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The concept of social justice and a growing economy: Mimics from a colony

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The term social justice has received enormous attention worldwide due to its critical impact on economies. Whereas some studies consider it as a fundamental issue in the human race, others regard it as prerequisite to peace and tranquility to a modern society. Over the past five decades, social injustice has been on the ascendancy as emerging countries rely on developed countries for survival of their economies. Since these dependencies by poor countries come at a cost, the developing economies continue to expand in their debt ratio to developed countries. At least since the Second World War (1939-45) and in some cases since the beginning of the twentieth century, there has been a general widening of the gap between the rich and the poor with no signs of these income differences closing anytime soon. In an emerging economy with high prospects for developing human resources like Ghana, social justice is considered a bedrock for healthy and sustainable living conditions. However, there have been high levels of injustice measured in terms of income-related inequalities, notably in the ownership of capital and other assets, accessibility of variety of basic services and other benefits, and personal security that hitherto money could not buy. This paper examines the extent to which social injustice is perceived to be prevalent in the Ghanaian economy (once a colony).

Key words: Social justice, growth, economy, human resources.

INTRODUCTION

The term social justice has received enormous attention worldwide due to its critical impact on economies. Whereas some studies consider it as a fundamental issue in the human race, others regard it as a prerequisite to peace and tranquility to a modern society. The phenomenon has however been defined in diverse perspectives to reflect the various viewpoints authors assess it from. If liberals and conservatives, religious

fundamentalists and radical secularists and all manner of groups within society consider causes as socially just, then, how can one develop a common meaning of the term? However, most authors consider the concept of social justice as one which looks at fairness beyond individual justice. It should be noted that fairness may not be the same as justice; sometimes justice may be served but the fairness of such decisions are measured by the

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affected individuals. According to Craig et al. (2008), it is often seen these days as either a relic of the 1970s, or a catch-all used by conservatives and progressives alike. Baldry argues that we should all be demanding for the revival of social justice—that is, ensuring systemic and structural social arrangements to improve equality, as a core political and social value. Fundamentally, the concept ensures optimum balance between individuals' joint responsibilities as a society and their responsibilities as individuals to contribute to a just society. Many different ideas exist about where that optimum balance lies though; with the Ghanaian economy having mixed assertions of the concept of social justice due to experiences from the Colonial era to date.

Over the past five decades, social injustice has been on the ascendancy as emerging countries rely on developed countries for survival of their economies. Since these dependencies by poor countries come at a cost, the developing economies continue to expand in their debt ratio to developed countries. Reports from a 3-year Project undertaken by the International Forum for Social Development revealed that the rise in inequality in the distribution of income among people is well-documented and displays the characteristics of a trend, having affected large numbers of countries, from the poorest to the most affluent, during the past two decades. At least since the Second World War (1939-45) and in some cases since the beginning of the twentieth century, there had been a general widening of the gap between the rich and the poor with no signs of these income differences closing anytime soon.

In an emerging economy like Ghana with high prospects for developing human resources, social justice is considered a bedrock for healthy and sustainable living conditions. However, there have been high levels of injustice measured in terms of income-related inequalities, notably in the ownership of capital and other assets, accessibility of variety of basic services and other benefits, and personal security that hitherto money could not buy. An emphasis on equal access to opportunities and rights reflects an approach to social justice that focuses on ensuring that people are not excluded from life opportunities and the activities of society (such as health care, housing, employment, education), on an unfair basis (such as race, gender, ethnicity, age). The importance of equal access to opportunities and rights is enshrined in the Constitution of Ghana. The Ghanaian constitution thus prohibits discrimination against people on the basis of particular irreversible traits (e.g. race, gender, ethnicity, age).

There is also greater inequality in the distribution of opportunities for remunerated employment, with worsening unemployment and underemployment in various parts of the world affecting a disproportionate number of people at the lower end of the socio-economic scale (National Pro Bono Resource Centre Report, 2001). The

continual growth of the inequality gap between the richest and poorest countries, measured in terms of national per capita income, is overwhelming. This situation gives credence to the popular contention that 'the rich get richer and the poor get poorer', particularly within the present global context. Moreover, extreme or absolute poverty, experienced by those whose income is barely sufficient for survival, remains widespread. Penury levels have risen in the wealthiest countries, and in various parts of Africa, but have remained stable in Latin America and have declined in Asia (National Pro Bono Resource Centre Report, 2001). It is arguably evident in the emerging country circumstances that extreme poverty and its adverse implications affect a large proportion of the populace and most efforts by governments and international organizations to reduce poverty have thus far failed to produce the desired results. To a large extent, one may conclude that within the framework of the Charter of the United Nations and the Universal Declaration of Human Rights, the very existence, persistence, and the bedeviling consequences of extreme poverty constitute an injustice to society. These issues make it necessary for some research efforts to be channeled into assessing the perception of social injustice in emerging economies with the view to providing in-depth appreciation of the phenomenon and strategies to mitigating the effects of social injustice on the citizenry. This paper therefore provides empirical evidence on how injustice is perceived by the citizenry despite the constitutional framework to regulate justice to the core. Specifically, this paper examines perceptions of social injustice and how the perceptions differ among females and males, as well as the commonest form of perceived social injustice in the Ghanaian setting.

Historical developments of the concept of social justice

Social justice standards guide adjustments in social institutions that affect the distribution of socially available goods, and the costs of supplying those goods, across members of a society; they encompass contribution as well as access to goods and they focus on accountability of institutions to a political community (Meckled-Garcia, 2011). Even though the contemporary concept of justice—as having to do with all persons deserving a fair share of important social goods—is a relatively modern concept: the concept of social justice dates back to the early days (Fleischacker, 2005). The earliest recorded ideas of social justice primarily applied to individual persons or nations with the intention of remedying effects of hierarchical inequalities, particularly inherited inequalities. For instance, the Bible contains references to the Jubilee year when slaves were freed, debts and obligations were liquidated, and land was returned to original owners. This

redistribution was primarily between individuals and was not applied universally. Thus, the idea of social justice in the early days emphasized individual property rights and involved adjustments to ownership of property to alleviate some unfair situations. Interestingly, the concept considered redressing inequalities of individuals or nations within a categorized level of assessment where resources were distributed on the basis of social status or position in society. In the view of Fleischacker for example, equality and justice applied only to individuals who occupied the same stratum of the hierarchical social order, that is, unequals in the social hierarchy are to be treated unequally. Through the teachings of the world's great religions (including Judaism, Christianity, Islam and Buddhism), universal concepts of justice developed and emphasized the importance of sharing, equality of treatment, not profiting at the expense of disadvantaged groups in society, the evils of greed, and rulers behaving righteously, fairly and justly towards their people (National Pro Bono Resource Centre, 2001). Though this era experienced high standards of justice for all, the universal concept of justice reflected in these religions was undermined by religious institutions that preached the virtue and practiced the vice. These religions consequently formed strict hierarchies and their Proponents competed with each other for recognition and resources. This era was also characterized by women and lower classes not being seen as equal and with slavery being an integral part of society. Hierarchical religious institutions continued a social structure where there was unequal distribution based on what individuals deserved according to their social status or position in society.

In the early period of the 17th and 18th centuries, social justice was used to rationalize consolidation of state power under the authority of absolute monarchs. For instance, Hobbes (1679) saw the construction of an external authority (state or leviathan) was essential to the maintenance of a just society. The state would create and enforce laws and social norms to preserve peace and restrain humans from harming each other in the pursuit of self-interest and this concept of a just society was consistent with the emergence of commercial and industrialized capitalism (National Pro Bono Resource Centre, 2001). This concept of social justice emphasized collective/state responsibility to create a system of laws to stop people from harming each other. Rousseau et al. (1778) who followed him in the 'age of revolution' shaped the formation of modern institutions in the west with the view that the pursuit and realization of social justice was linked to the preservation of individual liberty or freedom, achievement of equality (of rights, opportunities and outcomes) and establishment of common bonds of all humanity. This era recognized the concept of social justice to emphasize individual liberties and equality of opportunity, rights and outcomes stressing the importance of human well-being.

Social justice in the contemporary era

The gap between ideals of social justice that developed in the preceding centuries, and the realities of persistent inequality and injustice, became more apparent in the 19th and 20th centuries. In reality, it was difficult to reconcile social equality with the preservation of individual liberties; the elites who dominated emerging nation states withheld political rights from the majority of the population (especially from women and people of colour) and ignored social/economic rights (National Pro Bono Resource Centre, 2001). Marx (1883) argued that humans did not have a fixed innate nature, but were instead defined by their social relationships, which in turn, were dependent on the economic structure of society and the classes it produced. The author rejected Hobbes' idea that injustice was caused by human competition, selfishness and aggression and argued that the roots of injustice lie in political-economic structures based on subjugation, discrimination, exploitation and privilege. Justice would prevail when individuals receive what they need on the basis of their humanity and not on what they deserved because of their social class origin or productivity. This idea of social justice emphasizes redistribution on the basis of human need and value, as opposed to what an individual deserves on the basis of social status or productivity.

Unlike the Ghanaian system and other systems within the African continent, there has been broad agreement in the west that social justice must incorporate various means of achieving fair distribution of societal goods with however different ideas about what constitutes a fair distribution. For instance, Mill (1871) argued that the distribution of societal goods should be for the 'greatest net balance of satisfaction' for society. Mill said that utilitarianism was actually a 'standard of morality' which used happiness of the greater number of people as its ultimate goal. Although in principle utilitarianism advocates for the greatest good for the greatest number of people in a society, some processes and decision making grounded on the logic of utilitarianism may result in the unfair treatment of vulnerable populations in society. For example, placing all mentally ill people in the Ghanaian society in a special institution may yield greater good for society but may reflect an unequal distribution on the basis of status as it is often the disadvantaged whose rights are sacrificed for the good of the privileged classes of society. Rawls (1971)'s concept of social justice is probably the most influential by criticizing utilitarianism as being able to be used to justify concentration of goods benefiting privileged classes of society on the basis that it was for the greater good.

Rawls' conception of social justice provides that all social goods are to be distributed equally unless an unequal distribution of any or all of these goods is to the least advantaged. Contrary to the arguments of Rawls,

Fraser (2003) considers social justice as a matter of recognition rather than distribution. She argues that social justice cannot only be about the distribution of a set of predefined rights and goods since the worth of rights and goods are defined by some underlying structures which tend to satisfy the interests of dominant groups in society. Even though Honneth (2003) admits Fraser's view of social justice, the author further advanced that it lacks the tools necessary to address cultural and economic injustices. Honneth argues that reciprocal recognition between subjects is a necessary precondition for unrestrained identity formation and self-realization in that when social relations of recognition lack reciprocity, those being subordinated perceive themselves as disrespected. These feelings of disrespect then spark and fuel struggles for recognition, aimed at creating or restoring the necessary conditions of reciprocity.

Even though several other theories of justice, including the capabilities approach, advance varying arguments to the concept, this paper uses a limited view of social justice which focuses on joint responsibility that involves creating fair institutions and institutional frameworks, for example creating a labour market with jobs that are socially inclusive and a system for providing adequate income and other support to those who are unable to work. Many would argue that this is the core of any concept of social justice: it is about making the systems and structure of society more just, rather than seeking justice in individual cases; and assumes the positive intervention of government (and other society leadership) to tackle structural inequalities (Young, 1987).

LEGAL FRAMEWORK OF SOCIAL JUSTICE IN SOME COMMONWEALTH AFRICAN NATIONS

Social justice is not just a social issue, it is backed by legal provisions. Justice is enshrined in constitutional, legislative and other regulatory mechanisms in various countries. To ensure that justice is served, most Commonwealth countries (e.g. Ghana, Nigeria, and South Africa) have several constitutional provisions that enforce justice. This section therefore examines the legal framework of Ghana, Nigeria, and South Africa.

Ghana

Chapter Six of the 1992 Constitution of Ghana provides directive principles for state policy with the view to providing guide for all people in the interpretation and enforcement of laws in the country and the scope of these principles span from social justice to freedom from discrimination. For instance, Article 35 of the Constitution provides a responsibility on government to promote a just and reasonable access by all citizens to public facilities

and services in accordance with law. The Constitution further states in Article 34 (5) that government endeavors to prohibit discrimination and prejudice on the grounds of place of origin, circumstances of birth, ethnic origin, gender or religion, creed or other beliefs.

To achieve the objectives stated in clause (5) above, the Constitution provides that the State shall take appropriate measures to: (a) foster a spirit of loyalty to Ghana that overrides sectional, ethnic and other loyalties; (b) achieve reasonable regional and gender balance in recruitment and appointment to public offices; (c) provide adequate facilities for, and encourage, free mobility of people, goods and services throughout Ghana; (d) make democracy a reality by decentralizing the administrative and financial machinery of government to the regions and districts and by affording all possible opportunities to the people to participate in decision-making at every level in national life and in government; and (e) ensure that whenever practicable, the headquarters of a Government or public institution offering any service is situated in an area within any region, taking into account the resources and potentials of the region and the area.

Nigeria

The Federal Republic of Nigeria is "a State based on the principles of democracy and social justice". The Constitution promises to all Nigerian citizens, justice encompassing the social, economic, political, equality of status, opportunity and the dignity of an individual. The 1999 Constitution of Nigeria (as amended) reinforces the policy and legal basis of social Justice in Nigeria. The provisions, Fundamental Objectives and Directive Principles of State Policy serving as fundamental law propagating the concept of social justice per section 16 (sub-section 1) state that the State shall (a) harness the resources of the nation and promote national prosperity and an efficient, dynamic and self-reliant economy; (b) control the national economy in such a manner as to secure the maximum welfare, freedom and happiness of every citizen on the basis of social justice and equality of status and opportunity; (c) without prejudice to its right to operate or participate in areas of the economy, other than the major sectors of the economy, manage and operate the major sectors of the economy; and (d) without prejudice to the right of any person to participate in areas of the economy within the major sector of the economy, protect the right of every citizen to engage in any economic activities outside the major sectors of the economy. To achieve this effectively, the State shall direct its policy towards ensuring: (a) the promotion of a planned and balanced economic development; (b) that the material resources of the nation are harnessed and distributed as best as possible to serve the common good; (c) that the economic system is not operated in

such a manner as to permit the concentration of wealth or the means of production and exchange in the hands of few individuals or of a group; and (d) that suitable and adequate shelter, suitable and adequate food, reasonable national minimum living wage, old age care and pensions, and unemployment, sick benefits and welfare of the disabled are provided for all citizens.

Section 17 (sub-section 1 & 2) particularly emphasize that a “*State social order is founded on ideals of Freedom, Equality and Justice*” in which (a) every citizen shall have equality of rights, obligations and opportunities before the law; (b) the sanctity of the human person shall be recognized and human dignity shall be maintained and enhanced; (c) governmental actions shall be humane; (d) exploitation of human or natural resources in any form whatsoever for reasons, other than the good of the community, shall be prevented; and (e) the independence, impartiality and integrity of courts of law, and easy accessibility thereto shall be secured and maintained.

South Africa

The preamble to the South African Constitution proclaims that it was adopted to heal the divisions of the past and establish a society based on democratic values, social justice and fundamental human rights. This was to lay the foundations for a democratic and open society in which government is based on the will of the people and every citizen is equally protected by law; improve the quality of life of all citizens and free the potential of each person; and build a united and democratic South Africa able to take its rightful place as a sovereign state in the family of nations. The fundamental values of the constitution refer to (a) the achievement of equality, (b) non racism and non-sexism, and (c) a system of democratic governance that respectful, accountable, responsive and open. The importance of social justice is thus key to the transformative goals and processes of the South African constitution. For instance, the Chief Justice, Dikgang Moseneke, in his Fourth Bram Fischer Memorial lecture described the important role of social justice in constitutional adjudication explaining:

“...[I]t is argued here that a creative jurisprudence of equality coupled with substantive interpretation of the content of ‘socio-economic’ rights should restore social justice as a premier foundational value of our constitutional democracy side by side, if not interactively with, human dignity, equality, freedom, accountability, responsiveness and openness”.

Murray Wesson in his disagreement and the Constitutionalisation of social rights, stated that social rights/justice are likely regarded by many not as principles capable of constituting the political space but

rather as essentially political claims. In a similitude, social justice formed an issue of contention in *Occupies of 51 Olivia Road v City of Johannesburg*, (CCT 24/07 2008 ZACC 1.) on 19 February, 2008, the South African Constitutional Court handed down an important new decision on socio-economic rights. In this case, the city of Johannesburg approved a land mark settlement between the city of Johannesburg and resident of the several informal communities in Johannesburg, who had sought to prevent the city from evicting them as part of inner-city generation project. Rather than imposing a direct remedy, the court instead constitutionalized a novel engagement requirement in housing rights cases. Engagement which requires the government entities to consult with residents affected policy decisions that may involve eviction and publicly report on that process, offers a novel and potentially powerful mechanism for enforcing socio-economic rights that limits court intervention in policy decisions. The city of Johannesburg began as a series of emergency applications in the Witwatersrand High Court by the city of Johannesburg to evict over 300 people from six properties in inner-city Johannesburg. The residents of these buildings opposed the applications on several statutory and constitutional grounds, including the claim that the city failure to provide access to adequate housing as required in section 26 of the South African Constitution precluded their eviction.

Despite these constitutional provisions, unequal accessibility of a just society and a society devoid of discrimination on any count has always been blamed on lack of strong institutions to enforce the position of the law. The findings of this paper provide empirical evidence thereof.

Significance of the paper

There is growing interest in the concept of social justice across the globe with fewer contributions from the perspective of emerging economies. This paper therefore adds to the literature by providing an original piece that focuses mainly on how the phenomenon prevails in a once colony Ghana, now an emerging economy. Additionally, this paper provides in-depth understanding of the social justice concept and thus forms a solid basis for future research directions. Finally, the paper provides evidence to assist governments and other international organizations in policy directions to address the problem of social injustices within emerging economies.

METHODOLOGY

Research design/strategy

This paper employed a descriptive cross sectional survey approach. According to Saunders et al. (2007), descriptive survey focuses on the detailed description of the data, rather than giving mere

Table 1. Demographic characteristics of respondents.

Variable	Characteristics	Frequency	Percent
Gender	Male	53	46.1
	Female	62	53.9
Age	15-20	26	22.6
	21-25	21	18.3
	26-30	26	22.6
	31-35	14	12.2
	36-40	18	15.6
	41-45	6	5.2
	>45 years	4	3.5
Marital Status	Single	81	70.4
	Married	32	27.8
	Divorced	2	1.7

Source: Field data (2014).

Table 2. Gender difference in perception of social injustice.

Variables	Male N = 53		Female N = 62		t-vale	Df
	Mean	SD	Mean	SD		
Social injustice	4.00	0.693	4.22	0.527	-1.97	114

Source: Field data (2014).

explanation or drawing conclusions from the described data. The cross-sectional survey was chosen because data was collected from respondents at a snapshot. Using a stratified sampling technique, a total of 160 graduate students from the University of Ghana Business School constituted the accessible population for the study. This category of people was deemed appropriate to provide the requisite responses to the questions provided given their level of literacy and appreciation of the phenomenon. Using Krejcie and Morgan (1970)'s formulae for determining sample size for research, a sample size of 115 was estimated for the study. Thus 160 questionnaires were administered and 115 completed questionnaires were received indicating a response rate of 72%. The first part of the questionnaire requested respondents' biographic data to give an overview of the sample. The second part of the questionnaire asked respondents to assess how (on a scale of 1-5) their perception of social injustice within the Ghanaian economy was.

Analyses

In order to have a fair view of the sample characteristics, the biographic data (e.g. sex, age, marital status) of the respondents was analyzed and the results are shown in Table 1. Further, the paper sought to ascertain the difference in the level of social injustice with respect to gender (males and females). In order to explore this objective, independent samples t-test was employed to analyze the questionnaire items pertaining to social injustice among the respondents. First, the 10-item questionnaire was transformed into a composite browsing score. Thus, the average score for each individual respondent was computed for the t-test analysis. The outcome of the analysis is presented in Table 2.

With respect to the perception of injustice in Ghana, the respondents were given options ranging from unequal accessibility to

health care, education, employment opportunities, leadership positions, to decision making authority in society as the scope of social injustice. The respondents were thus given possible options (ranging from strongly disagree to strongly agree) to choose which of the alternatives best suited their perception. The responses were entered into Microsoft Excel software and the results were used to generate a bar chart as shown in Figure 1.

DISCUSSION

Table 1 revealed that the study was male dominated with an average age of 28 years. The average age provides valid evidence that the category of people sampled for the study may have witnessed the trend in the distribution of wealth and equal opportunity to fundamental necessities of life since constitutional rule in 1992, decades after emancipation from the colonial masters. As shown in Table 1, majority (70.4%) of the respondents were not married and this may be explained by the fact that the respondents were students and mostly people within the Ghanaian community will want to finish their education before settling down.

In order to examine the gender difference of the perception of injustice among the respondents, the independent samples t-test analysis was employed. As shown in Table 2, the analysis revealed a significant gender difference in respondents' perceptions of social injustice in the Ghanaian economy ($t(114) = .520, p < .05$). An observation of the mean differences showed

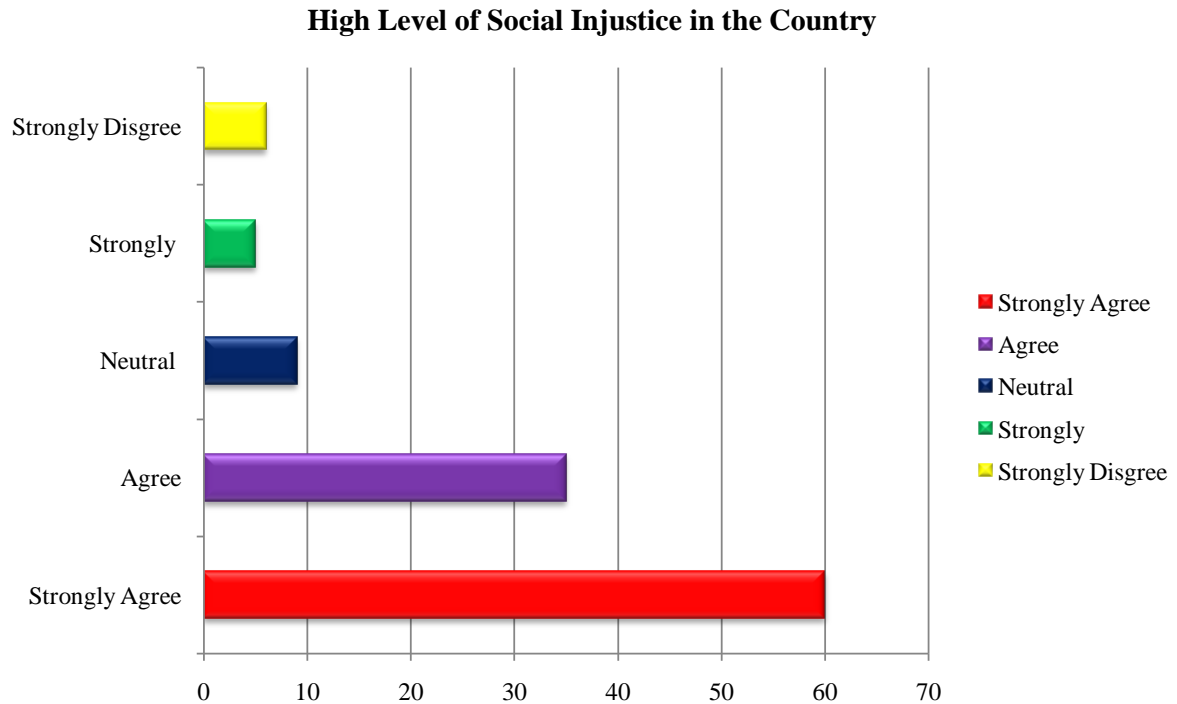


Figure 1. Perception of social injustice in Ghana. Source: Field data (2014).

that females ($M = 4.22$, $SD = .527$) to a large extent perceive that there is more social injustice in the Ghanaian economy than do the males ($M = 4.00$, $SD = .693$).

This finding makes practical sense in that females tend to be more vulnerable than men in the Ghanaian society and thus females are more likely to have the feeling of not getting equal access in the distribution of national wealth, opportunities, and basic needs as much as the males may perceive (Figure 1).

In order to identify the commonest form of injustice in Ghana, respondents were asked the form of injustice they perceive to be common. As shown in Figure 2, respondents indicated that amongst all the forms of injustice in Ghana, unequal access to employment tends to be the most prevalent followed by unequal access to education, leadership positions, decision making and health care in that order.

Even though the Constitution of Ghana provides for education to be made progressively free, there have been no attempts by the state to make this provision practicable as tuition fees in Schools keep increasing. Most of the top state positions are held by males, mostly not because they merit these positions but because of their affiliations with management. Health care was observed as the least unjust and this may be explained by some interventions such as the National Health Insurance Scheme by the state which makes accessibility to basic healthcare accessible and affordable to all Ghanaians. On the whole, this paper found that the

feeling of injustice in the Ghanaian setting as shown in Figure 1 is alarmingly high and this could have serious implications for industrial performance and overall national productivity. For instance, using UN sources on inequality across affluent nations, Wilkinson and Pickett (2009) compared each nation's level of income inequality (measured by the size of the gap in income between the wealthiest and poorest in society), with each other nation and with each nation's level of health and social problems. The issues they researched included physical health, education, housing, imprisonment, mental health, drug abuse, obesity, social mobility, trust and violence. They found that the outcomes for the more unequal countries were substantially worse on every count. Individuals who have the feeling of not being equitably and fairly treated by an organisation or a nation tend to dwindle in their commitment and/or patriotism to the entity or country. Thus, the individual will not give out the requisite efforts for business efficacy.

The findings of this paper should be of great concern to a developing economy like Ghana. In an environment where injustice is perceived by the people, they tend to exhibit behaviours which may be contrary to societal norms. For instance such people may exhibit poor attitude towards work in the organisations they find themselves. Consistent with the position of Honneth, the fact that people hold perceptions of injustice, it is probable that productivity will consequently suffer and it is not surprising that the country's national output has dwindled over the past few years.

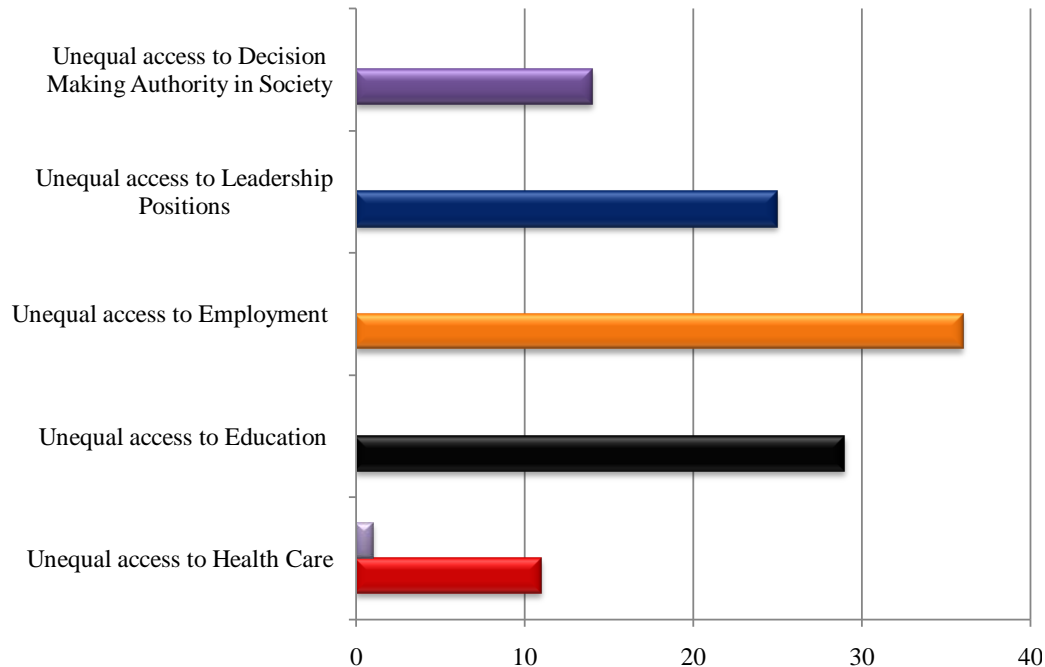


Figure 2. The commonest form of injustice in Ghana. Source: Field data (2014).

CONCLUSION AND RECOMMENDATIONS

An emphasis on equal access to opportunities and rights reflects an approach to social justice that focuses on ensuring that people are not excluded from life opportunities and the activities of society (such as health care, housing, employment, education), on an unfair basis (such as race, sex, age, religion). The importance of equal access to opportunities and rights has been recognized in international human rights and anti-discrimination legislation as well as the 1992 Constitution of Ghana which prohibits discrimination against people on the basis of particular immutable traits. The prevalence of social injustice despite the legal framework makes it worrying for the citizenry. Unless a conscious effort on the part of government to increasingly enforce these regulations and design programmes targeted at the less privileged in society, there will be little that other bodies may do to reduce the level of injustice in the social systems in the country.

Generally, governments both in developed and emerging economies tend to be the biggest stakeholder in the welfare of the citizenry. Governments, especially for emerging economies, must create social intervention programmes aimed at enhancing the economic standards of the less privileged so that they can access basic necessities of life. Accessibility to wealth of the state and other public offers should be based on meritocracy rather than relationship with authorities. The response to such an approach may not be radical; however the gradual

persistence and commitment to it would potentially diffuse the perception of injustice and instill in the people a high sense of patriotism. Patriotic people would exhibit discretionary behaviours which aim at treating and protecting state property as one's own-this behavior has the tendency to consequently improve national output and better the lives of the citizenry.

Conflict of Interests

The authors have not declared any conflict of interests.

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