offences committed under sections 21 and 22 of the Child Rights Act, which prohibits child marriage; section 24 of the Act, which prohibits subjecting a child to tattoos or marks; section 25, which prohibits the exposure of children to narcotics and activities relating thereto; and section 26, which prohibits the use of children in criminal activities. The second arm of the criminal jurisdiction conferred on the NIC by virtue of section 254C(5) of the Constitution (as amended) relates to offences created by relevant labour related statutes such as the Factories Act, Labour Act, Trade Disputes Act, Trade Unions Act, Workmen’s Compensation Act or any other Act or Law relating to labour, employment, industrial relations, workplace or any other enactment replacing the Acts or Laws. In this paper, I have considered two common crimes related to labour and employment.

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<sup>11</sup> Section 254C (1)A-M of the CFRN (Third Alteration) Amendment Act 2010

<sup>12</sup> Section 254C(1)(K) I of the CFRN (Third Alteration) Amendment Act 2010

<sup>13</sup> 254C (3) of the CFRN (Third Alteration) Amendment Act 2010

<sup>14</sup> 254(C)(1)(l)(iii) of the CFRN (Third Alteration) Amendment Act 2010

<sup>15</sup> Section 6 of the Third Alteration Act

## 5. Sexual Harassment at Workplace

In the course of employment and trade relations, the offence of sexual harassment maybe committed. This issue, in fact, is not novel in our jurisdiction. Presently, there is no labour law criminalizing sexual harassment in Nigeria. As noted earlier, being a subject matter over which the NIC has civil jurisdiction under section 254C(1)(g), sexual harassment can itself constitute a crime. Accordingly, the NIC would also exercise jurisdiction under section 254C (5). The recent Me-Too Movement raised public awareness to the inconvenient truth that there is a prevalence of non-consensual sex, sexual abuse and sexual harassment in the workplace which has rendered the workplace a hostile and unsafe environment.<sup>16</sup> According to the International Labour Organization (ILO), sexual harassment is a sex-based behaviour that is unwelcome and offensive to its recipient.<sup>17</sup> It is inappropriate and creates a hostile, unstable and offensive work environment. The Violence Against Person Prohibition Act 2015 (applicable in FCT, Lagos, and some other states) defines sexual harassment as ‘unwanted conduct of a sexual nature or other conduct based on sex or gender which is persistence, serious and demeans, humiliates or creates a hostile or intimidating environment and this may include physical, verbal or non-verbal conduct.’<sup>18</sup> Examples are: the exchange of sexual favour for work-related favour, asking a colleague to hug you against their wish, inappropriate and suggestive touching, or kissing. Some of these acts can properly be prosecuted as indecent assault.<sup>19</sup> Although they are crimes, they are labour related matters and are within the concurrent jurisdiction of the NIC.

## 6. Child Abuse, Child Labour and Human Trafficking

As civil matters, the NIC enjoys exclusive jurisdiction in child abuse, child labour and human trafficking issues pursuant to section 254C (1)(i) of the Constitution (as amended). Because they can also be criminal, they form part of those criminal causes and matters arising from any cause or matter of which civil jurisdiction is conferred on the National Industrial Court. Child labour as a crime is also part of the matter over which the NIC has jurisdiction by creation of statute like the Labour Act. This provision reiterates the invaluable role of the NIC in criminal disputes. At the 2023 World Day Against Child Labour, the federal government dropped a staggering figure of 43% as the number of Nigerian children that are engaged in child labour.<sup>20</sup> These children are working under conditions harmful to their development. Among others, section 28 of the Child Rights Act criminalizes child labour in the following terms:

- (1) Subject to this Act, no child shall be-
  - a. subjected to any forced or exploitative labour; or
  - b. employed to work in any capacity except where he is employed by a member of his family on light work of an agricultural, horticultural or domestic character; or
  - c. required, in any case, to lift, carry or move anything so heavy as to be likely to adversely affect his physical, mental, spiritual, moral or social development; or
  - d. employed as a domestic help outside his own home or family environment.
- (2) No child shall be employed or work in an industrial undertaking and nothing in this subsection shall apply to work done by children in technical schools or similar approved institutions if the work is supervised by the appropriate authority.<sup>21</sup>

Sections 59, 60, and 61 of the Labour Act contain similar provisions.

## 7. Case Studies of *FRN v Ogieriakhi Joyce Amenze*<sup>22</sup>, and *A.G. Federation v Ubah Joy Chioma*<sup>23</sup>

The National Industrial Court has in these two cases exercised its role in two respective ways in the administration of criminal disputes. In the 2022 case of *FRN v. Ogieriakhi Joyce Amenze*, the facts were as follow; the complainant vide a charge sheet and proof of evidence dated 26<sup>th</sup> of November 2021, initiated a charge against the defendant in the Benin Division of the NIC. She was charged for recruiting her victim, Blessing Sule and five other girls for prostitution in South Africa and thereby committed an offence contrary and punishable under section 16(1) of the Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015 (TIPPEA). The National Agency for Prohibition of Trafficking in Persons (NAPTIP) intercepted the victims at the Lagos Airport. The victims had been deceived to believe that they would engage in trades which will make them financially stable. The defendant had in fact promised that their Madam in South Africa would not deceive them. The girls were made to swear that they would not betray their Madam in South Africa. Halfway through trial, the defendant pleaded guilty. The provision

<sup>16</sup> Third Alteration Act, Section 245C (5)

<sup>17</sup> Templars Thought Lab, *Employers Responsibility for Dealing with Sexual Harassment in the Workplace*.

<sup>18</sup> Violence Against Person Prohibition Act 2015, Section 46

<sup>19</sup> Sections 353: ‘any person who unlawfully and indecently assaults any male person is guilty of a felony, and is liable to imprisonment for three years....’ See also section 360 of the Criminal Code.

<sup>20</sup> Ihechukwu Sunday, ‘FG’s Statistics on Child Labour Raises Concern’ *Daily Post*, July 28 2023.

<sup>21</sup> Child Rights Act, Section 28

<sup>22</sup> Suit No: NICN/BEN/1C/2021

<sup>23</sup> Suit No. NICN/OW/04/2015

under which the defendant was charged is section 16(1) of the Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015 which correlates with section 18(1) TIPPEA, where it is provided as follows:

Any person who organizes, facilitates or promotes foreign travels which promote prostitution or other forms of exploitation of any person or encourages such activity commits an offence and is liable on conviction to imprisonment for a term of not less than seven years and a fine of not less than One Million Naira.

Accordingly, the court verily assumed jurisdiction over the matter pursuant to section 254C (5) of the 1999 Constitution (Third Alteration) which provides that, 'The National Industrial Court shall have and exercise jurisdiction and powers in criminal causes and matters arising from any cause or matter of which civil jurisdiction is conferred on the National Industrial Court by this section or any other Act of the National Assembly or by any other law.' Remember that section 254C (1) had earlier given civil jurisdiction to the NIC in respect of matter '*connected with or related to child labour, child abuse, human trafficking or any matter connected therewith or related thereto*'

Delivering the judgement, His Lordship, Honourable Justice Adewemimo found that the defendant showed herself to be a major player in the crime of human trafficking. The court observed that human trafficking is the highest form of abuse and degradation of gender. To serve as a warning to others considering the common trend of human trafficking in our society and the fact that the defendant is deeply involved in the heinous crime with a wide range of international complicity, the court sentenced her to six months in correctional centre and a fine of One Million Naira.

In contrast, the NIC declined jurisdiction in the second case of *A.G. Federation v. Ubah Joy Chioma*. The accused person was arraigned on a one count charge of kidnapping of three-week-old baby from her parents contrary to and punishable under section 19(a) of the Trafficking in Persons (Prohibition) Law Enforcement and Administration Act 2003 at the NIC, Owerri Judicial Division. The relevant section provides that,

Any person who (a) takes or entices any person under 18 years of age or any person of unsound mind out of the custody of the lawful guardian of such person without the consent of the guardian or conveys any such person beyond the limits of Nigeria without the consent of someone legally authorised to give consent to such removal, commits an offence and is liable on conviction to imprisonment of 14 years without an option of fine.

The accused raised an objection to the jurisdiction of the National Industrial Court to hear and determine the charge. According to the defence counsel, section 245C (1) of the CFRN (Third Alteration) did not contemplate kidnapping. His Lordship, Honourable Justice O. Y. Anuwe delivered a razor-sharp judgement delineating the criminal jurisdiction of the NIC. According to him,

The entire provision of section 254C (1) of the CFRN 1999 deals with the civil jurisdiction of the court (NIC), which jurisdiction is exclusive. in subsection 5, this court is empowered to exercise criminal jurisdiction in respect of criminal causes arising and matters arising from the subject matters in subsection 1 of the section. The implication of these provisions is that before this court can assume criminal jurisdiction in any matter, it must be clearly shown that the criminal allegation or offence arose from or it is related or connected with the subject matters of the court's civil jurisdiction or there is any other law which conferred the criminal jurisdiction in respect of the offence on this court. I have earlier examined the provision of sections 33(1) and 64 of the Act which conferred jurisdiction to try offences under the Act on the Federal High Court, High Court of the Federal Capital Territory and the High Court of the State. This court is clearly not included. What is left to be determined now is whether it can be said in this case that the offence for which the accused is charged is connected with or related to the subject matter of section 254C (1)I of the CFRN. By virtue of subsection 1(i) of section 254 of the CFRN, this court can only assume jurisdiction to try the offence alleged against the accused person if the offence is connected with child labour, child abuse or human trafficking. ... from the documents available before this court, there are no facts therein to suggest that the accused involved the baby in child labour, child abuse or trafficked the child. I cannot find any fact also to suggest that the accused kidnapped the child with the purpose of enslaving the child, using the child for labour or to sell the child as to bring the case within the ambit of the criminal jurisdiction of this court. The offence alleged against the accused is strictly the offence of kidnapping as could be read from section 19(a) of the Trafficking in Persons (Prohibition) Law Enforcement and Administration Act 2003. This offence is not contemplated in subsection 1 (i) of section 254C of the CFRN. It is my view that that provision cannot be expanded to accommodate every situation just because a child is involved.

His Lordship continued by finding that there is a clear-cut difference between child labour, child abuse, human trafficking and kidnapping. According to him,

Child labour is employment of a person under the age of majority as a worker and such situation will include slavery, sale and trafficking in children, forced or compulsory labour and use of children in prostitution, drug trafficking or any work that will jeopardize their health, safety or morals. ... similarly, human trafficking as used in section 254C (1)I of the CFRN will involve the trading in or selling of human beings for purpose of being used for labour. In section 19(1)(a) of the Trafficking in Persons (Prohibition) Law Enforcement and Administration Act 2003, the offence of kidnapping is committed when a person takes another person who is under eighteen years of age out of the custody of the lawful guardian of such person without the consent of the guardian. From the foregoing, clearly, the matters on which this court may exercise its criminal jurisdiction arising from the subject matters of subsection 1 (i) of section 254C of the CFRN are different from the offence of kidnapping with which the accused person is charged before this court. Consequently, I hold that this court lacks the jurisdiction to try the accused person for the offence she is charged with.

Accordingly, that case ought to have been brought before the Federal High Court, FCT High Court or State High Court. For the purpose of settling criminal disputes under section 254C(5) of the Constitution (as amended), the President of the NIC may hear and determine or assign a single judge of the court to hear and determine such matters. The NIC may also apply the provisions of the Criminal Code, Penal Code, Criminal Procedure Code and the Evidence Act as the case may be. It also has all the powers of a High Court while sitting on a criminal case and appeal shall lie from its decision to the Court of Appeal as of right. In essence, the National Industrial Court, in its administration of criminal disputes, will guarantee liberty in labour, enhance social order in workplaces, and promote trade and industry.

### **8. Challenges and Prospects**

In considering the role of the NIC in the settlement of criminal disputes, the first issue that comes to mind is the problem of accessibility to the NIC since the NIC currently has limited number (8) of divisions across the federation. Secondly, family court, being more private, may be more appropriate than the NIC to handle criminal issues of child abuse. It is for the ease of business that the NIC specifically exists, thus, opening the doors of the NIC to criminal disputes may overflow it with many cases and render it less efficient, especially as labour matters require speedy settlement. In any case, the NIC may circumvent the challenge of accessibility and privacy in child-related cases by invoking its powers under section 254C (3) of the Constitution which allows it to create and refer disputes to ADR. Furthermore, the labour courts of other jurisdictions like Australia and Kenya also have criminal jurisdictions.<sup>24</sup> Therefore, while specialization could be more desirable regarding labour disputes, it would require much more time to truly assess the effectiveness of the role of the NIC in settling criminal disputes. In the meantime, the NIC has showed that like the High Courts, it can effectively deal with criminal disputes which are within the reach of its jurisdiction.

### **9. Conclusion**

The growing complexity of commerce and labour has been attended by increased crimes in the relationship of men and their business transactions. It, therefore, though not an absolute necessity, makes it laudable that the National Industrial Court is now adorned with criminal jurisdiction. It is not an absolute necessity since this jurisdiction is concurrent with the High Courts, especially as it could be argued as a distraction from the specialization in labour disputes. In any case, it is a step in the right direction. The effectiveness of business relationships is dependent on the National Industrial Court, consequently, its role is paramount, not just in its civil jurisdiction but in criminal dispute to create a safe workplace and good business relations and thus, promote the aggregate economy of Nigeria.

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<sup>24</sup> V.O. Ayeni, *A Critical Examination of the Criminal Jurisdiction of the National Industrial Court of Nigeria*, May 2019.