

Whistle Blowing Policy and Fight against Corruption in Nigerian Administrative System

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Abstract - Background: Beginning the federal to the state and local level of governments, there has been a phenomenal increase in the incidence of corruption and bad governance, which has consistently threatened political stability in the country. Corruption has eaten deep into the nation's political system and this portrays Nigeria in a negative way towards other nations of the world. This reality of corruption has hindered steady economic growth and development, while insecurity is heightened because of corruption. The purpose of this paper is to examine whether whistle blowing policy is playing any role in the fight against corruption.

Methods: The Key Informant Interview (KII) was used to interview some selected high profile and top ranking staff of the Economic and Financial Crimes Commission (EFCC), Independent Corrupt Practices and Other Related Offences Commission (ICPC) and Federal Ministry of Finance (FMF). The data used in this study was analyzed and interpreted with major findings using the Nvivo Software.

Results: Whistle blowing policy has been instrumental in fighting against corruption and other unlawful conduct in both the public and private arena as it encourages a culture of transparency and openness. The identified roles of whistle blowing policy spans across checks and balances, crime exposure, crime reduction, crime reporting, fund recovery, fund retrieval and persecution, image maintenance, image redemption, increased crime fight, increased governance and accountability, increased public awareness, information retrieval, new direction, rapid growth and support, and reduction of money laundering. Whistle blowing policy has encountered serious challenges. One of the prominent challenges is the absence of a special court to adjudicate suspected offenders given that it has been observed that the conventional courts in Nigeria has a very slow pace of trial with very few convictions. To improve whistle blowing policy, what should be done is to fight against the challenges that the whistle blowing policy is facing in fighting corruption. To achieve that, the whistle blower has to be protected and also ascertain that the information received from a whistle blower is accurate and valid.

Conclusion: The research concluded that whistle blowing policy plays a substantial role in fighting against corruption, whistle blowing policy encounters challenges and whistle blowing policy needs improvement.

Keywords: Whistle Blowing Policy; Whistle blower; Administration; Corruption.

I. INTRODUCTION

Fighting corruption has now become a phenomenon that cuts across all social class, race, culture, society and

gender. As such, it is not surprising that the Federal Government in an attempt to curtail corruption, financial malpractice and mismanagement of public funds as well as encourage compliance with financial regulations has, through the Federal Ministry of Finance (FMF), introduced a whistle-blowing policy, known as the Federal Ministry of Finance Whistle-Blowing Policy (FMF-WBP). The Whistle Blowing policy is directed at motivating anyone with information about a violation of financial regulations, fraud and theft, financial malpractice mismanagement of public funds and assets, to report it to the Federal Government through the Federal Ministry of Finance (Federal Ministry of Finance FMF-Whistle Blowing, 2017).

Interestingly, the practice of whistle blowing is not new in Nigeria. Dating back to the early African societies, traditional regulation enforcement organizations depended on info made available by whistle blowers in sustaining law and order. For example, the Yoruba tribe understood that an Oba can get info from whistle blowers in order to attain to the basis of any criminal behaviour or misconduct in his province. The belief is represented in the saying which stipulates "*Eti Oba nile eti Oba loko, eniyan lo n jebe*". (The Oba hears everything). Whistle blowers were secured by the Oba as his informants and should not be queried by any given authority or person. In a related manner, such also applied to the pre-colonial Igbo political system where the Igwe or Eze get intelligence information through his subjects who were scattered in the community disguised as ordinary villagers but in reality, they are basically spying for the benefit of the Igwe or Eze as the case may be. This is known as "igba akwukwo nwanunu" (whistle blowing).

Over the years, Nigeria can't be said to have managed her affairs appropriately and adequately devoid of the influence of corruption. In line with the foregoing, corruption depicts any form of dishonest conduct by any person delegated with a position of authority, mostly for private improvement. It includes embezzlement, bribery and other unwholesome practices. Illustratively, corruption is when a government official or political officeholder utilizes his or her office for personal benefits. In the words of Stephen Morris (cited in Kolo, 2017), a professor of political science, corruption remains the dishonest usage of unrestricted power for personal gain (Kolo, 2017).

It is on this ground that the need for the fight against corruption came into play. Accordingly, this study will attempt to investigate whether whistle blowing is playing any role in the fight against corruption. Furthermore, this study ascertained the extent to which whistle blowing policy has helped in the fight against corruption in Nigeria; examine the challenges of whistle blowing policy as a result of fight against corruption and make suggestions to improve whistle blowing policy in the Muhammadu Buhari Administration. This is important because, since the inception of Nigeria's independence, there has never been any policy set up by the federal government which solely offers and provide opportunities and platform to persons with reliable evidence about violation, improper activities and misconduct, which have the tendency to impact adversely on the Nigerian government and peoples to intensify exposure of financial related crimes. As such, whistle blowing policy was initiated to encourage the fight against corruption and financial crimes; increase level of public readiness in public organizations; improve accountability and transparency in the management of public funds; advance ease of doing business indicators and Nigeria's government ranking and recover public treasuries which can be used to fund Nigeria's infrastructural shortfall.

Whistle Blowing

Overtime, whistle blowing as a phenomenon has been a debatable and delicate issue because it involves revealing or exposing unethical secrets that a given individual, organization, government institution and company is involved and found wanting in. Whistle blowing as a term is perceived to depict two different and unrelated implications: first of all, it refers to the exercise of a police officer blowing his whistle in order to nab an alleged criminal; secondly, it is understood to follow the normal exercise of referees during sporting occasions who blow their whistle in order to stop a given action (Miceli & Near, 1992). The primary argument and assumption here in both cases is that the whistle blower comprehends something that he or she believes to be unethical or illegal and crave the indulgence of the authorities so that corrective measures could be taken. Given this exposition, the strength of the author here lies on the fact that that whistle blowing is craving the indulgence of authorities about an observed anomaly in a particular place and time, while the author's weakness lies on the negligence that the authorities might chose to ignore any given report made to them (Hoffman & McNutty, 2010).

To Banisar (2011), whistle blowing is a dominant anti-corruption instrument with the objective to support accountability by disclosing information about misconduct concerning fraud and corruption and also safeguarding the whistle blower against retaliation and sanctions of all kinds. In support, Curtis and Taylor (2010) states that effective whistle blowing requires basically an initial report, which is an achievement and solid perseverance in reporting. The basic argument of the authors emphasized here is that the proposed financial reward and protection is to encourage whistle

blowers to step out in the reporting procedure which can be cumbersome. As such, the strength of the view of scholar like Banisar (2011) is that proposed financial reward and protection serves as a motivation to blow whistle while the weakness of his argument is that they failed to take into cognizance that being famous and vengeance could also serve as motivations for whistle blowing.

In line with the foregoing, it is noteworthy to mention here that one of the modern usage of the term, whistle blowing was made by a United States of America consumer activist Ralph Nader in 1971 quoted in William (1983) and he explained that whistle blowing as "an deed of a person who believes that the public interest is more important than that of the institution he works for, blows the whistle that the institution is involved in fraudulent, corrupt, illegal and harmful activities". In his own perspective, Jubb (1999) asserts that whistle blowing is a voluntary disclosure to public record and is made by an individual who has or had private right of entry to information or data of an institution, about a major illegality or other wrong to an external entity having the legitimacy to identify the misconduct. Basically, the argument of a scholar like William (1983) is based on the fact that the motivations for whistle blowers bear the need of public interests at heart instead of personal gains unlike other scholars stated. On the other hand, the weakness of the argument of scholars like Jubb (1999) & William (1983) is that even though that whistle blowing is a *voluntary disclosure of unlawful deeds*, it becomes an obligatory act of disclosure immediately a whistle blower takes it upon himself or herself to divulge the illegal activities. This is exactly what the authors failed to acknowledge.

Oyebade (2016) explained that it is very obvious that whistle blowing has been recognized universally as one of the instruments to combat corruption and support good governance. Basically, the common law values of employees' responsibility of loyalty and privately is progressively declining for a more accountable culture of raising concern against dishonesties affecting the people.

According to Asian Institute of Management (AIM) (2006) cited in Oyebade (2016), whistle blowing is seen as the exposure of a wrongful act that needs to be terminated in order to safeguard public interest. This is the procedure by which people advance misgivings at work. Ogunkeye (2016) explained it as the discovery by an individual, usually an employee in a public institution or private institution made to the public, of illegality, corruption, mismanagement or other wrongdoings.

Clearly, whistle blowing refers to calling attention to the crime that is being committed within an institution with the intent of safeguarding public interest. It could be done by employees, suppliers contractors, clients, or anybody who knows about certain activities which are harmful to public good or the social or economic interest of the institution.

Corruption

In the light of the above, corruption is the misuse of authority delegated to an individual for personal gains. ACFE (2016) pointed out that corruption is indifferent kinds such as kickbacks illegal gratuities, bribery and collusion, economic extortion. Conventionally, it entails the unlawful use of power to obtain a benefit for an actor, in contradiction to the rights of others. In another perspective, Skalak, L. S. Golden Golden, Clayton, M. M., T. W., & Pill, J. S. (2011) pointed out that corruption spans across both financial statement and fraud misappropriation of assets. In agreement, Transparency International (2013) sees corruption as the misuse of delegated authority for personal gain. They argued that the concept of corruption to include personal gain and also corporate gain. Corruption spans across different kinds and ranges from administrative payment issues to expenses made to domestic government executives and their family members. For Ruzindana (1999) cited in Nwankwo (2014), Ruzindana avows that corruption in Africa is an issue of routine nonconformity from recognized values and customs by parties and public executives with whom they interact. He also identified the types of corruption in Africa as private gain, bribery, and other benefits to non-existent pensioners and employees. The illegal and dishonest behaviour shown specifically by individuals in power for their private gain is corruption.

Stemming from the scholars like Golden et al. (2011), Ruzindana (1999) & Nwankwo (2014) views as stated above, one thing in common with them is that they all agreed that corruption is the misuse of authority and privilege by an individual in authority basically for personal or co-operate gain. The strength of their argument lies on the fact that people usually abuse power when they find themselves in a position or a place of authority which is true. However, the weakness of their argument is that the authors failed to recognize that corruption is spans across different kinds of people. What this means is that anybody could be corrupt. Such a person does not have to be in authority or not.

To Shehu (2006), corruption is deceptive involving frequently the extortion and bribery cases, the taker and giver, both of who are indisposed to divulge the incidence of corruption. It is also difficult that our comprehension of the level of its influence specifically remains incomplete. If corruption is a multifaceted phenomenon, then a suitable comprehension of its influence must not only emphasize on the wrongdoers but also on the explicit circumstances in which it occurs. Furthermore, he opines that corruption is categorized. Petty or Grand corruption is seen more dominant in cultures with fragile compliance of the rule of law. Corruption can be active or passive. Notwithstanding the category, it has its conditional penalties. Rule of law could be used to define respect for regulations and laws. It is a multifarious idea as it could be seen as a symptom and manifestation of corruption. In the same vein, Kaufman (1999), avowed that corruption occurs

within explicit situations in any society, although it is not unusual, its occurrence is more intense in developing nations.

Adepeju (2016) finally established that corruption is ethical misrepresentation; damage to virtue and moral principles, destroying someone's loyalty; underrating moral uprightness, inducement by wrong means to violate duty.

Corruption can also be well-defined as absence of integrity specifically susceptibility to incentive; that is the usage of a position of expectation for dishonest profit. In Nigeria, corruption is punishable under Advance Fee Fraud and other Fraud the Money Laundering Act of 1995, Banks and other Financial Institution Act 1991, Related Offences Act of 1995, Failed Banks and Financial Malpractices in Banks Act 1994, Miscellaneous Offences Acts 1995, Economic and Financial Crimes Commission (EFCC) Acts and Independent Corrupt Practices and Other Related Offences Commission (ICPC) and so on and so forth.

Corruption is basically a major issue for government and businesses especially given the crave for development and growth in international space and markets notwithstanding the existence of several anti-corruption legislations and improved enforcement effort all over the world, corruption has stayed prevalent.

From the views scholars like Shehu (2006) and Kaufman (1999) shared, their basic argument is that even though that corruption is a deviation from normal and known standards, the conditions in which corruption takes place should be considered regardless of the fact that it is more prevalent in developing countries. The weakness of their argument is that the conditions that necessitate corruption should not justify the existence or reason for being corrupt.

The Nexus between Whistle Blowing and Corruption

One may wonder why the Nigerian administrative system is to a very large extent deeply saturated with corruption. The reason for this is because corruption is a parasite that has driven deep into the segments of every system in Nigeria. It is a criminal offence with such a disreputable viral effect and catastrophic disposition like a panic bomb (Akinnaso, 2016).

Though it is more of a corporate crime, as such, no responsible government can manage corruption with frivolity because the extremity of its ugly results is capable of inhibiting good governance. On account of this, the Nigerian governance system has to be sanitized to make the process smooth for growth and development. Given this, one of the major confrontations in the fight against corruption is determining and unmasking corruption. In line with the foregoing, whistle blowing to this end assumes an authentic mechanism to fight this destructive crime (Onuegbulam, 2017)

Remarkably, since the official launching of whistle blowing policy by the Federal Ministry of Finance on December 22, 2016, there has been several applauses from Nigerians given

that several regimes of government have made significant efforts to fight and control corruption, but it has seemed undefeatable in Nigerian administrative system since her independence. In the light of this, whistle blowing was perceived as a messiah to fight corruption (Silk, 2017).

Furthermore, there have been several arguments given to support the need for whistle blowing. First, as noted above, some organizations simply may be unable or unwilling to address wrongdoing. Be it as a result of refusal to abide by the law, fears of retaliation, or other reasons, whistle blowing may frankly be the only apparatus to parade and right wrongdoing (Samad, Khalid, & Kayadibi, 2015)

A second justification is that whistle blowing could be a mechanism to reform or correct organizations. Based on situations and circumstances surrounding some organizations, NGOs, public and private sectors, they can develop pathologies to carry wrongful acts which may breach the law. As such, whistle blowing could serve as a tool to reveal such anomaly with the objective that public exposure will enforce change (Akinnaso, 2016). Whether whistle blowing has thrived in producing reforms, it is a matter of debate. In some instances, specific deeds may be corrected through disclosure but measuring whether whistle blowing really reforms organizations is difficult to determine. Third, whistle blowing, possibly, explore to uncover criminal acts that deserves public knowledge which needs to be terminated and amended (Ozekhome, 2016).

Exposing illegal surveillance, bribery, illegal plots and abuse of organizational resources are acts that should be exposed and amended. Finally, whistle blowing may be justified as a way of advancing justice in the sense that offenders are obligated for their actions. Given aforementioned reasons, whistle blowing is progressively recognized as an evil or a departure from normalcy and more as essential and demanding component in detecting illegal and unethical behaviour (Johnson, 2003)

In simple terms and strictly speaking, the relationship that exists between whistle blowing and corruption is more like a dirt cleansing exercise where whistle blowing has been employed as a tool to sanitize the Nigerian administrative system. Corruption is seen as a platform where whistle blowing explores and exploits to purge the overall system.

II. MATERIALS AND METHODS

Research Design

Given this and for the purpose of this study, we utilized exploratory and explanatory research design. The justification of these two research designs is that, first of all, the research topic being studied is a new area and we are attempting to explore it in an effort to lay a formidable and firm groundwork that will open doors for future studies. This is important to address research questions of all types such as “what, why and how” of the research problem. Secondly, explanatory research design came into play in an attempt to

connect thoughts or ideas to comprehend the cause and effect of the given research problem. This is purposive in order to gain useful insights from the study.

Purposive sampling technique was adopted for this study because it is suitable based on the nature of the research topic being studied. In this study, some respondents of high profile and top ranking officials were selected. This selection spans across some officials of the Economic and Financial Crimes Commission, officials of Independent Corrupt Practices and Other Related Offences Commission (ICPC) and officials of the Federal Ministry of Finance were selected for interview. To add this, the high profile and top ranking officials of the selected institutions were chosen instead of the junior officers because they are more experienced and knowledgeable on the objective this study seeks fulfill.

III. METHOD OF DATA COLLECTION

The data used in this study were mainly retrieved from two basic sources- the primary and secondary collection of data. The primary sources include interviewing some selected high profile and top ranking officials of the Economic and Financial Crimes Commission, Independent Corrupt Practices and Other Related Offences Commission (ICPC) and Federal Ministry of Finance. The justification for selecting the three aforementioned anti-corruption agencies for retrieving primary source of data is that they are directly involved in the fight against corruption and has documented data on the purpose this study seek to fulfill.

Furthermore, in a qualitative research, the objective is to lessen discovery failure. As such, a qualitative researcher selects respondents based on personal judgement and he or she can rely on particular subgroups or individuals who special characteristics such as experience, exposure and knowledge of subject matter and so on and so forth. Other defining criteria that a qualitative researcher considers when selecting respondents is *who is it? Whose view is important? Who can provide answers to specific research questions?* (Alexander, 2019)

Basically, there are no general rules when determining an appropriate sample size in qualitative research. Qualitative sample size can be best decided by the time allotted, study objectives and resources available (Patton, 1990).

Here, the Key Informant Interviews was adopted for this research study. As the name suggests, Key Informant Interviews entails interviewing people who have informed opinions, knowledge and perspectives on a given facet of the program appraised. In line with the foregoing, Key Informant Interviews refers to “qualitative, in-depth interviews of people chosen for eyewitness account of a given topic of interest. The interviews are loosely structured among acquaintances, making room for a free flow of ideas and information. Interviewers frame questions spontaneously, dig for information and take notes, which are elaborated on later” (USAID 1996).

On the account of this, we adopted the Key Informant Interview (KII) technique in order to elicit and retrieve appropriate and sufficient response from high profile and top ranking personnel of Economic and Financial Crimes Commission, Independent Corrupt Practices and Other Related Offences Commission (ICPC) and Federal Ministry of Finance.

With regards to secondary sources of data collection, we utilized textbooks, journals, newspapers, government publications, rules of proceedings and internet materials.

Method of Data Analysis:

The data used in this study was analyzed and interpreted with major findings using the Nvivo Software. Nvivo is basically a qualitative data analysis (QDA) computer software package manufactured by QSR International. It is used for qualitative and mixed-methods research. Explicitly, its application includes the analysis of image data, focus groups, audio, unstructured text, video, interviews, social media, surveys, and journal articles (Kent State University Libraries, 2019)

IV. RESULTS AND DISCUSSION

The data reviewed revealed that whistle blowing policy has played and is still playing a significant and active role in Muhammadu Buhari Administration. The identified roles of whistle blowing policy spans across checks and balances, crime exposure, crime reduction, crime reporting, fund recovery, fund retrieval and persecution, image maintenance, image redemption, increased crime fight, increased governance and accountability, increased public awareness, information retrieval, new direction, rapid growth and support, and reduction of money laundering.

Furthermore, whistle blowing policy has encountered serious challenges in fighting against corruption in Muhammadu Buhari Administration. The identified challenges of whistle blowing policy spans across absence of protection, absence of robust and meaningful legislation, discouragement, fear of intimidation and victimization, insufficient legal knowledge, poor media reportage and uncertainty of information.

Finally, the data reviewed revealed that there are suggestions for improvement of whistle blowing in Nigeria. The identified areas of improvement for whistle blowing policy in Nigeria spans across certainty of information retrieval, extensive media enlightenment campaign, establishment of anti-corruption courts, increase of political will, maintenance of good governance, maintenance of uncorrupted, independent and uncompromising judiciary, passage of protection bill, provision of protection and strengthening of anti-corruption agencies.

V. DISCUSSION

Whistle blowing policy has been helpful in uncovering corruption in both the public and private sectors since its introduction in December, 2016. Within six months from the date it was inaugurated, the government has been able to

recover billions of naira looted from the public coffers through the tips from whistle blowers. For a country that is besieged with the financial load of improving its basic infrastructures and economy, the magnitude of money emanating from these recoveries can undoubtedly go a long way in providing necessary assistance.

Furthermore, whistle blowing policy has been instrumental in the fight against corruption and other unlawful conduct in both the private and public arena as it promotes a culture of openness and transparency. It has fundamentally linked to ensuring transparency and political accountability in relation to the use and management of public and private resources and property. It has promoted responsible and accountable use of public resources and property, whistle blowing is causally linked to socio-economic development, especially in developing countries. Whistle blowing has been of intrinsic value to organizations themselves. It encourages excellent organizational governance and is an efficient internal risk management instrument. It is not only in the public interest, but also an efficient tool for risk management within organization and instrument that support good governance and manifestation of more open organizational culture.

Finally, whistle blowing policy has encountered serious challenges. One of the prominent challenges is the absence of a special court to adjudicate suspected offenders given that it has been observed that the conventional courts in Nigeria has a very slow pace of trial with very few convictions. Another challenge attributed to whistle blowing is that the policy lacks transparency in the sense a potential whistle blower might feel used and dumped as soon as he or she submit a petition only to be told that the divulged information is already known to the government. Also the lack of transparency might encourage another level of corruption with insiders giving off worthwhile classified information to their cronies who will bridge any need gap. Furthermore, there is no standing law per se protecting the whistle blower from blowing the whistle. So with this, they are most times scared to release information to the authorities. Another challenge here is that sometimes, the information released by a whistle blower could be false and as such lacks validity or authenticity. People hardly agree to blow the whistle because they feel that their safety is not guaranteed. Also, the percentage of reward which is 2.5%-5% is not really high because it is found out that the exact amount of money a whistle blower may be expecting may not be the amount of money that will come out due to the computation.

From the study, it was discovered that there is need to improve whistle blowing policy in Muhammadu Buhari Administration. To improve whistle blowing policy what should be done is to fight against the challenges that the whistle blowing policy is facing in fighting corruption. To achieve that, the whistle blower has to be protected and also ascertain that the information received from a whistle blower is accurate and valid. There is need to guarantee the protection of whistle blowers by assuring them that they will be safe from any harm whatsoever.

VI. CONCLUSION

Based on the findings of this study, it was concluded that whistle blowing policy played a role in the fight against corruption through its achievements overtime since the inception of the policy. Furthermore, with the glaring evidence and inevitable challenges encountered by whistle blowers in their effort to blow the whistle when necessitated, it is no doubt that the whistle blowing policy suffers setback. Also, notwithstanding that whistle blowing policy is very effective in fighting corruption and has recorded remarkable results in its fight against corruption Muhammadu Buhari's Administration. However, there is need for improvements in so many areas as outlined above in the analysis.

VII. RECOMMENDATION

Federal Government of Nigeria should endeavour to see that the recovered money is channeled back into the economy to improve growth and development. Also, the fight against corruption should be sustained.

The National Assembly should quickly pass the Whistle Blower's Protection Bill into law because it is long overdue. If this is done, it will go a long way to encourage whistle blowers to boldly blow the whistle when the need arises. It will also reinforce the belief that whistle blower's safety is guaranteed from any harm, intimidation and victimization. The bill should be made to be powerful enough to protect whistle blowers and to punish anybody who threatens the lives of whistle blowers.

The prospective whistle blower and Federal Ministry of Finance should always ascertain that the information released and received is very valid and authentic.

The National Judicial Commission should ascertain that there is a high level maintenance of uncorrupted, independent and uncompromising judiciary to avoid compromise of reported cases.

The Federal Government of Nigeria should ensure that anti-corruption agencies such as EFCC, CBB and ICPC are strengthened in order to fight corruption effectively.

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