The Whistleblowing Policy's Measures to Combat Corruption in Nigeria (2016 To 2026)

Chukwudozie Chioma Delight

Nnamdi Azikiwe University

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ABSTRACT

This review examines Nigeria's 2016 Whistleblowing Policy as both an accountability tool and a contested practice within the country's anti-corruption framework from 2016 to 2026. It analyses the policy's design, implementation, and outcomes through three lenses: reward system, confidentiality and anonymity, and fair hearing, referencing notable cases such as Osborne Towers, OPL 245, Diezani Alison-Madueke, CBN fraud, NDDC, pension fund, and Kano drug procurement. The methodology involved a contextual review, integrating academic literature, government documents, reports from the EFCC and ICPC, civil society evaluations, and credible media coverage, with data sourced from databases and official Nigerian portals. The research included only English-language materials relevant to Nigerian practices published between 2016 and 2026, excluding opinion pieces lacking empirical support. Findings reveal that although the policy generated early recoveries, its executive nature, discretionary reward payment, lack of statutory confidentiality protections, and reliance on ex parte forfeiture have undermined credibility and due process. The absence of legal safeguards deters insiders and shifts disclosures to external actors. The review concludes that codification into a Whistleblower Protection Act, establishment of an independent adjudication body, integration of procedural safeguards for accused persons, enforceable anti-retaliation provisions, and transparent reporting are essential for legitimacy and effectiveness.

Keywords: Nigeria, Whistleblowing Policy, Corruption, Anonymity, Confidentiality, Fair Hearing.

INTRODUCTION

Whistleblowing has emerged as a central strategy in global anti-corruption and governance reforms. Manara et al. (2023) described corruption as the misuse of power and position for private advantage, embodying secrecy, discretion, and concealment of information. In line with this view, Vian et al. (2022) assert that corruption thrives on secrecy, impunity, and the absence of transparency, whereas whistleblowing acts as an agent for transparency and accountability. This implies that when there are no strong oversight processes within public and private organisations, there arises an opportunity for corrupt individuals to manipulate information asymmetry to perpetrate acts such as bribery, procurement fraud, theft, and corruption of office, among others. Not only does such opacity lead to misallocation of resources meant for public goods, but it also undermines the integrity of institutions. Whistleblowing interrupts this process since it allows individuals within the organisation to report their organisation's malpractice to authorities who can then take appropriate steps.

The international community, represented by organisations such as the Organisation for Economic Co-operation and Development (OECD), World Bank, and United Nations (UN), has approved whistleblowing as a form of governance, prompting many nations to enact measures that support whistleblowing and reward its practice financially (OECD, 2024; World Bank, 2026; UN, 2024). Empirical findings from anti-corruption agencies globally partially support the claim that a high percentage of fraud cases are discovered through information provided by insiders rather than from audits or investigations conducted by third parties (Priyadi et al., 2022; Westhausen, 2017; Dyck et al., 2008). This is due to the fact that insiders have unique access to information and processes that outsiders cannot easily acquire. In addition to the ability to detect, the threat of exposing the information serves as a deterrent. This is because when there is a probability that a person who commits any wrongdoing will be exposed, the cost associated with committing the act will increase, thus lowering the number of such acts. In some places, it has been easier to recover funds that were stolen using the whistleblower approach with financial incentives.

Whistleblowing Policy was introduced by the Nigerian government on December 21, 2016, through the Federal Ministry of Finance, which is intended to provide an incentive for citizens to voluntarily report financial fraud, embezzlement of funds, and other acts of corruption (Onuegbulam, 2017). The policy emerged more through reactive actions taken against systemic corruption and financial leakage than by way of a proactive policy that seeks to promote institutional probity. Introduced during the tenure of the Buhari government, this policy has been deliberately packaged as one that serves as a means of recovering money that has been looted by corrupt individuals against the backdrop of falling oil prices and financial crises (Federal Ministry of Finance, 2016). This means that the whistleblowing policy has largely been seen as a low-cost way of raising revenue.

Critically, the implementation timing and design of the policy expose the dichotomy between political pragmatism and real institutional change. Although the policy exploited citizen dissatisfaction with corrupt practices and resonated with anti-corruption discourses on a global scale (Transparency International, 2016), it came at the expense of passing the strong Whistleblower Protection Bill. The Nigeria whistleblowing policy's focus on the recovery of financial gains over transparency in the process can lead to the perception of the whistleblowing policy as a transactional policy where citizen engagement is valuable in monetary terms (Oke & Gberevbie, 2017). As a result, Nigeria implemented the policy in a manner dictated by its political needs, which questions its effectiveness as norm entrepreneurship.

Consequently, this literature review examines whistleblowing in Nigeria as both an accountability tool and a contested practice. It explores the policy’s design, outcomes, and limitations within Nigeria’s socio-political context and assesses the conditions necessary for its institutionalisation. Understanding these dynamics is essential for strengthening anti-corruption efforts and restoring public trust in governance.

The conceptual underpinnings of whistleblowing

There have been varied conceptions of whistleblowing within academic, legal, and policy domains, and these differences shape both scholarly inquiry and real-world application. This diversity can be observed through the contrast between Western academic conceptions of whistleblowing, legal statutes, and the nascent Nigerian scholarly work on whistleblowing, which contextualises the concept within a highly corrupt environment and weak institutional protection.

The commonly accepted definition of whistleblowing in the field of organisational studies is from Near and Miceli (2008), which defines whistleblowing as “the disclosure by organisation members (former or current) of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organisations that may be able to effect action”. In this context, whistleblowing becomes a pro-social act based on insider status, wrongdoing, and an actor able to take action. Nevertheless, Legal definitions of whistleblowing tend to be restrictive. Under the UK Public Interest Disclosure Act 1998, protection applies only to disclosures made in the public interest concerning criminal offences, legal violations, dangers to health and safety, and environmental damage. Similarly, the EU Whistleblower Directive 2019/1937 limits protection to breaches of Union law. Considering these limits, Lewis (2017) argues that statutory definitions function as a double-edged sword: they provide legal certainty but constrain the scope of protection. By specifying what counts as a protected disclosure, both the UK Act and the EU Directive enable insiders to invoke the law against their employers, yet exclude disclosures that fall outside the defined categories (Dyck et al., 2008).

Conversely, Thulo et al. (2025), rigid statutory classification results in substantial gaps in protection. By limiting coverage to enumerated forms of misconduct (criminal acts, breaches of statutory duty, and public health risks) the statutory framework tends to overlook disclosures related to moral violations, maladministration, or non-statutory harms. Other problems include the limited definition of qualified whistleblowers, high standards of 'public interest' and 'reasonable belief', and procedural rules favoring internal disclosure over external disclosure. While statutory systems shield whistleblowers against clear retaliation, these formal constraints do not always ensure adequate protection for whistleblowers dealing with nuanced, informal, or non-statutory organisational misconduct.

Localising the definition of whistleblowing has been the focus of Nigerian scholarly efforts. Eyongndi and Opara (2022) describe whistleblowing under Nigerian employment law as the act of exposing corruption in the workplace, recognising that even though the Federal Ministry of Finance has proposed a whistleblowing policy since 2016, there is no legislative process in place. Whistleblowing in Nigeria is described similarly by legal professionals in the country, being “the disclosure of information, usually by an employee, concerning the illegal, illicit, improper, or fraudulent activities occurring within an organisation, whether public or private” (Adetunji, 2023; Nwoke, 2019). In the policy document issued by the Federal Government of Nigeria, the whistleblower is described as “any individual who makes a voluntary disclosure in good faith of any information concerning possible misconduct or violation which has taken place, is ongoing or is likely to take place” (Nwoke, 2019). The definition of the term whistleblower offered by Nigerian scholars like Ifejika (2024) is “an act of making someone aware or hoisting the red flag indicating a terrible event or misconduct or deviation from standards in an organisation”. These definitions still contain the central components of insider information and public interest, but focus on the Nigerian situation, where the policy lacks statutory support.

Even though there are varying definitions of whistleblower disclosures, there are three main components that make up the distinction between whistleblower disclosures and others. The components include the subject, object, and recipient of the disclosure. Subject here means that the person reporting the information must be an insider. This is because a whistleblower must be a present or former member of the organisation (Lewis, 2006). The object relates to the content of the information provided by the insider. According to the whistleblowing policy, there must be some kind of misconduct that will affect the greater society in terms of loss of lives or property, among other things. This may include corruption, misuse of office, fraud, or any other activity that goes against the interests of the larger community. The choice of the recipient defines the method of reporting. If reports are submitted to superiors, compliance departments, or audit committees inside the organisation, then the reporting process is considered internal whistleblowing (Lewis, 2006). If reports are submitted to regulatory authorities, law enforcement agencies, journalists, or nongovernment organisations, then the reporting process is external whistleblowing. It influences the probability of taking corrective measures as well as retaliation, which is a crucial aspect in Nigeria, where retaliation cases are common because there are no statutory protections (O’Sullivan and Ngau, 2014).

Forms of whistleblowing are again categorised on the basis of their process and motivation. Internal and external whistleblowing still constitute the most important classification. From empirical findings, it is found that employees often opt for internal whistleblowing initially but eventually resort to external whistleblowing if the former proves to be ineffective or even part of the problem itself (Potipiroon and Wongpreedee, 2020; Vandekerckhove and Phillips, 2017; Jeon, 2017). For whistleblowers in Nigeria, internal whistleblowing faces obstacles due to poor institutional integrity and the risk of victimisation. The evidence base comprises 6 peer-reviewed studies (2018-2025) examining Nigerian whistleblowing. On institutional integrity, Okafor et al. (2020) found that a “weak and complex institutional environment” and “failure of program institutionalisation” undermine whistleblowing efficacy. Odinkonigbo et al. (2019) and Nwoke (2019) both identified the “absence of comprehensive legislation” and “dearth of strong institutions” as critical barriers. Moreover, anonymous or non-anonymous reporting poses another dilemma between security and credibility. While the former facilitates whistleblowing, the latter may hinder investigation if the whistleblower opts for anonymity.

On victimisation risks, Ifejika (2018) documented that whistleblowers face “victimisation or witch hunting, retaliation, denial of work-related benefits, recrimination, suspension from work, and even dismissal.” Akpan (2023) corroborated these findings, listing identical harms. Ezeoha et al. (2025) specifically highlighted the “risk of retaliation against whistleblowers.” Also, the concept of altruistic or strategic whistleblowing revolves around the motive. In altruistic whistleblowing, the reason is concern for the greater good, while strategic whistleblowing can be due to private grudges or organisational problems.

The Behavioural Determinants of Whistleblowing Intention and Public Participants

The reporting of organisational misconduct is not determined as much by the occurrence of misconduct itself but rather by the personal beliefs and circumstances that determine if a member intends to take action. There have been two major theoretical models that have driven the bulk of empirical studies regarding this issue: The

Theory of Planned Behaviour and Organisational Justice Theory. Both of these theories explain both personal cognition and organisational context in relation to whistleblowing intention.

The Theory of Planned Behaviour suggests that behavioural intention is a product of attitude towards the behaviour, subjective norm, and perceived behavioural control (Ajzen, 1991). As far as whistleblowing is concerned, attitude refers to the assessment by an individual of whether the act is ethical or required. Workers who view whistleblowing as aligned with their service and justice-related principles tend to have higher intentions to blow the whistle (Park & Blenkinsopp, 2009; Ugaddan & Park, 2017). Subjective norm measures the effect of peer pressure from colleagues, supervisors, and the broader organisation's culture. If reporting is encouraged by management and it becomes part of organisational culture, there will be an increase in intention to report; otherwise, the reverse will apply. Perceived behavioural control indicates beliefs on the ease or lack thereof to blow the whistle, which includes the knowledge of how to blow the whistle anonymously and without fear of reprisal. Studies have proven that all three variables are key predictors of whistleblowing intention (Zakaria et al., 2016; Park & Blenkinsopp, 2009).

However, the weight of each component appears context-dependent. Subjective norm, for instance, assumes that organisational culture and peer pressure operate uniformly, yet research in high power-distance or hierarchical organisations suggests employees may discount peer encouragement if top management signals disapproval through informal reprisals (Park and Blenkinsopp, 2008). This raises questions about whether "subjective norm" captures the coercive, top-down nature of organisational silence in practice. Perceived behavioural control is similarly problematic. The theory treats it as a belief in one's ability to act, but it underplays structural barriers such as weak legal protections, lack of anonymous reporting channels, and fear of career retaliation that persist even when individuals know the procedures. Zakaria et al. (2016) confirm that the variables predict intention statistically, but correlation does not establish that intention translates into actual whistleblowing behaviour when institutional safeguards are absent.

Notwithstanding, the Theory of Planned Behaviour provides a useful framework for understanding whistleblowing intention, its application is not without limitations. Ajzen's model frames intention as a function of attitude, subjective norm, and perceived behavioural control, and studies like Park & Blenkinsopp (2009) and Ugaddan & Park (2017) do show that individuals who view whistleblowing as ethically aligned with justice-related principles report higher intentions to act.

Organisational Justice Theory is the complementary theory, which states that the perception of fairness in an organisation leads to prosocial behaviour. There are three components in the organisational justice theory – distributive justice, which refers to the perception of outcome fairness; procedural justice, which refers to decision-making process fairness; and interactional justice, which refers to interpersonal fairness (Seifert et al., 2010). According to Seifert et al. (2010), all three factors being high will encourage internal reporting of financial improprieties by accountants. Rustiarini & Merawati (2020) have found similar results in the context of Indonesia, where employees who are treated fairly are more likely to report financial fraud than those who are treated unfairly. The key factor here is the issue of trust: When the employees have faith in the fact that the process is fair and that the management will react accordingly, the risk associated with reporting becomes low (Ugaddan & Park, 2017).

The combination of these theories implies that intention to blow the whistle is not solely individual or social. The Theory of Planned Behaviour describes the mental process through which an employee makes a decision based on whether whistleblowing is right, socially acceptable, and possible. Organisational justice affects the environment in which that logic takes place by affecting attitudes, norms, and perception of control. High procedural and interactional justice increase positive attitudes towards reporting, support norms, and improves perceptions of control by minimising fears of retribution. Consequently, formal policies alone cannot guarantee effectiveness in whistleblowing. It is the degree to which such policies are entrenched within processes considered fair by insiders that determines their effectiveness (Ugaddan & Park, 2017).

This is especially relevant in cases like Nigeria, where there are instances of high corruption. In such environments, there will be a lack of legal protection and enforcement of laws, which makes the perception of procedural and interactional justice weak. This is why the effectiveness of whistleblower policies is not achieved in such environments (Eyongndi & Opara, 2023). It is important to appreciate the interaction between cognitive and contextual factors to design an intervention strategy.

METHODOLOGY

This study adopted a contextual review approach to synthesise findings across academic literature, government documents, media reports, and policy evaluations concerning the design, implementation, and outcomes of Nigeria's whistleblower policy. The approach was selected to enable a broad yet focused assessment of how the policy has been formulated, operationalised, and received within Nigeria's institutional and socio-political environment between 2016 and 2026.

Data were collected through targeted searches of academic databases such as JSTOR, Scopus, and Google Scholar, alongside government repositories and official portals maintained by Nigerian public institutions. Credible national and international media outlets were also reviewed to capture contemporary developments and reported outcomes not yet reflected in scholarly sources. The search strategy employed keywords including "Nigeria whistleblower policy," "whistleblowing anti-corruption Nigeria," and "Whistleblower Protection Bill Nigeria" to ensure relevance and comprehensiveness.

The materials analysed comprised four categories. First, official policy papers, guidelines, and public pronouncements issued by the Federal Ministry of Finance, the Economic and Financial Crimes Commission (EFCC), and ICPC. Second, peer-reviewed journal articles and postgraduate theses examining the legal, administrative, and behavioural dimensions of whistleblowing in Nigeria. Third, reports and press statements published by civil society organisations and anti-corruption watchdogs. Fourth, news articles documenting specific cases of disclosures, financial recoveries, and implementation challenges.

To maintain analytical rigour, inclusion was restricted to materials published in English between 2016 and 2026, with a primary focus on Nigerian government sources and context-specific studies. Opinion pieces lacking empirical evidence and publications addressing whistleblowing exclusively outside Nigeria were excluded. This selection criteria ensured that the review remained grounded in verifiable data and directly relevant to the Nigerian policy environment.

RESULTS

Nigeria Policy Design and Incentive Structure

Unlike statutory law, the Nigeria Whistleblowing policy is an executive system built on the basis of voluntarism, discretion, and rewards to promote information from citizens or government employees regarding instances of financial mismanagement within the organisations (Federal Ministry of Finance, 2016). Rather than codifying enforceable rights and protections through legislation, the policy relies on a reward mechanism that grants whistleblowers between 2.5% and 5% of any funds recovered as a result of their disclosures. The underlying rationale is instrumental: insider information is assumed to be the most effective means of detecting fraud, bribery, and asset misappropriation within public institutions, where formal audit and investigation mechanisms have historically yielded low detection rates (Okafor et al., 2020; Dyck et al., 2008). By linking rewards to verifiable recoveries, the policy seeks to align the self-interest of informants with the fiscal objectives of the state, thereby creating a direct stake in the efficacy of asset recovery. Beyond monetary incentives, the policy incorporates confidentiality as a core component, allowing informants to submit information through channels administered by the Federal Ministry of Finance with the expectation that their identities remain undisclosed throughout investigation and reward processes (Ifejika, 2024). This provision is intended to mitigate the fear of retaliation that typically deters reporting in high-risk environments.

Despite these features, a critical assessment reveals structural and practical limitations that undermine the policy's capacity to function as a sustainable anti-corruption mechanism. First, the attribution of recoveries to whistleblowing remains problematic. The reported figures do not distinguish between cases initiated solely through whistleblower disclosures and those advanced through parallel EFCC or ICPC investigations. Without disaggregated data and independent verification, it is difficult to establish causality between the policy and the stated recoveries, raising the possibility that the policy is absorbing credit for pre-existing enforcement activity (Ifejika, 2024). Also, the reward system introduces significant moral hazard. According to (Salauddin and Ayinde, 2022) by tying remuneration to the monetary value of recoveries, the policy incentivises disclosures that promise high financial returns while potentially neglecting disclosures involving non-monetary harms, systemic mismanagement, or corruption in sectors with low asset recovery potential. It also creates risks of false or exaggerated claims, collusion, and strategic targeting of politically vulnerable actors rather than structurally entrenched corruption networks. The absence of statutory safeguards means there is no independent adjudication mechanism to assess the validity of claims or protect informants from malicious counter-allegations.

Furthermore, the reliance on confidentiality as the primary protection mechanism is insufficient in the absence of legal enforceability. While the policy promises anonymity, civil society reports and legal practitioners between 2017 and 2019 documented instances of identity leaks, non-payment of rewards, and informal retaliation against informants (SERAP, 2018; Signal Network, 2019). Because the policy lacks statutory backing, whistleblowers cannot compel compliance or seek redress through courts if confidentiality is breached or rewards are withheld. This gap exposes a fundamental contradiction: the policy seeks to reduce fear of retaliation while denying informants the legal rights that would make that reduction credible.

More so, the executive nature of the policy reflects a broader policy choice to prioritise administrative flexibility over legal certainty. Unlike South Africa's Protected Disclosures Act or the US False Claims Act, which embed whistleblower protections in statute, Nigeria's framework remains vulnerable to administrative reversal and inconsistent application across agencies (Adetunji, 2023). As Thulo et al. (2025) puts it, the absence of a Whistleblower Protection Bill means that protections are contingent on political will rather than legal obligation, limiting the policy's institutional durability. In comparative terms, the Nigerian model aligns with incentive-based approaches seen in the US, but without the accompanying legal infrastructure that makes those systems functional. The US False Claims Act combines financial rewards with qui tam provisions and anti-retaliation clauses enforceable in federal courts, thereby mitigating the risks of non-payment and reprisal (Adetunji, 2023). Nigeria's policy replicates the reward logic but omits the legal scaffolding, resulting in a system that may generate short-term recoveries but struggles to institutionalise trust among potential informants.

Nigeria's whistleblowing policy and framework in Specific Cases (2016-2026)

The process of examining the implementation of the whistleblowing policy of Nigeria includes assessing various elements such as the safety of whistleblowing procedures, measures to prevent retaliation, and a clear procedure for investigations. Some of the notable cases related to the whistleblowing discussed in this section include: The Osborne Towers $43 Million Seizure (2017), OPL 245 Malabu Oil Scandal, Diezani Alison-Madueke (2017), Drugs Procurement Scandal (2022), Sharon Philip v. Notore Chemical Industries Limited (2022), CBN Fraud Allegation (2018-2025), Niger Delta Development Commission (NDDC) Fraud, and Pension Fund Fraud. The three themes used to dissect these cases include Reward system, Confidentiality & Anonymity, and Fair Hearing.

The Reward System

Nigeria's 2016 Whistleblowing Policy was introduced with a clear economic logic: private citizens hold information that audit institutions cannot access, and a financial incentive would unlock it. The policy therefore promised informants between 2.5 and 5% of recovered funds, payable only after final forfeiture into the Consolidated Revenue Account and subject to approval by the Attorney-General of the Federation (Ojobo, 2023; Ministry of Finance, 2016). The early outcomes of this incentive-driven approach appear tangible. Within two months of implementation, the government reported recoveries exceeding $178 million attributed to whistleblower disclosures. By October 2017, reported recoveries had reached ₦527,643,500, $53,222,747, £21,222,890, and €547,730 (Federal Ministry of Finance, 2017). In each successful case, the whistleblower received a reward, underscoring the policy's commitment to financial inducement as a tool for disclosure.

The most frequently cited proof of the policy's success is the 2017 Osborne Towers seizure in Ikoyi, Lagos. Acting on a tip, the Economic and Financial Crimes Commission recovered $43.4 million, £27,800, and ₦23.2 million from an apartment (Ojobo, 2023). The Federal Government publicly announced that the whistleblowers received ₦421 million, representing the policy's 5% benchmark (Ministry of Finance, 2016). That announcement became the political poster case for the program and was used to signal to the public that disclosure pays. That announcement became the political poster case for the program and was used to signal to the public that disclosure pays. Yet even this flagship case revealed structural cracks. The lawyer to the principal informant later alleged that his client never received the money and was exposed to danger, while EFCC officials insisted payment had been made (Sahara Reporters, 2017). Ojobo (2023) pointed out that because the policy lacks a statutory adjudication mechanism, there was no independent forum to resolve the dispute.

If Osborne Towers represents the high point of reward visibility, the other high-value cases represent the norm of non-payment. The Malabu OPL 245 scandal involved over $1.3 billion in payments routed through a Nigerian escrow account to private intermediaries (Sani and Ibrahim, 2022). The scandal was exposed largely by non-governmental organisations such as Global Witness and by prosecutors in Italy, the Netherlands, and the United Kingdom, not by an insider using Nigeria's whistleblowing channel. Despite years of litigation and eventual acquittals, there is no public record of any whistleblower being identified or rewarded under the 2016 policy. The Diezani Alison-Madueke asset forfeitures follow the same pattern. Between 2017 and 2025, Nigerian and U.S. authorities secured forfeiture of more than $200 million in cash, properties, and jewellery linked to the former Minister of Petroleum Resources, including $52.88 million repatriated in January 2025 (Sani and Ibrahim, 2022; Ibrahim and Musa, 2021). Yet again, no whistleblower has been publicly acknowledged, and no evidence exists that the 2.5-5% incentive was applied. The contrast with Osborne Towers is stark: when the state chooses to publicise a reward, it can, but in most high-profile recoveries it does not, leaving potential informants to assume that disclosure yields no material benefit.

The Central Bank of Nigeria fraud allegations from 2023 reinforce the problem of non-payment and uncertainty. The fraudulent withdrawal of $6.23 million using forged presidential documents triggered INTERPOL red notices and an extensive EFCC investigation (Kanu et al., 2025). A Special Investigator's report also flagged ₦26.627 trillion in Ways and Means advances and ₦1.622 trillion in mismanaged COVID-19 intervention funds (Kanu et al., 2025). As of May 2026, the criminal case remained adjourned with no convictions or confirmed recoveries, and there is no public record of a whistleblower receiving a reward despite the scale of the allegations. Earlier, George Uboh's 2018 petition alleging ₦232 billion in forex fraud resulted not in payment but in his arraignment for defamation. The message to insiders is that disclosure carries downside risk without guaranteed upside. The Niger Delta Development Commission and pension fund cases echo this. In the NDDC, exposure came from auditors, civil society, and Senate probes, not from insiders using the formal channel, and no reward was paid. In the pension frauds, whistleblowers and recovery agents who claimed to facilitate the retrieval of ₦1.3 trillion alleged that officials withheld rewards, demanded kickbacks of up to 60%, and used security agencies to intimidate them (Nuhu and Isa, 2021). The Kano drug procurement scandal, where 38 local governments paid ₦345.8 million for undelivered drugs, was exposed by a public figure rather than a confidential informant, and again the policy's reward mechanism was not triggered (Yakubu and Dikwa, 2020).

The only area where victims of disclosure have received compensation is through the courts, not the policy. In Sharon Philip v. Notore Chemical Industries Ltd, the National Industrial Court awarded ₦7.5 million, including ₦5 million for victimisation, after the claimant was dismissed for testifying in an anti-corruption hearing (The Nation, 2022). The judgment established that retaliation is actionable under labour law, but it also underscored the policy's gap: protection and compensation depend on judicial innovation rather than statutory whistleblower guarantees.

Confidentiality and Anonymity

Confidentiality and anonymity are presented as foundational guarantees of Nigeria's 2016 Whistleblowing Policy. The policy guidelines issued by the Presidential Initiative on Continuous Audit state that the identity of a whistleblower "will be kept confidential" and that reports may be submitted anonymously through a dedicated portal, email, or telephone hotline. Protection from "victimisation of any form" is also pledged (Ministry of Finance, 2016). However, Ojobo (2023) stressed that because the policy remains an executive circular rather than an Act of the National Assembly, these assurances have no statutory force. There is no criminal offence for disclosing a whistleblower's identity, no independent agency with a legal mandate to receive and insulate disclosures, and no procedural rules that allow courts to hear whistleblower claims under seal. The result is that confidentiality operates as an administrative practice that holds only so long as the matter remains outside litigation, parliamentary scrutiny, or political contestation. Once any of those thresholds are crossed, anonymity typically collapses, and the informant is exposed to legal, professional, and physical risk.

The cases examined demonstrate both the limited circumstances in which confidentiality has been maintained and the more frequent circumstances in which it has failed. The Diezani Alison-Madueke asset forfeiture process between 2017 and 2025 provides the clearest example of sustained anonymity (Sunny-Hart, 2025; Ojobo, 2023; Sani and Ibrahim, 2022). Throughout that period, no whistleblower was publicly identified, and no individual came forward to claim the 2.5 to 5% reward stipulated by the policy. The absence of a name suggests that if an insider did provide information, the state preserved that person's anonymity. In that sense, the policy functioned as intended: a tip was received, agencies acted, assets were recovered, and the informant remained unknown. Yet the same opacity also illustrates a structural weakness. Because no reward was announced or paid, the public cannot verify whether the incentive mechanism operates in high-level corruption cases (Ojobo, 2023). Confidentiality without transparency prevents potential whistleblowers from assessing whether disclosure is worth the risk, and it removes the public accountability that would confirm the policy is more than symbolic.

A more ambiguous example is the Osborne Towers seizure of April 2017. The government announced that whistleblowers received 421 million naira, and the identities of the informants were not disclosed by the state. For a short period, the case validated the policy's logic that financial incentives and secrecy could produce rapid results beyond the reach of conventional audit. The breakdown occurred once the funds became subject to competing claims. The National Intelligence Agency and Rivers State Government both asserted ownerships, and the dispute entered the Federal High Court. Litigation required evidence concerning the source of the information, and the identities of persons claiming the reward became part of the public record (Ojobo, 2023). The case thus reveals a fundamental contradiction: to claim the reward, a whistleblower must be identified and verified, but Nigerian civil procedure provides no mechanism for pseudonymous plaintiffs or sealed proceedings. Confidentiality therefore ends at the point of payment, and any dispute over entitlement transforms anonymity into exposure.

The OPL 245 Malabu scandal shows how confidentiality fails when a case becomes transnational. The 1.3 billion dollar deal was brought into the public domain by Global Witness and by prosecutors in Italy, the Netherlands, and the United Kingdom rather than by a protected Nigerian insider. During trials in Milan and London, internal Nigerian memoranda, emails, and the names of officials were disclosed in open court. Parallel parliamentary hearings in Abuja named additional actors (Sani and Ibrahim, 2022; Yakubu and Dikwa, 2020). The 2016 policy could not shield anyone because the disclosure ecosystem was outside its jurisdiction and because the policy has no extraterritorial effect. For an insider contemplating disclosure in the oil sector, the lesson is that once foreign prosecutors are involved, Nigerian promises of secrecy are irrelevant. Confidentiality is only as strong as the weakest legal system in which the evidence may be tested.

The Central Bank of Nigeria fraud allegations from 2018 to 2025 further illustrate the fragility of anonymity within powerful institutions. While the initial disclosure may have been made anonymously, the institutional response quickly unmasked actors. Five officials who endorsed the internal memo were suspended and named, and media coverage identified suspects and witnesses. The earlier experience of George Uboh is instructive. After petitioning in 2018 over alleged 232 billion naira in forex fraud, Uboh was arraigned for defamation rather than being protected (Nwafor, 2026). The policy provides no statutory bar on retaliatory civil or criminal actions, so confidentiality depends entirely on the goodwill of the agency receiving the tip. When the accused occupy senior positions, that goodwill is often absent. The CBN's announcement in December 2024 that it would launch an externally hosted whistleblower platform from January 2025 is itself an acknowledgement that the 2016 framework did not guarantee anonymity for its staff.

In the Niger Delta Development Commission, pension fund, and Kano drug procurement cases, confidentiality was never seriously tested because insiders did not trust the channel. The NDDC's 70 billion naira in mobilisation fees and 61.4 billion naira in poorly executed contracts were exposed by auditors, civil society groups, and Senate probes. Televised hearings named contractors and officials, and no evidence suggests that an insider used the policy's anonymous portal (Ibrahim and Musa, 2021). In the pension sector, whistleblowers who claimed to have facilitated recovery of 1.3 trillion naira alleged that officials demanded 60% kickbacks and used security agencies to intimidate them (Agbata, Ekwueme, and Jeroh, 2023). Here the breach came from the custodians of the policy themselves, indicating that confidentiality can be violated not only by litigation but by administrative predation. In Kano, Dr Bello Galadanchi chose to make a public allegation regarding 345.8 million naira in undelivered drugs rather than file a confidential report, a choice that signals a lack of faith in the system's ability to protect him (Eyongndi and Opara, 2022). Across these sectors, disclosures occurred, but they came from auditors, NGOs, or public figures who already possessed a degree of political insulation, not from anonymous insiders.

The case of Sharon Philip v. Notore Chemical Industries Ltd demonstrates the consequences when confidentiality fails, and retaliation follows. After testifying in an anti-corruption hearing, Philip was subjected to false fraud allegations and dismissed from employment. In 2022, the National Industrial Court awarded 7.5 million naira in damages, including 5 million naira for victimisation, holding that retaliation for exposing misconduct constitutes an unfair labour practice (The Nation, 2022). The judgment is significant because it shows Nigerian courts are willing to remedy retaliation. Yet it also underscores the policy's deficiency. Protection was granted ex post through labour law, not ex ante through a whistleblower statute. The informant was exposed, punished, and only later compensated. The policy did not prevent the breach; judicial innovation did.

Fair Hearing

The Osborne Towers seizure of April 2017 demonstrates how fair hearing issues emerge at the point of recovery. Competing claims to ownership were immediately asserted by the National Intelligence Agency, which argued the money was for covert operations, and by the Rivers State Government, which claimed it belonged to a former governor (SERAP, 2018). The policy provided no statutory criteria or independent forum to resolve these claims. The forfeiture proceeded in rem, meaning the state moved against the property rather than against a person, and the eventual owners had to litigate their way back into the process. For any individual who might be linked to the funds, the absence of prior notice or a hearing before seizure meant that a fair hearing was postponed until after the state had taken possession. The case thus shows how whistleblower-driven recoveries can prioritize speed over procedural participation, leaving accused persons to contest outcomes after the fact.

The OPL 245 Malabu scandal further exposes the limits of fair hearing when disclosures originate outside Nigeria, and prosecutions span multiple jurisdictions. The transaction became public through Global Witness and prosecutors in Italy, the Netherlands, and the United Kingdom (Sani and Ibrahim, 2022). Nigeria's EFCC filed nine counts of conspiracy and money laundering in December 2016 and obtained an interim injunction over the oil block in 2017. Yet after years of trials, the Milan court acquitted the defendants in March 2021, and Nigerian courts dropped charges against Mohammed Bello Adoke in March 2023 for insufficient evidence (Sani and Ibrahim, 2022). From a fair hearing perspective, the Nigerian proceedings illustrate two problems. First, the whistleblowing policy had no role in generating the evidence, so the accused faced charges initiated by foreign disclosures and domestic political pressure without any structured process for testing the credibility of an informant. Second, the absence of legislation on reward or protection meant there was no regulated interface between whistleblowing and prosecution. The accused could not confront their accuser, examine the basis of the tip, or challenge the motives behind it because the policy does not create a legal record of disclosure. The eventual acquittals suggest that the evidentiary foundation was weak, yet the accused endured prolonged litigation and reputational harm without the procedural safeguards that a codified whistleblower law might have provided, such as preliminary vetting of tips and disclosure obligations.

The Diezani Alison-Madueke forfeitures present the most direct confrontation between whistleblowing-driven recovery and fair hearing. The recoveries from this case relied heavily on non-conviction-based forfeiture, which allows the state to seize property on a civil standard of proof without a criminal conviction. Diezani contested multiple forfeiture orders on the ground that she was denied a fair hearing, arguing that she was not given adequate notice or opportunity to challenge the evidence before assets were taken (Akinkugbe, 2018). The whistleblowing policy compounds the problem because it contains no rules on how a tip should be corroborated before it triggers a forfeiture application. If an anonymous or confidential disclosure leads directly to an ex parte order, the accused's first notice may be the seizure itself. The case also highlights misinformation risks. The EFCC later admitted that the widely circulated "diamond bra" allegation was fabricated (Olu, 2021; Unini, 2021). Because the policy lacks legal mechanisms to correct the record or sanction false disclosures, reputational harm to the accused can occur without recourse. Fair hearing therefore becomes subject to agency discretion rather than enforceable right, and both the accused and the public are left with diminished trust in the process.

The Central Bank of Nigeria fraud allegations from 2023 to 2025 show how fair hearing deficits extend to administrative and criminal proceedings triggered by whistleblowing. As of May 2026, the criminal case remained adjourned, yet administrative sanctions had already been imposed. Accused persons contested their inclusion and argued that they had limited opportunity to challenge the evidence (Nwafor, 2026). This reflects a broader pattern in Nigeria's asset recovery regime: disclosures feed directly into sanctions, interim forfeitures, and public naming before a full hearing occurs. The earlier case of George Uboh is instructive. After petitioning in 2018 over alleged 232 billion naira in forex fraud, Uboh was arraigned for defamation and tarnishing the CBN Governor's image. Civil society groups argued that defamation charges were being used as retaliation (Sahara Reporters, 2025), but the episode also shows how the accused whistleblower can become the accused defendant without clear procedural boundaries. The policy has no provisions on how to test a tip, notify the implicated party, or protect against malicious complaints, so fair hearing for the accused depends on the ad hoc practices of the EFCC or the court.

In the NDDC contract fraud, pension fund fraud, and Kano drug procurement cases, fair hearing issues are less prominent only because the disclosures came from auditors, civil society, and public figures rather than confidential insiders (Sani and Ibrahim, 2022). Once Senate hearings were televised or audit reports published, the accused were named in public before formal charges were filed. The policy did not structure those disclosures, so it provided no rules on notice or response. In pension fraud, where whistleblowers alleged that officials demanded 60% kickbacks, the accused officials were never publicly identified in relation to those specific allegations, illustrating how the absence of a transparent process denies both informant and accused a clear forum. In Sharon Philip v. Notore, the accused was the employer, not the whistleblower. The National Industrial Court's award of 7.5 million naira for victimisation remedied retaliation, but it did not address a fair hearing for persons accused of corruption because the case concerned employment law rather than asset recovery.

Across these cases, three structural features undermine fair hearing for the accused. First, the whistleblowing policy is not codified, so it cannot create binding rules of evidence, notice, or appeal. Tips can therefore move from a hotline to an ex parte forfeiture order without intermediate safeguards. Second, Nigeria's increasing reliance on non-conviction-based forfeiture means that the state acts against property first and persons second. The accused must then discharge the burden of proving lawful ownership, reversing the normal presumption. Third, there is no statutory mechanism to test the credibility of a whistleblower or to sanction knowingly false disclosures. The EFCC's admission regarding the "diamond bra" claim shows that misinformation can enter the public domain with no legal consequence, prejudicing the accused.

The consequence is a legitimacy deficit. Speed and recovery are achieved, as in Osborne Towers and Diezani, but at the cost of due process complaints that prolong litigation and invite judicial reversal, as in OPL 245 and the ongoing CBN case. For the accused, the absence of clear pre-seizure procedures creates the perception that whistleblowing is a tool for executive targeting rather than impartial accountability. For the policy, it means that high-profile recoveries may not be sustainable if courts later find breaches of fair hearing.

DISCUSSION

The effects of Nigeria's whistleblowing policy on potential informants can be usefully explained through the Theory of Planned Behaviour and Organisational Justice Theory, because both frameworks clarify why credibility, reward design, confidentiality, and fair hearing jointly shape the decision to disclose. The Theory of Planned Behaviour posits that intention to act is determined by attitude toward the behaviour, subjective norms, and perceived behavioural control (Ajzen, 1991). Organisational Justice Theory distinguishes between distributive justice, procedural justice, and interactional justice as determinants of employee trust and compliance (Colquitt, 2001). When applied to the cases reviewed, these theories show why the 2016 policy creates an unstable middle ground that deters high-value insider reporting.

The erosion of credibility in the Nigerian whistleblowing policy directly weakens attitude and perceived behavioural control. The case of Osborne Towers created an expectation that was not met in any subsequent major case. Rational insiders now face a near-zero expected value from disclosure, because the probability of payment is low and the probability of retaliation is high. Recent research provides stronger support for rewards. conclude that "evidence for the effectiveness of reward programs is significant". Recent empirical work supports the conditionality of rewards: Butler, Serra and Spagnolo (2020) found that financial incentives significantly increase whistleblowing likelihood in laboratory settings, and Potipiroon (2024) observed the same among 2,710 Thai civil servants. However, both Franke et al. (2016) and Iwasaki (2025) stress that rewards must be sufficiently high to offset retaliation risk and that prosocial motivation moderate's effectiveness. In Nigeria, the 2.5–5% rate is low relative to the 15–30% available under the U.S. False Claims Act, while retaliation risk is high because statutory protection is absent. Feldman and Lobel (2009) and Ayagre and Aidoo-Buameh (2023) further caution that monetary incentives can reduce reporting when they signal distrust or commodify ethics. The inconsistent payment record therefore produces a negative attitude: disclosure is perceived as risky and unlikely to be compensated. Under the Theory of Planned Behaviour, this also lowers perceived behavioural control, because insiders cannot be sure that the state will honour the bargain or shield them from harm.

The confidentiality-reward paradox and fair hearing deficits violate procedural and interactional justice, which shapes subjective norms and long-term legitimacy. Procedural justice requires consistent, unbiased processes, voice, and correctability (Colquitt, 2001). The 2016 policy contains no statutory rules for vetting tips, notifying implicated parties, or keeping claimants anonymous in court. Consequently, disclosures move from hotlines to ex parte forfeiture orders, as in Osborne Towers and Diezani, with the accused receiving notice only after seizure (Akinkugbe, 2018). The absence of preliminary hearings, together with the EFCC's admission that the "diamond bra" allegation was fabricated (Olu, 2021), signals to both potential whistleblowers and the accused that the process is arbitrary. Dauda et al. (2020) argue that this efficiency-legitimacy trade-off undermines trust. Interactional justice, which concerns dignity and informational fairness, is breached when informants are exposed during litigation, as Osborne showed, or when accused persons learn of allegations through media rather than formal notice, as occurred in the CBN case (Nwafor, 2026). George Uboh's arraignment for defamation after petitioning on forex fraud illustrates how the state can use legal process to punish disclosure, reinforcing a subjective norm that whistleblowing is deviant rather than civic (Sahara Reporters, 2025).

Comparative evidence clarifies the significance for Nigeria. The United States embeds procedural justice in the False Claims Act by requiring Department of Justice investigation, service on defendants, and full discovery rights (Kanteh and Mbye, 2026). South Africa's Protected Disclosures Act criminalises victimisation and mandates employer procedures for fair handling. The United Kingdom's PIDA provides no bounty but guarantees access to Employment Tribunals with strong anti-retaliation remedies. Nigeria borrowed the U.S. percentage model without its legal infrastructure and rejected the UK's protection model without adopting its safeguards. The result is distributive injustice: rewards are discretionary and lower than in peer systems, while risks are higher. It is also procedural injustice: there is no independent body to verify entitlement, no appeal if the Attorney-General withholds payment, and no sealed process to protect identity. For an insider applying the Theory of Planned Behaviour, the subjective norm within CBN, NDDC, or NNPC is that peers do not report and those who do are victimised, as Sharon Philip v. Notore confirmed. Perceived behavioural control is further diminished because the policy cannot stop defamation suits, dismissal, or physical danger.

Linking the two theories, the policy's deficits create a feedback loop. Violations of procedural and interactional justice generate negative subjective norms and attitudes, which reduce intention to blow the whistle. Low distributive justice—unpaid or contested rewards—further depresses perceived behavioural control. Because fair hearing is constitutionally guaranteed under Section 36 (Adetunji, 2023), its absence in whistleblower-triggered forfeitures signals institutional illegitimacy. Potential informants observe that the state prioritises speed over process, as Nicholls et al. (2021) note of civil forfeiture, and conclude that the system is not just. Accused persons likewise perceive executive targeting rather than impartial accountability, which increases resistance and litigation, as seen in OPL 245 acquittals (Sani and Ibrahim, 2022). The practical consequence is that major disclosures now come from auditors, NGOs, and foreign prosecutors, not confidential insiders, because only external actors possess enough power to withstand procedural deficits.

Therefore, aligning the policy with Organisational Justice Theory requires statutory codification of procedural safeguards: preliminary vetting of tips, notice to affected parties where feasible, independent adjudication of rewards, and sanctions for malicious complaints. Aligning with the Theory of Planned Behaviour requires raising distributive justice through enforceable, higher rewards and strengthening perceived behavioural control through anti-retaliation statutes and anonymous payment channels. Without these, the policy will continue to fail the tests of justice and behaviour, leaving Nigeria's whistleblowing framework reactive, contested, and incapable of generating the high-value disclosures it was designed to induce.

RECOMMENDATIONS

To reconcile Nigeria's whistleblowing policy with constitutional guarantees of a fair hearing and to enhance its effectiveness, comprehensive reform is required. The evidence from Osborne Towers, OPL 245, Diezani Alison-Madueke, and the CBN cases demonstrates that an executive directive cannot balance the competing demands of recovery, protection, and due process. Codification is therefore the foundational recommendation. The 2016 policy should be enacted as a Whistleblower Protection Act by the National Assembly, thereby creating enforceable rights and obligations rather than administrative assurances. Statutory backing would provide the legal basis for notice, evidence, and appeal procedures that are absent, and it would align the framework with Section 36 of the 1999 Constitution, which mandates a fair hearing (Adetunji, 2023).

Second, an independent adjudication and oversight body should be established, separate from the EFCC, Independent Corrupt Practices and Other Related Offenses Commission (ICPC), or Ministry of Finance. The Osborne Towers dispute over ownership and the contested reward payment show that conflicts arise when the investigating agency also determines entitlement (SERAP, 2018). A model similar to South Korea's Anti-Corruption and Civil Rights Commission or the US Securities and Exchange Commission (SEC) Office of the Whistleblower would allow impartial verification of claims, determination of rewards, and protection of identity. This body should be empowered to receive disclosures, assess credibility, and authorize anonymous filing through legal counsel, preventing the confidentiality collapse witnessed in OPL 245 and Osborne Towers (Sani and Ibrahim, 2022).

Third, procedural safeguards for the accused must be integrated. The Diezani and CBN cases reveal that non-conviction-based forfeiture and administrative sanctions often precede notice or hearing (Akinkugbe, 2018; Nwafor, 2026). Legislation should mandate preliminary corroboration of tips before ex parte orders, require notice to affected parties unless a court finds risk of dissipation, and permit in-camera hearings to balance investigation needs with fair hearing. It should also create a statutory mechanism to correct the record and sanction knowingly false disclosures, addressing reputational harm exemplified by the fabricated "diamond bra" claim (Olu, 2021).

Fourth, the reward system needs certainty and protection. While Osborne Towers saw a public announcement of ₦421 million, Diezani and CBN produced no record of payment, undermining incentives (Ojobo, 2023). The Act should stipulate timelines for payment after final forfeiture, provide for escrow or lawyer-intermediary channels to preserve anonymity, and create a right of appeal if a claim is denied. The US False Claims Act's 15-30% relator share and right to sue offer a comparative benchmark, whereas the UK's PIDA shows that strong anti-retaliation law can operate even without bounties.

Fifth, anti-retaliation provisions must be codified beyond labour law. Sharon Philip v. Notore established that courts will remedy victimisation, but protection should not depend on judicial creativity. The statute should criminalise disclosure of a whistleblower's identity, prohibit civil and criminal actions used to intimidate informants, and grant immunity for good-faith disclosures, preventing cases like George Uboh's defamation arraignment (Sahara Reporters, 2025).

Finally, capacity building and public reporting are essential. A transparent registry of disclosures, recoveries, and rewards paid (without identifying informants) would build trust and allow evaluation, addressing the opacity noted in Diezani and NDDC (Sani and Ibrahim, 2022). Training for investigators, prosecutors, and judges on handling whistleblower evidence would reduce due process breaches that prolong litigation, as seen in OPL 245.

If implemented, these reforms would transform the policy from an ad hoc executive tool into a durable legal institution. For Nigeria, the significance lies in sustaining anti-corruption gains without sacrificing constitutional legitimacy. International experience shows that whistleblowing systems succeed when incentives are credible, confidentiality is enforceable, and fair hearing is guaranteed. Without such balance, high-profile recoveries risk reversal and public trust erodes, leaving the policy effective only for low-risk, low-value disclosures.

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