The Right of Women to Inheritance Under Nigerian Customary and Islamic Law: A Comparative Analysis and The Case for Reform

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Abstract
Prior to the establishment of formal law in Nigeria, customary norms governing the devolution of a deceased person's estate existed as unwritten practice long before they hardened into binding custom. Many of these customary rules of inheritance, however, no longer withstand constitutional scrutiny, particularly as they concern women. Customary law typically directs a deceased person's estate toward male descendants and relatives, often excluding wives and daughters from land and other immovable property altogether. This article examines, on a comparative basis, how inheritance is treated under Yoruba, Igbo, Hausa and Benin customary law, under Islamic (Sharia) law, and under the Nrachi (Idegbe) custom practised in parts of Igbo-speaking Nigeria, drawing on statute, decided cases and the established secondary literature on Nigerian customary and Islamic succession law. Using a doctrinal and comparative method, the article shows that while the position of daughters has improved under Yoruba customary law and the position of widows and daughters is comparatively more protected under Islamic law, widows remain almost uniformly excluded from inheriting their husbands' estates across the customary systems examined, and are in several of them treated as part of the estate to be inherited rather than as inheritors. The article argues that these patterns amount to a continuing violation of women's fundamental rights to equality and non-discrimination, and that the disparity between what formal constitutional guarantees promise and what customary practice delivers calls for sustained legal reform.

Keywords: *women's inheritance rights, Nigerian customary law, Islamic law, Sharia, gender discrimination, legal reform*

1.0 Introduction

Despite Nigeria's ratification of international instruments aimed at curbing gender inequality, women continue to be disadvantaged in matters of intestate succession. Customary laws of inheritance in most parts of Nigeria deprive women of the right to inherit in their capacity as wives and daughters, often leaving widows and children in need and constituting, in effect, a form of social injustice against women. In almost every part of the country, women continue to experience discriminatory treatment arising from customary practice; in several systems a woman is still, in substance, treated as a minor with respect to her late husband's or father's estate. This pattern is compounded by patriarchal traditions that shape how a woman's fundamental rights are understood and applied in practice, notwithstanding legislative efforts at the international, regional and national levels to address gender inequality.

Gender inequality of this kind is a human-rights concern in its own right, and exclusion from property rights also carries implications for women's broader social and economic security. Widowhood, which ought to attract sympathy and support, is for many Nigerian women compounded by deprivation and helplessness arising from customary practice. The girl child fares little better: her entitlement to her father's property is frequently discounted simply because of her sex. Most systems of customary inheritance in Nigeria rest on a patrilineal structure in which property rights are held and transmitted through male family members; in parts of Eastern Nigeria, for instance, women are reported to be permitted to farm land allotted to them but not to inherit land from either their fathers or their husbands.

In matters of inheritance and succession, which this article mainly examines, attention under customary law is directed overwhelmingly to male family members, to the exclusion of female members, notwithstanding constitutional guarantees of non-discrimination.

1.1 Background to the Study

Most Nigerians remain largely unaware of the legal rules that govern their private affairs until a dispute arising from those rules affects them or their relatives directly; the law of inheritance is one such area of general unfamiliarity or indifference. Many Nigerians contract marriage under customary law, so that on intestacy, customary rules of succession, rather than statute, govern the distribution of the estate. Because Nigeria has as many variations in customary inheritance practice as it has ethnic groups, these rules differ markedly from one community to the next, though they are predominantly patrilineal. Succession under native law and custom is determined primarily by the custom of the deceased's place of origin and not by the deceased's place of residence or the location of the property, and the practice generally conforms to the primogeniture rule, under which the eldest child, usually the eldest son, inherits the family house and holds it in trust for the other children regardless of their sex.

Many of Nigeria's customary inheritance rules therefore deprive women of the right to inherit the estates of their deceased husbands or fathers. Some men are aware of this and take no steps to alter the position, whether from indifference or from an assumption that relatives will provide for their widow and children after their death; in practice, however, relatives entrusted with an estate not infrequently convert it to their own use, leaving widows and children in destitution. There is accordingly a need to draw attention to the unfairness of customary rules that deny widows and daughters the right to inherit, and to the hardship that such rules visit upon the women affected.

1.2 Statement of the Problem

Disinheriting women from their deceased fathers' or husbands' estates on the ground of their sex, under customary rules still prevalent in many parts of Nigeria, amounts to a disregard of constitutional guarantees and a breach of fundamental rights. Although some states have enacted legislation expressly abolishing such discriminatory customs, awareness of these statutory protections remains low, so that in practice many women have yet to benefit from them.

1.3 Objectives of the Study

This article pursues the following objectives: (i) to highlight the discrimination that customary and traditional inheritance practices impose on women; (ii) to evaluate the adequacy of the rules governing women's inheritance rights among a number of Nigerian ethnic groups; (iii) to identify the gains that Islamic law offers women in matters of inheritance by comparison with customary and traditional practice; and (iv) to make the case for reforming or abolishing customary rules of inheritance that discriminate against women.

1.4 Scope of the Study

The study is confined to an examination of customary and Islamic rules of inheritance as they affect women under Yoruba, Igbo, Hausa and Benin customary law, and under Islamic (Sharia) law, together with the Nrachi (Idegbe) custom practised in parts of Igbo-speaking Nigeria. It draws out the adverse effects of these rules on women and situates them against the constitutional guarantee of non-discrimination, with a view to making the case for reform.

1.5 Methodology

The research is doctrinal and comparative. Secondary sources were principally relied upon, including law textbooks, manuals and handbooks on customary law, journal articles, statutes and decided cases drawn from across the ethnic groups covered by the study.

1.6 Literature Review

A substantial body of scholarship addresses customary inheritance among the Igbo, Benin and Yoruba peoples of Nigeria, generally as chapters within broader treatments of customary law, family law or land law. Writers in this vein include Okoro, Obi, Okany, Oba and Oye, Nwabueze, Nwogugu, Animashaun, Oyeneyin, Yakubu and Osanwowa. Their consensus is that under Igbo, Benin and Yoruba customary law, wives are not entitled to inherit the real or personal property of their deceased husbands, though they may remain in the matrimonial house until remarriage or death, and that female children are generally not entitled to inherit a deceased father's real or personal property — save that, under Yoruba customary law, both male and female children may inherit personal property. Several of these writers do not criticise the discriminatory character of the rules they describe.

Nwogugu, Animashaun and Oyeneyin, by contrast, criticise these customary rules as inconsistent with the 1999 Constitution, though without proposing specific reforms. The manual of customary law compiled for the former Eastern Region of Nigeria, to which Obi contributed the preface, similarly states the applicable rules of succession across thirty-nine administrative divisions without subjecting them to critique, as does the handbook of Benin customs and usages issued under the authority of the Oba of Benin, which records urho (distribution per stirpes) as the sole recognised method of distributing a Benin estate without questioning the preference it accords to male children.

Ezeillo takes a more reform-oriented approach, proposing the harmonisation of received English law, local statute and customary law on inheritance, legal education for women, gender-sensitivity training for judicial and law-enforcement officers, and funding to support women contesting discriminatory inheritance rules. Clarke, Hogben, Ajayi and Holt trace the history of Islam and the introduction of Sharia in Kanem-Bornu and Hausa land, including the jihad of Usman dan Fodio; Bappa Mahmud and Tajudeen discuss the operation of Islamic law in the former Northern Region and the prospects for Sharia courts of appeal in the southern states, respectively. Chaudry, Gurin and Ati examine the inheritance rights the Qur'an accords to women and the rationale commonly offered for the larger male share, namely that Islam places greater financial responsibility for the family on men.

In the periodical literature, Onuoha criticises the general customary rule that a wife cannot inherit her husband's property as offensive to natural justice and recommends codification and harmonisation of the law, together with a continuing role for non-governmental organisations in public education; this article agrees with the latter point but takes the view that codification alone would secure certainty without necessarily improving women's substantive position. Opeloye addresses the prospects for Sharia implementation in south-western Nigeria, recommending inter-faith dialogue and dedicated Sharia panels; Sada examines the divine and human sources of Sharia and their relative rigidity and flexibility; and Edu criticises Igbo,

Benin and Yoruba customary rules of inheritance as unconstitutional and recommends legislation entitling a widow married under customary law to a share of her deceased husband's estate, extending beyond Igbo custom to all discriminatory customary systems of inheritance.

2.0 Customary and Islamic Inheritance in Nigeria: A Comparative Analysis

The right to inheritance in Nigeria differs from one ethnic group, state, region and even community to another. A deceased person's own custom generally governs succession to personal property, while immovable property, such as land and houses, is governed by the law of the place where the property is situated, on the principle of lex situs — a rule intended to limit conflicts between the many customary systems that apply across the country.

2.1 Inheritance Under Yoruba Customary Law

Under earlier Yoruba customary law, the eldest brother of a deceased person inherited absolutely, to the exclusion of the deceased's own children and wife or wives; this practice has since been departed from as repugnant to natural justice, equity and good conscience. The present position allows the deceased's children, whether male or female, to succeed to his property on intestacy, to the exclusion of other relatives — a position the courts have upheld in several decided cases. In Sule v Ajisegiri, the court rejected a claim that a male child was entitled to a larger share of the estate than his siblings, holding that the entitlement must be equal regardless of sex. In Ricardo v Abal, the court went further, holding that although a male child manages the estate as head, an older female child has the right of first choice on partition, so that daughters have the same entitlement as sons to the family house and may remain in possession of it even after marriage. Where all the deceased's children are female, the eldest daughter may become the family head (Dawodu), as held in Abibatu v Flora Cole.

Two recognised methods of distribution apply among children under Yoruba customary law: idi-igi, under which an equal share is allotted to each wife's branch of the family where the deceased was polygamous, and ori-ojori, under which each child receives an equal per-capita share. Wives and widows, however, fare markedly worse than daughters. A widow has no right to inherit or administer her deceased husband's property; the Yoruba customary law treats her, in substance, as part of the estate to be inherited, a position confirmed in Suberu v Sunmonu and in Sungunro-Daves v Sungunro, where the court explained that devolution under Yoruba custom 'follows the blood' and therefore excludes a wife unless it can be shown that property given to her was an outright gift. The courts have likewise held, in Rabiu v Absi, that a wife's improvement of family property does not alter the property's character as family property. The cumulative effect is that, while daughters have gained a measure of inheritance right under Yoruba customary law, widows remain almost entirely excluded; it is accordingly more accurate to say that daughters, rather than women generally, enjoy a right of inheritance under this custom, and the unevenness between the two classes of women calls for reform.

2.2 Inheritance Under Igbo Customary Law

Igbo customary inheritance follows the principle of primogeniture and is primarily patrilineal: both control of, and title to, the estate pass to the eldest son (the okpala, diokpa or diokpala) or, failing a son, to the deceased's brother. The eldest son inherits the deceased's personal effects, his title if any, and the family dwelling (obi), and generally controls the distribution of land among his brothers, a position of trust he cannot be compelled to share and from which he cannot be removed even for incompetence. Where there is no male issue, a brother or uncle of the deceased inherits as trustee for the benefit of the family, rather than as a widow's or daughter's entitlement in her own right.

A widow's inheritance under Igbo custom is unknown; her interest in family land is one of possession only, conditioned on good behaviour and unaffected by whether she has sons. The Supreme Court confirmed this position in Nezianya v Okagbue, holding that a widow's long possession of her husband's property does not make her its owner and cannot be dealt with without the family's consent, and in Chinweze v Masi, holding that a widow has only a life interest in her deceased husband's property, which ceases on her own death, and no right at all to retain moveable property. The discriminatory character of this rule creates a practical incentive for women to bear sons, since a good relationship with a son is often a widow's only secure route to continued occupation of land.

2.3 Inheritance Under Hausa Customary Law

Hausa customary law is substantially shaped by Islamic law under the Sharia system, though a residual customary element (simpliciter) persists independently of religion, and a non-Muslim Northerner remains bound by indigenous custom rather than Sharia. Under the pre-Islamic Hausa native custom, as illustrated in Mohammadu v Mohammadu, young males and females alike were excluded from inheriting their deceased father's estate, on the rationale that only those able to fight and secure Gamima (war booty) should inherit; females were, in the earliest form of the custom, themselves objects rather than subjects of inheritance. Only adult sons and brothers of the deceased were entitled to inherit; females could inherit only the moveable property of their mothers, while land, whoever nominally owned it, could only be inherited by males within the family.

2.4 Inheritance Under Benin Customary Law

Benin (Bini) customary succession is also governed by primogeniture. The eldest son is entitled, without exception, to inherit the igiogbe — defined in Idehen v Idehen as the deceased's principal dwelling house and family seat — notwithstanding any contrary testamentary disposition or family arrangement; by section 3(1) of the Wills Law of the former Bendel State, a Benin man cannot dispose of his igiogbe by will to anyone other than his eldest son. The preference for the eldest son reflects both the practical responsibilities he is trained from an early age to assume for the wider family and his role in ancestral worship, from which women are excluded under Benin custom. A widow cannot inherit her deceased husband's intestate estate; she, too, is treated as part of the estate to be inherited by the son or another relative. The igiogbe does not vest in the eldest son until the deceased's final burial rites (ukomwen) have been performed. Under Benin customary law, in short, women generally, whether as daughters or as widows, do not inherit; only male children do, with the eldest son additionally assuming headship of the family.

2.5 Inheritance Under Islamic (Sharia) Law

Islamic law is treated under Nigerian law as a species of native law and custom requiring proof before the courts, notwithstanding the view of many Islamic scholars that Sharia is not customary law properly so called. Of the systems examined, Islamic law takes the most progressive view of women's inheritance rights: a widow or daughter is disinherited only where she has intentionally killed the person from whom she would otherwise inherit, on the settled principle that a person may not profit from his or her own wrongdoing. Islam treats the preservation of property as a cardinal objective and expressly entitles widows and daughters to succeed to definite, fixed portions of an estate; a validly married woman is entitled to a share of her husband's estate even where the marriage produced no issue, and the distribution of a deceased man's widows among his male relatives is forbidden.

Under Sharia's personal-law code, a female heir generally receives half the share of a male heir of the same degree. A widow is entitled to one-quarter of her deceased husband's estate where he leaves no descendants and to one-eighth where he does, a share divided among multiple widows where more than one survives him; a surviving daughter alone is entitled to half the net estate, where a surviving son alone would take the whole. These entitlements derive from the Qur'an: chapter 4, verse 7 establishes that both men and women share in what parents and near relatives leave behind, and chapter 4, verse 11 fixes the female child's share at half that of a male child of the same degree. While this scheme remains biased against women relative to men, and the disparity invites scrutiny against section 42 of the 1999 Constitution, it nonetheless secures Muslim women a more definite and enforceable entitlement than any of the customary systems examined above, even though it does not secure full equality.

2.6 The Nrachi (Idegbe) Custom

The Nrachi, or Idegbe, custom arises where a deceased person leaves no surviving male issue to inherit his estate. Under this custom, a daughter remains unmarried in her father's household in order to bear a son in her father's name, who will then succeed to the estate in her place under the ordinary rule of primogeniture; the daughter herself inherits the estate only as an intermediate step, on the premise that a man without a son has, in effect, lost his lineage. The custom was historically regarded as the sole route by which a daughter could inherit under customary law, but it does so by ceremonially transforming her, in a customary sense, into the equivalent of a son, at the cost of her right to marry. In Mojekwu v Mojekwu, Fabiyi JCA condemned the custom as a set of contradictions that modern society can no longer sustain, and the custom has rightly attracted criticism as discriminatory, as an infringement of the right to marry and of the right of association, and as inconsistent with the Constitution; it strips the woman concerned of the ordinary incidents of womanhood, including marriage, purely in order to serve a lineage-preservation function that a reformed law of inheritance could achieve without that cost.

3.0 Discussion: Discriminatory Inheritance Practice as a Violation of Women's Fundamental Rights

Human rights exist on the premise that each person is a moral, rational being entitled to be treated with dignity, and to deprive a person of a fundamental right is, in substance, to diminish that person's humanity. Rights of this kind are universal: they belong to every person simply by virtue of being human, and states bear a corresponding duty to respect, protect and fulfil them, which includes refraining from interfering with their enjoyment and taking positive steps to secure it. Women's rights, on this understanding, are not a separate or lesser category of right but the ordinary incidents of human rights applied without discount on the ground of sex — a proposition that remains, in the Nigerian customary-law context, more aspirational than descriptive. The Universal Declaration of Human Rights, adopted by the United Nations General Assembly in 1948, affirms that human rights apply to all without distinction of any kind, including sex, and nothing in that instrument confines its guarantees to men. In practice, however, tradition, prejudice and social, economic and political interest have combined to relegate women's claims to a secondary or 'special interest' status within human-rights discourse generally, a pattern that reflects and reinforces the broader gender inequality this article has traced through customary and Islamic inheritance law. Part of the explanation lies in the conventional division between a public sphere, treated as the domain of law and government, and a private sphere of family, home and sexuality, treated as largely immune from legal regulation; inheritance within the family has traditionally been located in the latter. As Hilary Charlesworth has observed, a state's failure to regulate what happens in the private

sphere, including a state's failure to criminalise female disinheritance, in effect supports and legitimates the power of husbands over wives and of male relatives over widows and daughters. Because disinheritance of this kind occurs between private individuals rather than between the citizen and the state, it has tended to escape the attention that the law gives to more visibly public abuses, leaving the gender-specific harm of disinheritance comparatively invisible within the law's protection.

Read together, the customary and Islamic systems examined above show a consistent pattern: with the partial exception of daughters under Yoruba customary law and of both widows and daughters under Islamic law, women are treated across these systems as part of the estate to be inherited rather than as persons capable of inheriting. That pattern persists notwithstanding the constitutional guarantee of non-discrimination and notwithstanding Nigeria's standing as a party to international human-rights instruments generally directed against sex discrimination. The disparity between the formal guarantee and the lived customary practice is, on the evidence reviewed here, the central problem this article has set out to establish.

4.0 Conclusion

This article has examined, on a comparative basis, how Yoruba, Igbo, Hausa and Benin customary law, Islamic (Sharia) law, and the Nrachi custom treat women's entitlement to inherit. Across the customary systems examined, widows are almost uniformly excluded from inheriting their husbands' estates and are, in several of these systems, themselves treated as part of the estate to be inherited; daughters fare somewhat better under Yoruba customary law, where they share equally with sons in a deceased father's estate, but fare no better than widows under Igbo and Benin customary law. Islamic law, by comparison, secures both widows and daughters a fixed, legally enforceable share of the estate, even though that share remains smaller than a male heir. The Nrachi custom, the sole avenue by which a daughter could inherit under certain Igbo-speaking communities' customary law, achieves this only by requiring her to forgo marriage and to be ceremonially treated as male, at a considerable cost to her person.

These findings support the view, advanced throughout the literature reviewed in this article, that customary rules of inheritance which exclude or disadvantage women are difficult to reconcile with the constitutional guarantee of equality before the law and with Nigeria's standing commitments to eliminate discrimination against women. Because this article has confined itself to the comparative customary and Islamic law position, it does not purport to evaluate in detail the specific international, regional and national legal instruments bearing on gender equality, nor the particular institutional and enforcement obstacles that a reform agenda would need to overcome; those questions properly belong to a fuller, follow-on study. What the comparative analysis here does establish is the underlying case for reform: that the gap between constitutional promise and customary practice, with respect to women's right to inherit, remains wide enough in most of the systems examined to warrant sustained legislative and judicial attention, including continued judicial willingness, as shown in several of the cases discussed above, to declare discriminatory customary rules repugnant to natural justice, equity and good conscience.

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