

Cultural and Religious Influences on the Adoption of Relational Contracting Norms among Parties in Construction Projects in Northern Nigeria

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Abstract—Good relationship, among other things, between parties in the construction industry is vital for the success of any organization. In Nigeria, and particularly during the last two decades of democratic dispensation, several projects suffered setbacks due to a number of bad client /contractor relationships leading to project suspensions, terminations and disputes. Researches conducted elsewhere by a number of scholars have shown that Relational Contracting provides a viable solution to these problems because it recognizes the mutual benefits of all parties and win-win scenarios through more cooperative relationships between them. This work aims to investigate the Influence of Culture and Religion on the Adoption of relational contracting norms in Northern Nigeria. The population for this research comprised of stake holders in the construction companies operating in the three geo-political zones of Northern Nigeria. Purposive sampling technique was used for the study. Six different case studies of construction projects consisting of 90 interviews (Fifteen from six case studies) were undertaken. Data collection involving-structured interviews and questionnaires were adopted to satisfy the requirements of the study. Questionnaires and interviews were administered randomly on the management, other employees of the construction companies and construction stake holders in the study area. The influence of culture and religion in the development of relationships among parties was evaluated both statistically and literally. The results of the statistical analysis have shown that Islam and Christianity were the major religions of the construction parties in all the six case studies covered by this research; largely due to the religious background of the region. The religious and cultural backgrounds of the parties have been observed to play great roles in the development of good relationships. Among the Muslims, Islamic cultural and religious values have played significant roles. Several of the Hausa and Fulani norms have played significant roles in influencing relationships among the parties. The analysis of

variance (ANOVA) results shows that the Hausa Fulani norms influence the relations among parties in the Nigerian Construction Industry. Good relationships among construction parties developed from the interplay of a number of cultural and religious values. Religious etiquettes and Hausa Fulani cultural emotions were very important in relationship development. This study proposes a new relationship development model consisting of peculiar emotion and structural dimensions that is more suited to evaluate successful relations in construction projects in Northern Nigeria.

Keywords—*Construction Projects, Cultural and Religious Influences, Norms, Northern Nigeria, Parties, Relational Contracting*

Introduction

Nigeria, a federal republic with a population of over 200 million people as at 2019 (NPC 2019), and over 270 different tribal and cultural groups, presents a unique, but a diverse territorial entity. Nigeria, a country where more than 50% of the total populations were Muslims, 40 to 45% Christians and 5 to 10% practicing traditional beliefs represents a nation of religious diversity.

In Nigeria, and particularly during the last two decades of democratic dispensation, several projects suffered setbacks due to a number of bad client /contractor relationships leading to project suspensions, terminations and disputes. A survey conducted in the six north western states of Nigeria covered by the study involving stake holders indicated the influence of religious, social, political and economic factors on contractor/client relationships in the Nigerian construction industry. Examples abound in so many states of Nigeria. During this survey, participants were asked questions on culture, religion and their relationships vis-a-vis

interactions in the successful execution of contractual agreements among parties. They were also asked on their assessments of the nature and effects of the different cultural backgrounds of the parties on the performance of contracts and successful project execution and reasons for massive project failures observed in the region. To bring solutions to the existing problems among parties in the industry and create a harmonious relationship; the concept of Relational Contracting (RC) was proposed and brought into being. This is because researches conducted elsewhere by a number of scholars have shown that Relational Contracting provides a viable solution to these problems. This is because it recognizes the mutual benefits of all parties and win-win scenarios through more cooperative relationships between them. It also underpins various approaches, such as partnering, alliancing, joint venturing, long term contracting and other collaborative working arrangements (1; 8; 13, in 6). Representing a core element of mutual cooperation and team-working (11 in 6), RC provides the potential for contractual flexibility, improved relationships, and building team-working as observed by (4, 5). This study was designed to explore the dimensions of RC and its manifestation on the construction projects in Northern Nigeria.

Contracting Norms among parties in the construction industry have been as old as the industry itself, but little attention was given to it particularly in the context of national culture and in literature as observed by (9) in his works on Malaysia.

A number of attempts to fill this void by investigating how good relationships develop within construction projects have been undertaken elsewhere in Europe and some countries in Asia. Literature on this is meager or at least very few among African researchers. Different conditions have been evaluated based on regional peculiarities and circumstances. In the UK, for example, norms and traditions were considered, in other countries including Hong Kong and China these norms differ and vary generally. Most importantly, in none of these studies was religion considered as an important driving factor in the development of relations among parties. In Northern Nigeria particularly, with varied religious and cultural background, most relationships may be influenced by factors

linked to cultural and religious affiliations in addition to political, economic and other factors. Moreover, factors considered in most of these works elsewhere do not bear universal application as to bear relevance to situations obtained in this region. This research is intended to overcome the several shortcomings of the existing research particularly in the Nigerian and African socio cultural setting. This work therefore is an attempt to investigate the Nigerian situation.

The Research Methodology

This study is based on three research questions to address the deficiencies identified in existing works and to evaluate the Nigerian situation. These questions are: -

1. What are the Cultural and religious Processes by which relationships among parties develop in construction projects in Nigeria?
2. What are the Cultural and Religious factors that influence relationships among parties in the Nigerian construction industry?
3. How can these relational contracting norms be adopted in the different Cultural and Religious settings in Nigeria?

The population for the research was made up of stake holders in the construction companies operating in one of the three geo-political zones of Northern Nigeria (North East, North West and North central). Because an acceptable sample frame of contractors in the research area could not be obtained, questionnaires were administered purposively. Sample frames obtained from government ministries, departments and agencies do not distinguish between existing and closed or other kinds of contracting organizations. Secondly, contactors' contacts obtainable from these sources are not all current, making it impracticable to administer questionnaire on them. It is probable that some of the contractors in the lists obtained from these sources have either relocated or they have gone out of business. The researcher therefore used purposive sampling technique for the study. Six different case studies of construction projects consisting of 90 interviews (Fifteen from each of the six case studies) were undertaken. Data collection involving-structured interviews and questionnaires for a number of selected project case studies were adopted to satisfy the requirements of the study. For each case study, fifteen Questionnaires and interviews were

administered randomly on the management and other employees of the construction company. Data generated comprising of both qualitative and quantitative variables were sorted, summarized and a set of descriptive statistical techniques (percentiles and averages) used to present the results. Data generated was statistically analyzed for differences using Analysis of variance (ANOVA).

The Study Area: The Northern Nigeria Environmental and Religio-Cultural Setting

The Northern Nigeria is a fairly homogenous climatic region falling within the Sudano-sahelian vegetation belt of West Africa. A region occupied by the Hausa-Fulani and a multitude of other tribal and religious affiliations and ethnic groups is the extreme part of the country generally neighboring Chad, Cameroon and the Niger republics (3). This region shares common characteristics of climate, soil and vegetation but with diverse socio-cultural characteristics and economic structure. Hausa people, making up the largest inhabitants of the region are a diverse, but culturally homogenous people based primarily in the Sahelian and the sparse savanna areas of Southern Niger Republic and Northern Nigeria respectively (14). Hausa Ethnic group in this region make up the largest ethnic group in sub-Saharan Africa constituting a population of over 80 million people (14). The Fulani, another ethno-cultural group are a sedentary people who have developed and settled in extensive kingdoms as early as the 15th century who have settled in cities of pre-European origin (2). Hausa Fulani, a people of mixed Hausa and Fulani origin on the other hand, are an ethnic group of the Sudan; a vast region south of the Sahara, encompassing the Sahel, located primarily in the northern region of Nigeria. Although about 6 to 12 million speak *Fula* language, most of them speak a variant of Hausa as their native language and identify primarily as Hausa and secondary as Fulani (12).

In Nigeria, 77 million people or about 36% of Nigeria’s population are Hausa Fulani and are predominantly Muslim. A good percentage of the population of this region also practices different sects of Christianity and particularly the *Maguzawa* Hausas, a cocktail of traditional religions

Northern Nigeria is a home to over 35 other ethnic groups practicing more than 25 Islamic, Christian and Traditional religious sects

and denominations. Culturally, the Northern region of Nigeria presents a zone of rich socio-cultural heritage (3).



Source: Kabir, (2020)

Figure 1 Map of Nigeria showing the Northern and the Southern Regions

Results and Discussions

Table 1. Gender of respondents

Case Study Number	Male	Female	Total
1	13	2	15
2	14	1	15
3	15	0	15
4	14	1	15
5	15	0	15
6	13	2	15
Total	84	6	90

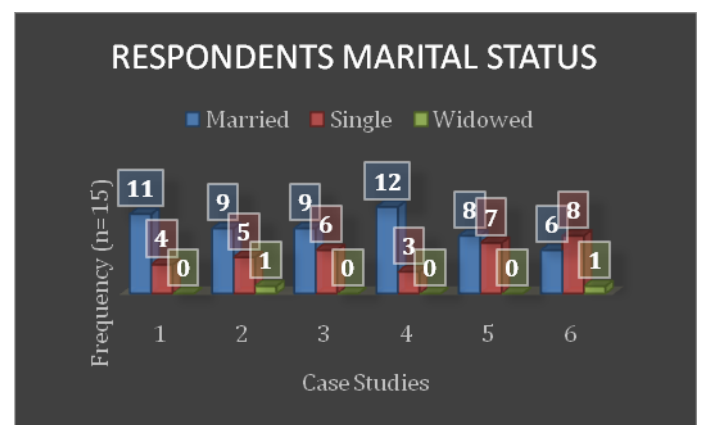


Table 2. Religious Inclination of the Respondents

Case Study Number	Islam	Christianity	Traditional Belief	Total
1	9	6	0	15
2	11	4	0	15
3	13	2	0	15
4	12	3	0	15
5	14	1	0	15
6	11	4	0	15
Total	70	20	0	90

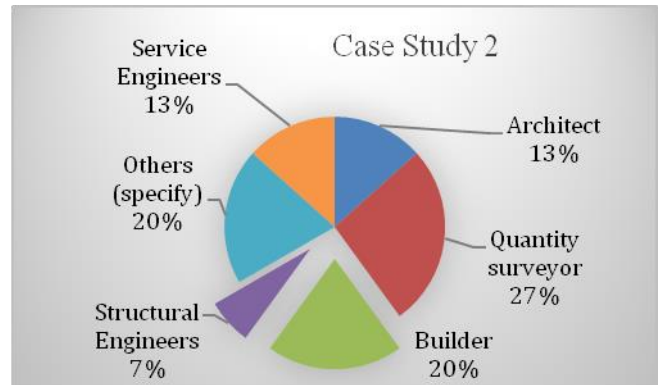


Table 3. Highest Educational Qualification

Case Study Number	Diploma/Certificate	Degree	Higher Degree	Total
1	2	9	4	15
2	6	8	1	15
3	4	9	2	15
4	5	8	2	15
5	5	9	1	15
6	4	9	2	15
Total	26	52	12	90

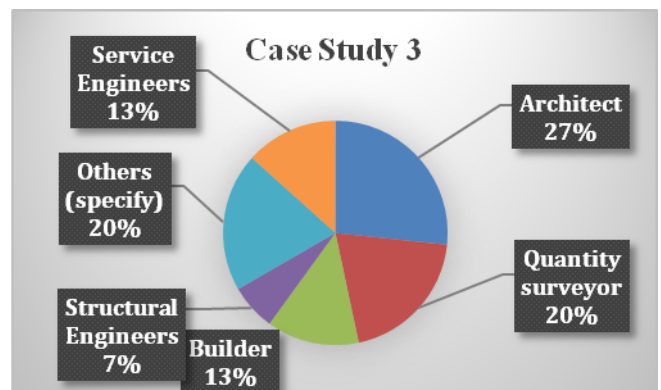


Table 4. Membership of Professional Associations

Case Study Number	Member	Non Member	Total
1	7	8	15
2	6	9	15
3	6	9	15
4	4	11	15
5	5	10	15
6	6	9	15
Total	34	56	90

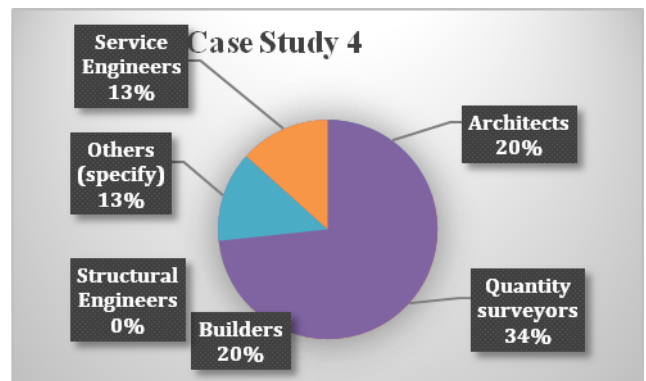
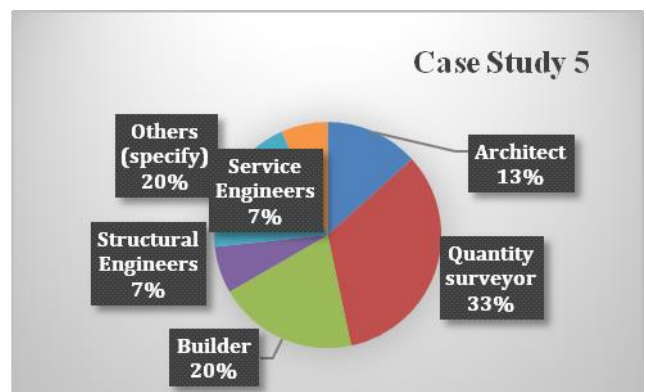
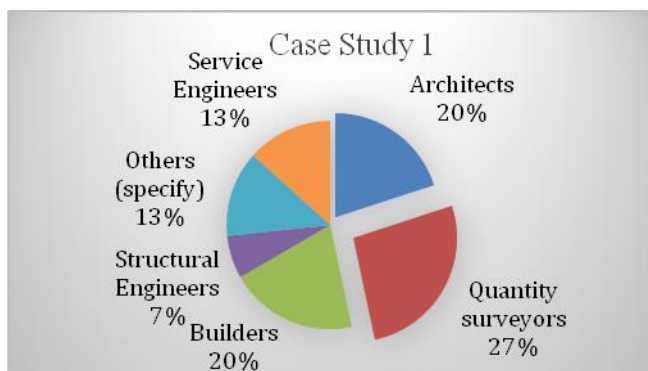


Figure 2. Summary of Professional Inclination of the Respondents for the Different Case Studies



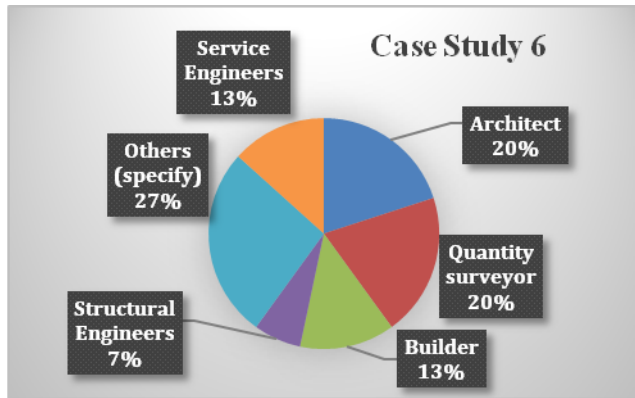


Table 5. Nature of Organizations of the Respondents

Case Study Number	Contractor	Consultant	Supplier	Client	Total
1	6	4	2	3	15
2	9	3	2	1	15
3	8	3	2	2	15
4	6	4	3	2	15
5	6	3	2	4	15
6	7	3	1	4	15
Total	42	20	12	16	90

Table 6. Respondent's Status/Position in the Organization

Case Study Number	Top mgt.	Middle mgt.	Lower mgt.	Advisory	Total
1	3	8	2	2	15
2	2	5	6	2	15
3	2	6	4	3	15
4	2	6	5	2	15
5	3	4	7	1	15
6	3	5	6	1	15
Total	15	34	30	11	90

Table 7. Respondent's Years of Practice/Experience

Case Study Number	Less than 5 Years	6 to 10 Years	11 to 15 Years	Greater than 15 Years	Total
1	6	4	2	3	15
2	9	3	2	1	15
3	8	3	2	2	15
4	6	4	3	2	15
5	6	3	2	4	15
6	7	3	1	4	15
Total	42	20	12	16	90

1	2	7	3	3	15
2	5	4	3	3	15
3	6	4	3	2	15
4	5	3	4	3	15
5	7	4	2	2	15
6	3	5	2	5	15
Total	28	27	17	18	90

Table 8. Scope of the Projects Undertaken by Respondents

Case Study Number	Small scale	Medium scale	Large scale	All of the above	Total
1	2	4	3	6	15
2	3	5	2	5	15
3	8	6	1	0	15
4	5	7	3	0	15
5	6	6	1	1	15
6	4	5	2	4	15
Total	28	33	12	17	90

Table 9. Type of Projects Undertaken by Respondents

Case Study Number	Public	Private	Both	Total
1	3	2	10	15
2	2	1	12	15
3	0	0	15	15
4	1	3	11	15
5	0	0	15	15
6	2	1	12	15
Total	8	7	75	90

Table 10. Nature of the Projects Handled by Respondents

Case Study No.	a. Civil Const.	b. Building Const.	c. Heavy Eng.	d. a and b	e. a & c	f. b & c	g. a,b, c, & d	Total
1	2	3	1	5	1	0	3	15
2	3	6	1	4	0	1	0	15
3	2	5	0	7	1	0	0	15
4	1	8	0	4	1	1	0	15
5	2	11	0	2	0	0	0	15
6	2	6	1	4	0	0	2	15
Total	12	39	3	26	3	2	5	90

Table 11. Islamic Cultural and religious values that influences relationships among parties in construction projects in northern Nigeria

S. No.	Cultural and religious values	CASE STUDIES						Total(n=70)
		1(n=9)	2(n=11)	3(n=13)	4(n=12)	5(n=14)	6(n=11)	
1	Respect for elders	7	8	11	8	12	9	55
2	Fear of God	9	11	12	12	14	11	69
3	Spirituality/faith in God	9	9	13	12	14	11	68
4	Sense of belonging	7	6	8	7	9	7	44
5	Brotherhood	7	9	10	8	8	8	60
6	Face/self-respect	6	7	8	7	9	5	49
7	Generosity	7	4	8	5	6	6	36
8	Politeness	5	8	12	9	7	7	48
9	Relationships	5	5	13	8	8	9	48
10	<i>Khunya</i> (Shame)	8	8	9	9	9	7	50
11	Sincerity	8	9	12	10	11	9	59
12	Considerate	8	5	7	7	10	10	47
13	Honesty	9	10	12	11	13	11	66
14	<i>Amanah</i> (Trust)	9	11	14	12	14	11	71
15	Paternalism	9	6	10	8	12	9	54
16	Inter-Personal Relationships	7	5	11	7	13	9	54
17	Sensitivity and Respect of the Feelings of others	6	10	10	8	12	10	56

Table 12. Christian Cultural and religious values that influences relationships among parties in construction projects in Northern Nigeria

S. No.	Cultural and religious Values	CASE STUDIES						Total (n=20)
		1(n=6)	2(n=4)	3(n=2)	4(n=3)	5(n=1)	6(n=4)	
1	Respect for elders							
1	Fear of God	4	2	2	2	1	2	13
2	Spirituality/faith in God	6	4	2	3	1	4	20
3	Sense of belonging	6	4	2	3	1	4	20
4	Brotherhood	5	2	2	1	0	2	12
5	Family	5	3	2	2	1	3	16
6	Generosity	3	3	1	3	1	3	14
7	Politeness	5	2	1	1	0	3	12
8	Loyalty	4	2	1	1	0	3	11
9	<i>Khunya</i> (Shame)	5	4	2	2	1	4	27
10	Sincerity	2	1	1	1	0	1	6
11	Considerate	3	2	1	2	1	2	15
12	Honesty	6	1	1	1	1	2	12
13	<i>Amanah</i> (Trust)	5	3	2	2	1	3	16
14	Paternalism	5	2	2	3	1	3	
15	Inter-Personal Relationships	4	3	2	3	0	4	16
16	Sensitivity and Respect of the Feelings of others	4	3	2	3	1	4	17
17	Cultural and religious Values	5	3	1	1	1	1	14

Table 14. Norms that Influences Relations among Parties in the Nigerian Construction Industry

S. No.	Norm	CASE STUDIES						Total Frequency (n=90)
		1 f(n=15)	2 f(n=15)	3 f(n=15)	4 f(n=15)	5 f(n=15)	6 f(n=15)	
1	Role integrity	6	8	13	8	13	13	61
2	Reciprocity,	8	6	12	12	12	14	64
3	Implementation of planning	9	7	14	11	13	12	66
4	Effectuation of consent	9	12	15	13	14	13	66
5	Flexibility	6	9	11	10	12	13	61
6	Contractual solidarity	8	13	14	13	14	14	76
7	Restraint of power	5	12	14	13	12	12	68
8	Propriety of means	7	13	12	12	13	12	69
9	The linking norms (restitution, reliance & expectation interest) and harmonization with the social matrix	9	14	15	14	14	13	79

Discussions of the results

The influence of culture and religion in the development of relationships among parties in the Nigerian construction industry in northern Nigeria has been evaluated; both statistically and literally. The results of the statistical analysis have shown that Islam and Christianity were the major religions of the construction parties in all the six case studies covered by this research. This is largely due to the religious background of the region with the largest of the population Muslims. The religious and cultural backgrounds of the parties have been observed to play great roles in the development of good relationships. Among the Muslims, Islamic cultural and religious values influence the relationships among parties in construction projects in northern Nigeria. This is evidently clear from the results of the analysis of Variance with a p-value $p = 0.000$ which is less than the critical value 0.05 ($p - \text{value} < 0.05$). Among the Christians as well, the

p-value $p = 0.000$ which is less than the critical value 0.05 ($p - \text{value} < 0.05$) shows that the result is significant, and we accept that Christian Cultural and religious values influence the relationships among parties in construction projects in northern Nigeria.

Several of the Hausa and Fulani norms have played significant roles in influencing relationships among the parties. All of the norms assessed have significant effects on the parties. The analysis of variance (ANOVA) results shows that the result is significant, and we accept that Norms influence the relations among parties in the Nigerian Construction Industry.

Summary

The northern Nigeria is as multi-religious as it is a much more multi-cultural region with largely Muslim majority population. Religious values of the Muslims, the Christians and cultural values of the Hausa Fulani of the region have played significant roles in the development of relations

among parties in the Nigerian construction industry.

The gender composition of the construction parties in the study area has presented an interesting pattern. Of the 90 (100%) respondents involved in the study, 84 were male while 6 were female. With respect to the respondents' marital status, 55 were married, 33 were singles and the remaining 2 were widowed. This also presented a favorable composition of different classes of participants in the study. The religious inclination of the respondents clearly portrays the nature of the region; a largely Muslim region of the country. 70 of the participants were Muslims while 20 were Christians. The academic composition of the participants is similar to those obtained by other researchers elsewhere. 26 of the respondents were holders of Diploma and other Certificates, 52 were holders of a Degree or its equivalent while 12 were holders of higher degrees. Respondents in the study area were largely not registered with their professional associations. 56 of the respondents were not registered while Only 34 were duly registered with their professional associations.

The compositions of the respondents have shown a favorable representation of the parties in the construction industry. The study results have shown that 24 were Quantity surveyors, 17 were Architects, 16 were Builders, 5 were Structural engineers and 11 were services Engineers, while the remaining 17 were other professionals. Of the 90 participants in the study, 42 were contractors, 20 were Consultants and 12 were Suppliers while 16 were Clients. Of this composition, 15 were top management members in their organizations, 34 were middle management members, 30 were members of the lower management in their organizations while 11 occupy advisory statuses in the organizations.

Of the total research population, 28 of the 90 participants have working experience of between 1 to 5 years, 27 have worked for between 6 to 10 years, 17 have working experience of between 11 to 15 years while the remaining 18 have worked for greater than 15 years in the construction industry.

On the scope of the projects undertaken by the participants, 28 of the participants were involved in small scale projects, 33 were involved in medium scale projects 12 undertake large scale

construction projects while 17 undertake all scope and kinds of projects in the study area. Of this research population, 12 undertake civil engineering construction, 39 undertake building construction, 3 were involved in heavy engineering, 26 were involved in both civil and building construction works, 3 were involved in both civil and heavy engineering, 2 undertake both building and heavy engineering works while the remaining 5 undertake all types of construction works.

Islamic religious values have played significant roles in relationship development among the participants. In order of significance, fear of God, Honesty, *Amanah* (Trust), Spirituality and faith in God were the most significant religious values. Other values of higher significance are Sensitivity and Respect of the Feelings of others and being considerate. Respect for elders, Paternalism, interpersonal relationships and sincerity were also important. Brotherhood, sense of belonging, politeness, *Khunya* (Shame), generosity and self-respect were less important compared to the other values. This is also similar with the results obtained from the data analysis regarding the significance of Christian religious values in the development of relations among construction parties in the study area.

The Hausa Fulani cultural norms that have shown most significant effects were the linking norms (restitution, reliance & expectation interest) and harmonization with the social matrix with 79 of the 90 respondents agreeing to its significance in shaping relationships. This is followed by Contractual solidarity with a frequency of 78/90; Propriety of means has a frequency of 69/90, Restraint of power with a frequency of 68/90, Restraint of power and implementation of planning with frequencies of 66/90 each, reciprocity with a frequency of 64/90 and lastly Role integrity with a frequency of 61/90.

Conclusions

In similarity to the findings of other scholars such as in the works of (9) in Malaysia, this study similarly found the significant role of emotions and values guided by religious beliefs as major factors that influence the development of good relationships in construction projects in Northern Nigeria. (9) argued that it was these emotions and

values that form people's attitude and behavior and this is true in the religious and cultural values of the Hausa/ Fulanis of the study area.

This study found out that good relationships among construction parties in northern Nigeria developed from the interplay of a number of cultural and religious values. Religious etiquettes and Hausa Fulani cultural emotions were very important in relationship development. The most important values include fear of God, Honesty, *Amanah* (Trust), Spirituality and faith in God were the most significant religious values. Other values of higher significance are Sensitivity and Respect of the feelings of others and being considerate referred to as *Dattako* among the Hausas. Respect for elders, Paternalism (*Dangantaka*), interpersonal relationships and sincerity were also important. Other values include brotherhood, sense of belonging, politeness, *Khunya* (Shame), generosity and self-respect. These values play significant roles at both the prior contract stage and the contract stage. Cultural values such as concern with other peoples' feelings played significant role towards good relationship development among parties in the contract. This was similar to the findings of (9) in his research in Malaysia.

Several of the relational contracting norms reviewed in literature have been observed to play significant roles in enhancing good relations among contracting partners. Of the nine norms and the seventeen cultural and religious values assessed and evaluated, at least 6 norms were applicable in the context of this study. Three of the other norms play less significant roles in developing long term relationships. However, other norms including kindness (*Alfarma*) and being considerate have been identified among the parties in the study area to play significant roles at the pre contract stages. As in (9) study in Malaysia, this study did not recognize relational planning and monitoring behavior as important in developing long-term relationships. There also appear to be similarities in a number of norms that shape relations among the Hausa Fulanis of the region with norms and values reviewed in literature. *Trust* and *sincerity* appeared to be very similar in the context of this research among the participants as in the literature.

Moreover, in the same similar vein to the findings of (9), a few more values and emotions

were added to the dimensions outlined in literature. The findings suggest the following new dimensions similar to those identified by (9) in his works to complement the relational contracting norms reviewed in literature. They are *personal relationships, social interaction, performance, special contract directives* and *political connection*. These values have been found to be significant in developing good relationships in construction projects in the context of this study.

The six case studies were spatially spread across the northern part of Nigeria. The spatial spread was to afford favorable coverage of the region in its distinctive religious and cultural background. From the analysis of the research outcomes, several of the values and norms that influence development of relations among parties appear to present common significance in enhancing relational norms; while others appear to have less commonality among the case studies. In Table 5.109 in Chapter five, all of the religious determinants among both the Muslims and the Christians especially trust (*Amanah*), Honesty, Spirituality/faith in God, Fear of God, Brotherhood, Sincerity, Inter-Personal Relationships and Paternalism have strong commonality among the case studies. On the other hand, politeness, Generosity, self-respect, being considerate, sense of belonging, respect for elders and Sensitivity and Respect of the Feelings of others have shown peculiarities in different case studies and therefore presented variations in significance among the case studies and by extension among the cultural and religious diversity.

Several reasons may have been the cause of these variations; one the construction environment which is largely full of different political interests and economic capacities, two which is also characterized by different cultural compositions. The background of the contractor and the size and nature of the contract is also important. As was observed by (9) one significant factor was that relationship development process among the parties in the contract occur in the context where the project, the organization and the culture that the individual belongs to. It is therefore the result of the interplay of complex interrelated structural and relational dimensions.

In relational contracting theory, good relationships among parties in the contract proceed from the relational norms (i.e. trust, commitment, flexibility, role integrity) (9). However, the outcome of the statistical analysis has shown that not all of these norms play significant roles in relationship development among contractual parties in Northern Nigeria. For instance, role integrity and flexibility were not recognized in the case studies evaluated. There were also other complementary norms which were not listed in the relational theory including political inclination, ability to provide concessions and the background and experience of the contractor. Relational contracting norms could not therefore be applied as measurement tools for evaluating successful relationships among contractual parties in the study area. A modified frame work which incorporates the peculiarities of the Hausa Fulani northern Nigeria is therefore an ideal tool for measurement of successful relationships in the study area.

Recommendations

The need for good relationships among parties in a contract is paramount for the success of any project. Consequent upon this, this research provides a number of recommendations for contractual parties to develop successful relationships in the study area.

In a similar effort to (9) proposition, considering the results of this study and the existing relational contracting norms literature, this study similarly proposes a new relationship development model consisting of peculiar emotion and structural dimensions that is more suited to evaluate successful relations in construction projects in Nigeria. This is particularly so when existing relational contracting frameworks proposed by other researchers including (4, 5). (11, 112), (2) failed to address the cultural and environmental aspect of the organizations. The only exception is (9) relationship development model consisting of thirteen dimensions which is based on similarities bordering on emotions between the Malaysian and Northern Nigeria contexts.

Because information for this study was only based on data obtained from Muslim and Christian participants of various ethnic and tribal backgrounds in projects in the study area, it is pertinent to conduct an in-depth investigation on

projects managed by Nigerians and expatriates without specific limitations or considerations on Muslims or Christians or any other religious dogma in future research. Finally, the findings of this research will go a long way in promoting good construction management strategies among managers if carefully taken into consideration in relationship development among parties.

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